

FRASERS CENTREPOINT TRUST

(Constituted in the Republic of Singapore pursuant to a trust deed dated 5 June 2006 (as amended))

NOTICE OF BOOKS CLOSURE AND DISTRIBUTION PAYMENT DATE

Notice is hereby given that the Transfer Books and Register of Unitholders of Frasers Centrepoint Trust ("**FCT**") will be closed at 5.00pm on Friday 1 November 2019 for the purpose of determining unitholders' entitlements to FCT's distribution. FCT has announced a distribution of 2.913 cents per unit for the period from 1 July 2019 to 30 September 2019, which comprises a taxable component of 2.647 cents per unit and a tax-exempt component of 0.266 cents per unit.

Unitholders whose securities accounts with The Central Depository (Pte) Limited are credited with units in FCT as at 5.00pm on Friday 1 November 2019 will be entitled to the distribution that will be paid on **Friday 29** November 2019.

Declaration for Singapore Tax Purposes

- 1. Tax will be deducted at source from the taxable income component in certain circumstances. The following paragraphs describe the circumstances in which tax will or will not be deducted from the taxable income component of the distribution.
- 2. The following categories of unitholders (not including a person acting in the capacity of a trustee) will receive a gross distribution (i.e. no tax will be deducted from it):
 - 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 companies incorporated outside Singapore; and
 - d) unitholders which are bodies of persons incorporated or registered in Singapore, including charities registered under the Charities Act (Cap 37) or established by any written law, town councils, statutory boards, co-operative societies registered under the Co-operatives Societies Act (Cap 62) or trade unions registered under the Trade Unions Act (Cap 333);
 - 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 (Cap 145); and
 - f) unitholders which are REIT Exchange-Traded Funds which have been accorded the tax transparency treatment.
- 3. To receive a gross distribution, unitholders in categories (b) to (f) above must complete a prescribed form the "*Declaration for Singapore Tax Purposes Form*" ("**Form A**").
- 4. These categories of unitholders, unless they are exempt from tax because of their own circumstances, will have to declare the gross taxable income in their income tax return and pay income tax subsequently at their own applicable tax rates.
- 5. Unitholders in category (a) are not required to submit any form. The gross distribution received by these unitholders (irrespective of their tax residence status) is exempt from Singapore income tax if it is not derived through a partnership in Singapore or from the carrying on of a trade, business or profession. Where the distribution is not exempt from Singapore income tax, these unitholders will have to declare the gross taxable income in their income tax return.
- 6. Tax at the reduced rate of 10%* will be deducted from the distribution made to qualifying foreign nonindividual unitholders. A qualifying 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, but the funds used to acquire the units in FCT are not obtained from that operation.
- 7. To receive the distribution net of tax deducted at 10%*, qualifying foreign non-individual unitholders are required to complete Form A.
- 8. Beneficial owners of units in FCT who hold their units through depository agents will receive:
 - a) gross distribution if they are persons described in categories (a) to (f) under Paragraph 2 above; and
 b) distribution net of tax deducted at 10%* if they are qualifying foreign non-individuals described in Paragraph 6 above.
- 9. 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.
- Form A and Form B (and its annexes) will be sent to unitholders and depository agents respectively, by FCT's Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd., on or around **Tuesday 5 November 2019**.
- 11. Unitholders (Form A) and the depository agents (Form B and its annexes) will have to complete the forms legibly and send it to the Unit Registrar such that they are received by **5.00pm on Thursday 14 November 2019**. Failure to comply with any of these requirements will render Form A and Form B invalid and the trustee and the manager of FCT will be obliged to deduct tax at the rate of 17% from the distribution.
- 12. 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.
- * The 10% concessionary income tax rate applies for distribution made on or before 31 December 2025.

BY ORDER OF THE BOARD

Frasers Centrepoint Asset Management Ltd.

As manager of Frasers Centrepoint Trust Company Registration No: 200601347G

Catherine Yeo Company Secretary 23 October 2019

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