



AMMA STATEMENT GUIDE

A Guide to your Cromwell Property Group (ASX:CMW) 30 June 2024 Attribution Managed Investment Trust Member Annual Statement (AMMA Statement)

The information in this Guide has been prepared to assist Australian resident individual holders of Cromwell Property Group stapled securities to understand their AMMA Statement and to prepare their 2024 income tax return. This Guide does not apply to company, trust, or superannuation fund securityholders. It should be read in conjunction with your 2024 AMMA Statement.

This Guide has been prepared for general information only and should not be relied upon as tax advice. This Guide should be read in conjunction with the Australian Taxation Office's (ATO) instructions and publications which can be found on the ATO's website. An investment in stapled securities can give rise to complex tax issues and each securityholder's particular circumstances will be different. As such, we recommend before taking any action based on this document, that you consult your professional tax advisor for specific advice in relation to the tax implications.

This document does not constitute financial product or investment advice, and in particular, it is not intended to influence you in making decisions in relation to financial products including Cromwell Property Group stapled securities.

While every effort is made to provide accurate and complete information, Cromwell Property Group does not warrant or represent that the information in this Guide is free of errors or omissions or is suitable for your intended use and personal circumstances. Subject to any terms implied by law which cannot be excluded.

Cromwell Property Group accepts no responsibility for any loss, damage, cost or expense (whether direct or indirect) incurred by you as a result of any error, omission or misrepresentation in the information contained in this Guide.

This Guide has been prepared on the basis of the prevailing taxation laws at 30 June 2024.

Who Is This Guide For?

This Guide provides general information to assist you in the preparation of your 2024 Australian individual income tax return.

This Guide applies to you if:

- You are an individual Australian resident securityholder of Cromwell Property Group stapled securities; and
- You hold your stapled securities for the purposes of investment (on capital account), rather than for resale at a profit (on revenue account), and the Capital Gains Tax (CGT) provisions apply to you.

If you hold your stapled securities on revenue account, or are a non-resident, superannuation fund, company, partnership or trust securityholder you should consult your professional tax advisor for more information.

This Guide has been prepared to assist you to complete your 2024 income tax return using your Cromwell AMMA Statement.

When you invest in Cromwell Property Group you acquire Cromwell Property Group stapled securities (ASX code: CMW). Each stapled security consists of a share in Cromwell Corporation Limited (CCL) and a unit in the Cromwell Diversified Property Trust (DPT).

In December 2006, CCL and DPT were stapled (referred to as the Stapling Transaction). This means that shares in CCL and units in DPT can only be transferred or traded together as Cromwell Property Group stapled securities on the Australian Securities Exchange. However, CCL shares and DPT units remain separate assets for taxation purposes.

Any dividends and franking credits from your shares in CCL and distributions in relation to your units in DPT need to be separately disclosed in your income tax return.

DPT was an Australian Attribution Managed Investment Trust (AMIT) for the year ended 30 June 2024. An AMIT is required to provide securityholders an AMMA Statement for the year. The AMMA Statement provides details of assessable income attributed to you and those amounts should be used in the preparation of your income tax return. Please see Part E for the disclosure of dividends paid by CCL for the year. CCL did not pay any dividends during the year.

Further information regarding Cromwell Property Group distributions and dividends is available on our website at www.cromwellpropertygroup.com/securityholder-centre/

Thank you for investing with Cromwell Property Group. For further information about your investment, please contact your advisor or call MUFG Pension & Market Services (formerly Link Market Services Limited) on 1300 550 841 between 7.30am and 8.00pm, EST, Monday to Friday.

Cromwell AMMA Statement Guide

Cromwell Diversified Property Trust (DPT) Distributions

Your AMMA Statement includes distribution of amounts attributed to you by DPT for the period from 1 July 2023 to 30 June 2024. DPT distributions made per unit include:

- 0.8300 cents on 17 November 2023;
- 0.7500 cents on 16 February 2024;
- 0.7500 cents on 17 May 2024; and
- 0.7500 cents on or about 16 August 2024.

Securityholders were entitled to these distributions if they held stapled securities at 5.00pm on the respective record dates of 29 September 2023, 29 December 2023, 28 March 2024 and 28 June 2024.

Attribution Managed Investment Trust Regime

The Responsible Entity of DPT made an irrevocable election to be an Attribution Managed Investment Trust (AMIT) for all years beginning from 1 July 2017.

Your AMMA Statement provides the components of the distribution that have been attributed to you for the period from 1 July 2023 to 30 June 2024.

For tax purposes, the distribution from DPT comprises separate components including interest income, taxable other income, capital gains and foreign income. Your attributed amounts of these components are outlined on your AMMA Statement.

