

10 March 2020

**NOTICE TO: CUSTODIANS/NOMINEE AGENTS AND
OTHER MANAGED INVESTMENT TRUSTS (MIT)**

The following provides details of the components of the BlackWall Property Trust (BWR) distribution for the half year ended 31 December 2019 (**period ended 31 December 2019**). The distribution is 3.5 cents per unit for the period ended 31 December 2019 and will be paid on 13 March 2020.

BlackWall Fund Services Limited, the trustee for the BlackWall Property Trust:

- considers that BlackWall Property Trust is a withholding managed investment trust (**withholding MIT**) in relation to its income year ended 30 June 2020;
- has made an election for BlackWall Property Trust to be an attribution managed investment trust (**AMIT**) from 1 July 2016; and
- gives the following notice to you as recipient of a payment of 3.5 cents per unit for the period ended 31 December 2019.

The total fund payment portion received by a particular unitholder can be determined by multiplying the amounts below by the number of securities held by that unitholder at 31 December 2019.

Component (cents per unit)

Component	BlackWall Property Trust (cents per unit)
Australian-sourced interest	-
Fund payment (refer to Note 1)	-

The fund payment has been determined in accordance with Subdivision 12A-B of Schedule 1 of the Taxation Administration Act 1953, being the amount from which an amount would be required to be withheld under Subdivision 12-H of Schedule 1 of the *Taxation Administration Act 1953* if the payment had been made to an entity covered by section 12-410 of that schedule. The fund payment is nil per unit (refer to Note 1), and relates to the income year ended 30 June 2020.

No part of the distribution in respect of the period ended 31 December 2019 is attributable to a fund payment from a clean building MIT.

These components are provided solely for the purpose of the withholding MIT non-resident withholding tax under Subdivision 12-H of Schedule 1 to the *Taxation Administration Act 1953* (Cth) and the non-resident interest withholding tax under Subdivision 12-F of Schedule 1 to the *Taxation Administration Act 1953* (Cth), and should not be used for any other purpose.

The taxation components for the distributions for the year ended 30 June 2020 will be shown on the Attribution MIT Member Statement, which will be issued in September 2020.

PLEASE NOTE: this information is provided to assist Custodians/Nominees and other MITs, and not Australian resident individual investors.

NOTE 1

The fund payment amount is calculated in accordance with Subdivision 12A-B of Schedule 1 to the *Taxation Administration Act 1953*. This subdivision deals with distributions from AMITs to foreign residents.

The trustee of a withholding MIT that is an AMIT must withhold tax from “fund payment” amounts in respect of distributions it makes during an income year. In determining the amount of the fund payment relating to a particular distribution, the trustee of the AMIT is required to take into account earlier fund payments made during the current year and changes in circumstances as the financial year progresses. The fund payment amount calculated under Subdivision 12A-B may not necessarily be the same as the cash distribution paid.

The method of calculating the fund payment amount is different to the way that an AMIT calculates its annual taxable and non-taxable components for income tax purposes. For example, the calculation of the fund payment amount does not include interest income or foreign source income. These amounts are however included in the calculation of the trust’s final annual taxable and non-taxable components for income tax purposes.

Subdivision 12A-B requires any discount capital gains that form part of a distribution to be grossed up (doubled) in calculating the fund payment amount. Consequently, discount capital gains can in some cases result in the fund payment amount exceeding the actual cash distribution paid.

As a result of the calculation required under Subdivision 12A-B, the amount of the fund payments determined by BlackWall Fund Services Limited as trustee for BlackWall Property Trust for the period ended 31 December 2019 amounted to nil.

Unitholders should seek their own tax advice regarding the fund payments.