

## **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 RECORD DATE AND DISTRIBUTION PAYMENT DATE**

**NOTICE IS HEREBY GIVEN THAT** the Transfer Books and Register of Stapled Securityholders of Far East Hospitality Trust ("**Far East H-Trust**") will be closed at **5.00 p.m.** on **Wednesday, 22 February 2023** (the "**Record Date**") for the purpose of determining the entitlements of stapled securityholders of Far East H-Trust ("**Stapled Securityholders**") to Far East H-Trust's distribution for the period from 1 July 2022 to 31 December 2022.

Far East H-Trust has announced a distribution of 1.73 Singapore cents per Stapled Security for the period from 1 July 2022 to 31 December 2022, comprising a taxable income component of 1.49 Singapore cents per Stapled Security ("**taxable income distribution**"); a tax-exempt income component of 0.03 Singapore cents per Stapled Security ("**tax-exempt income distribution**") and a other gains component of 0.21 Singapore cents per Stapled Security ("**other gains distribution**") from Far East Hospitality Real Estate Investment Trust ("**Far East H-REIT**") entirely.

For Singapore income tax purposes, the components making up a Stapled Security are recognised 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 recognised 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.

Stapled Securityholders whose securities accounts with The Central Depository (Pte) Limited are credited with stapled securities of Far East H-Trust ("**Stapled Securities**") as at 5.00 p.m. on **Wednesday, 22 February 2023** will be entitled to the distribution that will be paid on **Wednesday, 22 March 2023**.

## **DECLARATION FOR SINGAPORE TAX PURPOSES**

### **A. Taxable income distribution**

1. 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.
2. 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 companies incorporated outside Singapore;
  - (d) holders which are body of persons (excluding companies or partnerships) incorporated or registered in Singapore, such as:
    - (i) charities registered under the Charities Act 1994 or established by any written law; or
    - (ii) town councils; or
    - (iii) statutory boards; or
    - (iv) co-operative societies registered under the Co-operative Societies Act 1979; or
    - (v) trade unions registered under the Trade Unions Act 1940;
  - (e) holders which are international organisation that is exempt from tax on such distribution by reason of an order made under the International Organisations (Immunities and Privileges) Act 1948;
  - (f) holders which are real estate investment trust exchange-traded funds (“**REIT ETFs**”) which have been accorded the tax transparency treatment; and
  - (g) Supplementary Retirement Scheme (“**SRS**”) operators, acting in their capacity as nominees for Stapled Securities purchased using SRS funds.
3. To receive a gross distribution, Stapled Securityholders in categories (b) to (f) under Paragraph 2 above must complete a prescribed form – the “*Declaration for Singapore Tax Purposes Form*” (“**Form A**”).
4. 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.
5. Stapled Securityholders in category (a) under Paragraph 2 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.
6. Tax at the reduced rate of 10 per cent. (10%) will be deducted from the distribution made to foreign non-individual Stapled Securityholders or foreign funds.

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.

A foreign fund is one that qualifies for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947 that is not a resident of Singapore for income tax purposes and:-

- (c) who does not have a permanent establishment in Singapore (other than a fund manager in Singapore); or
- (d) 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 Stapled Securities in Far East H-Trust are not obtained from that operation.

A foreign fund refers to 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.

7. To receive the distribution net of tax deducted at 10 per cent. (10%), foreign non-individual Stapled Securityholders and foreign funds are required to complete Form A.
8. 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 (f) under Paragraph 2 above; and
  - (b) distribution net of tax deducted at 10 per cent. (10%) if they are foreign non-individuals and foreign funds described in Paragraph 6 above.
9. To receive gross distribution or distribution net of tax deducted at 10 per cent. (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 Stapled Securityholders and depository agents respectively, by Far East H-Trust's Stapled Security Registrar, Boardroom Corporate & Advisory Services Pte. Ltd. (the "**Registrar**") on or around **24 February 2023**.
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 Registrar by **5.00 p.m.** on **8 March 2023**. DBS Trustee Limited, the trustee of Far East H-REIT (the "**REIT Trustee**") and FEO Hospitality Asset Management Pte. Ltd. as manager of Far East H-REIT (the "**REIT Manager**") 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 will be obliged to deduct the appropriate amount of tax from the distribution in respect of which this announcement is made.
12. Stapled Securityholders who hold the Stapled Securities under the SRS do not have to return any form as they will receive gross distributions as long as distributions are paid to their respective SRS accounts.

## **B. Tax-exempt income distribution**

The tax-exempt income component of the distribution is exempt from tax in the hands of all Stapled Securityholders. No tax will be deducted at source from this component.

## **C. Other gains distribution**

The other gains component of the distribution is not taxable in the hands of all Stapled Securityholders. No tax will be deducted at source from this component.

**DECLARATION IN INCOME TAX RETURN**

The taxable income component of this distribution is considered as income for the year 2022. 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 per cent. (10%) are required to declare the gross amount of the taxable income distribution as taxable income in their Singapore income tax return for the year of assessment 2023.

**IMPORTANT REMINDER**

The Registrar will despatch the relevant forms to Stapled Securityholders on or around **24 February 2023**.

Stapled Securityholders and the depository agents must complete and return the Declaration for Singapore Tax Purposes Forms A and B (and its annexes), respectively to the Registrar's office by 5.00 p.m. on **Wednesday, 8 March 2023** in order to receive the distributions either at gross or at net (after deduction of tax at 10 per cent. (10%)) as described above.

**IMPORTANT DATES AND TIMES**

<b>Date/Time</b>	<b>Event</b>
Tuesday, 21 February 2023	Stapled Securities will be traded ex-distribution
Wednesday, 22 February 2023	Closure of the Transfer Books and Register of Stapled Securityholders
Wednesday, 8 March 2023	Stapled Securityholders and the depository agents must complete and return the Forms A and B (and its annexes), respectively to the Registrar's office
Wednesday, 22 March 2023	Payment of distribution

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

**Mr James Tan**

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FEO Hospitality Trust Management Pte. Ltd.  
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**Boardroom Corporate & Advisory Services Pte. Ltd.**

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Telephone: +65 6536 5355

**By Order of the Board**

Gerald Lee Hwee Keong  
Executive Director and Chief Executive Officer  
FEO Hospitality Asset Management Pte. Ltd.  
(Company Registration No. 201102629K)  
14 February 2023

**By Order of the Board**

Gerald Lee Hwee Keong  
Executive Director and Chief Executive Officer  
FEO Hospitality Trust Management Pte. Ltd.  
(Company Registration No. 201210698W)  
14 February 2023

**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 Far East H-Trust is not necessarily indicative of the future performance of Far East H-Trust.

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.