



ASCOTT RESIDENCE TRUST

A stapled group comprising:

Ascott Real Estate Investment Trust
(A real estate investment trust constituted on 19 January 2006 under the laws of the Republic of Singapore)

Managed by
Ascott Residence Trust Management Limited
(Company Registration No. 200516209Z)

Ascott Business Trust
(A business trust constituted on 9 September 2019 under the laws of the Republic of Singapore)

Managed by
Ascott Business Trust Management Pte. Ltd.
(Company Registration No. 201925299R)

ANNOUNCEMENT

NOTICE OF BOOKS CLOSURE AND DISTRIBUTION PAYMENT DATE

NOTICE IS HEREBY GIVEN THAT the Transfer Books and Register of Stapled Securityholders of Ascott Residence Trust (“**ART**”) will be closed on **6 August 2020 at 5.00 p.m.** (the “**Books Closure Date**”) to determine entitlements of holders of stapled securities in ART (“**Stapled Securities**”) and holders of Stapled Securities, “**Stapled Securityholders**”) to ART’s distribution for the period from 1 January 2020 to 30 June 2020 (the “**Distribution**”).

Stapled Securityholders whose securities accounts with The Central Depository (Pte) Limited are credited with Stapled Securities as at the Books Closure Date will be entitled to the Distribution to be paid on **28 August 2020**.

Declaration for Singapore tax purposes

We are pleased to inform you that ART will distribute 1.047 Singapore cents per Stapled Security for the period from 1 January 2020 to 30 June 2020, comprising:

- (a) Distribution from Ascott Real Estate Investment Trust (“**Ascott Reit**”)
 - (i) Taxable income component of 0.528 Singapore cents per Stapled Security;
 - (ii) Tax-exempt income component of 0.196 Singapore cents per Stapled Security; and
 - (iii) Capital component of 0.204 Singapore cents per Stapled Security; and
- (b) Distribution from Ascott Business Trust (“**Ascott BT**”)
 - (i) Tax-exempt income component of 0.119 Singapore cents per Stapled Security.

A. Taxable income

Tax will be deducted at source from the taxable income component in certain circumstances. The following section describes the circumstances in which tax will or will not be deducted from such component and the term “distribution” used thereafter refers to this component.

Individuals

Stapled Securityholders who are individuals and who hold Stapled Securities in their sole names or jointly with other individuals are not required to submit any forms and will receive a gross distribution. The distribution received by individuals (whether Singapore tax resident or not) is exempt from tax if it is not derived through a partnership in Singapore or from the carrying on of a trade, business or profession.

Qualifying Stapled Securityholders

Qualifying Stapled Securityholders (which term, for the avoidance of doubt, does not include individuals) will receive a gross distribution, but will have to pay income tax subsequently at their own applicable tax rates. Such Stapled Securityholders must complete a prescribed form to declare their Singapore tax residence status - the “Declaration for Singapore Tax Purposes Form” (“**Form A**”). They will receive Form A from the Unit Registrar of Ascott Reit, Boardroom Corporate & Advisory Services Pte. Ltd., and will have to complete and return Form A to Boardroom Corporate & Advisory Services Pte. Ltd.. If a Qualifying Stapled Securityholder fails to return Form A or fails to properly complete Form A, DBS Trustee Limited, as trustee of Ascott Reit (the “**Ascott Reit Trustee**”) and Ascott Residence Trust Management Limited (the “**Ascott Reit Manager**”) will be obliged to deduct tax at the rate of 17% from the distribution to such Qualifying Stapled Securityholders.

Qualifying Stapled Securityholders include Singapore incorporated and tax-resident companies. The complete list of Qualifying Stapled Securityholders will be shown on Form A.

CPF/SRS Funds

Stapled Securityholders who have purchased their Stapled Securities using moneys from their Central Provident Fund accounts or Supplementary Retirement Scheme accounts will receive a gross distribution which is tax-exempt. There is no need for such Stapled Securityholders to fill up any forms.

Foreign (non-individual) and qualifying non-resident fund Stapled Securityholders

Foreign (non-individual) and qualifying non-resident fund Stapled Securityholders who meet certain conditions will receive their Distribution net of 10% tax.

Foreign (non-individual) Stapled Securityholders

A foreign non-individual is one (other than an individual) who is not a resident of Singapore for income tax purposes and:

- (a) who does not have any permanent establishment in Singapore; or
- (b) who carries on any operation through a permanent establishment in Singapore, where the funds used to acquire the Stapled Securities in ART are not obtained from that operation.

Qualifying non-resident fund Stapled Securityholders

A qualifying non-resident fund is one that qualifies for tax exemption under section 13CA, 13X or 13Y of the Income Tax Act that is not a resident of Singapore for income tax purposes and:

- (a) does not have any permanent establishment in Singapore (other than a fund manager in Singapore); or
- (b) carries on any operation through a permanent establishment in Singapore (other than a fund manager in Singapore), where the funds used to acquire the Stapled Securities in ART are not obtained from that operation.

For this purpose, 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.

Such Stapled Securityholders (foreign non-individual and qualifying non-resident fund) must complete Form A to declare their status in relation to these conditions. They will receive Form A from Boardroom Corporate & Advisory Services Pte. Ltd. and will have to complete and return Form A to Boardroom Corporate & Advisory Services Pte. Ltd.. The Ascott Reit Trustee and Ascott Reit Manager will be obliged to deduct tax at the rate of 17% from the distribution if Form A is not returned within the stipulated time limit or is not properly completed.

