

To: Boardroom Corporate & Advisory Services Pte. Ltd.
50 Raffles Place
#32-01 Singapore Land Tower
Singapore 048623

FORM R2 (DEPOSITORY AGENTS)
CLAIMING OF TAX REFUND FOR INCOME DISTRIBUTION FOR PERIOD FROM _____ TO _____
DECLARATION BY DEPOSITORY AGENTS FOR SINGAPORE TAX PURPOSES
UNITS HELD FOR BENEFIT OF INDIVIDUALS, FOREIGN NON-INDIVIDUAL INVESTORS AND EXEMPT NON-CORPORATE INVESTORS

Name of registered holder : _____ Securities Account No. : _____
Address : _____ Holding : _____ Units

Name of Counter : Frasers Logistics & Commercial Trust

Please read the following important notes carefully before completion of this Form:

This Form is for tax refund claims only. It is applicable to Depository Agents who are claiming a refund of tax over-deducted from the following distributions made by Frasers Logistics & Commercial Trust (FLCT) in respect of FLCT units held by the Depository Agent for the benefit of individuals, foreign non-individual investors and exempt non-corporate investors:

- (i) in relation to units held solely for the benefit of individuals, taxable income distributions made on or after 29 April 2020 by FLCT where tax at the prevailing corporate tax rate (currently 17%) had been deducted from the distribution and where a refund of the tax over-deducted had not been claimed previously;
- (ii) in relation to units held solely for the benefit of foreign non-individuals, taxable income distributions made during the period from 29 April 2020 to 31 December 2025¹ (both dates inclusive) by FLCT where tax at the prevailing corporate tax rate (currently 17%), instead of the reduced rate of 10%, had been deducted from the distribution and where a refund of the tax over-deducted had not been claimed previously; and
- (iii) in relation to units held solely for the benefit of exempt non-corporates, taxable income distributions made on or after 29 April 2020 by FLCT where tax at the prevailing corporate tax rate (currently 17%) had been deducted from the distribution and where a refund of the tax over-deducted had not been claimed previously.

A foreign non-individual investor is one who is not a resident of Singapore² for income tax purposes and:

- (i) who does not have a permanent establishment³ in Singapore; or
- (ii) who carries on any operation in Singapore through a permanent establishment³ in Singapore, where the funds used to acquire the units in FLCT are not obtained from that operation.

An exempt non-corporate investor is one who is:

- (i) a charity registered under the Charities Act (Cap. 37) or established by any written law; or
- (ii) a town council; or
- (iii) a statutory board; or
- (iv) a co-operative society registered under the Co-operative Societies Act (Cap. 62); or
- (v) a trade union registered under the Trade Unions Act (Cap. 333); or
- (vi) an international organisation that is exempt from tax on such distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act (Cap. 145).

To claim the tax refund from IRAS and to enable the Trustee and the Manager of FLCT to ascertain the status of the beneficiaries to the units held by you (i.e. individuals, foreign non-individual investors or exempt non-corporate investors), you will need to make a declaration in this Form.

The Trustee and the Manager of FLCT will rely on the declarations made in this Form to determine if taxes have been over-deducted from the taxable income distributions made in respect of the units held by you in your capacity as a Depository Agent. Please therefore ensure that this Form and the Annexes are completed in full and legibly and is returned to Boardroom Corporate & Advisory Services Pte. Ltd. Failure to comply with any of these requirements will render this Form invalid and the Trustee and the Manager will not be able to determine if you are entitled to a tax refund in respect of the FLCT units held by you as a Depository Agent.

If you are eligible for the tax refund in respect of the units held by you as a Depository Agent, the amount of tax over-deducted will be refunded to you only after the IRAS has refunded the amount to the Trustee.

Please make sure that the information given and the declaration made in this Form is true and correct. The making of a false or incorrect declaration constitutes an offence under the Singapore Income Tax Act and the Declarant shall be liable to the appropriate penalties imposed under the said Act.

Please use a separate tax declaration form (Form R2) for each income distribution period.

