



**CAPITALAND INDIA TRUST**

(Registration Number: 2007004)

(a business trust registered under the Business Trusts Act 2004)

**ANNOUNCEMENT**

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**TAX RULING IN RESPECT OF THE S\$100,000,000 4.40 PER CENT. SUBORDINATED PERPETUAL SECURITIES ("PERPETUAL SECURITIES") ISSUED PURSUANT TO THE S\$1,500,000,000 MULTICURRENCY DEBT ISSUANCE PROGRAMME (THE "PROGRAMME")**

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CapitaLand India Trust Management Pte. Ltd. (in its capacity as trustee-manager of CapitaLand India Trust ("**CLINT**", and the trustee-manager of CLINT, the "**Trustee-Manager**") refers to the issue on 2 July 2025 of the Perpetual Securities under the Programme.

In the pricing supplement dated 25 June 2025 issued in connection with the Perpetual Securities (the "**Pricing Supplement**"), reference was made to an application to the Inland Revenue Authority of Singapore ("**IRAS**") for an advance tax ruling to confirm the classification of the Perpetual Securities for Singapore income tax purposes and the Singapore tax treatment of the payment of the distributions (including Optional Distributions). Unless otherwise defined herein, terms used in this announcement and which are defined in the terms and conditions of the Perpetual Securities read together with the Pricing Supplement (collectively, the "**Conditions**") shall bear the same meanings ascribed to them in the Conditions.

The Trustee-Manager wishes to announce that the abovementioned tax ruling has been obtained from the IRAS. In particular, the IRAS has stated in the tax ruling that:

- (a) the Perpetual Securities will be regarded as "debt securities" for the purpose of Sections 13(16) and 43H(4) of the Income Tax Act 1947 of Singapore and Regulation 2 of the Income Tax (Qualifying Debt Securities) Regulations; and
- (b) the Distributions (including Optional Distributions) payable on the Perpetual Securities will be regarded as interest payable on indebtedness.

Correspondingly, the Perpetual Securities should qualify as qualifying debt securities ("**QDS**") and holders of the Perpetual Securities should therefore be entitled to the tax concessions and exemptions available under the QDS scheme subject to the conditions set out in the section "Singapore Taxation" of the Information Memorandum dated 24 January 2022 (as amended by the Pricing Supplement).

BY ORDER OF THE BOARD

CapitaLand India Trust Management Pte. Ltd.  
(as Trustee-Manager for CapitaLand India Trust)

Hon Wei Seng  
Lee Wei Hsiung  
Company Secretaries  
5 December 2025

**Important Notice**

The past performance of CapitaLand India Trust ("CLINT") and CapitaLand India Trust Management Pte. Ltd., as Trustee-Manager of CLINT (the "Trustee-Manager") is not indicative of future performance. The listing of the units in CLINT ("Units") on the Singapore Exchange Securities Trading Limited (the "SGX-ST") does not guarantee a liquid market for the Units. The value of the Units and the income derived from them may fall as well as rise. Units are not obligations of, deposits in, or guaranteed by, the Trustee-Manager or any of its affiliates. An investment in the Units is subject to investment risks, including the possible loss of the principal amount invested. Investors have no right to request that the Trustee-Manager redeem or purchase their Units while the Units are listed on the SGX-ST. It is intended that holders of Units may only deal in their Units through trading on the SGX-ST. This announcement is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for the Units.