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This announcement is not for publication or distribution, directly or indirectly, in or into the United States of America (**"United States"**), European Economic Area, the United Kingdom, Canada, Japan or Australia. This announcement is not an offer of securities for sale in the United States, European Economic Area, the United Kingdom, Canada, Japan, Australia or any other jurisdiction. The securities referred to herein have not been and will not be registered under the United States Securities Act of 1933, as amended (the **"U.S. Securities Act"**), and may not be offered or sold in the United States except pursuant to an applicable exemption from, or in a transaction not subject to, the registration requirements under the U.S. Securities Act and in compliance with any applicable state securities laws. There will be no public offering of securities of ALOG (as defined herein) in the United States.



(Constituted in the Republic of Singapore pursuant to a Trust Deed dated 11 February 2010 as amended and restated)

## NOTICE OF RECORD DATE & CUMULATIVE DISTRIBUTION PAYMENT DATE

## NOTICE IS HEREBY GIVEN that this Notice of Record Date & Cumulative Distribution Payment Date replaces the Notice of Record Date & Distribution Payment Date issued on 26 October 2020<sup>1</sup> (after trading hours).

Pursuant to the Private Placement launched on 2 November 2020 (the "**Private Placement**"), the Transfer Books and Register of Unitholders of ARA LOGOS Logistics Trust ("**ALOG**") will be closed on **10 November 2020 at 5.00 p.m.** being the record date (the "**Record Date**") for the purpose of determining unitholders' entitlements to the cumulative distribution (the "**Cumulative Distribution**") of ALOG for the period from 1 July 2020 to the day immediately prior to the date on which the new units in ALOG ("**New Units**") are issued pursuant to the Private Placement. The New Units are expected to be listed on 11 November 2020.

Unitholders should note that the Record Date of 5 November 2020 as set out in the Notice of Record & Distribution Payment Date issued on 26 October 2020 (after trading hours) has been changed to 10 November 2020. Accordingly, the Record Date of 5 November 2020 for the 3QFY20 Distribution has been changed to the Record Date of 10 November 2020 for the Cumulative Distribution.

The next distribution following the Cumulative Distribution will comprise ALOG's distributable income for the period from 11 November 2020 onwards. The current expectation of the Manager of the distribution per unit ("**DPU**") under the Cumulative Distribution is estimated to be approximately

<sup>1</sup> Please see the announcements released by ALOG on 26 October 2020 titled "Notice of Books Closure & Distribution Payment Date – Taxable Income Component" and "Notice of Books Closure & Distribution Payment Date – Tax-Exempt Income Component".

2.095 Singapore cents<sup>2</sup> per unit in ALOG ("**Unit**") for the period from 1 July 2020 to the day immediately prior to the date on which the New Units are issued pursuant to the Private Placement comprising an estimated taxable income component of 1.473 Singapore cents per Unit, an estimated tax-exempt income component of 0.530 Singapore cents per Unit and an estimated capital distribution of 0.092 Singapore cents per Unit.

The actual quantum of the DPU under the Cumulative Distribution (together with a breakdown on the proportion of the Cumulative Distribution which comprise the taxable income component, the tax-exempt income component and the capital distribution component) will be announced in due course.

Holders of Units ("**Unitholders**") whose securities accounts with The Central Depository (Pte) Limited are credited with ALOG Units as at 5.00.p.m. on the Record Date will be entitled to the Cumulative Distribution that will be paid on **27 November 2020**.

### DECLARATION FOR SINGAPORE TAX PURPOSES

#### A Tax-exempt income

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

#### B Capital component

The capital component of the Cumulative Distribution represents a return of capital to Unitholders for Singapore income tax purposes and is therefore not subject to income tax. For Unitholders holding the units as trading assets, the amount of capital 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 ALOG will not deduct tax from the Cumulative Distribution that is not taxed at the Trustee level of ALOG to Unitholders;
  - (a) who are individuals and who hold Units either in their sole names or jointly with other individuals;
  - (b) which are companies incorporated and tax resident in Singapore;
  - (c) which are Singapore branches of foreign companies;
  - (d) which are non-corporate entities (excluding 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);

<sup>2</sup> The Cumulative Distribution comprises the declared 3Q FY20 distribution of 1.461 Singapore cents per Unit and the estimated Advanced Distribution for the period from 1 October 2020 to 10 November 2020, (being the date immediately prior to the date on which the New Units are issued pursuant to the Private Placement) based on distributable income for 1 July 2020 to 30 September 2020 and the Manager's pro-rated estimate of ALOG's revenue and expenses for the period from 1 October 2020 to 10 November 2020. This amount is only an estimate based on information currently available to the Manager, and the actual Cumulative Distribution may differ.

