

23 April 2015

To: All Unitholders of UOBAM Funds

Dear Unitholder

U.S. FOREIGN ACCOUNT TAX COMPLIANCE ACT

We, UOB Asset Management Ltd (the "**Managers**"), are writing to you on certain matters affecting the collective investment schemes authorised by the Monetary Authority of Singapore ("**MAS**") under section 286 of the Securities and Futures Act, Chapter 289 of Singapore managed by us (collectively, "**UOBAM Funds**") arising from the coming into effect of the United States ("**U.S.**") Foreign Account Tax Compliance Act ("**FATCA**").

FATCA, enacted in 2010 by the U.S. Congress as part of the U.S. Hiring Incentives to Restore Employment (HIRE) Act, targets non-compliance with tax laws by specified U.S. Taxpayers¹ using overseas accounts. Under FATCA, financial institutions outside of the U.S. are required to regularly submit information on financial accounts held by U.S. Taxpayers to the U.S. tax authorities. Failure to comply with FATCA may, amongst other things, subject the relevant UOBAM Fund to U.S. withholding tax on certain types of payments made to such UOBAM Fund. Accordingly, it is intended that all UOBAM Funds will comply with FATCA.

For the purpose of complying with FATCA, the Managers, the trustee of each UOBAM Fund (the "**Trustee**") and/or other service providers of each UOBAM Fund may be required to report and disclose information on certain investors in the relevant UOBAM Fund to the U.S. tax authorities and/or such Singapore authority as may be required under Singapore laws and regulations to be implemented as part of any intergovernmental agreement ("**IGA**") entered into between the U.S. and Singapore² in connection with FATCA and/or withhold certain payments to such investors.

Therefore, we would require you as an investor of a UOBAM Fund to:

- (a) provide such information, documents and assistance in connection with the above as the Trustee and/or us may require from time to time; and
- (b) notify us or any of our authorised agents or distributors in writing immediately in the event that you are or become a U.S. Taxpayer, or are holding units in any UOBAM Fund for the account of or benefit of a U.S. Taxpayer.

¹ "**U.S. Taxpayers**" in this letter refer to "United States persons" as defined in Section 7701(a)(30) of the U.S. Internal Revenue Code, as amended. Currently, a U.S. Taxpayer includes: a U.S. citizen or resident alien of the United States (as defined for U.S. federal income tax purposes); any entity treated as a partnership or corporation for U.S. tax purposes that is created or organized in, or under the laws of, the United States or any state thereof (including the District of Columbia); any other partnership that may be treated as a U.S. Taxpayer under future U.S. Treasury Department regulations; any estate, the income of which is subject to U.S. income taxation regardless of source; and any trust over whose administration a court within the United States has primary supervision and all substantial decisions of which are under the control of one or more U.S. fiduciaries. Persons who have lost their U.S. citizenship and who live outside the United States may nonetheless, in some circumstances, be treated as U.S. Taxpayers. Persons who are aliens as to the United States but who have spent 183 days or more in the United States in any of the last two years should check with their tax advisors as to whether they may be considered residents of the United States.

² Pursuant to the IGA entered into between Singapore and the U.S. on 9 December 2014, Singapore-based financial institutions will report information on financial accounts held by U.S. Taxpayers to the Inland Revenue Authority of Singapore (IRAS), which will in turn provide the information to the U.S. tax authorities.

You are also deemed to have consented to the Managers, each Trustee and/or other service providers to the UOBAM Funds carrying out their obligations in reporting and disclosing information on you and your investments to the U.S. tax authorities and/or such Singapore authority as may be required under Singapore laws and regulations to be implemented as part of any IGA entered into between the U.S. and Singapore.

Also, with effect from 24 April 2015, units of all UOBAM Funds³ ("**Units**") may not be offered, made available, or sold to or for the account of any U.S. Taxpayer or U.S. Person⁴. Applicants for Units may be required to declare that they are not U.S. Taxpayers and that they are neither acquiring Units on behalf of U.S. Taxpayers nor acquiring Units with the intent to sell or transfer them to U.S. Taxpayers.

