

GENERAL ANNOUNCEMENT::S\$180M 4.35% SUBORDINATED PERPETUAL SECURITIES UNDER S\$3B MMTN PROGRAMME - IRAS TAX RULING**Issuer & Securities****Issuer/ Manager**

GUOCOLAND LIMITED

Securities

GUOCOLAND LIMITED - SG1R95002270 - F17

Stapled Security

No

Announcement Details**Announcement Title**

General Announcement

Date & Time of Broadcast

13-Aug-2025 17:48:28

Status

New

Announcement Sub Title

S\$180M 4.35% SUBORDINATED PERPETUAL SECURITIES UNDER S\$3B MMTN PROGRAMME - IRAS TAX RULING

Announcement Reference

SG250813OTHLZX7

Submitted By (Co./ Ind. Name)

Ng Chooi Peng

Designation

Group Company Secretary

Description (Please provide a detailed description of the event in the box below)

Please refer to the attachment.

Attachments [SGX-IHT Series 030 T1-Guarantor Ann.pdf](#)

Total size =171K MB

S\$180,000,000 4.35 PER CENT. SUBORDINATED PERPETUAL SECURITIES ISSUED PURSUANT TO THE S\$3,000,000,000 MULTICURRENCY MEDIUM TERM NOTE PROGRAMME OF GLL IHT PTE. LTD.

Capitalised terms not defined in this announcement shall have the same meaning set out in the Trust Deed dated 23 April 2008 (as last amended and restated on 29 July 2022).

GuocoLand Limited (the “**Company**”) refers to the Pricing Supplement dated 21 February 2025 (“**Pricing Supplement**”) issued by its wholly-owned subsidiary, GLL IHT Pte. Ltd. (the “**Issuer**”), in connection with the issue of the S\$180,000,000 4.35 per cent. subordinated perpetual securities (the “**Securities**”). In the Pricing Supplement, reference was made to an application to the Inland Revenue Authority of Singapore (“**IRAS**”) for a ruling that holders of the Securities may enjoy the tax concessions available for qualifying debt securities (“**QDS**”), provided that the relevant conditions are met.

The Company wishes to announce that, based on such ruling which has been obtained from IRAS and based on the Return on Debt Securities in respect of the Securities filed with the Monetary Authority of Singapore, the Securities would be regarded as “debt securities” for the purpose of Section 43H(4) of the Income Tax Act 1947 and Regulation 2 of the Income Tax (Qualifying Debt Securities) Regulations. Accordingly, the Distributions due and payable on the Securities (including Arrears of Distribution and any Additional Distribution Amounts) will be regarded as interest payable on indebtedness. Correspondingly, the Securities should qualify as QDS and holders of the Securities should therefore be able to enjoy the tax concessions under the QDS scheme subject to the conditions set out in the section “Singapore Taxation” of the Information Memorandum dated 29 July 2022 (as amended by the Pricing Supplement).

By Order of the Board

Ng Chooi Peng
Group Company Secretary

13 August 2025