

15 February 2006

To: All Depository Agents

**CAPITACOMMERCIAL TRUST ("CCT")
BACK-END REFUND PROCEDURES**

1. Further to our Circular dated 13 July 2005, we are pleased to inform you that the back-end refund procedures have been finalised. Details of the procedures are provided in this Circular and you may proceed to avail of this process to claim for refund on behalf of your beneficiaries with immediate effect.

Categories of beneficiaries to whom the back-end refund is applicable

2. The back-end refund procedures allow you to make a claim for refund of any tax over-deducted from CCT's distributions (see paragraph 4 for the eligible distributions) on behalf of the following categories of beneficial unitholders:
 - (a) beneficial unitholders who are individuals; and
 - (b) beneficial unitholders who are foreign non-individuals (see paragraph 3 for definition).

For other categories of beneficial unitholders, they will need to go through the normal process of tax return filing to claim a refund, if any, of the tax-deducted.

3. A foreign non-individual refers to a beneficial unitholder (other than an individual) 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 in CCT are not obtained from that operation.

4. The back-end refund procedures apply to the following CCT's distributions:
- (a) in relation to beneficial unitholders who are individuals, distributions made by CCT on or after 28 February 2005. Under current tax law, individuals are exempt from tax on such distributions and therefore if tax had been deducted from the distributions made to them, they are entitled to a refund of the tax deducted; and
 - (b) in relation to beneficial unitholders who are foreign non-individuals, distributions made by CCT during the period from 18 February 2005 to 17 February 2010. Under current tax law, foreign non-individuals are taxed at a reduced rate of 10% on such distributions and therefore if tax had been deducted at the standard corporate tax rate (currently 20%) from the distributions made to them, they are entitled to a refund of the tax over-deducted.

Documents to be submitted

5. To make a claim for refund on behalf of your beneficiaries, you have to submit the following documents:
- (a) Form R2 (Depository Agents)
 - (i) you are required to make the declaration on Form R2 and to furnish the particulars of the beneficiaries on whose behalf the claim is made in the appropriate annexes (Annex 1 or Annex 2) to the Form. **Please use a separate Form R2 for each income distribution period;**
 - (ii) a sample of Form R2 and the accompanying Annexes is attached. You may download Form R2 from CCT's website at www.cct.com.sg with effect from 24 February 2006; and
 - (b) Subsidiary Income Tax Certificates ("SITCs")

each claim for refund has to be substantiated by the SITC that were issued for the distribution in respect of which the refund is claimed. The Inland Revenue Authority of Singapore ("IRAS") will verify the claim against the SITC and therefore the SITC must show, among other things, the name of the individual or foreign non-individual who is beneficially entitled to the distribution.

6. **For the purpose of the declaration in the Form R2, please note that your declaration of the status of the beneficiary or beneficiaries of the units deposited in a particular sub-account (i.e. individuals /foreign non-individual investors) must be properly substantiated. You must ensure that you have appropriate documents to support your declaration. Where the units are held through more than one tier of nominees, please note that the confirmation must be from the ultimate beneficiaries. Please also ensure that you keep records of the amount of distributions made to each beneficiary as the IRAS may require such information.**
7. Please submit the duly completed Form R2 and the accompanying SITCs to Lim Associates (Pte) Ltd at 10 Collyer Quay, #19-08 Ocean Building, Singapore 049315. In addition, please email a soft copy of the completed Annexes to Lim Associates (Pte) Ltd at MayChuan.Kiang@boardroomlimited.com.
8. You may submit Form R2 and the accompanying SITCs at any time. The Trustee and the Manager of CCT will file a claim for refund from the IRAS on a half-yearly basis. For example, all claims received by Lim Associates (Pte) Ltd during the half-year ending 30 June 2006 will be compiled and submitted to the IRAS in July 2006.
9. The amount of tax over-deducted will be refunded to you only after the IRAS has refunded this amount to the Trustee of CCT.

Issued by CapitaCommercial Trust Management Limited
as Manager of CapitaCommercial Trust