# SECURITIES AND FUTURES ACT (CAP. 289) SECURITIES AND FUTURES (DISCLOSURE OF INTERESTS) REGULATIONS 2012

## NOTIFICATION FORM FOR SUBSTANTIAL SHAREHOLDER(S)/UNITHOLDER(S) IN RESPECT OF INTERESTS IN

FORM

3
(Electronic Format)

#### **Explanatory Notes**

- 1. Please read the explanatory notes carefully before completing the notification form.
- 2. This form is for a Substantial Shareholder(s)/Unitholder(s) to give notice under section 135, 136, 137, 137J (as applicable to sections 135, 136 and 137) or 137U (as applicable to sections 135, 136 and 137) of the Securities and Futures Act (the "SFA").
- 3. This electronic Form 3 and a separate Form C, containing the particulars and contact details of the Substantial Shareholder(s)/Unitholder(s), must be completed by the Substantial Shareholder(s)/Unitholder(s) or a person duly authorised by the Substantial Shareholder(s)/Unitholder(s) to do so. The person so authorised should maintain records of information furnished to him by the Substantial Shareholder(s)/Unitholder(s).
- 4. This form and Form C, are to be completed electronically and sent to the Listed Issuer via an electronic medium such as an e-mail attachment. The Listed Issuer will attach both forms to the prescribed SGXNet announcement template for dissemination as required under section 137G(1), 137R(1) or 137ZC(1) of the SFA, as the case may be. While Form C will be attached to the announcement template, it will not be disseminated to the public and is made available only to the Monetary Authority of Singapore (the "Authority").
- 5. Where a transaction results in similar notifiable obligations on the part of more than one Substantial Shareholder/Unitholder, all of these Substantial Shareholders/Unitholders may give notice using the same notification form.
- 6. A single form may be used by a Substantial Shareholder/Unitholder for more than one transaction resulting in notifiable obligations which occur within the same notifiable period (i.e. within two business days of becoming aware of the earliest transaction). There must be no netting-off of two or more notifiable transactions even if they occur within the same day.
- 7. All applicable parts of the notification form must be completed. If there is insufficient space for your answers, please include attachment(s) by clicking the paper clip icon on the bottom left-hand corner or in item 11 of Part II or item 10 of Part III. The total file size for all attachment(s) should not exceed 1MB.
- 8. Except for item 5 of Part II and item 1 of Part IV, please select only one option from the relevant check boxes.
- 9. Please note that submission of any false or misleading information is an offence under Part VII of the SFA.
- 10. In this form, the term "Listed Issuer" refers to -
  - (a) a company incorporated in Singapore any or all of the shares in which are listed for quotation on the official list of a securities exchange;
  - (b) a corporation (not being a company incorporated in Singapore, or a collective investment scheme constituted as a corporation) any or all of the shares in which are listed for quotation on the official list of a securities exchange, such listing being a primary listing;

- (c) a registered business trust (as defined in the Business Trusts Act (Cap. 31A)) any or all of the units in which are listed for quotation on the official list of a securities exchange;
- (d) a recognised business trust any or all of the units in which are listed for quotation on the official list of a securities exchange, such listing being a primary listing; or
- (e) a collective investment scheme that is a trust, that invests primarily in real estate and real estaterelated assets specified by the Authority in the Code on Collective Investment Schemes, and any or all the units in which are listed for quotation on the official list of a securities exchange, such listing being a primary listing ("Real Estate Investment Trust").
- 11. For further instructions and guidance on how to complete this notification form, please refer to section 7 of the User Guide on Electronic Notification Forms which can be accessed at the Authority's Internet website at <a href="http://www.mas.gov.sg">http://www.mas.gov.sg</a> (under "Regulations and Financial Stability", "Regulations, Guidance and Licensing", "Securities, Futures and Fund Management", "Forms", "Disclosure of Interests").

#### Part I - General

T dit i - Schicial
Name of Listed Issuer:
Cromwell European Real Estate Investment Trust ("CEREIT")
Type of Listed Issuer:  Company/Corporation
Registered/Recognised Business Trust
✓ Real Estate Investment Trust
Name of Trustee-Manager/Responsible Person:
Cromwell EREIT Management Pte. Ltd.
Is more than one Substantial Shareholder/Unitholder giving notice in this form?  No (Please proceed to complete Part II)
✓ Yes (Please proceed to complete Parts III & IV)
Date of notification to Listed Issuer:
08-Apr-2021
00 7.pl 2021