- (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, statutory boards.
- 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);
- (f) Unitholders which are real estate investment trust exchange-traded funds which have been accorded the tax transparency treatment.
- 2. For Cumulative Distribution made to classes of Unitholders that do not fall within the categories stated under Note C1 above, the Trustee and the Manager of ALOG will deduct tax at the rate of 10% if the Unitholders are qualifying 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 qualifying 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 ALOG 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 above. The Trustee and the Manager of ALOG will rely on the declarations made in Form A to determine:
  - (a) if tax is to be deducted for the categories of Unitholders listed in (b) to (f) under Note C1; and
  - (b) if tax is to be deducted at the rate of 10% for Distribution to qualifying foreign nonindividual investors / foreign fund.
- 4. Unitholders who fall within class (a) under Note C1 are not required to submit Form A.
- 5. Unitholders who do not fall within classes of Unitholders listed in Note C1 and C2 above can choose not to return Form A as tax will be deducted from the Cumulative Distribution made to them at the prevailing corporate tax rate in any case.
- 6. Unitholders who hold the Units jointly (where at least one of the joint holders is not an individual) or through nominees do not have to return Form A.
- 7. The trustee and the manager of ALOG will deduct tax at the prevailing corporate tax rate from the Cumulative Distribution made out of ALOG's taxable income that is not taxed at

the Trustee level of ALOG, 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) qualifying 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).

- 8. 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.
- 9. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively by ALOG's Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd., on or around **11 November 2020.**
- 10. Unitholders and the depository agents will have to complete Form A and Form B (and its annexes) respectively legibly and send them to the Unit Registrar such that they are received by **5.00 pm on 19 November 2020**. The trustee and the manager of ALOG 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 ALOG will be obliged to deduct the appropriate amount of tax from the Cumulative Distribution in respect of which this announcement is made.

#### Last Date and Time for Return of the Forms

Unitholders and the depository agents must complete and return the applicable forms to Boardroom Corporate & Advisory Services Pte. Ltd.'s office by 19 November 2020 at 5.00 p.m. in order to receive the Cumulative Distribution either at gross or at net (after deduction of tax), as the case may be.

#### DECLARATION IN INCOME TAX RETURN

The income distribution is considered as income for the year 2020. Beneficial owners of the Cumulative Distribution, other than those who are exempt from tax on the income distribution, are required to declare the taxable income component of the Cumulative Distribution as taxable income in their income tax return for the Year of Assessment 2021.

#### IMPORTANT DATES AND TIMES

Date/Deadline	Event
10 November 2020 at 5.00 p.m.	Closing of ALOG's Transfer Books and Register of Unitholders
19 November 2020 at 5.00 p.m.	Unitholders and depository agents must have completed and returned the <i>"Declaration for</i> <i>Singapore Tax Purposes Form A or Form B"</i> , where applicable to the Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd.
27 November 2020	Payment of Cumulative Distribution

Should Unitholders have any queries in relation to these procedures, please do not hesitate to contact Mr. Donovan Ng at +65 6512 5159 or email <u>donovanng@ara-group.com</u> or visit our website at <u>http://www.aralogos-reit.com.</u>

### BY ORDER OF THE BOARD

ARA LOGOS Logistics Trust Management Limited (as manager of ARA LOGOS Logistics Trust) (Company Registration No. 200919331H)

Karen Lee Chief Executive Officer 2 November 2020

# ABOUT ARA LOGOS LOGISTICS TRUST ("ALOG")

Listed on the Singapore Exchange on 12 April 2010, ARA LOGOS Logistics Trust ("**ALOG**") is a real estate investment trust ("**REIT**") that invests in quality income-producing industrial real estate used for logistics purposes, as well as real estate-related assets in the Asia Pacific. ALOG is managed by ARA LOGOS Logistics Trust Management Limited.

As at 30 September 2020, ALOG's portfolio comprises 27 high quality logistics warehouse properties strategically located in established logistics clusters in Singapore and Australia. The portfolio has a total gross floor area of approximately 9.0 million square feet valued at approximately S\$1.26 billion.

For more information, please visit www.aralogos-reit.com.

