

Distribution Reinvestment and Cash Purchase Plan (“DRIP”) for Common Stockholders of Spratt Focus Trust, Inc.

The following is a brief overview of the DRIP program for Spratt Focus Trust, Inc. (“Fund”). For complete details, please contact Computershare the plan agent administering the DRIP Program, by clicking this link www.computershare.com/investor or call: within USA, US territories & Canada 800-426-5523 or Outside USA, US territories & Canada 781-575-2879.

Registered Common Stockholders of the Fund automatically participate in its Distribution Reinvestment and Cash Purchase Plans, which allows participants to reinvest their dividend and capital gains distributions and to make optional cash purchases of shares directly through Equiserve, the Fund’s Plan Agent, on a monthly basis. The DRIP also allows stockholders to deposit certificates representing their shares with Computershare for safekeeping.

Computershare maintains the accounts for registered stockholders who participate in the Plan and sends written confirmation of all transactions in an account. Computershare will also hold shares in each participant’s account in non-certificated form in the participant’s name; each participant will be able to vote these shares at a stockholder meeting or by proxy. A participant may also send other stock certificates that they hold to Computershare to be held in non-certificated form. If a nominee is the registered owner of your shares, the nominee will maintain the accounts on your behalf.

There is no service fee charged to participants for reinvesting distributions. Plan participants are subject to a service fee of \$0.75 and \$2.50 for each voluntary cash purchase and sale, respectively. Although the Plan permits the assessment of per share fees of \$0.05 and \$0.15 in connection with voluntary purchases and sales, respectively, Spratt, the Fund’s investment advisor, is absorbing such per share fees through December 31, 2015. No assurance can be given that Spratt will continue to absorb such per share fees after that date. Per share fees include any brokerage commissions Computershare is required to pay.