

SECURITIES AND FUTURES ACT (CAP. 289)  
SECURITIES AND FUTURES (DISCLOSURE OF INTERESTS)  
REGULATIONS 2012

**NOTIFICATION FORM FOR SHAREHOLDER(S) OF UNLISTED  
TRUSTEE-MANAGER OR RESPONSIBLE PERSON**

**FORM**  
**5**  
(Electronic Format)

Explanatory Notes

1. Please read the explanatory notes carefully before completing this notification form.
2. This form is for a Shareholder(s) of an unlisted Trustee-Manager or Responsible Person to give notice under section 137P or 137ZA of the Securities and Futures Act (Cap. 289) (the "SFA") for change in interests in the Trustee-Manager or Responsible Person, as the case may be.
3. This Form 5 and a separate Form C, containing the particulars and contact details of the Shareholder(s), must be completed by the Shareholder(s) or a person duly authorised by the Shareholder(s) to do so. The person so authorised should maintain records of information furnished to him by the Shareholder(s).
4. This form and Form C, are to be completed electronically and sent to the Trustee-Manager or Responsible Person via an electronic medium such as an e-mail attachment. The Trustee-Manager/Responsible Person will attach both forms to the prescribed SGXNet announcement template for dissemination under section 137R(1) or 137ZC(1) of the SFA, as the case may be. While Form C will be attached to the announcement template, it will not be disseminated to the public and is made available only to the Monetary Authority of Singapore (the "Authority").
5. Where a transaction results in similar notifiable obligations on the part of more than one Shareholder, all of these Shareholders may give notice using the same notification form.
6. Subject to paragraph 5, a separate notification form must be used by a Shareholder for each notifiable transaction. There must be no netting-off of two or more notifiable transactions even if they occur within the same day.
7. All applicable parts of the notification form must be completed. If there is insufficient space for your answers, please include attachment(s) by clicking on the paper clip icon on the bottom left-hand corner or in item 8 of Part II. The total file size for all attachment(s) should not exceed 1MB.
8. Except for item 1 of Part III, please select only one option from the relevant check boxes.
9. Please note that submission of any false or misleading information is an offence under Part VII of the SFA.
10. In this form, the term "Listed Issuer" refers to -
  - (a) a registered business trust (as defined in the Business Trusts Act (Cap. 31A)) any or all of the units in which are listed for quotation on the official list of a securities exchange;
  - (b) a recognised business trust any or all of the units in which are listed for quotation on the official list of a securities exchange, such listing being a primary listing; or
  - (c) a collective investment scheme that is a trust, that invests primarily in real estate and real estate-related assets specified by the Authority in the Code on Collective Investment Schemes, and any or all the units in which are listed for quotation on the official list of a securities exchange, such listing being a primary listing ("Real Estate Investment Trust").
11. For further instructions and guidance on how to complete this notification form, please refer to section 8 of the User Guide on Electronic Notification Forms which can be accessed at the Authority's Internet website at <http://www.mas.gov.sg> (under "Regulations and Financial Stability", "Regulations, Guidance and Licensing", "Securities, Futures and Fund Management", "Forms", "Disclosure of Interests").

## Part I - General

1. Name of Listed Issuer:

Suntec Real Estate Investment Trust

2. Type of Listed Issuer:

Registered/Recognised Business Trust

Real Estate Investment Trust

3. Name of Trustee-Manager/Responsible Person:

ARA Trust Management (Suntec) Limited

4. Date of notification to Trustee-Manager/Responsible Person:

27-May-2020

## Part II - Shareholder(s) details

Shareholder **A** 

1. Name of Shareholder:

AVICT Dragon Holdings Limited

2. Date of acquisition of or change in interest:



22-May-2020

3. Date on which Shareholder became aware of the acquisition of, or change in, interest   
(if different from item 2 above, please specify the date):

22-May-2020

4. Explanation (if the date of becoming aware is different from the date of acquisition of, or change in, interest):

5. Quantum of total voting shares (including voting shares underlying rights/options/warrants/convertible debentures {conversion price known}) held by Shareholder before and after the transaction:

<i>Immediately before the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	1,000,000	1,000,000
As a percentage of total no. of voting shares: 	0	100	100
<i>Immediately after the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	0	0
As a percentage of total no. of voting shares: 	0	0	0

6. Circumstances giving rise to deemed interests (if the interest is such):

*[You may attach a chart in item 8 to illustrate how the Shareholder's deemed interest arises]*

AVICT Dragon Holdings Limited ("AVICT Dragon"), which previously held a 20.48% interest in ARA Asset Management Holdings Pte Ltd ("ARA Holdings"), has on 22 May 2020 sold all its shares in ARA Holdings.