Australian resident taxpayers include in their assessable income their attributed amount of DPT's determined trust components (including any net capital gains of DPT). These attributed amounts are included in a resident taxpayer's assessable income for tax purposes irrespective of when the cash in respect of the attributed amounts is received.

This means:

- the distribution of 0.7500 cents per stapled security in August 2024 in relation to the June 2024 quarter is included in your 2024 AMMA Statement; and
- the distribution of 1.3750 cents per stapled security paid in August 2023 in relation to the June 2023 quarter is not included in your 2024 AMMA Statement.

If you are using myTax:

For resident individual securityholders using myTax to lodge their individual income tax return the following section should be used as a guide to personalise your income tax return to ensure the relevant questions and sections are completed.

If the distribution from your investment in DPT has been pre-filled for you, please check this information against your AMMA Statement. If the information has not been pre-filled, you should use the amounts in Part A of your AMMA Statement to complete the corresponding labels on your income tax return.

Part A – What Do You Do With These Amounts?

Your AMMA Statement has been prepared so that the amounts in Part A correspond to the amounts you are required to enter into your 2024 Individual Income Tax Return/Supplementary Section for individual Australian residents.

Part B – What Do You Do With These Amounts?

Part B of your AMMA Statement provides additional information relating to the trust components that were attributed to you for the year ended 30 June 2024.

Non-Primary Production (NPP) Income

Note 1 – Unfranked Dividends not Declared to be CFI

This is your attributed amount of unfranked dividends that are not declared to be conduit foreign income (CFI). No franking credits are attached to these dividends.

Note 2 – Unfranked Dividends Declared to be CFI

This is your attributed amount of unfranked dividends that are declared to be CFI. No franking credits are attached to these dividends.

Note 3 – Interest (Not Subject to Non-Resident Withholding Tax)

This is your attributed amount of interest income which is not subject to non-resident withholding tax. For the 2024 financial year no such income was attributed to you.

Note 4 – Interest (Subject to Non-Resident Withholding Tax)

This is your attributed amount of interest income subject to non-resident withholding tax.

Note 5 – Other Assessable Australian Income

This is your attributed amount of other assessable income from Australian sources (excluding capital gains). This amount includes rental income from direct and indirect property investments.

Note 6 – Non-Concessional MIT Income (NCMI) – Non-Primary Production (NPP)

This is your attributed amount of Non-Primary Production (NPP) Non-Concessional MIT Income (NCMI). This income broadly relates to income that DPT has derived, received or made which is attributable to:

- Cross staple arrangements between an operating entity and an asset entity (i.e. MIT cross staple arrangement income);
- Distribution from a trading trust, either directly or indirectly through a chain of flow-through entities (i.e. MIT trading trust income); and/or
- A residential dwelling asset whether or not held by the Fund (i.e. MIT residential housing income).

NCMI income includes both 'Other Assessable Australian Income' and 'Capital Gains' (refer to Note 14), both of which are assessable income for Australian tax purposes.

Note 7 – Excluded from NCMI – NPP

This is your attributed amount of income excluded from NCMI because DPT has elected and applied the transitional provisions. Income excluded from NCMI includes both 'Other Assessable Australian Income' and 'Capital Gains' (refer to Note 14) both of which are assessable income for Australian tax purposes.

Note 8 – Franked Dividends

This is your attributed amount of Franked Dividends. Your franking credit amount in relation to Franked Dividends is provided in the 'Foreign Income Tax Offsets/Frinking Credits' column. Although you did not receive the franking credits in cash, you should generally include them in your assessable income. You may be entitled to tax offsets for these amounts to reduce your income tax liability.

Capital Gains

Note 9 – Capital Gains –Discount Method

The discount capital gains are your attributed amount of net capital gains (reduced for capital losses and/or the application capital gains discount at the trust level) from the disposal of investments that have been held for at least 12 months. These have been separated into the following categories:

- Capital Gains – Discount Method (TAP) – these are capital gains from the sale of investments that are taxable Australian property; and
- Capital Gains – Discount Method (NTAP) – these are capital gains from the sale of investments that are not taxable Australian property.

Australian resident taxpayers are required to include both categories of discount capital gains in the calculation of their net capital gain for the income year.

Note 10 – Capital Gains – Other Method

Other capital gains are your attributed amount of net capital gains (reduced for capital losses) to which the CGT discount does not apply. These have been separated into the following categories:

- Capital Gains – Other Method (TAP) – these are capital gains from the sale of investments that are taxable Australian property; and
- Capital Gains – Other Method (NTAP) – these are capital gains from the sale of investments that are not taxable Australian property.

Australian resident taxpayers are required to include both categories of other capital gains in the calculation of their net capital gain for the income year.

Note 11 – AMIT CGT Gross Up Amount

This amount is the capital gains tax 50% discount applied when calculating the discount capital gains attributed to you.

