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## **FRASERS CENTREPOINT TRUST**

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

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

*Capitalised terms used herein, but not otherwise defined, shall have the meanings ascribed to them in the announcement of Frasers Centrepoint Trust dated 25 January 2024 titled "Launch of Equity Fund Raising By Way of a Private Placement to Raise Gross Proceeds of No Less Than Approximately S\$200.0 million" (the "Launch Announcement").*

NOTICE IS HEREBY GIVEN that pursuant to the Private Placement (as defined herein), the Transfer Books and Register of Unitholders of Frasers Centrepoint Trust ("**FCT**") will be closed at **5.00 p.m.** on **Friday, 2 February 2024** for the purpose of determining the entitlement of Unitholders to an advanced distribution for the period from 1 October 2023 to the day immediately prior to the date on which the New Units are issued pursuant to the Private Placement (the "**Advanced Distribution**", and the record date of the Advanced Distribution, the "**Advanced Distribution Record Date**").

The quantum of distribution per unit in FCT ("**Unit**") under the Advanced Distribution is currently estimated to be between 4.23 Singapore cents and 4.27 Singapore cents<sup>1</sup>. A further announcement on the actual quantum of distribution per Unit (which may differ from the estimate above) under the Advanced Distribution will be made by the Manager in due course.

The next distribution following the Advanced Distribution will comprise FCT's distributable income for the period from the day the New Units are issued pursuant to the Private Placement, currently expected to be on Monday, 5 February 2024, to 31 March 2024. Half-yearly distributions will resume thereafter.

Unitholders whose securities accounts with The Central Depository (Pte) Limited are credited with Units as at 5.00 p.m. on the Advanced Distribution Record Date will be entitled to the Advanced Distribution

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<sup>1</sup> This range is an estimate only based on information currently available to the Manager and the Manager's estimate of FCT's revenue and expenses for the relevant period on a *pro rata* basis and the actual Advanced Distribution may differ. The actual quantum of the distribution will be announced on a later date after the closure of the Transfer Books and Register of Unitholders.

that will be paid on or around 2 April 2024.

The Advanced Distribution is intended to ensure that the distributable income accrued by FCT from 1 October 2023 up to the day immediately preceding the date of issue of the New Units pursuant to the Private Placement (which at this point, will be entirely attributable to the Units in issue on the day immediately prior to the date on which the New Units pursuant to the Private Placement are issued (the “Existing Units”)) is only distributed in respect of the Existing Units, and is being proposed as a means to ensure fairness to holders of the Existing Units.

### **Status of New Units issued pursuant to the Private Placement**

The New Units issued pursuant to the Private Placement will, upon issue, rank pari passu in all respects with the Existing Units, other than in respect of the Advanced Distribution.

**For the avoidance of doubt, the holders of the New Units to be issued pursuant to the Private Placement will not be entitled to the Advanced Distribution.**

### **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;
  - d) unitholders which are bodies of persons (excluding companies or partnerships) incorporated or registered in Singapore, including charities registered under the Charities Act 1994 or established by any written law, town councils, statutory boards, co-operative societies registered under the Cooperatives Societies Act 1979 or trade unions registered under the Trade Unions Act 1940;
  - 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 1948; and
  - f) unitholders which are real estate investment trust 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 non-individual investors or foreign funds<sup>@</sup>. A qualifying foreign non-individual investor / foreign fund<sup>@</sup> 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<sup>^</sup> in Singapore; or
  - b) who carries on any operation in Singapore through a permanent establishment in Singapore (other than a fund manager 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 investor / foreign fund<sup>@</sup> 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.
10. 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 **Friday 8 March 2024**.
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 Monday 18 March 2024**. 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 will expire for distributions made after 31 December 2025 unless this concession is extended.

\*\* A company is not a resident of Singapore if the management and control of its business is exercised outside Singapore.