We also wish to inform you that, with effect from 29 May 2015:

- (1) The Managers shall have the right (in consultation with the Trustee) to compulsorily realise any holdings of Units in a UOBAM Fund held by:
 - (i) any unitholder in a UOBAM Fund ("**Holder**"):
 - (a) whose subscription for or holding of Units, in the opinion of the Managers, is or may be in breach of any applicable law or regulation in any jurisdiction; or
 - (b) where such realisation is, in the opinion of the Managers, necessary or desirable for the compliance of the Managers or the UOBAM Fund with any applicable law or regulation in any jurisdiction (including any regulatory exemption conditions); or
 - (ii) any Holder whose holdings, in the opinion of the Managers:
 - (a) may cause the UOBAM Fund to lose its authorised or registered status with any regulatory authority in any jurisdiction; or
 - (b) may cause the offer of the Units of the UOBAM Fund, the UOBAM Fund, the prospectus of the UOBAM Fund, the trust deed of the UOBAM Fund, the Managers or the Trustee to become subject to any authorisation, recognition, approval or registration requirements under any law or regulation in any other jurisdiction; or
 - (iii) any Holder whose holdings, in the opinion of the Managers:
 - (a) may cause a detrimental effect on the tax status of the UOBAM Fund in any jurisdiction or on the tax status of the Holders of the UOBAM Fund; or
 - (b) may result in the UOBAM Fund or other Holders of the UOBAM Fund suffering any other legal or pecuniary or administrative disadvantage which the UOBAM Fund or Holders might not otherwise have incurred or suffered; or
 - (iv) any Holder who fails any anti-money laundering, anti-terrorist financing or know-your-client checks, or where information and/or documentary evidence requested by the Managers and/or the Trustee for the purposes of any anti-money laundering, anti-terrorist financing or know-your-client checks cannot be obtained from the Holder (or the Holder has failed to provide the same) in a timely manner; or

³ Save for Asia Multi-Asset Monthly Income Scheme and United Global Asset Rotator, where a restriction on the offer, sale, etc of Units to U.S. Persons or U.S. Taxpayers is already in place.

⁴ "**U.S. Persons**" means U.S. Persons (as defined in Regulation S promulgated under the Securities Act of 1933 of the United States of America, as amended (the "**U.S. Securities Act**")) in reliance on Regulation S promulgated under the U.S. Securities Act.

- (v) any Holder, where information (including but not limited to information regarding tax status, identity or residency), self-certifications or documents as may be requested by the Managers and/or the Trustee pursuant to laws, regulations, guidelines, directives or contractual obligations with other jurisdictions' authorities (including, without limitation, FATCA and/or any Singapore laws, regulations, guidelines and directives implemented as part of any IGA entered into between the U.S. and Singapore in connection with FATCA) cannot be obtained from the Holder, or the Holder has failed to provide the same, in a timely manner; or
- (vi) any Holder who does not consent, or withdraws his consent, for the Managers or the Trustee to collect, use and/or disclose information or data relating to the Holder, where (in the opinion of the Managers or the Trustee) such information or data is necessary or desirable for the Managers, the Trustee, their respective related corporations and/or other service providers to perform their respective services and/or duties to or in respect of the UOBAM Fund and/or the Holder.

Any compulsory realisation due to the above may be carried out by the Managers on any dealing day, with prior notice to the relevant Holder, and shall be carried out in accordance with, and at the realisation price determined under, the applicable provisions on realisations in the trust deed of the relevant UOBAM Fund.

- (2) If the Managers and/or the Trustee are required to account to any duly empowered fiscal authority of Singapore or elsewhere for any income or other taxes, charges or assessments whatsoever on the value of any Units held by a Holder, the Managers (in consultation with the Trustee) shall be entitled, at any time with prior notice to that Holder, to realise such number of Units held by that Holder as may be necessary to discharge the liability arising. The Managers and/or the Trustee (as the case may be) shall be entitled to apply the proceeds of such realisation in payment, reimbursement and/or set-off against the liability.
- (3) The Managers, the Trustee and their respective delegates, agents or associates shall not be liable for any loss (whether direct or consequential and including, without limitation, loss of profit or interest) or damage suffered by any Holder or any party arising out of or caused in whole or in part by any actions which are taken by the Managers, Trustee and/or any of their respective delegates, agents or associates under the above paragraphs relating to compulsory realisation.

The above (together with other amendments) will be reflected in a supplementary or replacement prospectus to the registered prospectus of each UOBAM Fund lodged with the MAS on or around the date of this notice, or where applicable, in the updated prospectus of the relevant UOBAM Fund registered on or around the date of this notice. After the lodgement of the relevant supplementary or replacement prospectus or registration of the relevant updated prospectus (as the case may be), you may obtain a copy of it from us, any of our authorised agents or distributors, or from our website at uobam.com.sg.

The information contained in this notice does not constitute any tax or legal advice. You should obtain professional advice to ascertain the possible tax consequences of FATCA or any IGA on your investments in the relevant UOBAM Fund. Kindly be informed that the Managers are prohibited from rendering tax and legal advice.

