

## **FAR EAST HOSPITALITY TRUST**

A hospitality stapled group comprising:

**Far East Hospitality Real Estate Investment Trust**

(a real estate investment trust constituted on 1 August 2012 under the laws of the Republic of Singapore)

**Far East Hospitality Business Trust**

(a business trust constituted on 1 August 2012 under the laws of the Republic of Singapore)

### **NOTICE OF BOOKS CLOSURE AND DISTRIBUTION PAYMENT DATE**

**NOTICE IS HEREBY GIVEN** that the Transfer Book and Register of Stapled Securityholders of Far East Hospitality Trust ("**Far East H-Trust**") will be closed at 5.00 p.m. on **Thursday, 20 February 2014** for the purpose of determining Stapled Securityholders' entitlements to Far East H-Trust's distribution.

Far East H-Trust has announced a distribution of 1.42 Singapore cents per Stapled Security for the period from 1 October 2013 to 31 December 2013, comprising entirely taxable income distribution from Far East Hospitality Real Estate Investment Trust ("**Far East H-REIT**").

Stapled Securityholders whose securities accounts with The Central Depository (Pte) Limited are credited with Far East H-Trust Stapled Securities as at 5.00 p.m. on **Thursday, 20 February 2014** will be entitled to the distribution that will be paid on **Friday, 28 March 2014**.

### **DECLARATION FOR SINGAPORE TAX PURPOSES**

- 1 For Singapore income tax purposes, the components making up a Stapled Security are recognized separately, i.e. as one Far East H-REIT unit and one Far East Hospitality Business Trust ("**Far East H-BT**") unit. Accordingly, distributions from Far East H-Trust are recognized separately as distributions from Far East H-REIT and distributions from Far East H-BT for the purpose of determining the applicable Singapore tax treatment.
- 2 For taxable income distribution from Far East H-REIT, tax will be deducted at source in certain circumstances. The following paragraphs describe the circumstances in which tax will or will not be deducted from such distribution.
- 3 The following categories of Stapled Securityholders will receive a gross distribution (i.e. no tax will be deducted from it):-
  - (a) holders who are individuals and who hold the Stapled Securities either in their sole names or jointly with other individuals;
  - (b) holders which are companies incorporated and tax resident in Singapore;
  - (c) holders which are Singapore branches of foreign companies that have obtained specific approval from the Inland Revenue Authority of Singapore to receive the distribution from Far East H-Trust without deduction of tax; and

- (d) holders which are non-corporate entities (excluding partnerships) constituted or registered in Singapore.
- 4 To receive a gross distribution, Stapled Securityholders in categories (b) to (d) under Paragraph 3 above must complete a prescribed form – the “*Declaration for Singapore Tax Purposes Form*” (“**Form A**”).
- 5 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.
- 6 Stapled Securityholders in category (a) under Paragraph 3 above are not required to submit any form. The gross distribution received by these Stapled Securityholders (irrespective of their tax residence status) 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. Where the distributions are received by such Stapled Securityholders through a partnership in Singapore or from the carrying on of a trade, business or profession, such Stapled Securityholders must declare the distributions received as income in their Singapore income tax returns.
- 7 Tax at the reduced rate of 10% will be deducted from the distribution made to foreign non-individual Stapled Securityholders. A foreign non-individual Stapled Securityholder 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 in Far East H-Trust are not obtained from that operation.
- 8 To receive the distribution net of tax deducted at 10%, foreign non-individual Stapled Securityholders are required to complete Form A.
- 9 Beneficial owners of Stapled Securities in Far East H-Trust who hold their Stapled Securities through depository agents will receive:-
- (a) gross distribution if they are persons described in categories (a) to (d) under Paragraph 3 above; and
- (b) distribution net of tax deducted at 10% if they are foreign non-individuals described in Paragraph 7 above.
- 10 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.
- 11 Form A and Form B (and its annexes) will be sent to Stapled Securityholders and depository agents respectively, by Far East H-Trust's Stapled Security Registrar, Boardroom Corporate & Advisory Services Pte. Ltd. on 25 February 2014 (the “Registrar”).

- 12 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 Registrar by **5.00 p.m. on Monday, 10 March 2014**. The REIT Trustee and the REIT Manager of Far East H-REIT 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 REIT Trustee and the REIT Manager of Far East H-REIT will be obliged to deduct the appropriate amount of tax from the distribution in respect of which this announcement is made.
- 13 Stapled Securityholders who hold the Stapled Securities under the Central Provident Fund Investment Scheme (“**CPFIS**”) and the Supplementary Retirement Scheme (“**SRS**”) do not have to return the Form as they will receive gross distributions as long as the distributions are paid to their respective CPFIS and SRS accounts.

### **DECLARATION IN INCOME TAX RETURN**

This distribution is considered as income for the year 2014. 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 distribution as taxable income in their Singapore income tax return for the year of assessment 2015.

### **IMPORTANT REMINDER**

Stapled Securityholders and depository agents must complete and return the “*Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)*” to the Stapled Security Registrar’s office by **5.00 p.m. on Monday, 10 March 2014** in order to receive the distribution either at gross or at net (after deduction of tax at 10%) as described above.

### **IMPORTANT DATES AND TIMES**

Date/Deadline	Event
9.00 a.m. on Tuesday, 18 February 2014	Stapled Securities will be traded ex-distribution
5.00 pm on Thursday, 20 February 2014	Closure of Transfer Book and Register of Stapled Securityholders
5.00 pm on Monday, 10 March 2014	Stapled Securities holders and the depository agents must complete and return the Forms A and B (and its annexes), respectively to Boardroom Corporate & Advisory Services Pte. Ltd’s office
28 March 2014, Friday	Payment of Distribution

Should Stapled Securityholders have any queries in relation to these procedures, please contact:-

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FEO Hospitality Trust Management Pte. Ltd  
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By Order of the Board

Jill Chay Suet Yee  
Company Secretary  
FEO Hospitality Asset Management Pte. Ltd.  
(Company Registration No. 201102629K)  
12 February 2014

By Order of the Board

Jill Chay Suet Yee  
Company Secretary  
FEO Hospitality Trust Management Pte. Ltd.  
(Company Registration No. 201210698W)  
12 February 2014

#### **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, FEO Hospitality Asset Management Pte. Ltd. (as Manager of Far East H-REIT (the "**REIT Manager**")), FEO Hospitality Trust Management Pte. Ltd. (as Trustee-Manager of Far East H-BT (the "**Trustee-Manager**")) or any of its 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 REIT Manager and the Trustee-Manager to redeem or purchase their Stapled Securities while the Stapled Securities are listed. It is intended that holders of Stapled Securities 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.