



pan asia commercial

(Constituted in the Republic of Singapore pursuant to a trust deed dated 25 August 2005 (as amended))

## ANNOUNCEMENT

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### NOTICE OF RECORD AND DISTRIBUTION PAYMENT DATE

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NOTICE IS HEREBY GIVEN that the Transfer Books and Register of Unitholders of Mapletree Pan Asia Commercial Trust (“MPACT”) will be closed at **5.00 p.m.** on **Monday, 8 May 2023** for the purpose of determining unitholders’ entitlements to MPACT’s distribution. MPACT has announced a distribution of 2.25 Singapore cents per unit in MPACT (“Unit”) for the period from 1 January 2023 to 31 March 2023. The distribution of 2.25 Singapore cents per Unit comprises a taxable income component of 1.48 Singapore cents per Unit, a tax-exempt component of 0.60 Singapore cent per Unit and a capital component of 0.17 Singapore cent per Unit.

Unitholders whose securities accounts with The Central Depository (Pte) Limited are credited with units in MPACT as at **5.00 p.m.** on **Monday, 8 May 2023** will be entitled to the distribution that will be paid by **Thursday, 15 June 2023**.

All references to dates and times in this Announcement are to Singapore dates and times.

#### DECLARATION FOR SINGAPORE TAX PURPOSES

1. The tax-exempt income component of the distribution is exempt from tax in the hands of all Unitholders. No tax will be deducted at source from this component.
2. The capital component of the distribution is treated as a return of capital for Singapore income tax purposes. No tax will be deducted at source from this component.
3. The taxable income component of the distribution is a distribution of income to Unitholders of MPACT for Singapore income tax purposes. Tax will be deducted at source from the taxable income distribution in certain circumstances. The following paragraphs describe the circumstances in which tax will or will not be deducted from such distribution.
4. The following categories of Unitholders will receive a gross distribution (i.e. no tax will be deducted from the taxable income distribution):-
  - (a) Unitholders who are individuals (excluding individuals who derive the distribution through a partnership in Singapore or from carrying on of a trade, business or profession) and who hold the units either in their sole names or jointly with other individuals;
  - (b) Unitholders which are companies incorporated and tax resident in Singapore;

- (c) Unitholders which are Singapore branches of companies incorporated outside Singapore;
  - (d) Unitholders which are body of persons (excluding companies or partnerships) registered or constituted in Singapore;
  - (e) 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 1948;
  - (f) Unitholders which are real estate investment trust exchange-traded funds which have been accorded the tax transparency treatment; or
  - (g) An agent bank or Supplementary Retirement Scheme (“SRS”) operator which acts as a nominee for individuals who have purchased Units under the CPF Investment Scheme or the SRS respectively.
5. To receive a gross distribution, Unitholders in categories (b) to (g) under Paragraph 4 above must complete a prescribed form – the “*Declaration for Singapore Tax Purposes Form*” (“**Form A**”).
6. These categories of Unitholders, unless they are exempt from tax because of their own circumstances, will have to pay income tax subsequently at their own applicable tax rates.
7. Unitholders in category (a) under Paragraph 4 above are not required to submit any form. The gross distribution received by these Unitholders (irrespective of their tax residence status) is exempt from tax. However, this tax exemption does not apply to such Unitholders in respect of distribution derived by them through a partnership in Singapore or from the carrying on of a trade, business or profession. Such Unitholders, i.e. to whom the exemption does not apply, must declare the distribution received as income in their income tax returns.
8. Tax at the reduced rate of 10% will be deducted from the distribution made to Unitholders which are:
- (a) foreign non-individuals; and
  - (b) qualifying non-resident funds.
9. A foreign non-individual Unitholder is one (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 Units in MPACT are not obtained from that operation.

10. A qualifying non-resident fund is one that qualifies for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947 that is not a resident of Singapore for income tax purposes and:-
  - (a) does not have a permanent establishment in Singapore (other than a fund manager in Singapore); or
  - (b) 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 MPACT are not obtained from that operation.
11. A non-resident fund refers to a fund being a non-resident company, a partnership where all partners are non-residents, a trust administered by a non-resident trustee, or a non-resident entity.
12. To receive the distribution net of tax deducted at 10%, Unitholders in categories (a) and (b) under Paragraph 8 above are required to complete Form A.
  - (a) Beneficial owners of Units in MPACT who hold Units through depository agents will receive:-
    - (i) gross distribution if they are persons described in categories (a) to (g) under Paragraph 4 above; and
    - (ii) distribution net of tax deducted at 10% if they are Unitholders described in categories (a) and (b) under Paragraph 8 above.
13. To receive gross distribution and distribution net of tax deducted at 10%, depository agents are required to complete the "*Declaration by Depository Agents for Singapore Tax Purposes Form*" ("**Form B**") and its annexes.
14. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively, by MPACT's Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd., on or around **Wednesday, 10 May 2023**.
15. Unitholders (Form A) and the depository agents (Form B and its annexes) will have to complete the forms legibly and send them to the Unit Registrar such that they are received by **5.00 p.m. on Friday, 19 May 2023**. Failure to comply with any of these requirements will render Form A and Form B invalid and the Trustee and the Manager of MPACT will be obliged to deduct tax at the rate of 17% from the distribution.
16. Unitholders who hold Units under the Central Provident Fund Investment Scheme and the Supplementary Retirement Scheme do not have to return any form. They will receive gross distribution.

## DECLARATION IN INCOME TAX RETURN

This distribution is considered as income for the year 2023. Beneficial owners of the distribution, other than those who are exempt from tax on the distribution or who are entitled to the reduced tax rate of 10%, are required to declare the gross amount of the taxable income component of the distribution as taxable income in their Singapore income tax return for the year of assessment 2024.

## IMPORTANT REMINDER

Unitholders and depository agents must complete and return the “Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)”, respectively to the Unit Registrar’s office by **5.00 p.m.** on **Friday, 19 May 2023** in order to receive the distribution either at gross or at net (after deduction of tax at 10%) as described above.

## IMPORTANT DATES AND TIMES

Date / Deadline	Event
9.00 a.m. on Friday, 5 May 2023	First day of “ex-distribution” trading
5.00 p.m. on Monday, 8 May 2023	Closure of MPACT’s transfer books and Register of Unitholders (Record Date)
5.00 p.m. on Friday, 19 May 2023	Unitholders and depository agents must have completed and returned Form A or Form B, as applicable, to the Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd.
Thursday, 15 June 2023	Payment of distribution

By Order of the Board  
Wan Kwong Weng  
Joint Company Secretary  
MPACT Management Ltd.  
(Company Registration No. 200708826C)  
As Manager of Mapletree Pan Asia Commercial Trust

27 April 2023

## **IMPORTANT NOTICE**

The value of the Units and the income derived from them may fall as well as rise. Units are not obligations of, deposits in, or guaranteed by, the MPACT Manager, or any of its affiliates.

An investment in Units is subject to investment risks, including the possible loss of the principal amount invested. Investors have no right to request the MPACT Manager to redeem their Units while the Units are listed. It is intended that the MPACT 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.

The past performance of MPACT and the MPACT Manager, in its capacity as manager of MPACT, is not necessarily indicative of the future performance of MPACT and the MPACT Manager.