We look forward to your continued support. Should you have any queries, please call our hotline at 1800 222 2228 (operating hours from 8 a.m. to 8 p.m. daily (Singapore time)) or email us at uobam@uobgroup.com.

Yours faithfully



Faizal M Fazluddin
Chief Marketing Officer

2015 年 4 月 23 日

致大华资产管理公司所有基金单位持有人:

尊敬的基金单位持有人:

美国《外国账户税收遵从法案》

我公司, 大华资产管理有限公司 (“**管理人**”), 就美国《外国账户税收遵从法案》 (“**FATCA**”) 生效而对我们管理的集合投资计划 (经新加坡金融管理局 (“**MAS**”) 依据新加坡证券期货法第 289 章 286 条批准) 所产生的影响的有关事项 (统称 “**UOBAM 基金**”), 向您发函。

FATCA 于 2010 年由美国国会颁布, 作为美国《鼓励聘用恢复就业法案》的一部分, 主要针对特定美国纳税人¹利用海外账户违反税法的行为。FATCA 要求美国境外的金融机构定期向美国税务机关提交美国纳税人所持金融账户的信息。如不遵守 FATCA, 相关 UOBAM 基金可能 (包括但不限于) 就其收取的特定种类款项而被征收预提税。为此, 我们将促使所有 UOBAM 基金都遵守 FATCA。

为遵守 FATCA, 管理人、每个 UOBAM 基金受托人 (“**受托人**”) 和/或每个 UOBAM 基金服务提供者可能被要求向美国税务机关和/或新加坡相关机关 (依据美国和新加坡²签订的有关 FATCA 的任何政府间协议 (“**IGA**”) 而出台的配套新加坡法律法规) 报告和披露相关 UOBAM 基金的特定投资者, 并/或预提向该等投资者支付的特定款项。

因此, 我公司要求贵方, 作为 UOBAM 基金投资者,

- (a) 提供受托人和/或我公司不时要求的与上述有关的信息、文件和协助; 和
- (b) 如贵方为或成为美国纳税人, 或为美国纳税人之利益持有任何 UOBAM 基金的基金单位, 请立即书面通知我公司或我公司任何授权代理人或发售商。

贵方还将被视为已默认为同意, 由管理人、受托人和/或 UOBAM 基金服务提供者履行向美国税务机关和/或新加坡相关机关 (依据美国和新加坡签订的任何 IGA 而出台的配套新加坡法律法规) 报告和披露与有关贵方和贵方投资信息的义务。

¹ “**美国纳税人**”: 在本函中指美国《联邦税法》第 7701 条 (a) (30) 中定义的“美国人”。目前, 美国纳税人包括: 美国公民或在美国的外籍居民 (与美国联邦所得税相关的定义相同); 在美国或美国任意州 (包括哥伦比亚特区) 或根据美国或美国任意州 (包括哥伦比亚特区) 法律组织或成立、在美国税法下被视为合伙企业或公司的任何实体; 依据美国财政部未来出台的法规被视为美国纳税人任何其他合伙企业; 任何其收益 (不管收益来源) 受制于美国所得税法的房地产; 信托管理主要受到美国法院监督且所有实质决定均受到一个或多个美国受托人控制的任何信托。在某些情况下, 失去美国公民资格和居住在美国国外的人士也被视为美国纳税人。在过去两年内在美国逗留时间达到或超过 183 天的外籍居民, 应向其税务顾问咨询其是否被视为美国居民。

² 根据新加坡和美国于 2014 年 12 月 9 日签订的 IGA 规定, 总部位于新加坡的金融机构应向新加坡税务局 (IRAS) 报告美国纳税人持有的金融账户的信息, 再由新加坡税务将该信息转交给美国税务机关。

此外，自 2015 年 4 月 24 日起，所有 UOBAM 基金的基金单位³（“基金单位”）可能不得向美国纳税人或美国人士⁴，或向代前述人士获取的人士提供、发售。基金单位申请人可能被要求声明其非美国纳税人，且既非代美国纳税人持有基金单位，亦非为了向美国纳税人出售或转让基金单位而获取基金单位。

