Central GoldTrust

On January 15, 2016, Sprott Physical Gold Trust ("Sprott") acquired substantially all of the assets and liabilities of Central GoldTrust ("GTU") in exchange for units of Sprott ("PHYS Units"), and all outstanding units of GTU ("GTU Units") (other than a single GTU Unit held by Sprott Asset Management Gold Bld LP) were then automatically redeemed in exchange for the distribution, on a pro rata basis, of such PHYS Units to the holders of GTU Units (together, the "Reorganization").

The Reorganization is intended to qualify as a reorganization within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code"). Consistent with such classification, a holder's initial aggregate tax basis in the PHYS Units received should be equal to the holder's aggregate adjusted tax basis in the GTU Units exchanged. Holders of GTU Units received 4.4108 PHYS Units for each GTU Unit (the "Exchange Ratio") in the Reorganization, rounded down to the nearest whole PHYS Unit.

There should be no change in the aggregate basis as a result of the Reorganization.
Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ➤ Code sections 354(a), 368(a), and 1223(1).

18 Can any resulting loss be recognized? ➤ There was no gain or loss reported as a result of the Reorganization.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ➤

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ➤

Date ➤ April 29, 2016

Paid Preparer Use Only
Print/Type preparer’s name ➤
Preparer’s signature ➤
Date ➤
Check [ ] if self-employed
PTIN ➤

Firm’s name ➤
Firm’s address ➤
Firm’s EIN ➤
Phone no. ➤

Send Form 8837 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054