

## SGX-ST Announcement

For immediate release

A hospitality stapled group comprising:

**Frasers Hospitality Real Estate Investment Trust ("FH-REIT")**

(a real estate investment trust constituted on 12 June 2014 under the laws of Republic of Singapore)

**Frasers Hospitality Business Trust ("FH-BT")**

(a business trust constituted on 20 June 2014 under the laws of the Republic of Singapore)

### NOTICE OF BOOKS CLOSURE AND DISTRIBUTION PAYMENT DATE

**NOTICE IS HEREBY GIVEN THAT** the Transfer Books and Register of Stapled Securityholders of Frasers Hospitality Trust ("FHT") will be closed on **Tuesday, 10 May 2016 at 5.00pm** (the "**Books Closure Date**") to determine Stapled Securityholders' entitlements to FHT's distribution.

### DISTRIBUTION DETAILS

We are pleased to inform you that FHT will distribute 3.0506 Singapore cents per Stapled Security (the "**Distribution**") for the period from 1 October 2015 to 31 March 2016, comprising the following components:

	<b>Year of Assessment 2017</b>
	<b>For the period from 1 October 2015 to 31 March 2016</b>
Taxable income component (cents)	0.6899
Tax-exempt income component (cents)	0.1752
Capital component (cents)	2.1855
<b>Total distribution (cents)</b>	<b>3.0506</b>

DBS Bank Ltd. is the Sole Global Coordinator and Issue Manager of the initial public offer of the stapled securities (the "**Offering**"). DBS Bank Ltd., Morgan Stanley Asia (Singapore) Pte., Standard Chartered Securities (Singapore) Pte. Limited, and United Overseas Bank Limited are the joint bookrunners and underwriters for the Offering.

## **DECLARATION FOR SINGAPORE TAX PURPOSES**

For Singapore income tax purposes, the components making up a Stapled Security are recognised separately, i.e. as one FH-REIT unit and one FH-BT unit. Accordingly, distributions from FHT are recognised separately as distributions from FH-REIT and FH-BT for the purpose of determining the applicable Singapore tax treatment.

The tax-exempt component of the distribution is exempt from Singapore income tax in the hands of all Stapled Securityholders, regardless of their nationality, corporate identity or tax residence status. No tax will be deducted at source from such distribution.

The capital component of the distribution represents a return of capital to Stapled Securityholders for Singapore income tax purposes and is therefore not subject to Singapore income tax. For Stapled Securityholders who are liable to Singapore income tax on profits from sale of Stapled Securities, the amount of Capital Distribution will be applied to reduce the cost base of their Stapled Securities for Singapore income tax purposes.

Taxable income component of the distribution comprises distribution made out of FH-REIT's taxable income that is not taxed at the trustee level. Tax will be deducted at source from the Taxable Income Distribution in certain circumstances. The following section describes the circumstances in which tax will or will not be deducted from such distribution.

1. Perpetual (Asia) Limited, formerly known as The Trust Company (Asia) Limited, the trustee of FH-REIT (THE "**REIT Trustee**") and Frasers Hospitality Asset Management Pte. Ltd., as manager of FH-REIT (the "**REIT Manager**"), will not deduct tax from distributions made out of FH-REIT's taxable income that is not taxed at FH-REIT's level to:
  - a) Stapled Securityholders who are individuals and who hold the Stapled Securities either in their sole names or jointly with other individuals;
  - b) Stapled Securityholders which are companies incorporated and tax resident in Singapore;
  - c) Stapled Securityholders which are Singapore branches of foreign companies that have obtained specific approval from the Inland Revenue Authority of Singapore to receive the distribution from FH-REIT without deduction of tax; or
  - d) Stapled Securityholders 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);
    - (i) trade unions registered under the Trade Unions Act (Cap. 333);
    - (ii) charities registered under the Charities Act (Cap. 37) or established by an Act of Parliament; and
    - (iii) town councils.
2. To receive a gross distribution (i.e. no tax will be deducted from the taxable income component of the distribution), Stapled Securityholders falling within the categories (b) to (d) under Note 1 above are required to complete the applicable Section A, B or C of the "*Declaration for Singapore Tax Purposes Form*" ("**Form A**").

These categories of Stapled Securityholders, unless they are exempt from tax because of their own circumstances, will have to pay income tax subsequently at their own applicable tax rates.

3. Stapled Securityholders who fall within category (a) under Note 1 above are not required to submit Form A. The gross distribution received by these Stapled Securityholders (irrespective of

their tax residence status) is exempt from tax. However, this tax exemption does not apply to such Stapled Securityholders in respect of distribution derived by them through a partnership in Singapore or from the carrying on of a trade, business or profession. Such Stapled Securityholders, i.e. to whom the exemption does not apply, must declare the distribution received as income in their income tax returns.

