



(Constituted in the Republic of Singapore pursuant to a trust deed dated 31 March 2006 (as amended))

NOTICE OF RECORD DATE AND DISTRIBUTION PAYMENT DATE

NOTICE IS HEREBY GIVEN that the Transfer Books and Register of Unitholders of ESR-REIT (formerly known as ESR-LOGOS REIT) will be closed at **5.00 p.m.** on **5 February 2025** for the purpose of determining Unitholders' entitlements to ESR-REIT's distribution of:

- (i) 0.275 cents per Unit for the Units trading under the main ESR-REIT counter for the period from 11 November 2024 to 31 December 2024¹, comprising entirely of taxable income distribution; and
- (ii) 0.195 cents per Unit for the Consideration Units² trading under the temporary ESR-REIT A counter for the period from 29 November 2024 to 31 December 2024, comprising entirely of taxable income distribution.

As disclosed in ESR-REIT's announcement dated 29 November 2024, the Consideration Units are traded under a temporary stock counter on the Singapore Exchange Securities Trading Limited (the "**SGX-ST**") for the period commencing from the date of issue of the Consideration Units (being 29 November 2024) to the last day of "cum-distribution" trading for both the Units trading under the main ESR-REIT counter and the Consideration Units trading under the temporary ESR-REIT A counter. After the last day of "cum-distribution" trading, both the Units trading under the main ESR-REIT counter and the Consideration Units trading under the temporary ESR-REIT A counter will be aggregated and traded under the existing ESR-REIT main stock counter on the Main Board of the SGX-ST.

Based on the above Record Date of Wednesday, 5 February 2025, the last day of "cum-distribution" trading is Monday, 3 February 2025 and the first day of "ex-distribution" trading is Tuesday, 4 February 2025. In this regard, the Units trading under the main ESR-REIT counter and the Consideration Units trading under the temporary ESR-REIT A counter will be aggregated and traded under the existing ESR-REIT main stock counter on Thursday, 6 February 2025.

Unitholders whose securities accounts with The Central Depository (Pte) Limited are credited with ESR-REIT Units as at **5.00 p.m.** on **5 February 2025** will be entitled to the distribution that will be paid on or around **14 March 2025**.

The Manager of ESR-REIT hereby confirms that, after making payment of the distribution, ESR-REIT has sufficient financial resources to fulfil its liabilities as and when they fall due.

DECLARATION FOR SINGAPORE TAX PURPOSES

Taxable income distribution

Tax will be deducted at source from the taxable income distribution in certain circumstances. The following section describes the circumstances in which tax will or will not be deducted from such distributions.

1. The Trustee and the Manager of ESR-REIT will not deduct tax from distributions made out of ESR-REIT's taxable income that is not taxed at the trustee level of ESR-REIT to:

1 ESR-REIT paid an advanced distribution of 0.722 cents per Unit on 8 January 2025 for the period from 1 July 2024 to 10 November 2024. Please refer to ESR-REIT's announcements on 11 November 2024 for more details.

2 Consideration Units refer to the 20,595,881 LOGOS Consideration Units issued to LOGOS Units No. 1 Ltd and the 19,016,393 Ivanhoe Consideration Units issued to Ivanhoe Cambridge Asia Inc., at an issue price of S\$0.305 per Consideration Unit on 29 November 2024, as partial consideration for the acquisition of 20 Tuas South Avenue 14. Please refer to ESR-REIT's announcements on 29 November 2024 for more details.