Note 12 – Other Capital Gains Distribution

This is the cash distributed to you in relation to all capital gains other than amounts already shown in the 'Cash Distributions' column for capital gains.

Note 13 – Total Current Year Capital Gains

This is the total amount of capital gains attributed and/or distributed to you.

Note 14 – NCMI Capital Gains and Excluded from NCMI Capital Gains

Separately disclosed within the TAP and NTAP capital gains in Notes 9 and 10 are:

- NCMI Capital Gains (refer to Note 6); and
- Capital Gains Excluded from NCMI (refer to Note 7).

These disclosure amounts are included in the 'Discount Capital Gains' and 'Other Capital Gains' disclosed above (in Notes 9 and 10). This disclosure is irrelevant for most Australian resident investors.

Foreign Income

Note 15 – Other Net Foreign Source Income

This is your attributed amount of assessable income derived from foreign sources, including foreign sourced interest income, foreign dividend income and foreign rental income.

You may be entitled to an offset for the amount of any foreign income tax offset disclosed on your AMMA Statement (Label 200). If your total foreign income tax offset from all sources is less than \$1,000 then you can generally claim this amount in full. You should follow the steps in the instructions to Question 20 of the "Tax Return for Individuals (Supplementary Section) 2024" or refer to the ATO's publication "Guide to Foreign Income Tax Offset Rules 2024" to determine your entitlement.

Note 16 – Controlled Foreign Company Income

This is your attributed amount of Controlled Foreign Company Income relating to income and gains of foreign companies in which DPT had a direct or indirect interest.

Other Non-Assessable Amounts

Note 17 – Net Exempt Income

This is your attributed amount of Net Exempt Income as per Section 36-20 of the Income Tax Assessment Act 1997 (ITAA 1997).

Note 18 – Non-Assessable Non-Exempt Amount

This is your attributed amount of Non-Assessable Non-Exempt amount referred to in Section 6-23 of the ITAA 1997. Under the AMIT rules, securityholders are required to adjust the cost base and reduced cost base of their membership interests for this amount.

Note 19 – Other Non-Attributable Amounts

The Other Non-Attributable Amounts relate to cash distributions from DPT that exceed your attributed income. These amounts are non-assessable components of your distribution but do affect your cost base adjustments. The adjustment to the cost base of your units is outlined in Part D of your AMMA Statement.

Other Deductions From Distribution

Note 20 – TFN/ABN Amounts Withheld

If you have not provided your Tax File Number (TFN), Australian Business Number (ABN) or claimed a relevant exemption, amounts have been withheld at the highest marginal rate from the taxable components attributed to you. Any tax withheld should be included in Question 13R of your tax return and claimed as an offset against your tax payable.

Note 21 – Non-Resident Withholding Tax

Where you have indicated that you are a non-resident for Australian tax purposes, tax has been deducted from your interest, unfranked dividends (non-CFI) and fund payments attributed to you during the year at the rate prescribed under the tax legislation.

Part C – What Do You Do With These Amounts?

Part C of your AMMA Statement provides information to assist you in determining your entitlements to tax offsets.

This is your attributed amount of tax offsets (Label 200 and Label 13Q) related to franked dividends, foreign income and foreign capital gains.

Any foreign income tax offset amounts on foreign capital gains is adjusted for capital losses applied but is not reduced for the capital gains discount applied to those foreign capital gains at the trust level.

The amount allowable as a foreign income tax offset to an individual may be reduced if their own capital losses are offset against these amounts consistent with ATO ID 2010/175. You should refer to the ATO's publication "Guide to Foreign Income Tax Offset Rules 2024" to determine your entitlements. If you are unsure, you should also obtain your own tax advice from your professional tax advisor.

Part D – What Do You Do With These Amounts?

Part D of your AMMA Statement, provides information to assist you when making annual adjustments to the cost base of your units required under the AMIT regime.

AMIT Cost Base Adjustments

Note 22 – AMIT Cost Base Net Amount – Excess (Decrease)

If the distributions you have received from DPT for the year exceed the assessable amounts (including grossed up discount capital gains) attributed to you, then the cost base of your units is decreased by the amount of the excess.

Should this excess exceed the CGT cost base of your DPT units, this excess should generally give rise to a capital gain for you. If you have held your units for at least 12 months you may be able to reduce this capital gain by the CGT 50% discount. The amount shown in Part D represents the net decrease in the cost base of your units for the income year under the AMIT regime.

Note 23 – AMIT Cost Base Net Amount – Shortfall (Increase)

If the assessable amounts attributed to you exceed distributions you have received from DPT for the year, the cost base of your DPT units is increased by the amount of the distribution shortfall. The amount shown in Part D represents the net increase in the cost base of your units for the income year under the AMIT regime.

