

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

GLL IHT PTE. LTD.

Securities

GLL IHT S\$180M4.35% PERPSEC - SGXF37162413 - KETB

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No

Announcement Details**Announcement Title**

General Announcement

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

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Submitted By (Co./ Ind. Name)

Ng Chooi Peng

Designation

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-Issuer Ann.pdf](#)

Total size = 165K 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

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).

GLL IHT Pte. Ltd. (the “**Issuer**”) refers to the announcement dated 25 February 2025 made by GuocoLand Limited (the “**Guarantor**”) in connection with the issuance of S\$180,000,000 4.35 per cent. subordinated perpetual securities (the “**Securities**”) under its \$3,000,000,000 Multicurrency Medium Term Note Programme.

In the Pricing Supplement dated 21 February 2025 (“**Pricing Supplement**”) issued by the Issuer in connection with the issue of the Securities, 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 Issuer wishes to announce that, based on such ruling which has been obtained from the 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
Company Secretary

13 August 2025