

SGX-ST Announcement

For immediate release

A hospitality stapled group comprising:

Frasers Hospitality Real Estate Investment Trust

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

Frasers Hospitality Business Trust

(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 **Monday, 6 November 2017** at **5.00 p.m.** (the “**Books Closure Date**”) to determine Stapled Securityholders’ entitlements to the Distribution (as defined below).

DISTRIBUTION DETAILS

We are pleased to inform you that FHT will distribute 2.5137 Singapore cents per Stapled Security (the “**Distribution**”) for the period from 1 April 2017 to 30 September 2017, comprising the following components:

- (a) Distribution from Frasers Hospitality Real Estate Investment Trust (“**FH-REIT**”)

	Year of Assessment 2018
	For the period from 1 April 2017 to 30 September 2017
Taxable income component (cents)	0.5778
Tax-exempt income component (cents)	0.2272
Capital component (cents)	1.6859
Total distribution (cents)	2.4909

- (b) Distribution from Frasers Hospitality Business Trust (“**FH-BT**”)

	Year of Assessment 2018
	For the period from 1 April 2017 to 30 September 2017
Capital component (cents)	0.0228

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.

The 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, 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 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 Boardroom Corporate & Advisory Services Pte. Ltd. (the "**Stapled Security Registrar**"), on or around 9 November 2017.
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 Stapled Security Registrar such that they are received by **5.00 p.m. on Tuesday, 21 November 2017**. 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 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 2017. 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 2018.

DISTRIBUTION POLICY

Distributions from FHT comprise 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 of FHT (being 14 July 2014) to 30 September 2015 and at least 90.0% of its Distributable Income thereafter.

FH-BT's distribution policy is 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 the Board of Directors of Frasers Hospitality Trust Management Pte. Ltd. (as trustee-manager of FH-BT (the "**Trustee-Manager**"))).

On 19 October 2016, FH-BT was activated to be the master lessee of Novotel Melbourne on Collins (through its indirectly wholly-owned subsidiary).

FH-REIT's and FH-BT's final distributions for the financial period ended 30 September 2017 will be for the period from 1 April 2017 to 30 September 2017. The Distribution comprise 100% of the distributable income from FH-REIT and FH-BT.

Distributions are 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.

IMPORTANT REMINDER

Boardroom Corporate & Advisory Services Pte. Ltd. will despatch the relevant forms to Stapled Securityholders on or around 9 November 2017.

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, 21 November 2017 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/Time	Event
Thursday, 2 November 2017 at 9.00 a.m.	Stapled Securities will be traded ex-distribution
Monday, 6 November 2017 at 5.00 p.m.	Closing of the Transfer Books and Register of Stapled Securityholders
Thursday, 9 November 2017	Despatch of Tax Declaration Forms ¹
Tuesday, 21 November 2017 at 5.00 p.m.	Completed Tax Declaration Form must be received by the Stapled Security Registrar
Friday, 29 December 2017	Payment of Distribution

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

Ms. Sandy Leng
Investor Relations
Frasers Hospitality Asset Management Pte. Ltd.
Email: ir@frasershospitality.com
Telephone: +65 6349 0423

BY ORDER OF THE BOARD

Frasers Hospitality Asset Management Pte. Ltd.

(Company registration no. 201331351D)

(as REIT 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)

Catherine Yeo
Company Secretary
27 October 2017

1 "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.

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 REIT Manager and the Trustee-Manager (together, 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 Singapore Exchange Securities Trading Limited (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.