Disposal of your Stapled Securities

If you have disposed of Cromwell Property Group stapled securities during the 2024 financial year, then a separate CGT calculation will need to be calculated for the disposed shares in CCL and the disposed units in DPT.

We recommend you obtain a copy of the ATO's publications "Guide to Capital Gains Tax 2024" or "Personal Investors Guide to Capital Gains Tax 2024" available at: www.ato.gov.au. You should also obtain your own tax advice from your professional tax advisor.

Capital Proceeds and Cost Base of Shares and Units

The cost base on acquisition and proceeds received on disposal of each stapled security will need to be apportioned on a reasonable basis between the share in CCL and the unit in DPT.

One possible method of apportionment of the cost base and the disposal proceeds is on the basis of the relative net tangible assets of CCL and DPT, at the relevant time. Details of the net tangible assets of CCL and DPT, at six month intervals, are set out in Table 1.

Participation in the 2013 Cromwell Property Fund Merger

If you acquired your Cromwell Property Group stapled securities in 2013 in the Cromwell Property Fund (CPF) Merger, you should also refer to ATO Class Ruling CR 2013/20 for guidance in relation to your cost base. In this ruling, the Commissioner of Taxation accepts that at the time of the CPF Merger, the first element of the cost base of your CCL shares was \$0.02092 and the first element of the cost base of your DPT units was \$0.74925.

Participation in the 2006 Stapling Transaction

If you were a DPT or syndicate unit holder prior to the December 2006 Stapling Transaction, the first element of your cost base per CCL share will generally be the amount of the stapling distribution, being 0.025 cents per share. For your DPT units, the cost base will have been reduced to nil by distributions of tax deferred or non-assessable amounts (other than concession amounts) that you have received in prior financial years or the current financial year. These amounts are outlined in your previous Annual Tax Statements or AMMA Statements provided each year.

If you were a CCL shareholder prior to the December 2006 Stapling Transaction, the first element of your cost base per DPT unit will generally be the amount of the stapling distribution, being 0.1 cents per unit.

You should refer to previous years' Cromwell Tax Return and AMMA Statement Guides for further guidance.

Table 1: Net Tangible Assets of CCL and DPT

	Net Tangible Assets per stapled security	CCL Apportionment	DPT Apportionment
30 Jun 2024	\$0.61	6.44%	93.56%
31 Dec 2023	\$0.72	6.02%	93.98%
30 Jun 2023	\$0.84	4.23%	95.77%
31 Dec 2022	\$0.97	3.97%	96.03%
30 Jun 2022	\$1.04	3.50%	96.50%
31 Dec 2021	\$1.03	3.32%	96.68%
30 Jun 2021	\$1.02	3.51%	96.49%
31 Dec 2020	\$1.00	3.37%	96.63%
30 Jun 2020	\$0.99	3.03%	96.97%
31 Dec 2019	\$1.04	3.85%	96.15%
30 Jun 2019	\$0.97	0.00%	100.00%
31 Dec 2018	\$0.99	0.00%	100.00%
30 Jun 2018	\$0.96	0.00%	100.00%
31 Dec 2017	\$0.93	0.00%	100.00%
30 Jun 2017	\$0.86	0.00%	100.00%
31 Dec 2016	\$0.86	0.00%	100.00%
30 Jun 2016	\$0.82	0.00%	100.00%
31 Dec 2015	\$0.82	5.15%	94.85%
30 Jun 2015	\$0.74	4.50%	95.50%
31 Dec 2014	\$0.74	4.58%	95.42%
30 Jun 2014	\$0.73	4.11%	95.89%
31 Dec 2013	\$0.71	4.23%	95.77%
30 Jun 2013	\$0.70	4.98%	95.02%
31 Dec 2012	\$0.67	3.53%	96.47%
30 Jun 2012	\$0.67	2.45%	97.55%
31 Dec 2011	\$0.68	2.21%	97.79%
30 Jun 2011	\$0.73	1.31%	98.69%
31 Dec 2010	\$0.70	1.46%	98.54%
30 Jun 2010	\$0.71	1.31%	98.69%
31 Dec 2009	\$0.73	1.38%	98.62%
30 Jun 2009	\$0.76	1.18%	98.82%
31 Dec 2008	\$0.86	3.82%	96.18%

Part E – What Do You Do With These Amounts?

Cromwell Corporation Limited (CCL) Dividends

Note 24 – Company Dividends

CCL did not pay any dividends during the year ended 30 June 2024. As such, there is no CCL dividend amount to be included in your 2024 income tax return.

Duplicate AMMA Statements

A duplicate copy of your 2024 AMMA Statement can be downloaded, free of charge via the Investor Centre portal available on MUFG Pension & Market Services.

Alternatively, for a replacement statement contact MUFG Pension & Market Services on 1300 550 841 between 7.30am and 8.00pm, EST, Monday to Friday.



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