

No. S 286**INCOME TAX ACT 1947****INCOME TAX
(DIGITAL CORE REIT —
SECTION 13(12) EXEMPTION) ORDER 2026****ARRANGEMENT OF PARAGRAPHS****Paragraph**

1. Citation
 2. Exemption for Digital CR Singapore 2 Pte. Ltd.
 3. Exemption for Digital CR Singapore 3 Pte. Ltd.
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In exercise of the powers conferred by section 13(12) of the Income Tax Act 1947, the Minister for Finance makes the following Order:

Citation

1. This Order is the Income Tax (Digital Core REIT — Section 13(12) Exemption) Order 2026.

Exemption for Digital CR Singapore 2 Pte. Ltd.

2.—(1) Interest income described in sub-paragraph (2) received in Singapore by Digital CR Singapore 2 Pte. Ltd. (a company incorporated in Singapore) on or after 1 January 2022 from Digital CR US REIT, Inc. (a corporation incorporated under the laws of the State of Maryland, United States of America), arising from a loan granted by Digital CR Singapore 2 Pte. Ltd. to Digital CR US REIT, Inc. to fund the acquisition of ownership interests in the following limited liability companies constituted under the laws of the State of Delaware, United States of America, is exempt from tax:

- (a) Digital Quill JV, LLC;
- (b) Digital Porpoise JV, LLC;
- (c) Digital Stoughton JV, LLC;

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- (d) Digital Lafayette 2 JV, LLC;
 - (e) Digital Space Park JV, LLC;
 - (f) Digital Nash JV, LLC;
 - (g) Digital Winona JV, LLC.
- (2) The exemption in sub-paragraph (1) applies only if the monies used to fund the interest income originated from —
- (a) any rental income, or property-related income (including capital gain derived from divestment of property), from any of the properties specified in sub-paragraph (3); or
 - (b) any gain from the disposal of any ownership interest in any of the following limited liability companies constituted under the laws of the State of Delaware, United States of America:
 - (i) Digital Quill JV, LLC;
 - (ii) Digital Porpoise JV, LLC;
 - (iii) Digital Stoughton JV, LLC;
 - (iv) Digital Lafayette 2 JV, LLC;
 - (v) Digital Space Park JV, LLC;
 - (vi) Digital Nash JV, LLC;
 - (vii) Digital Winona JV, LLC;
 - (viii) Quill Equity, LLC;
 - (ix) Porpoise Ventures, LLC;
 - (x) GIP Stoughton, LLC;
 - (xi) Digital Lafayette 2, LLC;
 - (xii) Digital Space Park, LLC;
 - (xiii) Digital Nash, LLC;
 - (xiv) Digital Winona, LLC.

(3) For the purposes of sub-paragraph (2), the properties are the following:

- (a) the property named “44520 Hastings Drive (ACC3)”, located at 44520 Hastings Drive, Ashburn, VA 20147, United States of America;
- (b) the property named “8217 Linton Hall Road (VA4)”, located at 8217 Linton Hall Road, Bristow, VA 20136, United States of America;
- (c) the property named “43831 Devin Shafron Drive (Bldg. C)”, located at 43831 Devin Shafron Drive Building C, Ashburn, VA 20147, United States of America;
- (d) the property named “3011 Lafayette Street”, located at 3011 Lafayette Street, Santa Clara, CA 95054, United States of America;
- (e) the property named “1500 Space Park Drive”, located at 1500 Space Park Drive, Santa Clara, CA 95054, United States of America;
- (f) the property named “200 North Nash Street”, located at 200 North Nash Street, El Segundo, CA 90245, United States of America;
- (g) the property named “3015 Winona Avenue”, located at 3015 Winona Avenue, Burbank, CA 91504, United States of America.

(4) The exemption in sub-paragraph (1) is subject to the conditions specified in the letter from the Inland Revenue Authority of Singapore dated 9 February 2026 that is issued on behalf of the Minister for Finance and addressed to EY Corporate Advisors Pte. Ltd. as tax agent for Perpetual (Asia) Limited (a company incorporated in Singapore) in its capacity as trustee of Digital Core REIT (a real estate investment trust constituted in Singapore) and Digital CR Singapore 2 Pte. Ltd.

Exemption for Digital CR Singapore 3 Pte. Ltd.

3.—(1) Dividend or distribution income described in sub-paragraph (2) received in Singapore by Digital CR Singapore 3 Pte. Ltd. (a company incorporated in Singapore) on or after 1 January 2022 from Digital Gough, LLC (a limited liability company constituted under the laws of the State of Delaware, United States of America), is exempt from tax.

(2) The exemption in sub-paragraph (1) applies only if the monies used to fund the dividend or distribution income originated from —

- (a) any rental income, or property-related income (including capital gain derived from divestment of property), from the property named “371 Gough Road”, located at 371 Gough Road, Markham, Ontario, Canada, L3R 4B6; or
- (b) any gain from the disposal of any ownership interest in Digital Toronto Nominee Inc. (a company incorporated under the laws of the Province of British Columbia, Canada).

(3) The exemption in sub-paragraph (1) is subject to the conditions specified in the letter from the Inland Revenue Authority of Singapore dated 9 February 2026 that is issued on behalf of the Minister for Finance and addressed to EY Corporate Advisors Pte. Ltd. as tax agent for Perpetual (Asia) Limited in its capacity as trustee of Digital Core REIT and Digital CR Singapore 3 Pte. Ltd.

Made on 1 May 2026.

NGIAM SIEW YING
*Second Permanent Secretary,
Ministry of Finance,
Singapore.*

[AG/LEGIS/SL/134/2025/7]