ARA Holdings holds 100% of the shares of ARA Investment (Cayman) Limited, which in turn holds 100% of the shares of ARA Asset Management Limited.

ARA Asset Management Limited holds 1,000,000 ordinary shares in the capital of ARA Trust Management (Suntec) Limited (the "Suntec REIT Manager"), comprising 100% of the issued shares of the Suntec REIT Manager (the "Suntec REIT Manager Shares").

AVICT Dragon was previously deemed to be interested in the Suntec REIT Manager Shares held by

ARA Asset Management Limited pursuant to Section 4 of the Securities and Futures Act.

Following the sale by AVICT Dragon of all its shares in ARA Holdings, AVICT Dragon has ceased to have any deemed interest in the Suntec REIT Manager Shares.

7. Relationship between the Shareholders giving notice in this form:  
 [You may attach a chart in item 8 to show the relationship between the Shareholders]

AVICT Phoenix Holdings Limited ("AVICT Phoenix") holds more than 50 per cent. of the voting rights of AVICT Dragon.

AVIC Trust Co., Ltd. ("AVIC Trust") holds more than 50 per cent. of the voting rights of AVICT Phoenix.

China Aviation Investment Holdings Co., Ltd. ("China Aviation") holds more than 50 per cent. of the voting rights of AVIC Trust.

AVIC Capital Co., Ltd ("AVIC Capital") holds more than 50 per cent. of the voting rights of China Aviation.

Aviation Industry Corporation of China ("AVIC") holds more than 20 per cent. of the voting rights of AVIC Capital.

AVIC is wholly-owned by the Central State-Owned Assets Supervision and Administration Commission of the People's Republic of China.

By virtue of the above, AVICT Phoenix, AVIC Trust, China Aviation, AVIC Capital, and AVIC have each also ceased to have any deemed interest in the Suntec REIT Manager Shares.

8. Attachments (if any): 



(The total file size for all attachment(s) should not exceed 1MB.)

9. If this is a **replacement** of an earlier notification, please provide:

(a) SGXNet announcement reference of the **first** notification which was announced on SGXNet (the "Initial Announcement"):

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(b) Date of the Initial Announcement:

(c) 15-digit transaction reference number of the relevant transaction in the Form 5 which was attached in the Initial Announcement:

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10. Remarks (if any):

The consideration received by AVICT Dragon is in relation to its sale of shares in ARA Holdings. There is no specific consideration received by AVICT Dragon or by each of AVICT Phoenix, AVIC Trust, China Aviation, AVIC Capital, and AVIC for the disposal of the ordinary shares in the capital of the Suntec REIT Manager notified in this Form 5.


**Shareholder B** 

1. Name of Shareholder:

AVICT Phoenix Holdings Limited

2. Date of acquisition of or change in interest:



22-May-2020

3. Date on which Shareholder became aware of the acquisition of, or change in, interest   
(if different from item 2 above, please specify the date):

22-May-2020

4. Explanation (if the date of becoming aware is different from the date of acquisition of, or change in, interest):

5. Quantum of total voting shares (including voting shares underlying rights/options/warrants/convertible debentures {conversion price known}) held by Shareholder before and after the transaction:


<i>Immediately before the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	1,000,000	1,000,000
As a percentage of total no. of voting shares: 	0	100	100
<i>Immediately after the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	0	0
As a percentage of total no. of voting shares: 	0	0	0

6. Circumstances giving rise to deemed interests (if the interest is such):  
[You may attach a chart in item 8 to illustrate how the Shareholder's deemed interest arises]

Please refer to paragraphs 6 and 7 of the notification for Shareholder A.

7. Relationship between the Shareholders giving notice in this form:  
[You may attach a chart in item 8 to show the relationship between the Shareholders]

Please refer to paragraph 7 of the notification for Shareholder A.

