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(Constituted in the Republic of Singapore pursuant to a Trust Deed dated 11 February 2010 as amended and restated)

## **NOTICE OF RECORD DATE & ADVANCED DISTRIBUTION PAYMENT DATE**

*Capitalised terms used herein, unless otherwise defined, shall have the meanings ascribed to them in the announcement by ARA LOGOS Logistics Trust dated 26 October 2020 in relation to the proposed acquisition of five logistics properties located in Australia and fund investment in 49.5% interest in New LAIVS Trust and 40.0% in Oxford Property Fund.*

**NOTICE IS HEREBY GIVEN** that pursuant to the approval of unitholders of ARA LOGOS Logistics Trust (“**ALOG**”, and unitholders of ALOG, “**Unitholders**”) given on 23 December 2020 for the issuance of new units in ALOG (“**Subscription Units**”) to Ivanhoé Cambridge China Inc. and LOGOS Units No. 1 Ltd to raise total gross proceeds of up to approximately S\$88.7 million, the Transfer Books and Register of Unitholders of ALOG will be closed on **15 April 2021 at 5.00 p.m.** being the record date (the “**Record Date**”) for the purpose of determining Unitholders’ entitlements to the advanced distribution (the “**Advanced Distribution**”) comprising ALOG’s distributable income for the period from 1 January 2021 to the day immediately prior to the date on which the Subscription Units are issued. The Subscription Units are expected to be listed on or around 16 April 2021.

The next distribution following the Advanced Distribution will comprise ALOG’s distributable income for the period from 16 April 2021 onwards. The current expectation of the Manager of the distribution per unit (“**DPU**”) under the Advanced Distribution is estimated to be approximately 1.560 Singapore cents<sup>1</sup> per unit in ALOG (“**Unit**”) for the period from 1 January 2021 to the day immediately prior to the date on which the Subscription Units are issued comprising an estimated taxable income component of 1.159 Singapore cents per Unit, an estimated tax-exempt income component of 0.355 Singapore cents per Unit and an estimated capital distribution of 0.046 Singapore cents per Unit.

The actual quantum of the DPU under the Advanced Distribution (together with a breakdown on the proportion of the Advanced Distribution which comprise the taxable income component, the tax-exempt income component and the capital distribution component) will be announced in due course.

Unitholders whose securities accounts with The Central Depository (Pte) Limited are credited with Units as at 5.00 p.m. on the Record Date will be entitled to the Advanced Distribution that will be paid on or around **28 May 2021**.

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<sup>1</sup> The Advanced Distribution comprises the estimated distribution for the period from 1 January 2021 to 15 April 2021 (being the date immediately prior to the date on which the Subscription Units are issued) based on the Manager’s pro-rated estimate of ALOG’s revenue and expenses for the period from 1 January 2021 to 15 April 2021. This amount is only an estimate based on information currently available to the Manager, and the actual Advanced Distribution may differ.

## **STATUS OF THE SUBSCRIPTION UNITS**

Other than in respect of the Advanced Distribution, the Subscription Units will, upon issue, rank *pari passu* in all respects with the Units on the day immediately prior to the date on which the Subscription Units are issued, including the right to any distributions for the period after the day the Subscription Units are issued onwards.

## **DECLARATION FOR SINGAPORE TAX PURPOSES**

### **A Tax-exempt income**

The tax-exempt income component of the Advanced Distribution is exempt from tax in the hands of all Unitholders. No tax will be deducted at source for this component.

### **B Capital component**

The capital component of the Advanced Distribution represents a return of capital to Unitholders for Singapore income tax purposes and is therefore not subject to income tax. For Unitholders holding 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 and manager of ALOG will not deduct tax from the Advanced Distribution that is not taxed at the Trustee level of ALOG to Unitholders;
  - (a) who are individuals and who hold Units either in their sole names or jointly with other individuals;
  - (b) which are companies incorporated and tax resident in Singapore;
  - (c) which are Singapore branches of foreign companies;
  - (d) which are non-corporate entities (excluding partnerships) constituted 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, statutory boards.
  - (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);
  - (f) Unitholders which are real estate investment trust exchange-traded funds which have been accorded the tax transparency treatment.

