

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

**FORM R1 (QUALIFYING NON-RESIDENT NON-INDIVIDUALS, QUALIFYING NON-RESIDENT FUNDS AND EXEMPT NON-CORPORATES)  
 CLAIMING OF TAX REFUND FOR INCOME DISTRIBUTION FOR PERIOD FROM \_\_\_\_\_ TO \_\_\_\_\_  
 DECLARATION FOR SINGAPORE TAX PURPOSES**

Name of registered holder : _____	Securities Account No. : _____
Address : _____	Holding : _____ Units
_____	
_____	
<b>Name of Counter : CapitalLand Mall Trust (now known as CapitalLand Integrated Commercial Trust)</b>	

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

This Form is for tax refund claims only. It is applicable to qualifying non-resident non-individual, qualifying non-resident funds and exempt non-corporate investors as follows:

- (i) in relation to qualifying non-resident non-individuals, distribution made by CapitalLand Mall Trust (CMT) during the period from 18 February 2005 to 30 November 2020 (both dates inclusive) in respect of CMT units registered in their own names and where tax at the prevailing corporate tax rate (currently 17%), instead of the reduced rate of 10%, had been deducted from such distribution;
- (ii) in relation to qualifying non-resident funds, distribution made by CMT during the period from 1 July 2019 to 30 November 2020 (both dates inclusive) in respect of CMT units registered in their own names and where tax at the prevailing corporate tax rate (currently 17%), instead of the reduced rate of 10%, had been deducted from such distribution; and
- (iii) in relation to exempt non-corporates, distribution made by CMT during the period from 18 February 2005 to 30 November 2020 (both dates inclusive) in respect of CMT units registered in their own names and where tax at the prevailing corporate tax rate (currently 17%) had been deducted from such distribution.

You are a qualifying non-resident non-individual investor if you are not a resident of Singapore<sup>1</sup> for income tax purposes and:

- (a) you do not have a permanent establishment<sup>2</sup> in Singapore; or
- (b) you carry on any operation in Singapore through a permanent establishment<sup>2</sup> in Singapore, where the funds used by you to acquire the units in CMT are not obtained from that operation.

You are a qualifying non-resident fund if you qualify for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947 and are not a resident of Singapore<sup>1</sup> for income tax purposes and:

- (a) you do not have a permanent establishment<sup>2</sup> in Singapore (other than a fund manager in Singapore); or
- (b) you carry on any operation in Singapore through a permanent establishment<sup>2</sup> in Singapore (other than a fund manager in Singapore), where the funds used by you to acquire the units in CMT are not obtained from that operation.

You are an exempt non-corporate investor if you are:

- (a) a charity registered under the Charities Act 1994 or established by any written law; or
- (b) a town council; or
- (c) a statutory board; or
- (d) a co-operative society registered under the Co-operative Societies Act 1979; or
- (e) a trade union registered under the Trade Unions Act 1940; or
- (f) a platform work association registered under Part 3 of the Platform Workers Act 2024; or
- (g) international organisations that are exempt from tax on REITs' distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act 1948.

If you are a qualifying non-resident non-individual, qualifying non-resident fund or an exempt non-corporate investor and tax at the prevailing corporate tax rate (currently 17%) had been deducted from the distributions made to you in respect of units held by you, you can claim a refund of the tax over-deducted from the Inland Revenue Authority of Singapore (IRAS) through the Trustee and the Manager of CMT provided that the statute of limitation for the claim has not expired and you have not made a claim for tax credit in respect of the same refund amount in your Singapore income tax return submission under section 46(1)(d) of the Income Tax Act 1947. Please note that if you are making a refund claim through the Trustee and the Manager of CMT, you are not to make a further claim for section 46(1)(d) tax credit corresponding to this same refund in your Singapore income tax return submission (if applicable).

To claim the tax refund from IRAS and to enable the Trustee and the Manager of CMT to ascertain whether you are entitled to the reduced tax rate of 10% or exemption, you will need to make a declaration in this Form.

