

360 CAPITAL DIGITAL INFRASTRUCTURE FUND

NET ASSET BACKING OF ENTITIES IN THE 360 CAPITAL DIGITAL INFRASTRUCTURE FUND

AUSTRALIAN CAPITAL GAINS TAX

A 360 Capital Digital Infrastructure Fund (ASX: TDI) stapled security comprises two separate assets for capital gains tax purposes; a 360 Capital Digital Infrastructure Fund unit and a 360 Capital Digital Infrastructure Fund 2 unit.

For capital gains tax purposes you need to apportion the cost of each stapled security and the proceeds of sale of each stapled security over the separate assets that make up the stapled security. This apportionment should be done on a reasonable basis.

One possible method of apportionment is on the basis of the relative net tangible assets of the individual entities. For your information these percentages are set out below:

Net Tangible Assets per security

	17-Mar-20 ¹
360 Capital Digital Infrastructure Fund	69.4%
360 Capital Digital Infrastructure Fund 2	30.6%

¹ The stapling of the two separate entities occurred on 17 March 2020, creating the 360 Capital Digital Infrastructure Fund. Estimated NTA on stapling based on 31 December 2019 audit reviewed financial statements of 360 Capital Digital Infrastructure Fund (CDIF) adjusted for implementation of stapling proposal with capital distribution of \$0.60 per unit from CDIF, reinvested to acquire a unit in 360 Capital Digital Infrastructure Fund 2 (CDIF2).