2. For Advanced Distribution made to classes of Unitholders that do not fall within the categories stated under Note C1 above, the Trustee and the Manager of ALOG will deduct tax at the rate of 10% if the Unitholders are qualifying foreign non-individual investors or foreign funds (i.e. a non-resident fund that qualifies for tax exemption under Section 13CA, 13X or 13Y of the Singapore Income Tax Act). A qualifying foreign non-individual investor / foreign fund is one who is not a resident of Singapore 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 in ALOG 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 categories (b) to (f) stated under Note C1 or Section D of Form A if they qualify as a foreign non-individual investor / foreign fund as described under Note C2 above. The Trustee and the Manager of ALOG 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 Distribution to qualifying foreign non-individual investors / foreign fund.
4. **Unitholders who fall within class (a) under Note C1 are not required to submit Form A.**
5. Unitholders who do not fall within classes of Unitholders listed in Note C1 and C2 above can choose not to return Form A as tax will be deducted from the Advanced Distribution made to them at the prevailing corporate tax rate in any case.
6. Unitholders who hold the Units jointly (where at least one of the joint holders is not an individual) or through nominees do not have to return Form A.
7. The trustee and the manager of ALOG will deduct tax at the prevailing corporate tax rate from the Advanced Distribution made out of ALOG’s taxable income that is not taxed at the Trustee level of ALOG, 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); or
  - (c) qualifying foreign non-individual investors / 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-individuals / foreign funds).
8. 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 gross Distribution paid to their respective CPFIS or SRS accounts.

9. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively by ALOG's Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd., on or around **19 April 2021**.
10. Unitholders and the depository agents will have to complete Form A and Form B (and its annexes) respectively legibly and send them to the Unit Registrar such that they are received by **5.00 p.m. on 30 April 2021**. The trustee and the manager of ALOG 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 of ALOG will be obliged to deduct the appropriate amount of tax from the Advanced Distribution in respect of which this announcement is made.

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

**Unitholders and the depository agents must complete and return the applicable forms to Boardroom Corporate & Advisory Services Pte. Ltd.'s office by 30 April 2021 at 5.00 p.m. in order to receive the Advanced Distribution either at gross or at net (after deduction of tax), as the case may be.**

**DECLARATION IN INCOME TAX RETURN**

The income distribution is considered as income for the year 2021. Beneficial owners of the Advanced Distribution, other than those who are exempt from tax on the income distribution, are required to declare the taxable income component of the Advanced Distribution as taxable income in their income tax return for the Year of Assessment 2022.

## IMPORTANT DATES AND TIMES

Date/Deadline	Event
15 April 2021 at 5.00 p.m.	Closing of ALOG's Transfer Books and Register of Unitholders
30 April 2021 at 5.00 p.m.	Unitholders and depository agents must have completed and returned the " <i>Declaration for Singapore Tax Purposes Form A or Form B</i> ", where applicable to the Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd.
28 May 2021	Payment of Advanced Distribution

Should Unitholders have any queries in relation to these procedures, please do not hesitate to contact Ms. Cassandra Seet at +65 6428 7769 or email [cassandraset@ara-logos.com](mailto:cassandraset@ara-logos.com) or visit our website at <http://www.aralogos-reit.com>.

### BY ORDER OF THE BOARD

ARA LOGOS Logistics Trust Management Limited  
(as manager of ARA LOGOS Logistics Trust)  
(Company Registration No. 200919331H)

Karen Lee  
Chief Executive Officer  
7 April 2021

## **IMPORTANT NOTICE**

The value of units in ALOG (“**Units**”) and the income derived from them, if any, may fall or rise. Units are not obligations of, deposits in, or guaranteed by, ARA LOGOS Logistics Trust Management Limited (as the manager of ALOG) (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 should note that they will have no right to request the Manager to redeem or purchase their Units for so long as the Units are listed on Singapore Exchange Securities Trading Limited (the “**SGX-ST**”). It is intended that holders of Units may only deal in their Units through trading on the SGX-ST. The listing of the Units on the SGX-ST does not guarantee a liquid market for the Units. The past performance of ALOG is not necessarily indicative of the future performance of ALOG.