

ASX Announcement

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## ATO – Class Ruling

Perpetual Limited (“Perpetual”) (ASX:PPT) advises that the Australian Taxation Office (ATO) has published a Class Ruling (CR 2023/9) (the “Ruling”) relating to the Australian income tax implications for certain Pandal Shareholders (“Shareholders”) in relation to their disposal of Pandal Shares under the Scheme of Arrangement with Perpetual.

The Ruling can be viewed or downloaded from the ATO website via the following link:  
<https://www.ato.gov.au/law/view/document?docid=CLR/CR20239/NAT/ATO/00001>

The Ruling applies only to Shareholders on 16 January 2023 (Scheme Record Date), as set out in Paragraphs 4 and 5 of the Ruling.

The Ruling confirms the availability of partial scrip for scrip capital gains tax roll-over relief for certain Shareholders and that the Pandal Permitted Dividend is not included in the capital proceeds received for the disposal of Pandal Shares.

The information contained in this announcement is summary in nature and Shareholders should refer to the Ruling for a better understanding of its contents. The tax consequences of the Scheme may vary depending upon the Shareholder’s individual circumstances. Shareholders should consult their own tax adviser as to the potential tax consequences for them.

-ENDS-

This announcement is authorised for release by the CEO of Perpetual Limited.

### For more information please contact:

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## **About Perpetual**

Perpetual Limited ("Perpetual") is an ASX listed (ASX:PPT) global financial services firm operating a multi-boutique asset management business, as well as wealth management and trustee services businesses.

Perpetual owns leading asset management brands including Perpetual, Pandal, Barrow Hanley, J O Hambro, Regnan, Trillium and Thompson, Siegel and Walmsley (TSW)

Perpetual's private wealth business services high-net worth clients, not for profits, and small businesses through brands such as Perpetual Private, Jacaranda Financial Planning and Fordham.

Perpetual's corporate trust division provides services to managed funds, the debt market and includes a growing digital business, encompassing Laminar Capital.

Headquartered in Sydney, Perpetual services its global client base from offices across Australia as well as internationally from Asia, Europe, the United Kingdom and United States.