

FORM R2 (DEPOSITORY AGENTS)
CLAIMING OF TAX REFUND FOR INCOME DISTRIBUTION FOR PERIOD FROM _____ TO _____

DECLARATION BY DEPOSITORY AGENTS FOR SINGAPORE TAX PURPOSES
UNITS HELD FOR BENEFIT OF INDIVIDUALS, QUALIFYING NON-RESIDENT NON-INDIVIDUAL UNITHOLDERS, QUALIFYING NON-RESIDENT FUNDS
AND EXEMPT NON-CORPORATE UNITHOLDERS

Name of registered holder : _____	Securities Account No. : _____
Address : _____ _____ _____	Holding : _____ Units
Name of Counter : ParkwayLife Reit	

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

This Form is for tax refund claims only. It is applicable to Depository Agents who are claiming a refund of tax over-deducted from the following distributions made by Parkway Life Real Estate Investment Trust ("PLife REIT") in respect of PLife REIT units held by Depository Agent for the benefit of individuals, qualifying non-resident non-individual unitholders, qualifying non-resident funds or exempt non-corporate unitholders:

- (i) in relation to units held solely for the benefit of individuals, income distribution made on or after 23 August 2007 by PLife REIT where tax at the prevailing corporate tax rate had been deducted from the distribution and where a refund of the tax over-deducted had not been claimed previously;
- (ii) in relation to units held solely for the benefit of qualifying non-resident non-individual unitholders, distribution made during the period from 23 August 2007 to 31 December 2025 by PLife REIT where tax at the prevailing corporate tax rate, instead of the reduced rate of 10%, had been deducted from the distribution and where a refund of the tax over-deducted had not been claimed previously;
- (iii) in relation to units held solely for the benefit of qualifying non-resident funds, distribution made during the period from 1 July 2019 to 31 December 2025 by PLife REIT where tax at the prevailing corporate tax rate, instead of the reduced rate of 10%, had been deducted from the distribution and where a refund of the tax over-deducted had not been claimed previously; and
- (iv) in relation to units held solely for the benefit of exempt non-corporate unitholders, distribution made on or after 23 August 2007 by PLife REIT where tax at the prevailing corporate tax rate had been deducted from the distribution and where a refund of the tax over-deducted had not been claimed previously.

A qualifying non-resident non-individual unitholder is one who is not a resident of Singapore¹ for income tax purposes and:

- (i) who does not have any permanent establishment² in Singapore; or
- (ii) who carries on any operation through a permanent establishment² in Singapore, where the funds used to acquire the units in PLife REIT are not obtained from that operation.

A qualifying non-resident fund is one who qualifies for tax exemption under section 13D, 13U or 13V of the Income Tax Act 1947 and is not a resident of Singapore¹ for income tax purposes and:

- (i) who does not have any permanent establishment² in Singapore (other than a fund manager in Singapore); or
- (ii) who carries on any operation through a permanent establishment² in Singapore (other than a fund manager in Singapore), where the funds used to acquire the units in PLife REIT are not obtained from that operation.

An exempt non-corporate unitholder is one who is:

- (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.

To claim the tax refund from the Comptroller of Income Tax ("CIT") and to enable the Trustee and the Manager of PLife REIT to ascertain the status of the beneficiaries to the units held by you (i.e. individuals, qualifying foreign non-individual unitholders, qualifying non-resident funds or exempt non-corporate unitholders), you will need to make a declaration in this Form. 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.

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 declarations made in this Form to determine if tax have been over-deducted from the distributions made in respect of the units held by you in your capacity as a Depository Agent. Please therefore ensure that this Form and the Annex are 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 in respect of the PLife REIT units held by you as a Depository Agent.

If you are eligible for the tax refund in respect of the units held by you as a Depository Agent, 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 R2) for each income distribution period.

This Form, together with the Annex, 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. Please email a soft copy of the completed Annex to this declaration form to Boardroom Corporate & Advisory Services Pte Ltd at SRS.TeamD@boardroomlimited.com. Please note that it is compulsory to email the soft copy of the completed Annex.

Declaration

I, _____, NRIC/Passport No. _____, the principal officer of _____ ("the Depository Agent") hereby declare that the PLife REIT units registered in the name of the Depository Agent and deposited in the sub-accounts maintained with The Central Depository (Pte) Ltd, as listed in Annex to this declaration form in respect of the distribution for the period from _____ to _____ belonged beneficially to persons who are individuals, qualifying non-resident non-individuals, qualifying non-resident funds or exempt non-corporate unitholders respectively and that we have not previously claimed a refund of the tax over-deducted. The details of each of these beneficial owners are also listed in the Annex. We also attach _____ Subsidiary Income Tax Certificates that were issued to the unit holders shown in Annex in respect of which the claim for refund is made.

Signature of Declarant : _____

Date : _____

Contact No : _____

¹ 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.

² 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.

PARKWAYLIFE REAL ESTATE INVESTMENT TRUST ("PLife REIT")
INCOME DISTRIBUTION FOR PERIOD _____ TO _____
Name of Counter : ParkwayLife Reit

Annex

Annex to Declaration Form

S/No.	Certificate Serial No.	Depository Agent	CDP Sub-Account No.	Name of beneficiary holder(s)	Identification No.*	Address	Number of units held	Gross distribution paid	Amount of tax deducted at prevailing corporate tax rate/10%#	Tax to be refunded at prevailing corporate tax rate/10%#
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

* For individuals, this refer to Singapore NRIC No., foreign ID No., or Passport No.
 For non-individuals, this refer to the Unique Entity Number ("UEN") or tax reference number.

Delete where applicable.