

**Digital Core REIT Confirms No Withholding Tax Applicable to Sale or Transfer of Units
under Section 1446(f) of U.S. Internal Revenue Code**

Formally certifies withholding tax exception requirements satisfied under Treas. Reg. 1.1446(f)-4(b)(3)(ii)(A) as Digital Core REIT was not engaged in a U.S. trade or business at any time

Singapore – 2 December 2022 – Digital Core REIT (SGX: DCRU), a leading pure-play data centre REIT listed in Singapore and sponsored by Digital Realty, [announced on 25 October 2022](#) that the U.S. withholding tax under the final regulations of Section 1446(f) of the U.S. Internal Revenue Code is **NOT** applicable to the sale or transfer of Digital Core REIT units. The Section 1446(f) withholding tax does **NOT** apply because Digital Core REIT is a publicly traded partnership that has operated, and intends to continue to operate, in such a manner so as **NOT** to be treated as engaging in a U.S. trade or business.

In an effort to be comprehensive and upon the advice of tax advisor Ernst & Young LLP, Digital Core REIT has published a qualified notice on its website at <https://www.digitalcorereit.com/investor-relations/tax/> formally stating that it was **NOT** engaged in a U.S. trade or business at any time during its taxable year through the “PTP designated date” within the meaning of the final regulations. A final version of the qualified notice will be published on 1 January 2023, the date upon which the final regulations and Section 1446(f) withholding tax become effective. The qualified notice will be valid for a 92-day period from its posting date, and Digital Core REIT intends to publish a new qualified notice each quarter going forward.

The Section 1446(f) withholding tax does **NOT** apply to the sale or transfer of Digital Core REIT units, and brokers who effect a transfer of Digital Core REIT units are **NOT** required to withhold the Section 1446(f) withholding tax. Unitholders are **NOT** required to file a U.S. federal income tax return or apply for a U.S. tax identification number solely based on the Section 1446(f) withholding tax.

By Order of the Board
Digital Core REIT Management Pte. Ltd.
(Company Registration Number: 202123160H)
as Manager of Digital Core REIT

John J. Stewart
Chief Executive Officer
2 December 2022

BofA Securities (Merrill Lynch (Singapore) Pte. Ltd.), Citigroup Global Markets Singapore Pte. Ltd. and DBS Bank Ltd. were the joint issue managers, global coordinators, bookrunners and underwriters for the initial public offering of units in Digital Core REIT.

Important Notice

This announcement is for information purposes only and does not constitute or form part of an offer, invitation, or solicitation of any offer to purchase or subscribe for any securities of Digital Core REIT in Singapore or any other jurisdiction nor should it or any part of it form the basis of, or be relied upon in connection with, any contract or commitment whatsoever. The value of units in Digital Core REIT (“**Units**”) and the income derived from them may fall as well as rise. The Units are not obligations of, deposits in, or guaranteed by Digital Core REIT Management Pte. Ltd. (as manager of Digital Core REIT (the “**Manager**”)), Perpetual (Asia) Limited (as trustee of Digital Core REIT) or any of their respective affiliates. The past performance of Digital Core REIT is not necessarily indicative of its future results.

Holders of Units (“**Unitholders**”) have no right to request that the Manager redeem or purchase their Units while the Units are listed. It is intended that Unitholders may only deal in their Units through trading on Singapore Exchange Securities Trading Limited (the “**SGX-ST**”). Listing of the Units on the SGX-ST does not guarantee a liquid market for the Units.