

31 March 2026

Dear Unitholder,

LIONGLOBAL NEW WEALTH SERIES – LIONGLOBAL USD ENHANCED LIQUIDITY FUND

ANNUAL DISCLOSURE PURSUANT TO CIRCULAR FDD CIR 10/2024 ISSUED BY THE MONETARY AUTHORITY OF SINGAPORE (the “MAS Circular”)

LionGlobal USD Enhanced Liquidity Fund (the “**Sub-Fund**”) was previously approved by the Monetary Authority of Singapore (“**MAS**”) under the Enhanced-Tier Fund Tax Scheme pursuant to Section 13U of the Income Tax Act 1947 (“**ITA**”) and the relevant regulations (the “**Section 13U Scheme**”) with effect from 10 March 2023. Due to market conditions, the Sub-Fund was not able to meet certain economic conditions under the S13U Scheme. As such, it is intended that the Sub-Fund be availed to the tax exemption scheme under Section 13D of the ITA and the relevant regulations (the “**Section 13D Scheme**”) instead.

Under the Section 13D Scheme, Specified Income (as defined in the Appendix) derived from Designated Investments (as defined in the Appendix) derived by the Sub-Fund will be exempt from tax in Singapore, subject to the relevant conditions under the Section 13D Scheme being met.

Investors in the Sub-Fund should note that under certain circumstances, they may be obliged to pay a “financial amount” to the Inland Revenue Authority of Singapore (“**IRAS**”) if they are not “qualifying investors”.

Please refer to the Appendix for further information on the taxation of the Sub-Fund under the Section 13D Scheme as well as on the applicable criteria for assessing whether an investor is a “qualifying investor” or “non-qualifying investor”.

Pursuant to paragraph 7 of Annex 9 to the MAS Circular, we are required to provide you with certain information relating to the Sub-Fund to enable you to determine your investment stake in the Sub-Fund, in respect of the financial year ended 31 December 2025, and to assess whether you are a “non-qualifying investor”.

In this connection, please be informed that:

- (i) The profit of the Sub-Fund for the financial year ended 31 December 2025 as per the audited financial statement of the Sub-Fund was US\$6,686,063;
- (ii) The total value of the Sub-Fund (i.e. net assets attributable to unitholders) as at 31 December 2025 was US\$192,862,392; and
- (iii) The Sub-Fund had more than 10 investors as at 31 December 2025.

Please contact your financial advisor/distributor for information on the total value of your holdings in the Sub-Fund as at 31 December 2025.

Please contact us at (65) 6417 6900 or email us at contactus@lionglobalinvestors.com if you have any queries or would like more information.

We thank you for your continued support and we look forward to being of service to you.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Kwok Keng Han', written over a horizontal line.

Kwok Keng Han
Chief Marketing Officer
For and on behalf of
Lion Global Investors Limited

Appendix

Taxation of the Sub-Fund under S13D status and Holders in Singapore

The key aspects relating to the taxation of Section 13D Scheme are summarized below. Unless otherwise defined in this notice, capitalised terms used herein shall have the meanings ascribed to them in the prospectus of the Sub-Fund (the “**Prospectus**”). A copy of the Prospectus may be obtained from our website at www.lionglobalinvestors.com.

1. Trust Level

Specified Income derived from Designated Investments derived by the Sub-Fund will be exempt from tax in Singapore, subject to the relevant conditions under the Section 13D Scheme being met.

(i) “**Specified income**” is defined as:

Any income or gains derived on or after 19 February 2022 from Designated Investments except for the following:

- (a) distributions made by a trustee of a real estate investment trust¹ that is listed on the Singapore Exchange;
- (b) distributions made by a trustee of a trust who is a resident of Singapore or a permanent establishment in Singapore, other than a trust that enjoys tax exemption under Sections 13D, 13F, 13L or 13U of the ITA;
- (c) income or gain derived or deemed to be derived from Singapore from a publicly traded partnership and/or non-publicly traded partnership, where tax is paid or payable in Singapore on such income of the partnership by deduction or otherwise; and
- (d) income or gain derived or deemed to be derived from Singapore from a limited liability company, where tax is paid or payable in Singapore on such income of the limited liability company by deduction or otherwise.

(ii) “**Designated investments**” on or after 19 February 2022² is defined as:

- (a) Stocks and shares of any company, other than an unlisted company that is in the business of trading or holding of Singapore immovable properties (other than one that is in the business of property development);
- (b) Debt securities (i.e. bonds, notes, commercial papers, treasury bills and certificates of deposits), other than non-qualifying debt securities³ issued by an unlisted company that is in the business of trading or holding of Singapore immovable properties (other than one that is in the business of property development);

¹ As defined in section 43(10) of the ITA, which is a trust constituted as a collective investment scheme authorized under section 286 of the SFA and listed on the Singapore Exchange, and that invests or proposes to invest in immovable property and immovable property-related assets.