@ A foreign fund refers to a non-resident fund that is 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, and is one that qualifies for tax exemption under Section 13D, 13U or 13V of the Income Tax Act 1947.

^ Under Section 2 of the Income Tax Act 1947, permanent establishment means a fixed place where a business is wholly or partly carried on. It includes a place of management, a branch, an office, a factory, a warehouse, a workshop, a building or work site or a construction, installation or assembly project. A person shall be deemed to have a permanent establishment in Singapore if the person (a) carries on supervisory activities in connection with a building or work site or a construction, installation or assembly project; or (b) has another person acting on that person's behalf in Singapore who (i) has and habitually exercises an authority to conclude contracts; (ii) maintains a stock of goods or merchandise for the purpose of delivery on behalf of that person; or (iii) habitually secures orders wholly or almost wholly for that person or for such other enterprises as are controlled by that person.

### **IMPORTANT DATES AND TIMES**

<b>Event</b>	<b>Indicative Date / Time</b>
First day of "ex-distribution" trading	1 February 2024, at 9.00 a.m.
Close of FCT's Transfer Books and Register of Unitholders for the Advanced Distribution	2 February 2024, at 5.00 p.m.
Unitholders and depository agents must have completed and returned the "Declaration for Singapore Tax Purposes Form A and Form B" to the Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd.	18 March 2024, at 5.00 p.m.
Payment of Advanced Distribution	On or around 2 April 2024

### **BY ORDER OF THE BOARD**

#### **Frasers Centrepoint Asset Management Ltd.**

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

Catherine Yeo  
Company Secretary  
25 January 2024

For further information, kindly contact:  
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## **IMPORTANT NOTICE**

**This announcement is not for distribution, directly or indirectly, in or into the United States and is not an offer of securities for sale in the United States or any other jurisdictions.**

This announcement is for information purposes only and does not constitute an offer for sale or an invitation or offer to acquire, purchase or subscribe for Units in the United States, Singapore or any other jurisdiction.

The value of units in FCT (“**Units**”) and the income derived from them, if any, may fall or rise. The 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 should note that they 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 SGX-ST. Listing of the Units on the SGX-ST does not guarantee a liquid market for the Units.

The past performance of FCT and the Manager is not necessarily indicative of the future performance of FCT and the Manager.

This announcement may contain forward-looking statements that involve risks and uncertainties. Actual future performance, outcomes and results may differ materially from those expressed in forward-looking statements as a result of a number of risks, uncertainties and assumptions. Representative examples of these factors include (without limitation) general industry and economic conditions, interest rate trends, cost of capital and capital availability, competition from similar developments, shifts in expected levels of property rental income, changes in operating expenses, (including employee wages, benefits and training costs), property expenses and governmental and public policy changes and the continued availability of financing in the amounts and the terms necessary to support future business.

Investors are cautioned not to place undue reliance on these forward-looking statements, which are based on the Manager’s current view on future events.

This announcement is not for release, publication or distribution, directly or indirectly, in or into the United States, European Economic Area, the United Kingdom, Canada, Japan or Australia, and should not be distributed, forwarded to or transmitted in or into any jurisdiction where to do so might constitute a violation of applicable securities laws or regulations.

The securities referred to herein have not been and will not be registered under 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 of the Securities Act and in compliance with any applicable state securities laws. Any public offering of securities to be made in the United States would be made by means of a prospectus that may be obtained from an issuer and would contain detailed information about such issuer and the management, as well as financial statements. There will be no public offering of the securities referred to herein in the United States.

This advertisement has not been reviewed by the Monetary Authority of Singapore.

**Notification under Section 309B of the Securities and Futures Act 2001 of Singapore**

The New Units are prescribed capital markets products (as defined in the Securities and Futures (Capital Markets Products) Regulations 2018) and Excluded Investment Products (as defined in MAS Notice SFA 04-N12: Notice on the Sale of Investment Products and MAS Notice FAA-N16: Notice on Recommendations on Investment Products).