8. Attachments (if any): 



(The total file size for all attachment(s) should not exceed 1MB.)

9. If this is a **replacement** of an earlier notification, please provide:


(a) SGXNet announcement reference of the **first** notification which was announced on SGXNet (the "Initial Announcement"):

(b) Date of the Initial Announcement:

(c) 15-digit transaction reference number of the relevant transaction in the Form 5 which was attached in the Initial Announcement:


10. Remarks (if any):

Please refer to paragraph 10 of the notification for Shareholder A.

**Shareholder C** 

1. Name of Shareholder:

2. Date of acquisition of or change in interest:

3. Date on which Shareholder became aware of the acquisition of, or change in, interest  (if different from item 2 above, please specify the date):

4. Explanation (if the date of becoming aware is different from the date of acquisition of, or change in, interest):

5. Quantum of total voting shares (including voting shares underlying rights/options/warrants/convertible debentures {conversion price known}) held by Shareholder before and after the transaction:

Immediately before the transaction	Direct Interest	Deemed Interest	Total
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	1,000,000	1,000,000

As a percentage of total no. of voting shares: ⓘ	0	100	100
<i>Immediately after the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	0	0
As a percentage of total no. of voting shares: ⓘ	0	0	0

6. Circumstances giving rise to deemed interests (*if the interest is such*):  
 [You may attach a chart in item 8 to illustrate how the Shareholder's deemed interest arises]

Please refer to paragraphs 6 and 7 of the notification for Shareholder A.

7. Relationship between the Shareholders giving notice in this form:  
 [You may attach a chart in item 8 to show the relationship between the Shareholders]

Please refer to paragraph 7 of the notification for Shareholder A.

8. Attachments (*if any*): ⓘ



(The total file size for all attachment(s) should not exceed 1MB.)

9. If this is a **replacement** of an earlier notification, please provide:

- (a) SGXNet announcement reference of the **first** notification which was announced on SGXNet (*the "Initial Announcement"*):

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- (b) Date of the Initial Announcement:

- (c) 15-digit transaction reference number of the relevant transaction in the Form 5 which was attached in the Initial Announcement:

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10. Remarks (*if any*):

Please refer to paragraph 10 of the notification for Shareholder A.


**Shareholder D** 

1. Name of Shareholder:

China Aviation Investment Holdings Co., Ltd.

2. Date of acquisition of or change in interest:



22-May-2020

3. Date on which Shareholder became aware of the acquisition of, or change in, interest   
(if different from item 2 above, please specify the date):

22-May-2020

4. Explanation (if the date of becoming aware is different from the date of acquisition of, or change in, interest):

5. Quantum of total voting shares (including voting shares underlying rights/options/warrants/convertible debentures {conversion price known}) held by Shareholder before and after the transaction:

<i>Immediately before the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	1,000,000	1,000,000
As a percentage of total no. of voting shares: 	0	100	100
<i>Immediately after the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	0	0
As a percentage of total no. of voting shares: 	0	0	0


6. Circumstances giving rise to deemed interests (if the interest is such):  
[You may attach a chart in item 8 to illustrate how the Shareholder's deemed interest arises]

Please refer to paragraphs 6 and 7 of the notification for Shareholder A.

7. Relationship between the Shareholders giving notice in this form:  
[You may attach a chart in item 8 to show the relationship between the Shareholders]

Please refer to paragraph 7 of the notification for Shareholder A.



8. Attachments (if any): 



(The total file size for all attachment(s) should not exceed 1MB.)

9. If this is a **replacement** of an earlier notification, please provide:


(a) SGXNet announcement reference of the **first** notification which was announced on SGXNet (the "Initial Announcement"):

(b) Date of the Initial Announcement:

(c) 15-digit transaction reference number of the relevant transaction in the Form 5 which was attached in the Initial Announcement:


10. Remarks (if any):

Please refer to paragraph 10 of the notification for Shareholder A.

