To: Boardroom Corporate & Advisory Services Pte. Ltd.
1 Harbourfront Avenue
#14-07 Keppel Bay Tower
Singapore 098632

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, QUALIFYING NON-RESIDENT NON-INDIVIDUAL INVESTORS, QUALIFYING NON-RESIDENT FUNDS AND EXEMPT NON-CORPORATE INVESTORS

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

Name of Counter : CapitaLand 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 CapitaLand Commercial Trust ("CCT") in respect of CCT units held by the Depository Agent for the benefit of individuals, qualifying non-resident non-individual investors, qualifying non-resident funds or exempt non-corporate investors:

(i) in relation to units held solely for the benefit of individuals, distribution made during the period from 27 August 2004 to 19 November 2020 (both dates inclusive) by CCT 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 qualifying non-resident non-individuals, distribution made during the period from 18 February 2005 to 19 November 2020 (both dates inclusive) by CCT 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;
(iii) in relation to units held solely for the benefit of qualifying non-resident funds, distribution made during the period from 1 July 2019 to 19 November 2020 (both dates inclusive) by CCT 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
(iv) in relation to units held solely for the benefit of exempt non-corporates, distribution made during the period from 18 February 2005 to 19 November 2020 (both dates inclusive) by CCT 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 qualifying non-resident non-individual investor is one who is not a resident of Singapore[1] for income tax purposes and:
(i) who does not have a permanent establishment[2] in Singapore; or
(ii) who carries on any operation in Singapore through a permanent establishment[2] in Singapore, where the funds used to acquire the units in CCT are not obtained from that operation.

A qualifying non-resident fund is one who qualifies for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947 and is not a resident of Singapore[1] for income tax purposes and:
(i) who does not have a permanent establishment[2] in Singapore (other than a fund manager in Singapore); or
(ii) who carries on any operation in Singapore through a permanent establishment[2] in Singapore (other than a fund manager in Singapore), where the funds used to acquire the units in CCT are not obtained from that operation.

An exempt non-corporate investor is one who is:
(i) a charity registered under the Charities Act 1994 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 1979; or
(v) a trade union registered under the Trade Unions Act 1940; or
(vi) a platform work association registered under Part 3 of the Platform Workers Act 2024; or
(vii) 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 1948.

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

Please note that beneficiaries who have made a claim for tax credit in respect of the same amount in their Singapore income tax return submission (if applicable) under section 46(1)(d) of the Income Tax Act 1947 will not be eligible for a refund of the taxes over-deducted. Please thereform confirm with the beneficiaries for whom you are making a claim for a refund in this Form that they have not made any previous such claims for tax credit corresponding to the same refund in their Singapore income tax return submissions and inform them that they are not to make any further claims for tax credit in respect of the same refund amount.

The Trustee and the Manager of CCT will rely on the declarations made in this Form to determine if tax have been over-deducted from the 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 CCT 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 Income Tax Act 1947 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, is to be returned to Boardroom Corporate & Advisory Services Pte. Ltd., 1 Harbourfront Avenue, #14-07 Keppel Bay Tower, Singapore 098632. The Trustee and the Manager of CCT will collate all declarations received on a half-yearly basis (by 30 June and 31 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 CCT 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 _____ belonged beneficially to persons who are individuals, qualifying non-resident non-individuals, qualifying non-resident funds or 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 qualifying non-resident non-individuals, qualifying non-resident funds and the exempt non-corporate investors shown in Annex 1 to Annex 3 in respect of which the claim for refund is made.

Further, we have, in respect of each of these beneficial owners: (i) confirmed that they have not previously made any claim for tax credit under section 46(1)(d) of the Income Tax Act 1947 in respect of this same refund amount in their Singapore income tax return submission (if applicable); and (ii) informed them not to make a further claim for such section 46(1)(d) tax credit corresponding to this same refund in their Singapore income tax return submission (if applicable).

Signature of Declarant : _____ Date : _____

Contact No : _____

[1] 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.

A non-resident fund refers to a fund that is 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.

[2] Under the Income Tax Act 1947, 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, 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
(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 a stock of goods or merchandise for the purpose of delivery on its behalf; or
(c) habitually secures orders wholly and almost wholly for the unitholder or for such other enterprises as are controlled by the unitholder.

CAPITALAND COMMERCIAL TRUST ("CCT")
INCOME DISTRIBUTION FOR PERIOD _____ TO _____

Annex 1

Annex to Declaration Form - Individuals

S/No.	CDP Sub-Account No.	Name of beneficiary holder(s)	Tax Certificate Serial No.	Singapore Tax Reference Number (e.g. UENO, ITR, ASGD)	Number of units	Gross distribution amount	Amount of tax deducted (original)	Amount of tax deducted (amended)	Amount of tax to be refunded
1									
2									
3									
4									
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8									
9									
10									
11									
12									
13									
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15									
16									

CAPITALAND COMMERCIAL TRUST ("CCT")
INCOME DISTRIBUTION FOR PERIOD _____ TO _____

Annex 2

Annex to Declaration Form - Qualifying Non-Resident Non-Individual Investors and/ or Qualifying Non-Resident Funds

S/No.	CDP Sub-Account No.	Name of beneficiary holder(s)	Tax Certificate Serial No.	Singapore Tax Reference Number (e.g. UENO, ITR, ASGD)	Number of units	Gross distribution amount	Amount of tax deducted (original)	Amount of tax deducted (amended)	Amount of tax to be refunded
1									
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CAPITALAND COMMERCIAL TRUST ("CCT")
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)	Tax Certificate Serial No.	Singapore Tax Reference Number (e.g. UENO, ITR, ASGD)	Number of units	Gross distribution amount	Amount of tax deducted (original)	Amount of tax deducted (amended)	Amount of tax to be refunded
1									
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