

## **NOTICE OF BOOKS CLOSURE & DISTRIBUTION PAYMENT DATE**

NOTICE IS HEREBY GIVEN that the Transfer Books and Register of Unitholders of Suntec Real Estate Investment Trust (“**Suntec REIT**”) will be closed at **5.00 p.m.** on **31 January 2020** being the **Record Date** for the purpose of determining unitholders' entitlements to Suntec REIT's distribution. Suntec REIT has announced a distribution of **2.347** cents per unit in Suntec REIT (“**Unit**”) for the period of **1 October 2019** to **31 December 2019** (the “**Distribution**”), comprising a taxable income component of **1.572** cents per unit, a tax-exempt income component of **0.544** cents per unit and a capital distribution of **0.231** cents per unit.

The above estimated Distribution per Unit is computed based on **2,811,142,973** units entitled to distribution, and on the basis that none of the remaining balance of S\$86,500,000 principal amount 1.75% convertible bonds due 2021 and S\$300,000,000 principal amount 1.75% convertible bonds due 2024 (“**Convertible Bonds**” collectively) is converted into Units on or prior to the **Record Date**. Accordingly, the actual quantum of the Distribution per Unit may differ from the above estimated Distribution per Unit if any of the remaining balance of the Convertible Bonds is converted into Units on or prior to the **Record Date**. The actual quantum of the Distribution per Unit will be announced on **Friday, 31 January 2020**, after the closure of the Transfer Books and Register of Unitholders of Suntec REIT.

Holders of Units (“**Unitholders**”) whose securities accounts with The Central Depository (Pte) Limited are credited with Suntec REIT Units as at **Record Date** will be entitled to the Distribution that will be paid on **Friday, 28 February 2020**.

### **DECLARATION FOR SINGAPORE TAX PURPOSES**

#### **A Tax-exempt income**

The tax-exempt income component of the distribution is exempt from tax in the hands of all Unitholders. No tax will be deducted at source for this component.

#### **B Capital distribution component**

Capital distribution represents a return of capital to Unitholders for Singapore income tax purposes and is therefore not subject to income tax. For Unitholders who hold the Units as trading assets, the amount of capital gain distribution will be applied to reduce the cost base of their Units for the purpose of calculating the amount of taxable trading gains arising from the disposal of the Units.

## **C Taxable income component**

1. The trustee and manager of Suntec REIT will not deduct tax from Distribution made out of Suntec REIT's taxable income that is not taxed at Suntec REIT's level to:
  - (a) Unitholders who are individuals and who hold the Units either in their sole names or jointly with other individuals;
  - (b) Unitholders which are companies incorporated and tax resident in Singapore;
  - (c) Unitholders which are Singapore branches of foreign companies;
  - (d) Unitholders which are body of persons (excluding companies or partnerships) constituted or registered in Singapore, such as:
    - (i) institutions, authorities, persons or funds specified in the First Schedule to the Income Tax Act (Cap.134);
    - (ii) co-operative societies registered under the Co-operative Societies Act (Cap. 62);
    - (iii) trade unions registered under the Trade Unions Act (Cap. 333);
    - (iv) charities registered under the Charities Act (Cap. 37) or established by an Act of Parliament; and
    - (v) town councils.
  - (e) Unitholders which are international organisations that are exempt from tax on such distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act (Cap. 145); or
  - (f) Unitholders which are real estate investment trust exchange-traded funds ("REIT ETFs") which have been accorded the tax transparency treatment.
  
2. For Distribution made to classes of Unitholders that do not fall within the categories stated under Note C1 above, the trustee and the manager of Suntec REIT will deduct tax at the rate of 10% if the Unitholders are foreign non-individual investors or foreign funds (i.e. a non-resident fund that qualifies for tax exemption under Section 13CA, 13X or 13Y of the Singapore Income Tax Act). A foreign non-individual investor / foreign fund is one who is not a resident of Singapore for income tax purposes and:
  - (a) who does not have a permanent establishment in Singapore (other than a fund manager in Singapore); or
  - (b) who carries on any operation in Singapore through a permanent establishment in Singapore (other than a fund manager in Singapore), where the funds used to acquire the Units in Suntec REIT are not obtained from that operation.
  