**Shareholder E** 

1. Name of Shareholder:



2. Date of acquisition of or change in interest:

3. Date on which Shareholder became aware of the acquisition of, or change in, interest  (if different from item 2 above, please specify the date):

4. Explanation (if the date of becoming aware is different from the date of acquisition of, or change in, interest):

5. Quantum of total voting shares (including voting shares underlying rights/options/warrants/convertible debentures {conversion price known}) held by Shareholder before and after the transaction:

<i>Immediately before the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	1,000,000	1,000,000


As a percentage of total no. of voting shares: 	0	100	100
<i>Immediately after the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	0	0
As a percentage of total no. of voting shares: 	0	0	0

6. Circumstances giving rise to deemed interests (*if the interest is such*):  
 [You may attach a chart in item 8 to illustrate how the Shareholder's deemed interest arises]

Please refer to paragraphs 6 and 7 of the notification for Shareholder A.

7. Relationship between the Shareholders giving notice in this form:  
 [You may attach a chart in item 8 to show the relationship between the Shareholders]

Please refer to paragraph 7 of the notification for Shareholder A.

8. Attachments (*if any*): 



(The total file size for all attachment(s) should not exceed 1MB.)

9. If this is a **replacement** of an earlier notification, please provide:

(a) SGXNet announcement reference of the **first** notification which was announced on SGXNet (*the "Initial Announcement"*):

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(b) Date of the Initial Announcement:


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(c) 15-digit transaction reference number of the relevant transaction in the Form 5 which was attached in the Initial Announcement:

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10. Remarks (*if any*):

Please refer to paragraph 10 of the notification for Shareholder A.


**Shareholder**<sup>F</sup> 

1. Name of Shareholder:

Aviation Industry Corporation of China

2. Date of acquisition of or change in interest:



22-May-2020

3. Date on which Shareholder became aware of the acquisition of, or change in, interest   
(if different from item 2 above, please specify the date):

22-May-2020

4. Explanation (if the date of becoming aware is different from the date of acquisition of, or change in, interest):

5. Quantum of total voting shares (including voting shares underlying rights/options/warrants/convertible debentures {conversion price known}) held by Shareholder before and after the transaction:

<i>Immediately before the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	1,000,000	1,000,000
As a percentage of total no. of voting shares: 	0	100	100
<i>Immediately after the transaction</i>	<i>Direct Interest</i>	<i>Deemed Interest</i>	<i>Total</i>
No. of voting shares held and/or underlying the rights/options/warrants/convertible debentures:	0	0	0
As a percentage of total no. of voting shares: 	0	0	0


6. Circumstances giving rise to deemed interests (if the interest is such):  
[You may attach a chart in item 8 to illustrate how the Shareholder's deemed interest arises]

Please refer to paragraphs 6 and 7 of the notification for Shareholder A.

7. Relationship between the Shareholders giving notice in this form:  
[You may attach a chart in item 8 to show the relationship between the Shareholders]

Please refer to paragraph 7 of the notification for Shareholder A.

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8. Attachments (*if any*): 



(The total file size for all attachment(s) should not exceed 1MB.)

9. If this is a **replacement** of an earlier notification, please provide:

(a) SGXNet announcement reference of the **first** notification which was announced on SGXNet (the "Initial Announcement"):

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(b) Date of the Initial Announcement:

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(c) 15-digit transaction reference number of the relevant transaction in the Form 5 which was attached in the Initial Announcement:

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10. Remarks (*if any*):

Please refer to paragraph 10 of the notification for Shareholder A.
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### Part III - Transaction Details

1. Type of securities which are the subject of the transaction (*more than one option may be chosen*):

- Voting shares
- Rights/Options/Warrants over voting shares
- Convertible debentures over voting shares (*conversion price known*)
- Others (*please specify*):

2. Number of shares, rights, options, warrants, and/or principal amount of convertible debentures acquired or disposed by Shareholder(s):

1,000,000

3. Amount of consideration paid or received by Shareholder(s) (*excluding brokerage and stamp duties*):

Please refer to paragraph 10 of the notification for Shareholder A.

4. Circumstance giving rise to the interest or change in interest (*please specify*):

Please refer to paragraphs 6 and 7 of the notification for Shareholder A.

*Item 5 is to be completed by an individual submitting this notification form on behalf of the Shareholder(s).*

5. Particulars of Individual submitting this notification form to the Trustee-Manager/Responsible Person:

(a) Name of Individual:

Tong Lufeng

(b) Designation (*if applicable*):

Director

(c) Name of entity (*if applicable*):

AVICT Dragon Holdings Limited

*Transaction Reference Number (auto-generated):*

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