- (a) Unitholders who are individuals and who hold the units either in their sole names or jointly with other individuals;
 - (b) Unitholders who are Central Provident Fund (“**CPF**”) members who use their CPF funds under the CPF Investment Scheme and where the distributions received are returned to their CPF accounts;
 - (c) Unitholders who are individuals and use their Supplementary Retirement Scheme (“**SRS**”) funds and where the distributions received are returned to their SRS accounts;
 - (d) Unitholders which are companies incorporated and tax resident in Singapore;
 - (e) Unitholders which are Singapore branches of companies incorporated outside Singapore;
 - (f) Unitholders which are body of persons (excluding companies or partnerships) incorporated or registered in Singapore, such as:
 - (i) statutory boards;
 - (ii) co-operative societies registered under the Co-operative Societies Act 1979;
 - (iii) trade unions registered under the Trade Unions Act 1940;
 - (iv) charities registered under the Charities Act 1994 or established by any written law; and
 - (v) town councils;
 - (g) 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 1948; and
 - (h) Unitholders which are real estate investment trust exchange-traded funds which have been accorded the tax transparency treatment.
2. For distributions made to Unitholders who do not fall within the categories stated under Note 1 above, the Trustee and the Manager of ESR-REIT will deduct tax at the rate of 10% if the Unitholders are:
- (a) foreign non-individual investors – for distributions made during the period from 18 February 2005 to 31 December 2025; or
 - (b) foreign funds – for distributions made during the period from 1 July 2019 to 31 December 2025.
- A foreign non-individual investor is one which is not a resident of Singapore* for income tax purposes and;
- (i) which does not have a permanent establishment[^] in Singapore; or
 - (ii) which carries on any operation in Singapore through a permanent establishment in Singapore, where the funds used to acquire the units in ESR-REIT are not obtained from that operation.
- A foreign fund is one that qualifies for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947 that is not a resident of Singapore* for income tax purposes and;
- (i) which does not have a permanent establishment[^] in Singapore (other than a fund manager in Singapore); or
 - (ii) which 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 ESR-REIT 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 A*” (“**Form A**”) if they fall within the categories (d) to (h) stated under Note 1, Section D of Form A if they qualify as a foreign non-individual investor as described under Note 2, or Section E of Form A if they qualify as a foreign fund as described under Note 2.

4. The Trustee and the Manager of ESR-REIT 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 (d) to (h) under Note 1; and (ii) if tax is to be deducted at the rate of 10% for distributions to foreign non-individual investors and foreign funds as described under Note 2.
5. **Unitholders who fall within categories (a) to (c) under Note 1 are not required to submit Form A.** The gross distribution received by these unitholders (irrespective of their tax residence status) is exempt from tax. However, this tax exemption does not apply to such unitholders in respect of distribution derived by them through a partnership in Singapore or from the carrying on of a trade, business or profession. Such unitholders, i.e., to whom the exemption does not apply, must declare the distribution received as income in their income tax returns.
6. Unitholders who do not fall within the categories of Unitholders listed in Note 1 and Note 2 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 in any case.
7. The Trustee and the Manager of ESR-REIT will deduct tax at the prevailing corporate tax rate from distributions made out of ESR-REIT's taxable income that is not taxed at the trustee level of ESR-REIT, in respect of units held by depository agents except where the beneficial owners of these units are:
 - (a) individuals and the units are not held through a partnership in Singapore;
 - (b) qualifying unitholders as listed in categories (d) to (h) under Note 1;
 - (c) foreign non-individual investors; or
 - (d) foreign funds.

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

8. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively, by ESR-REIT's Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd., on or around **11 February 2025**.
9. Unitholders (Form A) and depository agents (Form B and its annexes) will have to complete the forms legibly and send it to the Unit Registrar such that it is received by **5.00 p.m. on 19 February 2025**. The Trustee and the Manager of ESR-REIT 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 of ESR-REIT will be obliged to deduct the appropriate amount of tax from the Distribution.
10. Unitholders who hold units under the Central Provident Fund Investment Scheme ("**CPFIS**") and the Supplementary Retirement Scheme ("**SRS**") do not have to return the Form as they will receive gross distributions paid to their respective CPFIS and SRS accounts.

IMPORTANT REMINDER

Unitholders and depository agents must complete and return the "*Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)*" to Boardroom Corporate & Advisory Services Pte. Ltd.'s office by 5.00 p.m. on 19 February 2025 in order to receive the distribution either at gross or at net as described above.

DECLARATION IN INCOME TAX RETURN

The distribution is considered as income for the year 2024. Beneficial owners of the distribution, other than those who are exempt from tax on the distribution, are required to declare the taxable income component of the distribution as taxable income in their income tax return for the Year of Assessment 2025.

IMPORTANT DATES AND TIMES

Timeline	Event
9.00 a.m., 4 February 2025 (Tue)	Units will be traded ex-distribution
5.00 p.m., 5 February 2025 (Wed)	Closure of ESR-REIT's Transfer Books and Register of Unitholders
11 February 2025 (Tue)	Despatch of Tax Declaration Form to Unitholders
5.00 p.m., 19 February 2025 (Wed)	Unitholders and depository agents must have completed and returned the Tax Declaration Form to the Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd.
14 March 2025 (Fri)	Payment of distribution

BY ORDER OF THE BOARD

ESR-REIT Management (S) Limited

As Manager of ESR-REIT

(Company Registration No. 200512804G, Capital Markets Services Licence No. 100132)

Adrian Chui

Chief Executive Officer and Executive Director

24 January 2025

For further enquiries, please contact:

ESR-REIT Management (S) Limited

Lyn Ong

Senior Manager,

Capital Markets and Investor Relations

Tel: +65 6222 3339

Email: lyn.ong@esr-reit.com.sg

Sua Xiu Kai

Manager,

Corporate Communications

Tel: +65 6222 3339

Email: xiukai.sua@esr-reit.com.sg

Notes

- * A Company is not a resident of Singapore if the management and control of its business is exercised outside Singapore.

