► See separate instructions.

Part I Reporting Issuer

1	Issuer's name		2 Issuer's employer identification number (EIN)								
Vir	tus Vontobel Foreign O	pportunities Fund	33-1070585								
3	Name of contact for add	ditional information	Telephone No. of contact			5 Email address of contact					
_	tual Fund Services			_	300-243-1574	Virtus.Investment.Partners@virtus.com					
6	Number and street (or P	P.O. box if mail is not	7 City, town, or post office, state, and ZIP code of contac								
<u>10</u>	1 Munson Street		Greenfield, MA 01301								
8 Date of action 9 Classification and description											
<u>3/8</u>	/2024		Regulated		vestment Company Shares						
10	CUSIP number	11 Serial number(s)		12	Ticker symbol	13 Account number(s)					
	See Attached	N/A			e Attached	N/A					
						ck of form for additional questions.					
14						inst which shareholders' ownership is measured for					
					Growth Fund acquired all of						
		U			of beneficial interest. The Iss						
						ion and termination of the Issuer. The merger of					
				1 In	iternational Growth Fund qua	alifies as a tax-free reorganization within					
Ine	e meaning of Internal Re	venue Code 9368(a)									
Th	e exchange is based on	the number and val	ue of shares	out	standing at the close of busi	iness March 8, 2024 (see attached).					

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► A shareholder's aggregate basis in the shares of Virtus SGA International Growth

Fund they received in exchange for their shares of Virtus Vontobel Foreign Opportunities Fund will be the same as their aggregate basis in shares of Virtus Vontobel Foreign Opportunities Fund surrendered. The number of Virtus SGA International Growth Fund shares that were received for each share of Virtus Vontobel Foreign Opportunities Fund surrendered in the exchange is detailed in the attached.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► There was no change in aggregate basis as a result of the above described organizational action. The net asset value of Virtus Vontobel Foreign Opportunities Fund shares that were surrendered in the exchange for each share of Virtus SGA International Growth Fund is detailed in the attached.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► Internal Revenue Code §368(a), §358, §354.

 18 Can any resulting loss be recognized? ►
 There was no gain or loss on the transaction. Accordingly, each investor's aggregate basis in the shares of Virtus SGA International Growth Fund received in the exchange will be the same as the aggregate basis in their shares of Virtus Vontobel Foreign Opportunities Fund surrendered.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► <u>The above described organizational</u> action is reportable in the tax year 2024.

	Under penalties of perjury I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.									
Sign Here	Signa	iture Malate	Date Þ	April 18, 2024						
		Mahmood Rahman								
	Print	your name A signed copy is maintained	by the issuer.	Title 🕨	Vice Pres	dent				
Paid Prepa	ror	Print/Type preparer's name	Preparer's signature	Date		Check if self-employed	PTIN			
Use C		Firm's name				Firm's EIN ►				
		Firm's address ►			Phone no.					
Send Fo	orm 89	37 (including accompanying statements) to	o: Department of the Treasury, Internal R	evenue S	ervice, Oqc	len, UT 84201	-0054			

EIN: 33-1070585

Virtus Vontobel Foreign Opportunities Fund Form 8937 Attachment March 8, 2024

Target Fund Name	Class	Cusip	Ticker	Target Fund NAV		Acquiring Fund Name	Class	Cusip	Ticker	Acquiring Fund NAV		Conversion / Merger Ratio	
Virtus Vontobel Foreign Opportunities Fund	А	92828R859	JVIAX	\$	26.6354	Virtus SGA International Growth Fund	А	92837F284	SCIIX	\$	9.5183	\$	2.7983
Virtus Vontobel Foreign Opportunities Fund	С	92828R842	JVICX	\$	24.6100	Virtus SGA International Growth Fund	С	92837X632	VSGEX	\$	9.9753	\$	2.4671
Virtus Vontobel Foreign Opportunities Fund	I	92828R834	JVXIX	\$	26.8954	Virtus SGA International Growth Fund	I	92837F276	STITX	\$	9.8939	\$	2.7184
Virtus Vontobel Foreign Opportunities Fund	R6	92828W569	VFOPX	\$	26.9946	Virtus SGA International Growth Fund	R6	92837F268	SCIZX	\$	9.9753	\$	2.7061