This Form, together with the Annexes, are to be returned to Boardroom Corporate & Advisory Services Pte. Ltd., 50 Raffles Place, #32-01 Singapore Land Tower, Singapore 048623. The Trustee and the Manager of FLCT will collate all declarations received on a half-yearly basis (by 15 June and 15 December) and submit a claim for tax refund to the IRAS on a half-yearly basis. Please email a soft copy of the completed Annexes to this declaration form to Boardroom Corporate & Advisory Services Pte. Ltd. at SRS.TeamA@boardroomlimited.com. Please note that it is compulsory to email the soft copy of the completed Annexes.

Declaration

I, _____, NRIC/Passport No. _____, the principal officer of _____ ("the Depository Agent") hereby declare that the FLCT units registered in the name of the Depository Agent and deposited in the sub-accounts maintained with The Central Depository (Pte) Ltd, as listed in Annex 1 to Annex 3 to this declaration form in respect of the distribution for the period from _____ to _____ belonged beneficially to persons who are individuals, foreign non-individuals and exempt non-corporates respectively and that we have not previously claimed a refund of the tax over-deducted. The details of each of these beneficial owners are also listed in the Annexes. We also attach _____ Subsidiary Income Tax Certificates that were issued to the individuals, the foreign non-individuals and the exempt non-corporates shown in Annex 1 to Annex 3 in respect of which the claim for refund is made.

Signature of Declarant : _____ Date : _____

Contact No : _____

¹ Or which other date as may be applicable should the duration of the tax concession mentioned herein (i.e. the reduced rate of tax deduction) be subsequently extended.

² For the purpose of the distribution, a company is not a tax resident in Singapore if the management and control of its business is exercised outside Singapore during the respective calendar year in which the distribution was made and there is no intention to change the management and control of its business to Singapore.

³ Under the Singapore Income Tax Act, permanent establishment means a fixed place where a business is wholly or partly carried on including a place of management, a branch, an office, a factory, a warehouse, a workshop, a farm or plantation, a mine, oil well, quarry or other place of extraction of natural resources, and a building or work site or a construction, installation or assembly project. A unitholder shall be deemed to have a permanent establishment in Singapore if it:

- (i) carries on supervisory activities in connection with a building or work site or a construction, installation or assembly project; or
- (ii) has another person acting on the unitholder's behalf in Singapore who:
 - (a) has and habitually exercises an authority to conclude contracts;
 - (b) maintains stock of goods or merchandise for the purpose of delivery on the unitholder's behalf; or
 - (c) habitually secures orders wholly or almost wholly for the unitholder or for such other enterprises as are controlled by the unitholder.

FRASERS LOGISTICS & COMMERCIAL TRUST (FLCT)
INCOME DISTRIBUTION FOR PERIOD _____ TO _____

Annex 1

Annex to Declaration Form - Individuals

S/No.	CDP Sub-Account No.	Name of beneficiary holder(s)	Identification No.*	Number of units	Gross distribution paid	Amount of tax deducted	Amount of tax to be refunded
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							

* This refers to Singapore NRIC No., foreign ID No., or Passport No.

FRASERS LOGISTICS & COMMERCIAL TRUST (FLCT)
INCOME DISTRIBUTION FOR PERIOD _____ TO _____

Annex 2

Annex to Declaration Form - Foreign Non-Individual Investors

S/No.	CDP Sub-Account No.	Name of beneficiary holder(s)	Address	Number of units	Gross distributions paid	Amount of tax deducted	Amount of tax to be refunded
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							

FRASERS LOGISTICS & COMMERCIAL TRUST (FLCT)
INCOME DISTRIBUTION FOR PERIOD _____ TO _____

Annex 3

Annex to Declaration Form - Exempt Non-Corporate Investors

S/No.	CDP Sub-Account No.	Name of beneficiary holder(s)	Registration/Reference No.	Number of units	Gross distributions paid	Amount of tax deducted	Amount of tax to be refunded
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							