Nominee Stapled Securityholders

Nominees who hold their Stapled Securities for the benefit of individuals and Qualifying Stapled Securityholders will receive a gross distribution. Nominees who hold their Stapled Securities for the benefit of qualifying foreign (non-individual) investors will receive a distribution net of 10% tax. This is provided the nominees furnish certain particulars of the beneficiaries to the Ascott Reit Trustee and the Ascott Reit Manager. These particulars are to be provided together with a declaration by the nominees of the status of the beneficiaries.

Nominees will receive the Declaration by Depository Agents for Singapore Tax Purposes Form (“**Form B**”) from Boardroom Corporate & Advisory Services Pte. Ltd. and will have to complete and return the Form B to Boardroom Corporate & Advisory Services Pte. Ltd.. The Ascott Reit Trustee and the Ascott Reit Manager will be obliged to deduct tax at the rate of 17% from the distribution if the Form B is not returned within the stipulated time limit or is not properly completed.

Joint Stapled Securityholders and All Other Stapled Securityholders

Stapled Securityholders who hold their Stapled Securities jointly (other than those held jointly by individuals) as well as Stapled Securityholders who do not fall within the categories described above will receive their distribution net of 17% tax. These Stapled Securityholders do not need to return any forms.

B. Tax-exempt income

The tax-exempt income component is exempt from tax in the hands of all Stapled Securityholders. No tax will be deducted at source from this component.

C. Capital component

The capital component of the distribution is treated as a return of capital for Singapore tax purposes.

Important Reminder

Last Date and Time for Return of the Forms

Boardroom Corporate & Advisory Services Pte. Ltd. will despatch the relevant forms to Stapled Securityholders on or around 11 August 2020.

Stapled Securityholders must complete and return the applicable form(s) to Boardroom Corporate & Advisory Services Pte. Ltd.'s office by **18 August 2020 at 5.00 p.m.** in order to receive a gross distribution or a distribution net of 10% tax, as the case may be.

Declaration in Income Tax Return

The distribution is considered as income for the year 2020. 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 distribution as taxable income in their income tax return for the year of assessment 2021.

Distribution Policy

Distributions from ART comprise distributions from Ascott Reit and Ascott BT.

ART's distribution policy is to distribute at least 90% of its taxable income (other than gains from the sale of real estate properties by ART which are determined to be trading gains) and net overseas income (comprising tax-exempt income component and capital component), with the actual level of distribution to be determined at the discretion of Ascott Reit Manager and Ascott Business Trust Management Pte. Ltd. as trustee-manager of Ascott BT.

Distributions will be made on a semi-annual basis, with the amount calculated as at 30 June and 31 December each year.

Distribution for 1H 2020

In view of the uncertainty surrounding the COVID-19 situation, ART had retained approximately 15% of ART's 1H 2020 income available for distribution, as rent negotiations are still on-going and ART may grant further rental deferment and / or waivers to support some tenants through this challenging period.

To mitigate the impact of COVID-19 on distributions and to share past divestment gains with Stapled Securityholders, ART had included a S\$5.0 million top-up in the 1H 2020 distribution.

The eventual distribution of the 15% retained amount will depend on the final amount of income available for distribution based on the financial results for the full year ending 31 December 2020. For the avoidance of doubt, ART will maintain its distribution policy of distributing at least 90% of its taxable income and net overseas income to its Stapled Securityholders.

Directors' Responsibility Statement

The Board of the Directors of Ascott Business Trust Management Pte. Ltd. as the trustee-manager of Ascott BT is satisfied on reasonable grounds that, immediately after making the Distribution, the trustee-manager of Ascott BT will be able to fulfil from the Trust Property (as defined in the Business Trusts Act, Chapter 31A of Singapore) of Ascott BT, the liabilities of Ascott BT as these liabilities fall due.

Important Dates and Times

Date / Deadline	Event
6 August 2020 at 5.00 p.m.	Closing of the Transfer Books and Register of Stapled Securityholders of ART
By 18 August 2020 at 5.00 p.m.	Stapled Securityholders including depository agents must complete and return Form A or Form B, as applicable
28 August 2020	Payment of Distribution

By Order of the Board

ASCOTT RESIDENCE TRUST MANAGEMENT LIMITED

(Company Registration No. 200516209Z)

As manager of Ascott Real Estate Investment Trust

ASCOTT BUSINESS TRUST MANAGEMENT PTE. LTD.

(Company Registration No. 201925299R)

As trustee-manager of Ascott Business Trust

Karen Chan

Company Secretary

28 July 2020

IMPORTANT NOTICE

The past performance of Ascott Residence Trust (“**ART**”) is not indicative of future performance. The listing of the stapled securities in ART (the “**Stapled Securities**”) on Singapore Exchange Securities Trading Limited (the “**SGX-ST**”) does not guarantee a liquid market for the Stapled Securities. The value of the Stapled Securities and the income derived from them may fall as well as rise. Stapled Securities are not obligations of, deposits in, or guaranteed by, Ascott Residence Trust Management Limited as manager of Ascott Real Estate Investment Trust or Ascott Business Trust Management Pte. Ltd. as trustee-manager of Ascott Business Trust (collectively, the “**Managers**”) or any of their respective affiliates. An investment in the Stapled Securities is subject to investment risks, including the possible loss of the principal amount invested. Investors have no right to request that the Managers redeem or purchase their Stapled Securities while the Stapled Securities are listed on the SGX-ST. It is intended that holders of Stapled Securities may only deal in their Stapled Securities through trading on the SGX-ST.

This announcement is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for the Stapled Securities.