4. For taxable income distributions made to categories of Stapled Securityholders that do not fall within the categories stated under Note 1 above, the REIT Trustee and the REIT Manager will deduct tax at the rate of 10% if the Stapled Securityholders are foreign non-individual investors. A foreign non-individual investor 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, where the funds used to acquire the Stapled Securities are not obtained from that operation.
5. To receive the distribution net of tax deducted at 10%, foreign non-individual investors are required to complete Section D of Form A.
6. The REIT Trustee and the REIT Manager will rely on the declarations made in Form A to determine (i) if tax is to be deducted for distributions to the categories of Stapled Securityholders listed in (b) to (d) under Note 1 above; and (ii) if tax is to be deducted at the rate of 10% for distributions to foreign non-individual investors under Note 4 above.
7. Stapled Securityholders who do not fall within the categories of Stapled Securityholders listed in Note 1 and Note 4 above can choose not to return Form A as tax will be deducted from the distributions made to them at the prevailing corporate tax rate in any case.
8. Beneficial owners of Stapled Securities in FHT who hold the Stapled Securities through depository agents will receive:
  - (a) Gross distribution if they are persons described in categories (a) to (d) under Note 1 above; or
  - (b) Distribution net of tax deducted at 10% if they are foreign non-individuals described in Note 4 above.
9. To receive gross distribution and distribution net of tax deducted at 10%, the depository agents are required to complete the *"Declaration by Depository Agents for Singapore Tax Purposes Form"* ("**Form B**") and its annexes.
10. Form A and Form B (and its annexes) will be sent to Stapled Securityholders and depository agents respectively, by FH-REIT's Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd., on or around 12 May 2016.
11. Stapled Securityholders (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 **5.00 p.m.** on **Tuesday, 24 May 2016**. Failure to comply with any of these requirements will render Form A and Form B invalid and the REIT Trustee and the REIT Manager will be obliged to deduct tax at the prevailing corporate tax rate from the distributions in respect of which the declaration is made. Stapled Securityholders may wish to seek tax advice for completing the Form A and/or Form B.
12. Stapled Securityholders who hold Stapled Securities under the Supplementary Retirement Scheme ("**SRS**") do not have to return any form. They will receive gross distribution.

## **DECLARATION IN INCOME TAX RETURN**

This distribution is considered as income for the year 2016. 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 amount of the taxable income component of the distribution as taxable income in their Singapore income tax return for the year of assessment 2017.

## **DISTRIBUTION POLICY**

Distributions from FHT comprises distributions from FH-REIT and FH-BT.

FH-REIT's distribution policy is to distribute 100.0% of FH-REIT's Distributable Income for the period from the Listing Date to 30 September 2015 and at least 90.0% of its Distributable Income thereafter.

The distribution will be made on a semi-annual basis for the six-month periods ending 31 March, and 30 September. Distributions, when paid, will be in Singapore dollars. FH-REIT's first distribution for the financial period ended 31 March 2016 will be for the period from 1 October 2015 to 31 March 2016 and will be paid on or before 29 June 2016.

FH-BT was dormant as at the Listing Date and no distributions will be made during the period that FH-BT remains dormant. In the event that FH-BT becomes active and profitable, FH-BT's distribution policy will be to distribute as much of its income as practicable, and the declaration and payment of distributions by FH-BT will be at the sole discretion of Board of Directors of the Trustee-Manager.

## **IMPORTANT REMINDER**

**Boardroom Corporate & Advisory Services Pte. Ltd will despatch the relevant forms to Stapled Securityholders on or around 12 May 2016.**

**Stapled Securityholders and the depository agents must complete and return the “*Notice of Election and Declaration for Singapore Tax Purposes Forms A and B (and its annexes)*”, respectively to Boardroom Corporate & Advisory Services Pte. Ltd's office by 5.00 p.m. on Tuesday, 24 May 2016 in order to receive the distributions either at gross or at net (after deduction of tax at 10%) as described above.**

## **IMPORTANT DATES AND TIMES**

<b>Date/Time</b>	<b>Event</b>
Friday, 6 May 2016 at 9.00 a.m.	Stapled Securities will be traded ex-distribution
Tuesday, 10 May 2016 at 5.00 p.m.	Closing of the Transfer Books and Register of Stapled Securityholders
Thursday, 12 May 2016	Despatch of Tax Declaration Forms <sup>1</sup>
Tuesday, 24 May 2016 at 5.00 pm	Completed Tax Declaration Form must be received by the Stapled Security Registrar
Wednesday, 29 June 2016	Payment of Distribution

<sup>1</sup> “**Tax Declaration Forms**” means the “Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)” which are sent to all Stapled Securityholders except individual Stapled Securityholders.

Should Stapled Securityholders have any queries in relation to the matters stated above, please do not hesitate to contact:

Mr Colin Low  
Investor Relations  
Frasers Hospitality Asset Management Pte. Ltd.  
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**BY ORDER OF THE BOARD**

**Frasers Hospitality Asset Management Pte. Ltd.**

(Company registration no. 201331351D)

(as Manager of Frasers Hospitality Real Estate Investment Trust)

**Frasers Hospitality Trust Management Pte. Ltd.**

(Company registration no. 201401270M)

(as Trustee-Manager of Frasers Hospitality Business Trust)

Piya Treruangrachada  
Company Secretary  
29 April 2016

**IMPORTANT NOTICE**

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

The value of 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, the Managers or any of their affiliates. An investment in Stapled Securities is subject to investment risks, including the possible loss of the principal amount invested. Investors have no right to request the Managers to redeem their Stapled Securities while the Stapled Securities are listed. It is intended that Stapled Securityholders may only deal in their Stapled Securities through trading on the SGX-ST. Listing of the Stapled Securities on the SGX-ST does not guarantee a liquid market for the Stapled Securities. The past performance of FHT is not necessarily indicative of the future performance of FHT.

This announcement is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for Stapled Securities in the United States. This announcement is not for publication or distribution, directly or indirectly, in or into the United States (including its territories and possessions, any state of the United States and the District of Columbia), Canada or Japan. The securities referred to herein have not been and will not be registered under the United States Securities Act of 1933, as amended (the "**Securities Act**"), and may not be offered or sold in the United States, except pursuant to an applicable exemption from, or in a transaction not subject to, the registration requirements under the Securities Act. No public offering of securities is being made in the United States.