



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

NOTICE OF RECORD DATE AND DISTRIBUTION PAYMENT DATE

NOTICE IS HEREBY GIVEN THAT the Transfer Books and Register of Unitholders of First Real Estate Investment Trust ("**First REIT**") will be closed at 5.00 p.m. on 18 May 2022 (the "**Record Date**") to determine Unitholders' entitlements to First REIT's distribution. Details of the distribution are as follows:

- (a) Unitholders with units in First REIT ("**Units**") traded under the main First REIT stock counter, First REIT (AW9U), will receive a total of 0.66 cents per Unit for the period from 1 January 2022 to 31 March 2022. The distribution of 0.66 cents per Unit comprises a taxable income component of 0.04 cents per Unit, a tax-exempt income component of 0.1 cents per Unit and a capital component of 0.52 cents per Unit; and
- (b) Unitholders with Units traded under the temporary stock counter, First REIT A (WCJU), will receive a total of 0.23 cents per Unit for the period from 1 March 2022 to 31 March 2022. The distribution of 0.23 cents per Unit comprises a taxable income component of 0.01 cents per Unit, a tax-exempt income component of 0.04 cents per Unit and a capital component of 0.18 cents per Unit. This temporary stock counter was established as a result of the issue of 431,147,541 consideration Units as partial payment of the purchase consideration for the acquisition of 12 nursing homes located in Japan, as described in the First REIT announcement dated 8 December 2021 "Proposed Acquisition of 12 Nursing Homes Located in Japan and The Proposed Settlement in respect of the Terminated Development Works adjacent to Siloam Hospitals Surabaya",

(the "**Distributions**").

The temporary First REIT stock counter, First REIT A (WCJU), will be merged with the main First REIT stock counter, First REIT (AW9U), once units under both stock counters commence trading on an "ex" basis at 9.00 a.m. on Tuesday, 17 May 2022.

Unitholders of First REIT ("**Unitholders**") whose securities accounts with The Central Depository (Pte) Limited ("**CDP**") are credited with Units as at the Record Date will be entitled to the Distributions to be paid on 24 June 2022, with the actual amount of the Distributions depending on whether they hold Units traded under the main First REIT stock counter, First REIT (AW9U), or the temporary stock counter, First REIT A (WCJU),

DECLARATION FOR SINGAPORE TAX PURPOSES

1. The tax-exempt component of the Distributions is exempt from tax in the hands of all Unitholders. No tax will be deducted at source from this component.
2. The capital component of the Distributions is treated as a return of capital for Singapore income tax purposes. No tax will be deducted at source from this component.
3. Tax will be deducted at source from the taxable income component in certain circumstances. The following paragraphs describe the circumstances in which tax will or will not be deducted from the taxable income component of the Distributions.
4. The following categories of Unitholders will receive a gross distribution (i.e., no tax will be deducted from it):
 - (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 companies incorporated outside Singapore;
- (d) Unitholders which are international organisations that are exempt from tax on such distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act (Cap. 145);
- (e) 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; or
- (f) Unitholders which are real estate investment trust exchange-traded funds that have been accorded tax transparency treatment.

5. To receive a gross distribution, Unitholders in categories (b) to (f) under Paragraph 4 above must complete the applicable Section A, B or C of the “*Declaration for Singapore Tax Purposes Form*” (“**Form A**”).

These categories of Unitholders, unless they are exempt from tax because of their own circumstances, will have to pay income tax subsequently at their own applicable tax rates.

6. Unitholders in category (a) under Paragraph 4 above are not required to submit any form. 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.
7. Tax at the reduced rate of 10% will be deducted from the distribution made to foreign non-individual Unitholders or non-resident funds.

A foreign non-individual Unitholder 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 units in First REIT are not obtained from that operation.

A non-resident fund is one that qualifies for tax exemption under section 13CA, 13X or 13Y of the Income Tax Act that is not a resident of Singapore for income tax purposes and:

- (a) who does not have a permanent establishment in Singapore (other than a fund manager in Singapore); or
- (b) who carries on any operation in Singapore through a permanent establishment in Singapore (other than a fund manager in Singapore), where the funds used to acquire the units in First REIT are not obtained from that operation.

A non-resident fund refers to a fund being 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.

8. To receive the distribution net of tax deducted at 10%, foreign non-individual Unitholders and non-resident funds are required to complete Section D of Form A.
9. Unitholders who do not fall within the classes of Unitholders listed in Paragraph 4 and Paragraph 7 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, currently at 17%.

10. For beneficial owners of units in First REIT who hold their units through depository agents to receive:
 - (a) gross distribution if they are persons described in categories (a) to (f) under Paragraph 4 above; or
 - (b) distribution net of tax deducted at 10% if they are foreign non-individuals or non-resident funds described in Paragraph 7 above,

the depository agents must complete the “*Declaration by Depository Agents for Singapore Tax Purposes Form*” (“**Form B**”) and its annexes.

11. 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 23 May 2022.
12. Unitholders (Form A) and the depository agents (Form B and its annexes) will have to complete the forms legibly and send it to the Unit Registrar such that they are received by 5.00 p.m. on 3 June 2022. Failure to comply with any of these requirements will render Form A and Form B invalid and the Trustee and the Manager of First REIT will be obliged to deduct tax at the rate of 17% from the distribution. Unitholders may wish to seek tax advice for completing the Form A and/or Form B.
13. Unitholders who hold units under the Central Provident Fund Investment Scheme (“**CPFIS**”) and the Supplementary Retirement Scheme (“**SRS**”) do not have to return any form. They will receive gross distribution.

DECLARATION IN INCOME TAX RETURN

The Distributions is considered as income for the year 2022. 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 2023.

LAST DATE AND TIME FOR RETURN OF FORMS

Boardroom Corporate & Advisory Services Pte. Ltd. will despatch the relevant forms to Unitholders on or around 23 May 2022.

Unitholders and depository agents must complete and return the applicable form to Boardroom Corporate & Advisory Services Pte. Ltd. by 3 June 2022 at 5.00 p.m. in order to receive the taxable income component of the Distributions either at gross or at net (after deduction of tax at 10%) as described above.

IMPORTANT DATES AND TIMES

Date/Deadline	Event
Tuesday, 17 May 2022	Units trade ex-Distribution
Wednesday, 18 May 2022 at 5:00 p.m.	Closing of Transfer Books and Register of Unitholders of First REIT
Friday, 3 June 2022 at 5:00 p.m.	Unitholders to complete and return Form A or B as applicable
Friday, 24 June 2022	Payment of Distributions

By Order of the Board

Tan Kok Mian Victor
Executive Director and Chief Executive Officer
First REIT Management Limited
(as manager of First Real Estate Investment Trust)
(Company registration no. 200607070D)

6 May 2022

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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.