



# AIMS AMP CAPITAL INDUSTRIAL REIT

# AIMS AMP CAPITAL INDUSTRIAL REIT MANAGEMENT LIMITED

(formerly known as MacarthurCook Investment Managers (Asia) Limited)

As Manager of AIMS AMP Capital Industrial REIT (formerly known as MacarthurCook Industrial REIT)

1 Raffles Place, #21-01 OUB Centre
Singapore 048616

Unless otherwise defined herein, all defined and undefined terms used in this announcement will have the meaning ascribed to them in the Circular to unitholders of AIMS AMP Capital Industrial REIT dated 6 November 2009 and the Offer Information Statement dated 30 November 2009.

## SPECIAL DISTRIBUTION FOR THE PERIOD FROM 1 OCTOBER 2009 TO 23 NOVEMBER 2009 ("SPECIAL DISTRIBUTION")

Further to its announcement dated 19 November 2009 in relation to the Special Distribution Books Closure Date, AIMS AMP Capital Industrial REIT Management Limited, as the manager (the "Manager") of AIMS AMP Capital Industrial REIT ("AIMS AMPCI REIT") is pleased to announce a Special Distribution of 0.95 cents per Unit, payable on 23 March 2010.

Unitholders whose securities accounts with The Central Depository (Pte) Limited were credited with Units as at 5.00 p.m. on **30 November 2009** will be entitled to the Special Distribution. For the avoidance of doubt, the 221,428,572 units issued on 24 November 2009, pursuant to the AMP Capital Investment and the Cornerstone Investments will not be entitled to the Special Distribution.

### **DECLARATION FOR SINGAPORE TAX PURPOSES**

- 1. The trustee of AIMS AMPCI REIT ("Trustee") and the Manager will not deduct tax from the Special Distribution made out of AIMS AMPCI REIT's taxable income that is not taxed at AIMS AMPCI 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 Special Distribution 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 (Cap. 134);
    - (ii) co-operative societies registered under the Co-operative Societies Act (Cap. 62);
    - (iii) trade unions registered under the Trade Unions Act (Cap. 333);
    - (iv) charities registered under the Charities Act (Cap. 37) or established by an Act of Parliament; and
    - (v) town councils.
- 2. For the Special Distribution made to classes of Unitholders that do not fall within the categories stated under Note 1 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 A" ("Form A") if they fall within the classes (b), (c) or (d) stated under Note 1 or Section D of Form A if they qualify as a foreign non-individual investor as described under Note 2. The Trustee and the Manager will rely on the declarations made in Form A to determine:
  - (a) if tax is to be deducted for the categories of Unitholders listed in (b), (c) or (d) under Note 1: or
  - (b) if tax is to be deducted at the rate of 10% for the Special Distribution to foreign nonindividual investors.
- 4. Unitholders who fall within class (a) under Note 1 are not required to submit Form A.
- 5. Unitholders who do not fall within the classes of Unitholders listed in Notes 1 and 2 above may choose not to return Form A as tax will be deducted from the Special Distribution made to them at the prevailing corporate tax rate in any case.
- 6. The Trustee and the Manager will deduct tax at the prevailing corporate tax rate from the Special Distribution made out of AIMS AMPCI REIT's taxable income that is not taxed at AIMS AMPCI REIT's level, 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 (b), (c) or (d) under Note 1); or
  - (c) Foreign non-individual investors (as defined under Note 2).

For Units held through depository agents, the depository agents must complete the "Declaration by Depository Agents for Singapore Tax Purposes Form B" ("Form B") and its annexes (Annex 1 for individuals, Annexes 2 and 2.1 for Qualifying Unitholders and Annex 3 for foreign non-individuals).

- 7. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively, by AIMS AMPCI REIT's Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd, on or around **22 February 2010**.
- 8. Forms from Unitholders (Form A) and depository agents (Form B and its annexes) must be completed legibly and received by the Unit Registrar by **5.00 p.m. on 4 March 2010**. 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 the appropriate amount of tax from the Special Distribution in respect of which this announcement is made.
- Unitholders who hold Units under the Central Provident Fund Investment Scheme ("CPFIS")
  or the Supplementary Retirement Scheme ("SRS") do not have to submit any form. They
  will receive a gross Special Distribution which will be paid to their respective CPFIS or SRS
  accounts.
- 10. The tax rate of 10% as indicated in Notes 2 and 3 is a concessionary rate that applies to taxable income distributions made by AIMS AMPCI REIT on or before 17 February 2010. As the Special Distribution is to be paid on 23 March 2010, the 10% rate is no longer applicable if the Singapore Government does not extend the same concession to distributions made after 17 February 2010.

For purposes of the above, the Unit Registrar will continue to send out Form A and Form B for completion by the relevant Unitholders within the stipulated time limit. In the event that the above tax concession is extended, qualifying foreign non-individual investors will continue to receive the Special Distribution net of 10% tax. Otherwise, the Trustee and the Manager of AIMS AMPCI REIT will deduct tax from the Special Distribution to qualifying foreign non-individual investors at the prevailing corporate tax rate of 17%, or any other rate as determined by the Singapore Government.

#### Last Date and time for Return of the Form

Unitholders and depository agents must complete and return the "Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)", respectively to Boardroom Corporate & Advisory Services Pte Ltd's office by **5.00 p.m. on 4 March 2010**, in order to receive the Special Distribution either gross or net (after deduction of tax) as described above.

#### **Declaration in Income Tax Return**

The Special Distribution is considered as income for the year ending 31 March 2010. Beneficial owners of the Special Distribution, other than those who are exempt from tax on the Special Distribution, are required to declare the gross Special Distribution as taxable income in their income tax return for the Year of Assessment 2011.

#### **Important Dates and Times**

•	Completed "Declaration for Singapore Tax Purposes Form A and Form B (and annexes)" must be received by the Unit Registrar, Boardroom Corporate & Advisory Services Pte Ltd
23 March 2010	Payment of Special Distribution

For enquiries, please contact Ms Tang Buck Kiau at 6309-1053 or email: bktang@aimsampcapital.com.

By Order of the Board **AIMS AMP Capital Industrial REIT Management Limited** (Company Registration No. 200615904N) As Manager of AIMS AMP Capital Industrial REIT

Tang Buck Kiau Company Secretary 26 January 2010

### **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 of AIMS AMPCI REIT may only deal in their Units through trading on the Singapore Exchange Securities Trading Limited ("SGX-ST"). Listing of the Units on the SGX-ST does not guarantee a liquid market for the Units.

The past performance of AIMS AMPCI REIT is not necessarily indicative of the future performance of AIMS AMPCI REIT.