

**Plantation Capital Ltd (ABN 65 133 678 029)**  
**As Responsible Entity For**  
**Passive Income (USA Commercial Property) Fund**  
**ARSN 155 770 095**

Lelievre Super Investments Pty Ltd ATF The Lelievre  
 Superannuation Fund  
 PO Box 6140  
 BURANDA QLD 4102

**Passive Income (USA Commercial Property) Fund**  
**AMIT Member Annual Statement**  
**For The Year Ended 31 December 2020**

**PART A: YOUR DETAILS**

RECORD	DETAILS ON FILE
Account Name	Lelievre Super Investments Pty Ltd ATF The Lelievre Superannuation Fund
Account Number	I00951
You are recorded as being a	Superannuation Fund
Australian tax file number (TFN)	Provided
Country of residence at 31 December 2020	Australia

**PART B: SUMMARY OF 2021 TAX RETURN (SUPPLEMENTARY SECTION) ITEMS**

TAX RETURN (SUPPLEMENTARY SECTION)	AMOUNT (\$)	TAX RETURN LABEL
Share of net income from trusts, less net capital gains, foreign income and franked distributions	2.90	13U
Franked distributions from trusts	0.00	13C
Other expense deductions	0.00	13Y
Franking credits	0.00	13Q
Credit for TFN amounts withheld	0.00	13R
Credit for foreign resident amounts withheld	0.00	13A
Net capital gain	0.00	18A
Total current year capital gains	0.00	18H
Assessable foreign source income	36,372.17	20E
Other net foreign source income	36,372.17	20M
Foreign income tax offsets	11,263.69	20O

Please note that tax return labels are applicable to individual tax returns. This document does not constitute tax advice. For further information, please refer to the PDS. To the extent permitted by law, no liability is accepted for any loss or damage as a result of reliance on this information.

**PLEASE RETAIN THIS STATEMENT FOR INCOME TAX PURPOSES**

**PART C: COMPONENTS OF DISTRIBUTION**

COMPONENTS OF DISTRIBUTION	CASH DISTRIBUTION (\$)	TAX PAID OR FRANKING CREDIT (GROSSED UP) (\$)	ATTRIBUTION (\$)	OTHER AMOUNT (\$)	TAX RETURN LABEL
<b>AUSTRALIAN INCOME</b>					
Interest	2.90		2.90		
Dividends	0.00		0.00		
Dividends: unfranked amount declared to be CFI	0.00		0.00		
Dividends: unfranked amount not declared to be CFI	0.00		0.00		
Dividends: Less LIC capital gain deduction	0.00		0.00		
Other Income	0.00		0.00		
NCMI - Non Primary Production	0.00		0.00		
Less other allowable trust deductions	0.00		0.00		
<b>Non primary production income (A)</b>	<b>2.90</b>		<b>2.90</b>		<b>13U</b>
<b>Dividends - franked (X)</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		<b>13C/13Q</b>
<b>FOREIGN INCOME</b>					
<b>CAPITAL GAINS</b>					
Capital gains discount: Taxable Australian property	0.00	0	0.00		
Capital gains discount: Non-Taxable Australian property	0.00	0	0.00		
Capital gains other: Taxable Australian property	0.00	0	0.00		
Capital gains other: Non-Taxable Australian property	0.00	0	0.00		
NCMI Capital Gains	0.00	0	0.00		
<b>Net capital gains</b>	<b>0.00</b>		<b>0.00</b>		<b>18A</b>
AMIT CGT gross up amount			0.00		
Other capital gains distribution	0.00				
<b>Total current year capital gains (B)</b>	<b>0.00</b>		<b>0.00</b>		<b>18H</b>
<b>FOREIGN INCOME</b>					
Other net foreign income	25,108.48	11,263.69	36,372.17		20M/200
Assessable foreign source income	25,108.48	11,263.69	36,372.17		20E
<b>Total Foreign income (C)</b>	<b>25,108.48</b>	<b>11,263.69</b>	<b>36,372.17</b>		
<b>Cash distribution sub-total (A + X + B + C)</b>	<b>25,111.38</b>				
<b>TAX OFFSETS</b>					
Franking credit tax offset		0.00			13Q
Foreign income tax offset		11,263.69			20O
<b>Total tax offsets (D)</b>		<b>11,263.69</b>			
<b>OTHER NON-ASSESSABLE AMOUNTS</b>					
Net exempt income	0.00		0.00		
Non-assessable non exempt amount (E)	0.00		0.00		
Other non-attributable amounts	13,450.94		0.00		
Return of Capital	0.00				
<b>Gross cash distribution (G)</b>	<b>38,562.32</b>			<b>38,562.32</b>	
<b>AMIT cost base net amount - excess</b>				<b>13,450.94</b>	
<b>AMIT cost base net amount - shortfall</b>				<b>0.00</b>	
<b>OTHER DEDUCTIONS FROM DISTRIBUTION</b>					
Less: TFN amounts withheld	0.00				13R
Less: Non-resident amounts withheld	0.00				13A
Less: Other expenses	0.00				13Y
<b>Net cash distribution</b>	<b>38,562.32</b>				

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**PART C: COMPONENTS OF DISTRIBUTION (Continued)**

COMPONENTS OF DISTRIBUTION	CASH DISTRIBUTION (\$)	TAX PAID (\$)	ATTRIBUTION (\$)	OTHER AMOUNT (\$)	TAX RETURN LABEL
NON RESIDENT REPORTING					
Non Resident Withholding Amount	0.00	0.00	0.00	0.00	
MIT Fund Payments	0.00	0.00	0.00	0.00	
Deemed Payment - Dividend	0.00	0.00	0.00	0.00	
Deemed Payment - Interest	0.00	0.00	0.00	0.00	
Deemed Payment - Royalties	0.00	0.00	0.00	0.00	
Deemed Payment - Fund Payment	0.00	0.00	0.00	0.00	

The Fund has a tax substituted accounting period of 31 December in lieu of 30 June. This tax statement therefore includes distributions for the period 1 January 2020 to 31 December 2020. Any distribution from 1 January 2021 (i.e. for 30 June 2021 and 31 December 2021) will be included in the Fund's 2022 tax distribution statement. This statement is to assist you in preparing your 30 June 2021 income tax return.

The other non-attributable amounts represents a distribution out of capital of the Fund. Unless this amount exceeds the cost base of your units in the Fund (as adjusted for prior reductions), this amount is not assessable to you. However, this amount will reduce your CGT cost base in your units in the Fund as it gives rise to an excess AMIT cost base net amount. This reduction will be relevant in determining future capital gains on the disposal of your units or the treatment of other non-attributable amounts.

The foreign income tax offset (FITO) represents US withholding tax that has been paid by the REIT (Ozinus Realty LLC) on dividends paid to the Fund and/or any disposal of underlying assets. As the Fund is being treated as fiscally transparent for US taxation purposes, US withholding tax has been paid to the IRS on behalf of each Investor in the Fund on their share of the gross dividend paid by the REIT (before expenses of the Fund) based on each Investor's US withholding tax rate. For a non US person/entity the maximum rate of 30% withholding tax applies, however as the Australian government has signed a treaty with the US, this rate may be reduced to 15% by completion of the W-8BEN/W-8BEN-E form to claim the treaty benefits. Investors may be eligible to claim a FITO, however the precise quantum should be confirmed by their taxation advisor. Please refer to the PDS for further information on the treatment of US withholding tax on dividends paid by the Fund.

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