# ABOUT ARA LOGOS LOGISTICS TRUST MANAGEMENT LIMITED

ALOG is managed by ARA LOGOS Logistics Trust Management Limited (the "**Manager**"), a whollyowned subsidiary of LOGOS. ARA Asset Management Limited ("**ARA**" or the "**Group**") is a majority shareholder of LOGOS, which operates as ARA's global logistics real estate platform.

LOGOS is one of Asia Pacific's leading logistics property groups with over 6.7 million sqm of property owned and under development, and a completed value of S\$14 billion across 24 ventures. As a vertically integrated business, LOGOS manages every aspect of logistics real estate, from sourcing land or facilities, to undertaking development and asset management, on behalf of some of the world's leading global real estate investors.

ARA is a leading APAC real assets fund manager with a global reach. With S\$110 billion<sup>(3)</sup> in gross assets under management as at 30 June 2020, ARA manages listed and unlisted real estate investment trusts (REITs), private real estate equity and credit funds, and infrastructure funds in 28 countries. As part of its investor-operator philosophy, ARA also operates a real estate management services division with local teams to manage its assets worldwide.

ARA's multi-platform, multi-product global fund management business is supported by dedicated local teams with in-depth knowledge and expertise and empowered by a forward-looking real estate technology strategy. Built on a foundation of strong corporate governance and business integrity, ARA counts some of the world's largest pension funds, sovereign wealth funds, financial institutions, endowments and family offices as its investors.

For more information on LOGOS and ARA, please visit <a href="https://www.logosproperty.com">https://www.logosproperty.com</a> and <a href="https://www.logosproperty.com"/>https://www.logosproperty.com</a> and <a href="https://www.logosproperty.com"/htt

## **IMPORTANT NOTICE**

This announcement is not for distribution, directly or indirectly, in or into the United States and is not an offer of securities for sale in the United States or any other jurisdictions.

This Announcement is for information purposes only and does not constitute an invitation or offer to acquire, purchase or subscribe for securities of ALOG in Singapore, the United States 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 and the income derived from them may fall as well as rise. Units are not

<sup>3</sup> Includes assets under management by ARA Asset Management Limited and the Group of companies and its Associates as at 30 June 2020.

obligations of, deposits in, or guaranteed by, the Manager, the Trustee, or any of their respective affiliates. An investment in Units is subject to investment risks, including the possible loss of the principal amount invested. The past performance of ALOG is not necessarily indicative of the future performance of ALOG.

Investors have no right to request the Manager to redeem their Units while the Units are listed. It is intended that Unitholders may only deal in their Units through trading on the SGX-ST. Listing of the Units on the SGX-ST does not guarantee a liquid market for the Units.

This Announcement may contain forward-looking statements that involve risks and uncertainties. Actual future performance, outcomes and results may differ materially from those expressed in forward-looking statements as a result of a number of risks, uncertainties and assumptions. Representative examples of these factors include (without limitation) general industry and economic conditions, interest rate trends, cost of capital and capital availability, competition from similar developments, shifts in expected levels of property rental income and occupancy, changes in operating expenses, including employee wages, benefits and training, property expenses and governmental and public policy changes and the continued availability of financing in the amounts and the terms necessary to support future business. You are cautioned not to place undue reliance on these forward looking statements, which are based on the Manager's current view of future events.

This announcement is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for the Units in the United States or any other jurisdiction. The past performance of ALOG and the Manager is not necessarily indicative of the future performance of ALOG and the Manager.

This announcement is not for release, publication or distribution, directly or indirectly, in or into the United States, European Economic Area, the United Kingdom, Canada, Japan or Australia, and should not be distributed, forwarded to or transmitted in or into any jurisdiction where to do so might constitute a violation of applicable securities laws or regulations.

The Units have not been and will not be registered under the U.S. Securities Act and may not be offered or sold in the United States, except pursuant to an applicable exemption from, or in a transaction not subject to, the registration requirements of the U.S. Securities Act and in compliance with any applicable laws. There will be no public offering of the securities referred to herein in the United States.

This publication has not been reviewed by the Monetary Authority of Singapore.

**Notification under Section 309B of the Securities and Futures Act, Chapter 289 of Singapore**: The Units are prescribed capital markets products (as defined in the Securities and Futures (Capital Markets Products) Regulations 2018) and Excluded Investment Products (as defined in MAS Notice SFA 04-N12: Notice on the Sale of Investment Products and MAS Notice FAA-N16: Notice on Recommendations on Investment Products).