



SGX-ST Announcement

### **Notice of Books Closure and Distribution Payment Date**

**NOTICE IS HEREBY GIVEN THAT** the Transfer Books and Register of Unitholders of Starhill Global Real Estate Investment Trust ("**Starhill Global REIT**") will be closed on Wednesday, 6 November 2019, at 5.00 p.m. (the "**Books Closure Date**") to determine the entitlements of holders of units in Starhill Global REIT's ("**Units**" and holders of Units, "**Unitholders**") distributable income of 1.1300 cents per Unit for the period from 1 July 2019 to 30 September 2019 (the "**Distribution**"), comprising a taxable income component of 0.9900 cents per Unit, a tax-exempt income component of 0.0400 cents per Unit and a capital component of 0.1000 cents per Unit.

Unitholders whose securities accounts with The Central Depository (Pte) Limited ("**CDP**") are credited with the Units as at 5.00 p.m. on the Books Closure Date will be entitled to the Distribution to be paid on Friday, 29 November 2019.

### **DECLARATION FOR SINGAPORE TAX PURPOSES**

**A** Tax-exempt income component

The tax-exempt income of the distribution is exempt from tax in the hands of all Unitholders.

**B** Capital component

The capital component of the distribution represents a return of capital to Unitholders for tax purposes and is therefore not subject to income tax. For Unitholders who hold 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 of Starhill Global REIT ("**Trustee**") and the manager of Starhill Global REIT ("**Manager**") will not deduct tax from the Distribution made out of Starhill Global REIT's taxable income that is not taxed at Starhill Global REIT's level to:

- (a) Unitholders who are individuals 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 foreign companies;
- (d) Unitholders which are body of persons (excluding companies or partnerships) incorporated or registered in Singapore, such as:

- (i) institutions, authorities, persons or funds specified in the First Schedule to the Income Tax Act (Cap. 134);
  - (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;
- (e) 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); or
- (f) Unitholders which are real estate investment trust exchange-traded funds which have been accorded the tax transparency treatment.

2. For the Distribution made to classes of Unitholders that do not fall within the categories stated under Note C1 above, the Trustee and the Manager will deduct tax at the rate of 10% if the Unitholders are foreign non-individual investors or foreign funds.

A foreign non-individual investor is one 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 are not obtained from that operation.

A foreign fund is one who is a non-resident fund that qualifies for tax exemption under section 13CA, 13X or 13Y of the Income Tax Act 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 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 classes (b) to (f) stated under Note C1 or Section D of Form A if they qualify as a foreign non-individual investor or foreign fund as described under Note C2. The Trustee and the Manager 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 the Distribution to foreign non-individual investors or foreign funds under Note C2.

4. **Unitholders who fall within class (a) under Note C1 are not required to submit Form A.**

5. Unitholders who do not fall within the classes of Unitholders listed in Notes C1 and C2 above can choose not to return Form A as tax will be deducted from the Distribution made to them at the prevailing corporate tax rate in any case.

6. The Trustee and the Manager will deduct tax at the prevailing corporate tax rate from the Distribution made out of Starhill Global REIT’s taxable income that is not taxed at Starhill Global REIT’s level, 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);
- (c) Foreign non-individual investors (as defined under Note C2); or
- (d) 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-individual investors or foreign funds).

7. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively, by Starhill Global REIT’s Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd, on or around Friday, 8 November 2019.

8. Unitholders (Form A) and 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 Monday, 18 November 2019. The Trustee and the Manager 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 will be obliged to deduct the appropriate amount of tax from the Distribution in respect of which this announcement is made.
  
9. 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 the gross Distribution paid to their respective CPFIS or SRS accounts.

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

***Unitholders and depository agents must complete and return the “Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)”, respectively to Boardroom Corporate & Advisory Services Pte Ltd’s office by Monday, 18 November 2019, at 5.00 p.m. in order to receive the Distribution either at gross or net (after deduction of tax at 10%) as described above.***

**DECLARATION IN INCOME TAX RETURN**

The Distribution is considered as income for the financial year ending 30 June 2020. Beneficial owners of the Distribution, other than those who are exempt from tax on the Distribution, are required to declare the gross Distribution as taxable income in their income tax return for the **Year of Assessment 2021**.



**IMPORTANT DATES AND TIMES**

Wednesday, 6 November 2019 at 5.00 p.m.	Close of the Transfer Books and Register of Unitholders
By Monday, 18 November 2019 at 5.00 p.m.	Unitholders and depository agents must have completed and returned the " <i>Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)</i> " to the Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd
Friday, 29 November 2019	Payment of Distribution

For enquiries, please contact Mr. Jonathan Kuah at tel: (65) 6835 8633 or email: [jonathan.kuah@ytlstarhill.com](mailto:jonathan.kuah@ytlstarhill.com) or visit our website at [www.starhillglobalreit.com](http://www.starhillglobalreit.com)

By Order of the Board  
YTL Starhill Global REIT Management Limited  
(*Company Registration No. 200502123C*)  
As Manager of Starhill Global Real Estate Investment Trust

Lam Chee Kin  
Joint Company Secretary  
29 October 2019



### **About Starhill Global REIT**

*Starhill Global REIT is a Singapore-based real estate investment trust investing primarily in real estate used for retail and office purposes, both in Singapore and overseas. Since its listing on the Mainboard of the Singapore Exchange Securities Trading Limited (the “SGX-ST”) on 20 September 2005, Starhill Global REIT has grown its initial portfolio from interests in two landmark properties on Orchard Road in Singapore to 10 properties in Singapore, Australia, Malaysia, China and Japan, valued at about S\$3.1 billion.*

*These comprise interests in Wisma Atria and Ngee Ann City on Orchard Road in Singapore, Myer Centre Adelaide, David Jones Building and Plaza Arcade in Adelaide and Perth, Australia, Starhill Gallery and Lot 10 in Kuala Lumpur, Malaysia, a retail property in Chengdu, China, and two properties in Tokyo, Japan. Starhill Global REIT remains focused on sourcing attractive property assets in Singapore and overseas, while driving organic growth from its existing portfolio, through proactive leasing efforts and creative asset enhancements.*

*Starhill Global REIT is managed by an external manager, YTL Starhill Global REIT Management Limited. The Manager is a wholly-owned subsidiary of YTL Starhill Global REIT Management Holdings Pte. Ltd. which is in turn an indirect wholly-owned subsidiary of YTL Corporation Berhad.*

### **Important Notice**

The value of units in Starhill Global REIT (“Units”) and the income derived from them may fall or rise. The Units are not obligations of, deposits in, or guaranteed by, the 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 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 document is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for the Units. The past performance of Starhill Global REIT is not necessarily indicative of the future performance of Starhill Global REIT.

This document 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 and foreign exchange trends, cost of capital and capital availability, competition from similar developments, shifts in expected levels of property rental income, changes in operating expenses (including employee wages, benefits and training costs), property expenses and governmental and public policy changes. Investors are cautioned not to place undue reliance on these forward-looking statements, which are based on the Manager’s view of future events.