² This list of designated investment is provided for ease of reference.

³ “Non-qualifying debt securities” will refer to debt securities that do not enjoy the “Qualifying Debt Securities” tax status as defined under section 13(16) of the ITA.

- (c) Units in real estate investment trusts and exchange traded funds constituted in the form of trusts and other securities (not already covered in other subparagraphs of the Designated Investments list) but excludes any securities issued by any unlisted company that is in the business of trading or holding of Singapore immovable properties (other than one that is in the business of property development);
- (d) Futures contracts held in any futures exchanges;
- (e) Immovable property situated outside Singapore;
- (f) Deposits placed with any financial institution;
- (g) Foreign exchange transactions;
- (h) Interest rate or currency contracts on a forward basis, interest rate or currency options, interest rate or currency swaps, and any financial derivative⁴ relating to any designated investment specified in this list or financial index;
- (i) Units in any unit trust, except:
 - (1) A unit trust that invests in Singapore immovable properties;
 - (2) A unit trust that holds stock, shares, debt or any other securities, that are issued by any unlisted company that is in the business of trading or holding of Singapore immovable properties (other than one that is in the business of property development); and
 - (3) A unit trust that grant loans that are excluded under (j);
- (j) Loans⁵, except:
 - (1) Loans granted to any unlisted company that is in the business of trading or holding of Singapore immovable properties (other than one that is in the business of property development);
 - (2) Loans to finance / re-finance the acquisition of Singapore immovable properties; or
 - (3) Loans that are used to acquire stocks, shares, debt or any other securities, that are issued by an unlisted company that is in the business of trading or holding of Singapore immovable properties (other than one that is in the business of property development);
- (k) Commodity derivatives⁶;
- (l) Physical commodities other than physical investment precious metals mentioned in (z) if:

⁴ To clarify, “financial derivatives” within the list of designated investments should only refer to “financial derivatives relating to any designated investment or financial index”.

⁵ This includes secondary loans, credit facilities and advances.

⁶ Commodity derivatives means derivatives, the payoffs of which are wholly linked to the payoffs or performance of the underlying commodity.

- (1) The trading of those physical commodities by the prescribed person, approved company or approved person in the basis period for any year of assessment is done in connection with and is incidental to its trading of commodity derivatives (referred to in this paragraph as related commodity derivatives) in that basis period; and
 - (2) The trade volume of those physical commodities traded by the prescribed person, approved company or approved person in that basis period does not exceed 15% of the total trade volume of those physical commodities and related commodity derivatives traded in that basis period;
- (m) Units in a registered business trust;
 - (n) Emission derivatives⁷ and emission allowances;
 - (o) Liquidation claims;
 - (p) Structured products⁸;
 - (q) Islamic financial products⁹ and investments in prescribed Islamic financing arrangements under Section 34B of the ITA that are commercial equivalents of any of the other designated investments specified in this list¹⁰;
 - (r) Private trusts that invest wholly in designated investments specified in this list;
 - (s) Freight derivatives¹¹;
 - (t) Publicly-traded partnerships that do not carry on a trade, business, profession or vocation in Singapore¹²;
 - (u) Interests in limited liability companies that do not carry on any trade, business, profession or vocation in Singapore;
 - (v) Bankers' acceptances issued by financial institutions;
 - (w) Accounts receivables and letters of credits;

⁷ Emission derivatives means derivatives, the payoffs of which are wholly linked to the payoffs or performance of the underlying emission allowances.

⁸ As per the definition of "structured product" under section 13(16) of the ITA.

⁹ Recognised by a Shariah council, whether in Singapore or overseas.

¹⁰ The former is included as a designated investment with effect from 19 February 2019.

¹¹ Freight derivatives mean derivatives, the payoffs of which are wholly linked to the payoffs or performance of the underlying freight rates.

¹² The allocation of profits from such partnerships to the fund vehicle will be considered as specified income. However, the fund vehicle would not be entitled to a refund of any taxes that was imposed on the partnership profits. This would relate to the publicly-traded partnerships' profits which are derived or deemed to be derived from Singapore, and examples of such income are payments that fall within section 12(6) and (7) of the ITA.

- (x) Interests in Tokumei Kumiai (“TK”)¹³ and Tokutei Mokuteki Kaisha (“TMK”)¹⁴;
- (y) Non-publicly-traded partnerships that:
 - i. Do not carry on a trade, business, profession or vocation in Singapore; and
 - ii. Invest wholly in designated investments specified in this list;
- (z) Physical investment precious metals (“IPMs”), if the investment in those physical investment precious metals does not exceed 5% of the total investment portfolio, calculated in accordance with the formula $A \leq 5\% \text{ of } B$ ¹⁵, where —
 - i. A is the average month-end value of the total investment portfolio in physical IPMs over the basis period; and
 - ii. B is the value of the total investment portfolio as at the last day of the basis period; and
- (aa) Equity interest¹⁶ in real estate investment funds constituted in any form, including real estate investment funds that are not legal entities¹⁷ (not already covered in other sub paragraphs of the list of designated investments), other than real estate investment funds that —
 - i. Invest in Singapore immovable properties; or
 - ii. Hold stock, shares, debt or any other securities, that are issued by any unlisted company that is in the business of trading or holding of Singapore immovable properties (other than one that is in the business of property development).

