

To: Boardroom Corporate & Advisory Services Pte Ltd  
1 Harbourfront Avenue Keppel Bay Tower #14-07  
Singapore 098632

**FORM R1 (QUALIFYING NON-RESIDENT NON-INDIVIDUALS, QUALIFYING NON-RESIDENT FUNDS AND EXEMPT NON-CORPORATES)  
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
<b>Name of Counter : ParkwayLife Reit</b>	

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

This Form is for tax refund claims only and is applicable to qualifying non-resident non-individual unitholders, qualifying non-resident funds and exempt non-corporate unitholders as follows:

- (a) Qualifying non-resident non-individual unitholders who received distributions made by Parkway Life Real Estate Investment Trust ("PLife REIT") during the period from 23 August 2007 to 31 December 2025 in respect of PLife REIT 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;
- (b) Qualifying non-resident funds who received distributions made by PLife REIT during the period from 1 July 2019 to 31 December 2025 in respect of PLife REIT 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; and
- (c) Exempt non-corporate unitholders who received distributions made by PLife REIT after 23 August 2007 in respect of PLife REIT units registered in their own names and where tax at the prevailing corporate tax rate had been deducted from such distributions.

Distributions made by PLife REIT out of its taxable income that is not taxed at the trustee level of PLife REIT to qualifying non-resident non-individual unitholders (during the period from 23 August 2007 to 31 December 2025) and qualifying non-resident funds (during the period from 1 July 2019 to 31 December 2025) are subject to tax at the reduced tax rate of 10%.

You are a qualifying non-resident non-individual unitholder if you are not a resident of Singapore<sup>1</sup> for income tax purposes and:

- (a) you do not have any permanent establishment<sup>2</sup> in Singapore; or
- (b) you carry on any operation through a permanent establishment<sup>2</sup> in Singapore, where the funds used by you to acquire the units in PLife REIT are not obtained from that operation.

You are a qualifying non-resident fund if you qualify for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947, you are not a resident of Singapore<sup>1</sup> for income tax purposes and:

- (a) you do not have any permanent establishment<sup>2</sup> in Singapore (other than a fund manager in Singapore); or
- (b) you carry on any operation through a permanent establishment<sup>2</sup> in Singapore (other than a fund manager in Singapore), where the funds used by you to acquire the units in PLife REIT are not obtained from that operation.

You are an exempt non-corporate unitholder if you are:

- (a) institutions, authorities, persons or funds specified in the First Schedule to the Income Tax Act 1947;
- (b) co-operative societies registered under the Co-operative Societies Act 1979;
- (c) trade unions registered under the Trade Unions Act 1940;
- (d) charities registered under the Charities Act 1994 or established by an Act of Parliament;
- (e) town councils;
- (f) any other non-corporate entity (other than a partnership) constituted or registered in Singapore;
- (g) an international organisation that is exempt from tax on such distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act 1948; and
- (h) real estate investment trust exchange-traded funds ("REIT ETF"s) which have been accorded the tax transparency treatment.

If you are a qualifying non-resident non-individual unitholder, qualifying non-resident fund or an exempt non-corporate 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 Comptroller of Income Tax ("CIT") through the Trustee and the Manager of PLife REIT. Where refund requests for tax over-deducted at the prevailing corporate tax rate have been submitted through the Trustee/Manager of PLife REIT, please do not make further claims for section 46(1)(d) tax credits corresponding to such refunds in your Income Tax Return submissions.

In respect of non-resident non-individual unitholders and non-resident funds, please note that this refund arrangement will only apply for income distributions made to qualifying non-resident non-individual unitholders during the period from 23 August 2007 to 31 December 2025 and income distributions made to qualifying non-resident funds during the period from 1 July 2019 to 31 December 2025.

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

Please note that the statutory time-barred due date on claiming the tax refund is within four (4) years from the end of the relevant Year of Assessment (YA) (e.g. For claim of refund in respect of distributions made for the period from 1 January 2023 to 30 June 2023 (which relates to the YA 2024), the claim must be submitted to the IRAS on or before 31 December 2028.

The Trustee and the Manager of PLife REIT 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 CIT 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.**

**Qualifying non-resident non-individuals, qualifying non-resident funds and exempt non-corporates 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, 1 Harbourfront Avenue, Keppel Bay Tower #14-07, Singapore 098632. The Trustee and the Manager of PLife REIT will collate all declarations received on a half yearly basis (by 5.00pm of 15 June and 15 December) and submit a claim for tax refund to the CIT on a half yearly basis.

**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

**For qualifying non-resident non-individual unitholder or qualifying non-resident fund:**

- (a) the Entity is not a resident of Singapore<sup>1</sup> for income tax purposes; and
- (b) the Entity does not have a permanent establishment<sup>2</sup> in Singapore.

**If your reply to (a) is "Yes" and to (b) is "No", please proceed with (c) -**

- (c) the funds used to acquire the holdings in PLife REIT are not obtained from any operation carried on in Singapore through a permanent establishment<sup>2</sup> in Singapore.

**For exempt non-corporate unitholder:**

- (d) the Entity is:
- an institution, authority, person or fund specified in the First Schedule to the Income Tax Act 1947;
  - a co-operative society registered under the Co-operative Societies Act 1979;
  - a trade union registered under the Trade Unions Act 1940;
  - a charity registered under the Charities Act 1994 or a charity established by an Act of Parliament;
  - a town council;
  - any other non-corporate entity (other than a partnership) constituted or registered in Singapore;
  - an international organisation that is exempt from tax on such distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act 1948;
  - a real estate investment trust exchange-traded fund ("REIT ETF") which has been accorded the tax transparency treatment.

Please find attached the Subsidiary Income Tax Certificate / Annual Distribution Statement that was issued for the distribution in respect of which this claim for refund is made.

Signature of Declarant : \_\_\_\_\_

Date: \_\_\_\_\_

Contact No: \_\_\_\_\_

<sup>1</sup> For the purpose of the distribution, a person is not a tax resident in Singapore if the control and management of its business is exercised outside Singapore.

<sup>2</sup> Under Section 2 of the Income Tax Act 1947, 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 person 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 that person'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 or almost wholly for that person or for such other enterprises as are controlled by that person.