

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

FORM R1 (FOREIGN NON-INDIVIDUALS)
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
Name of Counter : Frasers Commercial Trust Stock counter : FrasersComm	

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

This Form is for tax refund claims only and is applicable to foreign non-individual investors who received distributions made by Frasers Commercial Trust ("FCOT"; formerly known as Allico Commercial Real Estate Investment Trust or "Allico REIT") during the period from **30 March 2006 to 31 March 2015** in respect of FCOT units registered in their own names and where tax at the prevailing corporate tax rate, instead of the reduced rate of 10%, had been deducted from such distributions.

Distributions made by FCOT during the period from **30 March 2006 to 31 March 2015** out of its taxable income that is not taxed at the trustee level of FCOT to foreign non-individual investors are subject to tax at the reduced tax rate of 10%.

You are a foreign non-individual investor if you are not a resident of Singapore¹ for income tax purposes and:

- (a) you do not have a permanent establishment² in Singapore; or
- (b) you carry on any operation in Singapore through a permanent establishment² in Singapore, where the funds used by you to acquire the units in **FCOT** are not obtained from that operation.

If you are a foreign non-individual investor and tax at the prevailing corporate tax rate 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 FCOT.

Please note that this refund arrangement will only apply for income distributions made to foreign non-individual investors during the period from **30 March 2006 to 31 March 2015**.

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

The Trustee and the Manager of FCOT 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%, 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 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.

Foreign non-individuals 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., 50 Raffles Place #32-01, Singapore Land Tower, Singapore 048623. The Trustee and the Manager of FCOT will collate all declarations received on a **half yearly basis (on or around every 15 June (first refund for the year) and every 15 December (second refund of the year))** and submit a claim for tax refund to the IRAS.

Declaration		
I, _____, NRIC/Passport No. _____, the Director/Principal Officer of _____ ("the Entity") 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
(a) the Entity is not a resident of Singapore ¹ for income tax purposes; and	<input type="checkbox"/>	<input type="checkbox"/>
(b) the Entity does not have a permanent establishment ² in Singapore.	<input type="checkbox"/>	<input type="checkbox"/>
If your reply to (b) is "No", please proceed with (c) -		
(c) the funds used to acquire the holdings in FCOT are not obtained from any operation carried on in Singapore through a permanent establishment ² in Singapore.	<input type="checkbox"/>	<input type="checkbox"/>
Please find attached the Subsidiary Income Tax Certificate / Annual Dividends Statement that was issued for the distribution in respect of which this claim for refund is made.		
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.

² 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, 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.