

Hotel Property Investments Trust
ARSN 166 484 377

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20 March 2024

ABN 25 010 330 515

Notice of proposal to amend the Trust Deed to take advantage of the new tax regime

About this notice

This notice is given by Hotel Property Investments Limited (ACN 010 330 515, AFSL 479719) ("**HPI**") in its capacity as the responsible entity of the Hotel Property Investments Trust ("**Trust**").

This notice is to inform investors that HPI proposes to change the Trust's Trust Deed to take advantage of the Attribution Managed Investment Trust tax regime ("**AMIT Regime**").

As the AMIT Regime affects a large number of managed investment trusts, the Australian Securities and Investments Commission has granted relief which permits HPI to make the proposed changes under *ASIC Corporations (Attribution Managed Investments Investment Trusts) Instrument 2016/489* provided that, among other things, this notice is given to investors to explain the changes proposed.

Why is HPI proposing to amend the Trust Deed?

The AMIT Regime is a taxation regime which was introduced for managed investment trusts. The proposed amendments to the Trust's Trust Deed will allow HPI to elect into and operate under this new taxation regime.

What information should investors know about the proposed amendments?

HPI considers that the proposed amendments to the Trust's Trust Deed are in the best interests of investors. In particular, we note that:

- the AMIT Regime provisions generally provide greater certainty than the existing regime, while providing flexibility to facilitate more equitable outcomes, including in relation to the attribution of the Trust's taxable income to its investors;
 - by electing into the AMIT Regime, the Trust should be deemed to be a fixed trust for tax purposes. This provides certainty that the Trust will be able to access simpler tax loss rules; and
 - the legislated certainty for treating under/overs in respect of the taxable income of the Trust under the AMIT Regime will be a benefit, as it reduces the risk that the Trust needs to reissue tax statements to investors.
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When will the change take effect?

HPI plans to effect these changes after 27 March 2024.

What happens next?

HPI will modify the Trust's Trust Deed to take advantage of the AMIT Regime as proposed, unless it receives requests by 5PM Australian Eastern Standard Time (**AEST**) on 27 March 2024 from investors with at least 5% of the votes that may be cast, to call and arrange to hold a meeting of the Trust's investors. This meeting would be to consider and vote on a special resolution to modify the Trust Deed to take advantage of the AMIT Regime as proposed.

If you wish to request a meeting of the Trust's investors, your request must be made in writing and sent to enquiries@hpitrust.com.au by 5PM AEST on 27 March 2024. Your email must include your full name and your HIN investor number.

If you have any questions in relation to this notice you may wish to speak with your financial advisor. You may also contact us on (03) 9038 1774 between 9AM and 5PM AEST Monday to Friday. You can also email us at enquiries@hpitrust.com.au.