

ASCENDAS HOSPITALITY TRUST

A stapled group comprising:

Ascendas Hospitality Real Estate Investment Trust

(a real estate investment trust constituted on 13 March 2012 under the laws of the Republic of Singapore)

Ascendas Hospitality Business Trust

(a business trust constituted on 13 March 2012 under the laws of the Republic of Singapore)

BACK-END TAX REFUND PROCEDURES

Ascendas Hospitality Fund Management Pte. Ltd. ("**A-HREIT Manager**"), as manager of Ascendas Hospitality Real Estate Investment Trust ("**A-HREIT**"), and Ascendas Hospitality Trust Management Pte. Ltd. ("**A-HBT Trustee-Manager**"), as trustee-manager of Ascendas Hospitality Business Trust ("**A-HBT**"), wish to announce that Ascendas Hospitality Trust ("**A-HTRUST**") will be implementing the back-end tax refund process to allow eligible stapled securityholders to claim for a refund of excess tax previously deducted from distributions by **A-HTRUST** made out of A-HREIT's taxable income that is not taxed at the trustee level ("**Taxable Income Distributions**"). Details of the process are provided in this Announcement and the process is available for use with immediate effect.

Categories of Eligible Stapled Securityholders

1. The back-end refund process allows the following beneficial stapled securityholders to make a claim for refund of any excess tax deducted from A-HTRUST's Taxable Income Distributions (see paragraph 4 for the eligible distributions):
 - a. beneficial stapled securityholders who are individuals holding stapled securities in A-HTRUST through a Depository Agent;
 - b. beneficial stapled securityholders who are foreign non-individuals (see paragraph 2 for the definition); and
 - c. beneficial stapled securityholders who are exempt non-corporate stapled securityholders (see paragraph 3 for the definition).

Other categories of beneficial stapled securityholders will need to go through the normal process of tax return filing to claim a refund, if any, of excess tax deducted.

2. A foreign non-individual refers to a beneficial stapled securityholder (other than an individual) who is not a resident of Singapore for income tax purposes and:
 - a. who does not have a permanent establishment in Singapore; or
 - b. who carries on any operation in Singapore through a permanent establishment in Singapore, where the funds used to acquire the stapled securities in A-HTRUST are not obtained from that operation.

3. An exempt non-corporate stapled securityholder refers to a beneficial stapled securityholder incorporated or registered in Singapore which is:
 - a. a charity registered under the Charities Act (Cap. 37) or established by any written law;
 - b. a town council;
 - c. a statutory board;
 - d. a co-operative society registered under the Co-operative Societies Act (Cap. 62); or
 - e. a trade union registered under the Trade Unions Act (Cap. 333).

Applicable Taxable Income Distributions

4. The back-end refund process applies to the following A-HTRUST's Taxable Income Distributions:
 - a. in relation to beneficial stapled securityholders who are individuals or exempt non-corporate stapled securityholders, Taxable Income Distributions made by A-HTRUST on or after 20 December 2013. Under current tax law, all individuals and exempt non-corporate stapled securityholders are entitled to receive Taxable Income Distributions from A-HTRUST without tax being deducted at source and therefore, if tax had been deducted from the Taxable Income Distributions made to them, they are entitled to a refund of the tax deducted. However, individuals who derived such distributions from the carrying on of a trade, business or profession or from a partnership in Singapore are liable to tax on the distributions and hence are required to declare such distributions in their income tax returns; and
 - b. in relation to beneficial stapled securityholders who are foreign non-individuals, Taxable Income Distributions made by A-HTRUST during the period from 20 December 2013 to 31 March 2015¹ (both dates inclusive). Under current tax law, foreign non-individuals are taxed at a reduced rate of 10% on income distributions made by a real estate investment trust during the period from 18 February 2005 to 31 March 2015 and therefore, if tax had been deducted at the standard corporate tax rate (currently 17%) from the Taxable Income Distributions made to them, they are entitled to a refund of the excess tax deducted.

¹ Or which other date as may be applicable should the duration of the tax concession mentioned herein be subsequently extended.

Documents to be submitted

5. To make a claim for refund, the following documents are required:

a. Form R1

- i. Foreign non-individuals and exempt non-corporates who hold stapled securities in A-HTRUST directly (i.e. in their own names) are required to complete Form R1. **Please use a separate Form R1 for each income distribution period.**
- ii. Each Form R1 submission must be accompanied by either the Subsidiary Income Tax Certificate ("SITC") or the Annual Dividend Statement ("ADS") issued by The Central Depository (Pte) Limited that was issued for the Taxable Income Distribution in respect of which the claim for refund is made. The IRAS will verify the claim against the SITC (or ADS) and therefore the SITC (or ADS), must show, among other things, the name of the individual, foreign non-individual or exempt non-corporate stapled securityholder who is beneficially entitled to the distribution.

Form R2 (Depository Agents)

- i. Depository Agents are required to make the declaration on Form R2 and to furnish the particulars of the beneficiaries on whose behalf the claim is made in the appropriate annexes (Annex 1, Annex 2 or Annex 3) to the Form. **Please use a separate Form R2 for each income distribution period.**
- ii. Each Form R2 submission must be accompanied by the SITC that was issued for the Taxable Income Distribution in respect of which the claim for refund is made.
- iii. **Please note that the declaration status of the beneficiary or beneficiaries of the stapled securities deposited in a particular sub-account (i.e. individuals / foreign non-individual investors / exempt non-corporate stapled securityholders) must be properly substantiated. Depository Agents must ensure that the appropriate documents to support the declaration are available. Where the stapled securities are held through more than one tier of nominees, please note that the confirmation must be from the ultimate beneficiary or beneficiaries. Please also ensure that records of the amount of distributions made to each beneficiary are kept as the Inland Revenue Authority of Singapore ("IRAS") may require such information;**

6. Please submit the duly completed Form R1 or Form R2 and the accompanying SITCs or ADSs to Boardroom Corporate & Advisory Services Pte. Ltd., 50 Raffles Place, #32-01 Singapore Land Tower, Singapore 048623. In addition, please email a soft copy of the completed Annexes to Boardroom Corporate & Advisory Services Pte. Ltd. at SHS-SD.CA@boardroomlimited.com.

Applicants may submit the Form R1 or Form R2 and accompanying SITCs at any time. The claim for refund will be collated on a half-yearly basis (by 15 May and 15 November each year) and filed with the IRAS by A-HTRUST on a half-yearly basis. For example, all claims received by Boardroom Corporate & Advisory Services Pte. Ltd. during the half-year ending 15 May 2015 will be compiled and submitted to the IRAS in June 2015. However, please also note that every claim for refund must be made to the IRAS within four years from the end of the year of assessment to which the claim relates. For example, for claiming of refund in respect of Taxable Income Distribution made by A-HTRUST for the period 10 June 2013 to 30 September 2013 (which relates to the year of assessment 2015), the claim for refund must be submitted to the IRAS on or before 31 December 2019.

7. The amount of excess tax deducted will be refunded only after the IRAS has refunded this amount to A-HTRUST.

By Order of the Board

Mary Judith de Souza
Joint Company Secretary

Ascendas Hospitality Fund Management Pte. Ltd. (Company Registration No. 201133966D),
as Manager of A-HREIT

Ascendas Hospitality Trust Management Pte. Ltd. (Company Registration No. 201135524E),
as Trustee-Manager of A-HBT

12 January 2015