
UPDATE ON SUNTEC REIT'S AUSTRALIA MANAGED INVESTMENT TRUST STATUS

ESR Trust Management (Suntec) Limited, as manager of Suntec REIT (the "**Manager**"), refers to the substantial unitholding notification announcements by Tang Yigang @ Gordon Tang and Celine Huaidan @ Celine Tang (the "**Relevant Unitholders**") dated 10 February 2025 whereby Tang Yigang @ Gordon Tang now holds 13.55% of the units in Suntec REIT ("**Units**") and Celine Huaidan @ Celine Tang now holds 13.65% of the Units.

Suntec REIT hold its Australian properties through its wholly-owned entity, being Suntec REIT (Australia) Trust. For the financial year ended 31 December 2024 (and also for prior financial years), Suntec REIT (Australia) Trust qualified as a withholding managed investment trust ("**MIT**").

To qualify as a withholding MIT, there are several conditions that must be met and amongst other requirements, at no time during the year, no individual (who is not a resident of Australia, i.e. "**Foreign Individual**") can directly or indirectly hold, control or have the right to acquire an effective interest of 10.0% or more in Suntec REIT. A withholding MIT enjoys a concessionary withholding tax rate at 10% or 15% on distributions compared to, if Suntec REIT (Australia) Trust does not qualify for MIT treatment, an effective Australian tax rate of 30% to 45%¹ may arise.

The increase in stake by the Relevant Unitholders as described above resulted in the failure to satisfy the condition that a Foreign Individual cannot hold an effective interest of more than 10.0% in Suntec REIT and an effective indirect interest of more than 10.0% in Suntec REIT (Australia) Trust. Accordingly, as Suntec REIT (Australia) Trust is not able to meet the 10.0% foreign resident individual test, it would no longer qualify as a withholding MIT, resulting in Suntec REIT (Australia) Trust being subject to an expected effective Australian tax rate of 30%².

As the failure to meet the 10.0% foreign resident individual test occurred in 2025, Suntec REIT (Australia) Trust will still enjoy a concessionary withholding tax rate at 10% or 15% on distributions for the financial year ended 31 December 2024. However, for financial year ending 31 December 2025 and beyond, and assuming Suntec REIT (Australia) Trust does not qualify as a withholding MIT, Suntec REIT (Australia) Trust is expected to be subject to an effective Australian tax rate of 30%. It should be noted that as the 10.0% foreign resident individual test must be satisfied for the entire year, even if subsequently during 2025, there is no Foreign Individual which holds an effective

1 Where Suntec REIT (Australia) Trust does not qualify for MIT treatment, the distributions would be subject to Australian tax at 30.0% (where the unitholder is a company) or 45.0% (where the unitholder is a trust), thus bringing the effective tax rate to 30% to 45% on distributions made by Suntec REIT (Australia) Trust, instead of the preferential withholding tax rate of 10% or 15%.

2 Subject to internal restructuring of the holding of the Australian assets.

interest of more than 10.0% in Suntec REIT, Suntec REIT (Australia) Trust would not qualify as a withholding MIT for the entire of 2025.

For **illustrative purposes only and on a pro forma basis**, assuming that that Suntec REIT (Australia) Trust is subject to an effective Australian tax rate of 30% for the financial year ended 31 December 2024, its distribution per Unit would be 6.055 cents instead of 6.192 cents. Correspondingly, the deferred tax liability balance in respect of the Australian assets will increase to 30% which would, on a pro forma basis, impact its net asset value per Unit to be S\$2.03 instead of S\$2.05.

For the avoidance of doubt, there is **no** change to the distribution declared on 23 January 2025. If in the future there is a drop in the Relevant Unitholders unitholding interest such that Suntec REIT (Australia) Trust satisfies the 10.0% foreign resident individual test for the entire year and thus qualify as a withholding MIT for such year, Suntec REIT (Australia) Trust would then enjoy a concessionary withholding tax in such year.

The foregoing action by the Relevant Unitholders is beyond the control of Suntec REIT and the Manager.

Unitholders and potential investors are advised to exercise caution when dealing or trading in the Units.

BY ORDER OF THE BOARD
ESR Trust Management (Suntec) Limited
(as manager of Suntec Real Estate Investment Trust)
(Company registration no. 200410976R)

Chong Kee Hiong
Director
10 February 2025

ABOUT SUNTEC REIT

Listed on 9 December 2004, Suntec REIT holds properties in Suntec City, Singapore's largest integrated commercial development (including one of Singapore's largest shopping mall), a 66.3% interest in Suntec Singapore Convention & Exhibition Centre, a one-third interest in One Raffles Quay and a one-third interest in Marina Bay Financial Centre Towers 1 and 2 and the Marina Bay Link Mall. Suntec REIT holds a 100% interest in a commercial building located at 177 Pacific Highway, Sydney, a 100% interest in a commercial building located at 21 Harris Street, Pyrmont, Sydney, a 50.0% interest in Southgate Complex, Melbourne, a 50.0% interest in a commercial building located at Olderfleet 477 Collins Street, Melbourne and a 100% interest in a commercial building located at 55 Currie Street, Adelaide, Australia. Suntec REIT also holds a 50.0% interest in Nova Properties and a 100% interest in The Minster Building both located in London, United Kingdom.

Suntec REIT is managed by an external manager, ESR Trust Management (Suntec) Limited (formerly known as ARA Trust Management (Suntec) Limited). For more details, please visit www.suntecreit.com. Suntec REIT is committed towards the sustainable management of its real estate portfolio, and to ensure good corporate governance, prudent financial management, fair employment practices and efficient utilisation of resources to support its economic growth and the delivery of long-term value to unitholders.

ABOUT ESR TRUST MANAGEMENT (SUNTEC) LIMITED

Suntec REIT is managed by ESR Trust Management (Suntec) Limited, a wholly-owned subsidiary of ESR Asset Management Limited (formerly known as ARA Asset Management Limited).

ESR Asset Management Limited is part of the ESR Group ("**ESR**"), Asia-Pacific's leading New Economy real asset manager and one of the largest listed real estate investment managers globally. ESR's fully integrated fund management and development platform extends across Australia and New Zealand, Japan, South Korea, Greater China, Southeast Asia, and India, including a presence in Europe. ESR provides investors with a diverse range of real asset investment and development solutions across private and public investment vehicles. ESR's focus on New Economy real assets offers customers modern solutions for logistics, data centres, and infrastructure and renewables. ESR's purpose, Space and Investment Solutions for a Sustainable Future, drives ESR to manage sustainably and impactfully for the communities where it operates and the spaces it develops to thrive for generations to come. ESR Group Limited is listed on The Stock Exchange of Hong Kong (HKSE: 1821.HK). Visit www.esr.com for more information.

IMPORTANT NOTICE

This announcement is for information purposes only and does not constitute or form part of any offer or invitation to sell or issue, or any solicitation of any offer to subscribe for or acquire, units in Suntec REIT (the "**Units**") in any jurisdiction in which such an offer or solicitation is unlawful.

The value of Units and the income derived from them may fall as well as rise. 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. The past performance of Suntec REIT is not necessarily indicative of the future performance of Suntec REIT.