3. Unitholders are required to complete the applicable Section A, B or C of the "*Declaration for Singapore Tax Purposes Form A*" ("Form A") if they fall within the categories (b) to (f) stated under Note C1 or Section D of Form A if they qualify as a foreign non-individual investor / foreign fund as described under Note C2. The trustee and the manager of Suntec REIT will rely on the declarations made in Form A to determine:

- (i) if tax is to be deducted for the categories of Unitholders listed in (b) to (f) under Note C1; and
  - (ii) if tax is to be deducted at the rate of 10% for Distribution to foreign non-individual investors / foreign funds.
4. Unitholders who fall within class (a) under Note C1 are not required to submit Form A.
  5. Unitholders who do not fall within the classes of Unitholders listed in Note C1 and Note C2 above can choose not to return Form A as tax will be deducted from the distributions made to them at the prevailing corporate tax rate in any case.
  6. The trustee and the manager of Suntec REIT will deduct tax at the prevailing corporate tax rate from Distribution made out of Suntec REIT's taxable income that is not taxed at Suntec REIT's level, in respect of Units held by depository agents except where the beneficial owners of these Units are:
    - (a) Individuals and the Units are not held through a partnership in Singapore;
    - (b) Qualifying Unitholders (as listed in categories (b) to (f) under Note C1); or
    - (c) Foreign non-individual investors / foreign funds (as defined under Note C2).

For Units held through depository agents, the depository agents must complete the "*Declaration by Depository Agents for Singapore Tax Purposes Form B*" ("**Form B**") and its annexes (Annex 1 for individuals, Annexes 2 and 2.1 for qualifying Unitholders and Annex 3 for foreign non-individuals / foreign funds).

7. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively, by Suntec REIT's Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd, on or around **4 February 2020**.
8. Unitholders (Form A) and the depository agents (Form B and its annexes) will have to complete the forms legibly and send them to the Unit Registrar such that they are received by **5.00 p.m. on Wednesday, 12 February 2020**. The trustee and the manager of Suntec REIT will rely on the declarations made in Form A and Form B to determine if tax is to be deducted. Failure to comply with any of these requirements will render Form A and Form B invalid and the trustee and the manager of Suntec REIT will be obliged to deduct the appropriate amount of tax from the Distribution in respect of which this announcement is made.
9. Unitholders who hold Units under the Central Provident Fund Investment Scheme (CPFIS) or the Supplementary Retirement Scheme (SRS) do not have to return the Form as they will receive gross Distribution paid to their respective CPFIS or SRS accounts.

***Last Date and Time for Return of the Form***

***Unitholders and the depository agents must complete and return the “Declaration for Singapore Tax Purposes Forms A and B (and its annexes)”, respectively to Boardroom Corporate & Advisory Services Pte Ltd’s office by 5.00 p.m. on Wednesday, 12 February 2020 in order to receive the Distribution either at gross or at net (after deduction of tax at 10%) as described above.***

**DECLARATION IN INCOME TAX RETURN**

The Distribution is considered as income for the year 2019. Beneficial owners of the Distribution, other than those who are exempt from tax on the Distribution, are required to declare the taxable income component of the Distribution as taxable income in their income tax return for the Year of Assessment 2020.

**IMPORTANT DATES AND TIMES**

<b>Date/Deadline</b>	<b>Event</b>
5.00 p.m., Friday, 31 January 2020	Close of Suntec REIT’s Transfer Books and Register of Unitholders
5.00 p.m., Wednesday, 12 February 2020	Unitholders and depository agents must have completed and returned the “ <i>Declaration for Singapore Tax Purposes Form A and Form B</i> ” to the Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd
Friday, 28 February 2020	Payment of Distribution

Should Unitholders have any queries in relation to these procedures, please do not hesitate to contact Ms. Lynn Lee or Ms. Tan Cheng Cheng at 6835 9232 or email: [lynnlee@ara-group.com](mailto:lynnlee@ara-group.com) or [chengchengtan@ara-group.com](mailto:chengchengtan@ara-group.com) or visit our website at <[www.suntecreit.com](http://www.suntecreit.com)>.

By Order of the Board

ARA Trust Management (Suntec) Limited (Company Registration No. 200410976R)

Manager of Suntec Real Estate Investment Trust (Suntec REIT)

Chong Kee Hiong

Director

22 January 2020

**Important Notice**

The value of Units and the income derived from them, if any, may fall or rise. Units are not obligations of, deposits in, or guaranteed by, the Manager or any of its affiliates. An investment in Units is subject to investment risks, including the possible loss of the principal amount invested.

Investors should note that they will have no right to request the Manager to redeem or purchase their Units for so long as the Units are listed on Singapore Exchange Securities Trading Limited (the “**SGX-ST**”). It is intended that holders of Units may only deal in their Units through trading on the SGX-ST. The listing of the Units on the SGX-ST does not guarantee a liquid market for the Units.

The past performance of Suntec REIT is not necessarily indicative of the future performance of Suntec REIT.