



(Constituted in the Republic of Singapore pursuant to
a trust deed dated 19 October 2006)

NOTICE OF ADVANCE DISTRIBUTION BOOKS CLOSURE & DISTRIBUTION PAYMENT DATES

NOTICE IS HEREBY GIVEN that, pursuant to the proposed issuance of new units in First REIT as part satisfaction of the purchase consideration for the acquisition of Siloam Hospitals TB Simatupang, which is located at Jalan Letjend. TB Simatupang/ Jalan R.A. Kartini No.8, RT 010 / RW 04, Cilandak, Jakarta Selatan, Indonesia (the **"Consideration Units"**), the transfer books and register of unitholders of First Real Estate Investment Trust (**"First REIT"**) will be closed at 5.00 p.m. on 21 May 2013 for the purpose of determining the entitlements of unitholders of First REIT (**"Unitholders"**) to First REIT's distributable income (the **"Advance Distribution"**) for the period from 1 April 2013 to the day immediately prior to the date on which the Consideration Units are issued. The Consideration Units are expected to be issued on 22 May 2013.

The current expectation of Bowsprit Capital Corporation Limited, as the manager of First REIT (the **"Manager"**) is that the quantum of distribution per unit in First REIT (**"Unit"**) under the Advance Distribution will be approximately 0.98 cents¹ which consists of tax-exempt, capital and taxable income component.

The actual quantum of the distribution per Unit under the Advance Distribution will be announced on a later date after the management accounts of First REIT for the relevant period have been finalised.

Unitholders whose securities accounts with The Central Depository (Pte) Limited are credited with Units as at 5.00 p.m. on 21 May 2013 will be entitled to the Advance Distribution that will be paid on or around 26 June 2013.

The Advance Distribution is intended to ensure that the distributable income accrued by First REIT up to the day immediately preceding the date of issue of the Consideration Units (which at this point, will be entirely attributable to the existing Units) is only distributed in respect of the existing Units, and is being proposed as a means to ensure fairness to holders of existing Units.

DECLARATION FOR SINGAPORE TAX PURPOSES

A Tax-exempt income component

The tax-exempt income component of the Advance Distribution is exempt from tax in the hands of all Unitholders. No tax will be deducted at source for this component.

¹ The estimated distribution for the period from April 2013 to the day immediately prior to the date on which the Consideration Units is based on the Manager's pro-rated estimate of First REIT's revenue and expenses for the quarter ending 31 March 2013.

B Capital component

The capital component of the Advance Distribution is treated as a return of capital for Singapore income tax purposes. No tax will be deducted at source from this component.

C Taxable income component

1. HSBC Institutional Trust Services (Singapore) Limited, as trustee of First REIT (the “**Trustee**”), and the Manager will not deduct tax from the Advance Distribution made out of First REIT’s taxable income that is not taxed at First REIT’s level to:
 - (a) Unitholders who are individuals and who hold the Units either in their sole names or jointly with other individuals;
 - (b) Unitholders which are companies incorporated and tax resident in Singapore;
 - (c) Unitholders which are Singapore branches of foreign companies that have obtained specific approval from the Inland Revenue Authority of Singapore to receive the distributions from the trustee of First REIT without deduction of tax; or
 - (d) Unitholders 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 (Chapter 134);
 - (ii) co-operative societies registered under the Co-operative Societies Act (Chapter 62);
 - (iii) trade unions registered under the Trade Unions Act (Chapter 333);
 - (iv) charities registered under the Charities Act (Chapter 37) or established by an Act of Parliament; and
 - (v) town councils.

collectively referred to as “**Qualifying Unitholders**”.
2. For distribution made to classes of Unitholders that do not fall within the categories stated under Note C1 above, the Trustee and the Manager will deduct tax at the rate of 10% if the Unitholders are foreign non-individual investors. A foreign non-individual investor is one 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 Units are not obtained from that operation.
3. Unitholders are required to complete the applicable Section A, B or C of the “*Declaration for Singapore Tax Purposes Form*” (“**Form A**”) if they fall within the categories (b) to (d) stated under Note C1 or Section D of Form A if they qualify as a foreign non-individual investor as described under Note C2. The Trustee and the Manager will rely on the declarations made in Form A to determine:
 - (i) if tax is to be deducted for the categories of Unitholders listed in (b) to (d) under Note C1; and