#### Part III - Substantial Shareholder(s)/Unitholder(s) Details

[To be used for multiple Substantial Shareholders/Unitholders to give notice]

Substantial Shareholder/Unitholder A
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Name of Subst	antial Shareholder	(Unitholder:		
Straits Equities Ho	ldings (One) Pte. Ltd			
		nolder a fund mana held solely through	•	hose interest in the
Notification in re	espect of:			
☐ Becoming a S	Substantial Sharehol	der/Unitholder		
✓ Change in the	percentage level of	interest while still ren	naining a Substantial	Shareholder/Unitholder
Ceasing to be	a Substantial Shar	eholder/Unitholder		
Date of acquisit	ion of or change ir	n interest:		
05-Apr-2021				
		nolder/Unitholder be from item 4 above,		acquisition of, or the date):
05-Apr-2021				
Explanation (if change in, inter		ing aware is differer	nt from the date of	acquisition of, or the

Quantum of total voting shares/units (including voting shares/units underlying 7. rights/options/warrants/convertible debentures {conversion price known}) held by Substantial Shareholder/Unitholder before and after the transaction:

Immediately before the transaction	Direct Interest	Deemed Interest	Total
No. of voting shares/units held and/or underlying the rights/options/warrants/convertible debentures:	0	782,788,645	782,788,645
As a percentage of total no. of voting shares/(	0	28.07	28.07
Immediately after the transaction	Direct Interest	Deemed Interest	Total
Immediately after the transaction  No. of voting shares/units held and/or underlying the rights/options/warrants/ convertible debentures :	Direct Interest	Deemed Interest 782,788,645	Total 782,788,645

Pleas	e see paragraph 9 of Shareholder B's notification.
Rela	ationship between the Substantial Shareholders/Unitholders giving notice in this form:
[You	may attach a chart in item 10 to show the relationship between the Substantial reholders/Unitholders]
Pleas	e see paragraph 9 of Shareholder B's notification.
Atta	chments ( <i>if any</i> ): 🕤
G	(The total file size for all attachment(s) should not exceed 1MB.)
	is is a <b>replacement</b> of an earlier notification, please provide:
(a)	SGXNet announcement reference of the <u>first</u> notification which was announced on SGXNet (the "Initial Announcement"):
(b)	Date of the Initial Announcement:
( )	
(c)	15-digit transaction reference number of the relevant transaction in the Form 3 which was attached in the Initial Announcement:
Ren	narks ( <i>if any</i> ):
	percentages of total number of ordinary voting units are calculated based on (i) the total number of units are calculated based on (ii) the total number of units are calculated based on (iii) the total number of units are calculated based on (iii) the total number of units are calculated based on (iii) the total number of units are calculated based on (iii) the total number of units are calculated based on (iii) the total number of units are calculated based on (iiii) the total number of units are calculated based on (iiii) the total number of units are calculated based on (iiii) the total number of units are calculated based on (iiii) the total number of units are calculated based on (iiii) the total number of units are calculated based on (iiiiii) the total number of units are calculated based on (iiiiiiii) the total number of units are calculated based on (iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii
in issu	ue as at the date of this notification, being 2,796,650,416 units and (ii) the number of units in CEREIT or Cromwell Property Group ("CPG") currently is deemed interested in as at the date of this notification
VVIIICI	rotothwell Property Group ( Group currently is deemed interested in as at the date of this notification
stanti	al Shareholder/Unitholder B
	ne of Substantial Shareholder/Unitholder:
Title 3	Straits Trading Company Limited
	substantial Shareholder/Unitholder a fund manager or a person whose interest in t
seci	urities of the Listed Issuer are held solely through fund manager(s)?
secu	drittles of the Listed issuer are neid solely through fund manager(s)? 'es No

	Date of acquisition of or change in interest:					
	05-Apr-2021					
	Date on which Substantial Shareholder/Unitholder became aware of the acquisition of, or the change in, interest (if different from item 4 above, please specify the date):					
	05-Apr-2021					
	Explanation (if the date of becomi change in, interest):	ng aware is differ	ent from the date o	f acquisition of, or t		
	Quantum of total voting share rights/options/warrants/convertible Shareholder/Unitholder before and	e debentures (con	version price knowi			
	Immediately before the transaction	Direct Interest	Deemed Interest	Total		
n	of voting shares/units held and/or derlying the hts/options/warrants/convertible debentures:	0	782,788,645	782,788,645		
	a percentage of total no. of voting ares/t	0	28.07	28.07		
	Immediately after the transaction	Direct Interest	Deemed Interest	Total		
n	of voting shares/units held and/or derlying the rights/options/warrants/nvertible debentures :	0	782,788,645	782,788,645		
	a percentage of total no. of voting ares/ເ	0	27.99	27.99		
	Circumstances giving rise to deemed interests (if the interest is such): [You may attach a chart in item 10 to illustrate how the Substantial Shareholder/Unitholder's deemed interest arises]					
	Please see paragraph 9 below.					
	Relationship between the Substan [You may attach a chart in item 10 to Shareholders/Unitholders]					

