



## **Frasers Property Limited**

*(Formerly known as Frasers Centrepoint Limited)  
Incorporated in Singapore  
Company Registration No. 196300440G*

### **TAX RULING IN RESPECT OF ISSUE OF S\$200 MILLION FIXED RATE SUBORDINATED PERPETUAL SECURITIES BY FRASERS PROPERTY TREASURY PTE. LTD. (CONSOLIDATED TO FORM A SINGLE SERIES WITH THE S\$400 MILLION FIXED RATE SUBORDINATED PERPETUAL SECURITIES ISSUED ON 11 APRIL 2019) UNDER ITS S\$5.0 BILLION MULTICURRENCY DEBT ISSUANCE PROGRAMME**

Frasers Property Limited (formerly known as Frasers Centrepoint Limited) (the "**Company**") refers to its announcement dated 30 July 2019 in respect of the issue of S\$200 million in aggregate principal amount of fixed rate subordinated perpetual securities (the "**Series 4 Tranche 2 Securities**"), which have been consolidated to form a single series with the S\$400 million fixed rate subordinated perpetual securities issued on 11 April 2019, by its wholly-owned subsidiary, Frasers Property Treasury Pte. Ltd. (formerly known as FCL Treasury Pte. Ltd.) (the "**Issuer**"), under the S\$5.0 billion Multicurrency Debt Issuance Programme established by the Issuer on 16 January 2017 and guaranteed by the Company.

In the pricing supplement dated 23 July 2019 issued in connection with the Series 4 Tranche 2 Securities (the "**Pricing Supplement**"), references were made to an application to the Inland Revenue Authority of Singapore ("**IRAS**") for an advance tax ruling to confirm the classification of the Series 4 Tranche 2 Securities for Singapore income tax purposes and the Singapore tax treatment of the payment of the Distributions. Unless otherwise defined herein, terms used in this announcement and which are defined in the terms and conditions of the Series 4 Tranche 2 Securities read together with the Pricing Supplement (collectively, the "**Conditions**") shall bear the same meanings ascribed to them in the Conditions.

The Company wishes to announce that the abovementioned tax ruling has been obtained from the IRAS. In particular, the IRAS has stated in the tax ruling that it is prepared to regard the Series 4 Tranche 2 Securities as "debt securities" for the purpose of Section 43N(4) of the Income Tax Act (Chapter 134 of Singapore) ("**ITA**") and Regulation 2 of the Income Tax (Qualifying Debt Securities) Regulations ("**QDS Regulations**"). Accordingly, the Distributions (accruing from 30 July 2019) due and payable on the Series 4 Tranche 2 Securities (including Arrears of Distributions and any Additional Distribution Amounts) will be regarded by the IRAS as interest payable on indebtedness. Subject to the conditions in respect of the qualifying debt securities ("**QDS**") scheme being met under the QDS Regulations, Section 43N and Section 13(16) of the ITA, the Series 4 Tranche 2 Securities will be regarded by the IRAS as QDS and the holders of the Series 4 Tranche 2 Securities will be entitled to the tax concessions and exemptions under Section 43N and Section 13(1)(a) of the ITA respectively.

Catherine Yeo

Company Secretary

29 January 2020