We will endeavour to conduct the affairs of the Sub-Fund in such a way that the Sub-Fund will satisfy the qualifying conditions under the Section 13D Scheme for the life of the Sub-Fund. Notwithstanding the foregoing, there is no assurance that we will, on an on-going basis, be able to ensure that the Sub-Fund will always meet all the qualifying conditions for the Section 13D Scheme. If the Sub-Fund is disqualified from the Section 13D Scheme, it may be exposed to Singapore tax on its income and gains, wholly or partially as the case may be, at the prevailing corporate tax rate. The Sub-Fund can however, enjoy the tax exemption under the Section 13D Scheme in any subsequent period if it is able to satisfy the specified conditions in that subsequent period.

¹³ A TK is a contractual arrangement under which one or more silent investors (the TK investor) makes a contribution to a Japanese operating company (the TK operator) in return for a share in the profit/loss of a specified business conducted by the TK operator (the TK business).

¹⁴ A TMK is generally a type of corporation formed under Japanese law. It is a structure/entity used for securitisation purposes in Japan.

¹⁵ The threshold may be waived by the Comptroller of Income Tax (“CIT”), subject to the CIT’s review of the circumstances and facts of each case.

¹⁶ “Equity interest” in a real estate fund refers to a right or interest to a share in the profits of the fund, and may include units, shares, or securities in the fund.

¹⁷ Such real estate investment funds were not mentioned in Annex 1 of FDD Cir 05/2022 and are now included herein for clarity.

2. Holders' Level

Distributions paid by the Sub-Fund out of income derived during the periods that the Sub-Fund enjoys the Section 13D Scheme will be exempted from Singapore tax in the hand of its investors.

Singapore currently does not impose tax on capital gains. However, there are no specific laws or regulations which deal with the characterisation of gains. In general, gains from the disposal or redemption of the Units may be construed to be of an income nature and subject to Singapore income tax if they arise from activities which the IRAS regards as the carrying on of a trade or business in Singapore.

Financial amount payable by non-qualifying investors in the Sub-Fund

Even though the Sub-Fund may be exempt from tax as outlined above, investors should note that under certain circumstances, they may be obliged to pay a "financial amount" to the IRAS if they are not "qualifying investors".

Generally, investors who do not fall under the following will be considered as "non-qualifying":

- (i) An individual investor.
- (ii) A bona fide non-resident non-individual investor¹⁸ (excluding a permanent establishment in Singapore) that:
 - a. does not have a permanent establishment in Singapore (other than a fund manager) and does not carry on a business in Singapore; or
 - b. carries on an operation in Singapore through a permanent establishment in Singapore but does not use funds from its operation in Singapore to invest in the qualifying fund;
- (iii) Designated person¹⁹;
- (iv) A section 13O fund which, at all times during the basis period for the year of assessment, satisfies the conditions under S13O scheme;
- (v) A section 13U fund which, at all times during the basis period for the year of assessment, satisfies the conditions under S13U scheme; and
- (vi) An investor other than one listed in (i) to (v):
 - a. where the S13D fund has less than 10 investors and such an investor, alone or with his associates, beneficially owns not more than 30% of the total value of issued securities of the S13D fund (being a company) or the total value of the S13D fund (being a trust fund), as the case may be; or

¹⁸ A bona fide non-resident non-individual investor is one which carries out substantial business activities for genuine commercial reasons and has not as its sole purpose the avoidance or reduction of tax.

¹⁹ "Designated person" as defined in the Income Tax (Exemption of Income of Prescribed Persons Arising from Funds Managed by Fund Manager in Singapore) Regulations 2010.

- b. where the S13D fund has 10 or more investors and such an investor, alone or with his associates, beneficially owns not more than 50% of the total value of the issued securities of the S13D fund (being a company) or the total value of the S13D fund (being a trust fund), as the case may be.

For the purpose of determining whether an investor of a S13D fund is an associate of another investor of the fund, the two investors shall be deemed to be associates of each other if:

- (i) at least 25% of the total value of the issued securities in one investor is beneficially owned, directly or indirectly, by the other; or
- (ii) at least 25% of the total value of the issued securities in each of the two investors is beneficially owned, directly or indirectly, by a third party²⁰.

You should note that you are solely responsible for computing the aggregate unitholdings of yours and your associates to determine if you would be a non-qualifying investor. Non-qualifying investors are obliged to declare and pay the financial amount in their respective income tax returns for the relevant year of assessment.

²⁰ Does not apply where an investor is an independent listed entity and does not have 25% or more shareholding in any other investor.