As ARA Real Estate Investors XXI Pte. Ltd. holds above 20.00% of CPG, and CPG is deemed interested in 27.99% of the units in Cromwell European Real Estate Investment Trust ("CEREIT"), ARA Real Estate Investors XXI Pte. Ltd. is deemed interested in 27.99% of the units in CEREIT through CPG.

As ARA RE Investment Group (Singapore) Pte. Ltd. holds 100% of ARA Real Estate Investors XXI Pte. Ltd., it is also deemed interested in 27.99% of the units in CEREIT.

As ARA Asset Management Limited holds 100% of ARA RE Investment Group (Singapore) Pte. Ltd., it is also deemed interested in 27.99% of the units in CEREIT.

As ARA Investment (Cayman) Limited holds 100% of ARA Asset Management Limited, it is also deemed interested in 27.99% of the units in CEREIT.

As ARA Asset Management Holdings Pte. Ltd. holds 100% of ARA Investment (Cayman) Limited, it is also deemed interested in 27.99% of the units in CEREIT.

As Straits Equities Holdings (One) Pte. Ltd. holds 20.95% of the voting rights of ARA Asset Management Holdings Pte. Ltd., it is also deemed interested in 27.99% of the units in CEREIT.

As The Straits Trading Company Limited holds 100% of the voting rights of Straits Equities Holdings (One) Pte. Ltd., it is also deemed interested in 27.99% of the units in CEREIT.

10. Attachments (if any)	(
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(The total file size for all attachment(s) should not exceed 1MB.)

11.	If this is a <b>rep</b>	lacement of	f an earli	er notification,	please provide:
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(a)	SGXNet announcement reference of the <u>first</u> notification which was announced on SGXNet (the "Initial Announcement"):
(b)	Date of the Initial Announcement:
(c)	15-digit transaction reference number of the relevant transaction in the Form 3 which was attached in the Initial Announcement:

#### 12. Remarks (if any):

The percentages of total number of ordinary voting units are calculated based on (i) the total number of units in issue as at the date of this notification, being 2,796,650,416 units and (ii) the number of units in CEREIT which CPG currently is deemed interested in as at the date of this notification.

### Part IV - Transaction details

	Rights/Options/Warrants over voting shares/units
	Convertible debentures over voting shares/units (conversion price known)
	Others (please specify):
	mber of shares, units, rights, options, warrants and/or principal amount of convertible pentures acquired or disposed of by Substantial Shareholders/Unitholders:
	. Please see paragraph 4 below.
IV.A	riease see paragraph 4 below.
	ount of consideration paid or received by Substantial Shareholders/Unitholders (excluding kerage and stamp duties):
N.A	. Please see paragraph 4 below.
Circ	cumstance giving rise to the interest or change in interest:
	uisition of:
	Securities via market transaction
	Securities via off-market transaction (e.g. married deals)
	Securities via physical settlement of derivatives or other securities
	Securities pursuant to rights issue
	Securities via a placement
	Securities following conversion/exercise of rights, options, warrants or other convertibles
Dis	posal of:
	Securities via market transaction
	Securities via off-market transaction (e.g. married deals)
Oth	er circumstances:
	Acceptance of take-over offer for the Listed Issuer
	Corporate action by the Listed Issuer which Substantial Shareholders/Unitholders did not participate in ( <i>please specify</i> ):
<b>√</b>	Others (please specify):
	re is no direct acquisition of units in Cromwell European Real Estate Investment Trust. The substantial
	cholders' interest arises from ARA Real Estate Investors XXI Pte. Ltd.'s interest in Cromwell Property Group.

Item 5 is to be completed by an individual submitting this notification form on behalf of the Substantial Shareholders/Unitholders. Particulars of Individual submitting this notification form to the Listed Issuer: 5. (a) Name of Individual: Ngiam May Ling Designation (if applicable): (b) Company Secretary (c) Name of entity (if applicable): The Straits Trading Company Limited Transaction Reference Number (auto-generated): 0 9 9 9 3 4 2 3 0 4 8 3