我公司还希望贵方知悉，自 2015 年 5 月 29 日起，

(1) 管理人将有权（征询受托人意见后）强制变现以下持有人持有的 UOBAM 基金的基金单位：

- (i) 任何 UOBAM 基金单位持有人（“持有人”），如
 - (a) 管理人认为，其基金单位认购或持有违反或可能违反任何管辖范围内的适用法律或法规；或
 - (b) 管理人认为，根据任何管辖范围内的任何适用法律或法规规定（包括任何法定豁免条件），该等变现对 UOBAM 基金管理人或 UOBAM 基金合规必要或有利；或
- (ii) 任何持有人，管理人认为其持有
 - (a) 可能引起任何管辖范围内的监管机构取消 UOBAM 基金授权或注册；或
 - (b) 可能导致 UOBAM 基金的基金单位提供、UOBAM 基金、UOBAM 基金发售计划书、UOBAM 基金信托书、管理人或受托人受限于任何管辖范围内的法律或法规下的授权、认可、批准或注册要求；或
- (iii) 任何持有人，管理人认为其持有情况：
 - (a) 可能对 UOBAM 基金在任何管辖范围内的纳税状况或 UOBAM 基金持有人的纳税状况产生不利影响；或
 - (b) 可能导致 UOBAM 基金或其他 UOBAM 基金持有人遭受本来不会发生或遭受的法律、金钱或行政上的不利后果；或
- (iv) 未通过反洗钱、反恐怖主义融资或了解客户程序的审查，或不能及时应管理人和/或受托人要求提交用于反洗钱、反恐怖主义融资或了解客户程序审查的信息和/或证明文件的持有人；或
- (v) 不能按照法律、法规、规范、指令或与其他管辖机关约定的义务（包括但不限于 FATCA 和/或因美国和新加坡就 FATCA 签订的 IGA 而出台的新加坡法律、法规、规

³ 亚洲多元资产每月收益计划（Asia Multi-Asset Monthly Income Scheme）和大华全球资产轮动基金（United Global Asset Rotator）除外，因为其中已向美国人士或美国纳税人提供、销售基金单位做出限制。

⁴ “美国人士”指《美国证券法》下出台的 S 法规中定义的美国人士（定义见不时修订的美国 1993 年证券法（“《美国证券法》”）下出台的 S 法规）。

范和指令），应管理人和/或受托人要求提供信息（包括但不限于有关纳税状况、身份或住所的信息）、身份证明或文件的持有人。

- (vi) 不同意或撤销其作出的同意管理人或受托人收集、使用和/或披露有关持有人的信息或数据的持有人。而在管理人或受托人认为，该等信息或数据对管理人、受托人、各自相关公司和/或其他服务提供者提供与 UOBAM 基金和/或持有人有关的服务和/或履行职责必要或有益。

任何因上述原因导致的强制变现可由管理人于任何交易日变现，并提前通知相关持有人，变现应根据相关 UOBAM 基金信托书中有关变现的条款和变现价格进行。

- (2) 如管理人和/或受托人被要求就持有人所持有的基金单位价值，向任何有权限的新加坡财政机关或其他机关申报所得或其他税收、费用或纳税评估等，管理人（征询受托人意见后）有权随时向持有人发出事先书面通知，在履行相应责任必需的范围内变现持有人持有的基金单位。管理人和/或受托人（视情况而定）有权用变现资金进行付款、偿付和/或抵偿债务。
- (3) 管理人、受托人及其各自的代表、代理人或合伙人不承担任何持有人因为（部分或全部原因）管理人、受托人和/或其各自的代表、代理人或合伙人采取的上述各段落中有关强制变现的行为产生的任何损失（无论直接或间接，包括但不限于利润或利益损失）或损害。

上述内容（随同其他修改内容）将反映在本通知日或前后基于 MAS 注册的发售计划书所做的补充或替换发售计划书中，或（如适用）反映在本通知日或前后对注册的相关 UOBAM 基金的更新发售计划书中。在提交相关补充或替换发售计划书或注册相关更新发售计划书后（视情况而定），您可从我公司、我公司任何授权代理人或发售商、或我公司网站 uobam.com.sg 获取一份复本。

本通知以英文和中文书就，如英文版本与中文版本有任何不一致的，以英文版本为准。

本通知中包含的信息不构成任何税务通知或法律通知。如欲确定 FATCA 或 IGA 对贵方 UOBAM 基金相关投资可能产生的任何税务影响，请寻求专业建议。请注意，我们管理人被禁止提供税务或法律建议。

我们期待贵方一如既往的支持。如有任何疑问，请拨打热线:1800 222 2228（营业时间（新加坡时间）上午 8:00 至下午 8:00），或发送电子邮件至 uobam@uobgroup.com。

您诚挚的



Faizal M Fazluddin
首席营销官