- ^ Under the Singapore Income Tax Act, permanent establishment means a fixed place where 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.

About ESR-REIT

ESR-REIT is a leading New Economy and future-ready Asia Pacific S-REIT. Listed on the Singapore Exchange Securities Trading Limited since 25 July 2006, ESR-REIT invests in quality income-producing industrial properties in key gateway markets.

As at 31 December 2024, ESR-REIT holds interests in a diversified portfolio of logistics properties, high-specifications industrial properties, business parks and general industrial properties with total assets of approximately S\$6.0 billion. Its portfolio comprises 72 properties (excluding 48 Pandan Road held through a joint venture) located across the developed markets of Singapore (52 assets), Australia (18 assets) and Japan (2 assets), with a total gross floor area of approximately 2.5 million sqm, as well as investments in three property funds in Australia. ESR-REIT is also a constituent of the FTSE EPRA Nareit Global Real Estate Index.

ESR-REIT is managed by ESR-REIT Management (S) Limited (the “**Manager**”) and sponsored by ESR Group Limited (“**ESR**”). The Manager is owned by ESR (99.0%) and Shanghai Summit Pte. Ltd. (1.0%), respectively.

For further information on ESR-REIT, please visit www.esr-reit.com.sg.

About the Sponsor, ESR Group

ESR Group is Asia-Pacific's leading New Economy real asset manager and one of the largest listed real estate investment managers globally. Our fully integrated fund management and development platform extends across Australia and New Zealand, Japan, South Korea, Greater China, Southeast Asia, and India, including a presence in Europe. We provide investors with a diverse range of real asset investment and development solutions across private and public investment vehicles. Our focus on New Economy real assets offers customers modern solutions for logistics, data centres, and infrastructure and renewables. Our purpose, Space and Investment Solutions for a Sustainable Future, drives us to manage sustainably and impactfully for the communities where we operate and the spaces we develop to thrive for generations to come. ESR Group Limited is listed on The Stock Exchange of Hong Kong (HKSE: 1821.HK). Visit www.esr.com for more information.

Important Notice

The value of units in ESR-REIT (“**Units**”) and the income derived from them may fall as well as rise. Units are not investments or deposits in, or liabilities or obligations, of ESR-REIT Management (S) Limited (“**Manager**”), Perpetual (Asia) Limited (in its capacity as trustee of ESR-REIT) (“**Trustee**”), or any of their respective related corporations and affiliates (individually and collectively “**Affiliates**”). An investment in Units is subject to equity investment risk, including the possible delays in repayment and loss of income or the principal amount invested. Neither ESR-REIT, the Manager, the Trustee nor any of the Affiliates guarantees the repayment of any principal amount invested, the performance of ESR-REIT, any particular rate of return from investing in ESR-REIT, or any taxation consequences of an investment in ESR-REIT. Any indication of ESR-REIT performance returns is historical and cannot be relied on as an indicator of future performance.

Investors have no right to request that the Manager redeem or purchase their Units while the Units are listed. It is intended that investors may only deal in their Units through trading on Singapore Exchange Securities Trading Limited (the “**SGX-ST**”). Listing of the Units on the SGX-ST does not guarantee a liquid market for the Units. This announcement may contain forward-looking statements that involve assumptions, risks and uncertainties. Actual future performance, outcomes and results may differ materially from those expressed in forward-looking statements as a result of a number of risks, uncertainties and assumptions. Representative examples of these factors include (without limitation) general industry and economic conditions, interest rate trends, cost of capital and capital availability, competition from similar developments, shifts in expected levels of occupancy or property rental income, changes in operating expenses, governmental and public policy changes and the continued availability of financing in amounts and on terms necessary to support ESR-REIT’s future business. You are cautioned not to place undue reliance on these forward-looking statements, which are based on the Manager’s current view of future events.

This announcement is for information purposes only and does not have regard to your specific investment objectives, financial situation or your particular needs. Any information contained in this announcement is not to be construed as investment or financial advice and does not constitute an offer or an invitation to invest in ESR-REIT or any investment or product of or to subscribe to any services offered by the Manager, the Trustee or any of the Affiliates.