The Trustee and the Manager of CMT will rely on the declaration made in this Form to determine if you are entitled to a refund. Please therefore ensure that this Form is 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.

If you are eligible for the reduced rate of 10% or tax exemption, 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 R1) for each income distribution period.**

**Qualifying non-resident non-individuals, qualifying non-resident funds and exempt non-corporates who hold their units through Depository Agents should contact their Depository Agent as any claim for refund of the tax over-deducted from distributions made in respect of units that were held by a Depository Agent will be processed through the Depository Agent.**

This Form 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 CMT 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.

**Declaration**

I, \_\_\_\_\_, NRIC/Passport No. \_\_\_\_\_, the Director/Principal Officer of \_\_\_\_\_ ("the Entity") with the Singapore Tax Reference No. (e.g., UEN/ ITR/ ASGD) \_\_\_\_\_, hereby declare that the Entity is the beneficial owner of the holdings relating to the distribution for the period from \_\_\_\_\_ to \_\_\_\_\_ and that:

Tick ( / ) either the "Yes" or "No" box	Yes	No
<b>For qualifying non-resident non-individual investor:</b>		
(a) the Entity is not a resident of Singapore <sup>2</sup> for income tax purposes; and	<input type="checkbox"/>	<input type="checkbox"/>
(b) the Entity does not have a permanent establishment <sup>3</sup> in Singapore. <i>If your reply to (b) is "No", please proceed with (c) -</i>	<input type="checkbox"/>	<input type="checkbox"/>
(c) the funds used to acquire the holdings in CMT are not obtained from any operation carried on in Singapore through a permanent establishment <sup>3</sup> in Singapore.	<input type="checkbox"/>	<input type="checkbox"/>
<b>For qualifying non-residents fund:</b>		
(a) the Entity qualifies for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947 that is not a resident of Singapore <sup>2</sup> for income tax purposes; and	<input type="checkbox"/>	<input type="checkbox"/>
(b) the Entity does not have a permanent establishment <sup>3</sup> in Singapore (other than a fund manager in Singapore). <i>If your reply to (b) is "No", please proceed with (c) -</i>	<input type="checkbox"/>	<input type="checkbox"/>
(c) the funds used to acquire the holdings in CMT are not obtained from any operation carried on in Singapore through a permanent establishment <sup>3</sup> in Singapore (other than a fund manager in Singapore).	<input type="checkbox"/>	<input type="checkbox"/>
<b>For exempt non-corporate investor:</b>		
- a charity registered under the Charities Act 1994 or established by any written law; or	<input type="checkbox"/>	<input type="checkbox"/>
- a town council; or	<input type="checkbox"/>	<input type="checkbox"/>
- a statutory board; or	<input type="checkbox"/>	<input type="checkbox"/>
- a co-operative society registered under the Co-operative Societies Act 1979; or	<input type="checkbox"/>	<input type="checkbox"/>
- a trade union registered under the Trade Unions Act 1940; or	<input type="checkbox"/>	<input type="checkbox"/>
- a platform work association registered under Part 3 of the Platform Workers Act 2024; or	<input type="checkbox"/>	<input type="checkbox"/>
- international organisations that are exempt from tax on REITs' distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act 1948.	<input type="checkbox"/>	<input type="checkbox"/>

Please find attached the Subsidiary Income Tax Certificate that was issued for the distribution, or the CDP Account Statement, in respect of which this claim for refund is made.

I confirm that the Entity has not made, and will not be making, a claim for tax credit under section 46(1)(d) of the Income Tax Act 1947 in respect of this same refund amount in its Singapore income tax return submission (if applicable).

Signature of Declarant : \_\_\_\_\_ Date: \_\_\_\_\_

Contact No: \_\_\_\_\_

<sup>1</sup> 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.

<sup>2</sup> 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 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 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.