- (ii) if tax is to be deducted at the rate of 10% for distribution to foreign non-individual investors.
- 4. **Unitholders who fall within class (a) under Note C1 are not required to submit Form A. The gross distribution received by these Unitholders (irrespective of their tax residence status) is exempt from tax if it is not derived through a partnership in Singapore or from the carrying on of a trade, business or profession.**
- 5. Unitholders who do not fall within the classes of Unitholders listed in Note C1 and Note C2 above can choose not to return Form A as tax will be deducted from the taxable income component of the distributions made to them at 17%.
- 6. The Trustee and the Manager will deduct tax at 17% from distribution made out of First REIT's taxable income that is not taxed at First REIT's level, in respect of Units held by depository agents except where the beneficial owners of these Units are:
 - (a) Qualifying Unitholders (as listed in categories (a) to (d) under Note C1), who will receive gross distribution; or
 - (b) Foreign non-individual investors (as defined under Note C2), who will receive distribution net of tax deducted at 10%.

For Units held through depository agents, the depository agents must complete the "Declaration by Depository Agents for Singapore Tax Purposes Form" (**Form B**) and its annexes.

- 7. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively, by First REIT's Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd, on or around 27 May 2013.
- 8. Unitholders (Form A) and the depository agents (Form B and its annexes) will have to complete the forms legibly and send them to the Unit Registrar such that they are received by **5.00 p.m. on 4 June 2013**. The Trustee and the Manager will rely on the declarations made in Form A and Form B to determine if tax is to be deducted. Failure to comply with any of these requirements will render Form A and Form B invalid and the Trustee and the Manager will be obliged to deduct tax at the rate of 17% from the taxable income component of the distribution.
- 9. Unitholders who hold Units under the Central Provident Fund Investment Scheme ("**CPFIS**") or the Supplementary Retirement Scheme ("**SRS**") do not have to return the Form as they will receive gross distribution paid to their respective CPFIS or SRS accounts.

Last Date and Time for Return of the Form

Unitholders and the depository agents must complete and return the "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 4 June 2013 in order to receive the distribution either at gross or at net (after deduction of tax at 10%) as described above.

DECLARATION IN INCOME TAX RETURN

The Advance Distribution is considered as income for the year 2013. 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 Advance Distribution as taxable income in their Singapore income tax return for the Year of Assessment 2014.

IMPORTANT DATES AND TIMES

Date/Deadline	Event
5.00 p.m., 21 May 2013	Close of First REIT's Transfer Books and Register of Unitholders for the Advance Distribution
5.00 p.m., 4 June 2013	Unitholders and depository agents must have completed and returned the "Declaration for Singapore Tax Purposes Form A and Form B" to the Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd
On or around 26 June 2013	Payment of Advance Distribution

Should Unitholders have any queries in relation to these procedures, please do not hesitate to contact the following persons or visit our website at <www.first-reit.com>:

Investor enquiries:
Victor Tan
Bowsprit Capital Corporation Limited
(65) 6435 0168

Media inquiries:
Janice Ong
August Consulting
(65) 6733 8873

By Order of the Board

Dr Ronnie Tan Keh Poo
Chief Executive Officer and Director
Bowsprit Capital Corporation Limited
(as manager of First Real Estate Investment Trust)
(Company registration no. 200607070D)

13 May 2013

Important Notice

This announcement is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for Units.

The value of Units and the income derived from them may fall as well as rise. Units are not obligations of, deposits in, or guaranteed by, the Manager or any of its affiliates. An investment in Units is subject to investment risks, including the possible loss of the principal amount invested. Investors have no right to request the Manager to redeem their Units while the Units are listed. It is intended that Unitholders may only deal in their Units through trading on the SGX-ST. Listing of the Units on the SGX-ST does not guarantee a liquid market for the Units. The past performance of First REIT is not necessarily indicative of the future performance of First REIT.

This announcement is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for Units in the United States. This announcement is not for publication or distribution, directly or indirectly, in or into the United States (including its territories and possessions, any state of the United States and the District of Columbia), Canada or Japan. The securities referred to herein have not been and will not be registered under the United States Securities Act of 1933, as amended (the “**Securities Act**”), and may not be offered or sold in the United States, except pursuant to an applicable exemption from, or in a transaction not subject to, the registration requirements under the Securities Act. No public offering of securities is being made in the United States.