# Information under Article 23 of the European Alternative Investment Fund Managers Directive (AIFMD) for UK and Dutch Investors

October 4, 2016

## **DISCLAIMER**

This document has been prepared solely for the purpose of providing U.K. and Dutch investors with certain information under Article 23 of the European Alternative Investment Fund Managers Directive (European Directive 2011/61/EU) as implemented in their respective jurisdictions. Accordingly, you should not use this document for any other purpose.

#### **Netherlands**

The units of Frontier Real Estate Investment Corporation ("FRI" or the "AIF") are being marketed in the Netherlands under Section 1:13b of the Dutch Financial Supervision Act (Wet op het financieel toezicht, or the "Wft"). In accordance with this provision, Mitsui Fudosan Frontier REIT Management Inc. (the "AIFM") has notified the Dutch Authority for the Financial Markets of its intention to offer these units in the Netherlands. The units of FRI will not, directly or indirectly, be offered, sold, transferred or delivered in the Netherlands, except to or by individuals or entities that are qualified investors (gekwalificeerde beleggers) within the meaning of Article 1:1 of the Wft, and as a consequence neither the AIFM nor FRI is subject to the license requirement pursuant to the Wft. Consequently, neither the AIFM nor FRI is subject to supervision of the Dutch Central Bank (De Nederlandsche Bank, "DNB") or the Netherlands Authority for Financial Markets (Autoriteit Financiële Markten, the "AFM") and this Article 23 AIFMD Prospectus is not subject to approval by the AFM. No approved prospectus is required to be published in the Netherlands pursuant to Article 3 of the European Directive 2003/71/EC (the EU Prospectus Directive) as amended and implemented in Netherlands law. The AIFM is solely subject to limited ongoing regulatory requirements as referred to in Article 42 of the AIFMD.

## **United Kingdom**

Units of FRI are being marketed in the United Kingdom pursuant to Article 59 of the United Kingdom Alternative Investment Fund Managers Regulations 2013. In accordance with this provision, the AIFM has notified the Financial Conduct Authority (the "FCA") of its intention to offer these units in the United Kingdom.

For the purposes of the United Kingdom Financial Services and Markets Act 2000 ("FSMA") FRI is an unregulated collective investment scheme which has not been authorized by the FCA.

Accordingly, any communication of an invitation or inducement to invest in FRI may be made to persons in the United Kingdom only if the communication falls within one or more of the categories of exempt financial promotions under the Financial Services and Markets Act (Financial Promotion) Order 2005 (the "Order"), such as financial promotions communicated to:

- (1) persons who are investment professionals, as defined in article 19 of the Order;
- (2) persons who are certified high net worth individuals, as defined in article 48 of the Order;
- (3) persons who are high net worth companies, unincorporated associations, or other entities listed in article 49 of the Order; or
- (4) persons who are certified sophisticated investors, as defined in article 50 of the Order,

or if the communication is made to persons to whom such an invitation or inducement may otherwise lawfully be communicated. The distribution of this document to any person in the United Kingdom in circumstances not falling within one of the above categories is not permitted and may contravene FSMA. No person falling outside those categories should treat this document as constituting a promotion to him, or act on it for any purposes whatever.

In relation to each Member State of the European Economic Area which has implemented the Prospectus Directive (each, a Relevant Member State), with effect from and including the date on which the Prospectus Directive is implemented in that Relevant Member State (the Relevant Implementation Date) no offer of units of FRI may be made to the public in that Relevant Member State except in circumstances falling within Article 3(2) of the Prospectus Directive, provided that no such offer of units shall require the publication of a prospectus pursuant to Article 3 of the Prospectus Directive, or a supplement to a prospectus pursuant to Article 16 of the Prospectus Directive.

For the purposes of this provision, the expression "an offer of units to the public" in relation to any units in any Relevant Member State means the communication in any form and by any means of sufficient information on the terms of the offer and the units to be offered so as to enable an investor to decide to purchase or subscribe the units, as the same may be varied in that Member State by any measure implementing the Prospectus Directive in that Member State, the expression "Prospectus Directive" means Directive 2003/71/EC (and amendments thereto, including the 2010 PD Amending Directive, to the extent implemented in the Relevant Member State), and includes any relevant implementing measure in the Relevant Member State and the expression "2010 PD Amending Directive" means Directive 2010/73/EU.

Article 23 (1)(a)			
Objectives of the	Frontier Real Estate Investment Corporation ("FRI" or the "AIF") is a REIT specializing in retail		
AIF	facilities and aims to secure stable earnings over the medium to long term.		
Investment strategy	The investment strategy of FRI aims to secure stable earnings over the medium to long term.		
	In order to do this, it (i) focuses on "best-in-town" facilities and uses Mitsui Fudosan's		
	expertise in operation and management support and (ii) maintains a strong earnings structure		
	based on lease contracts with long-term fixed rents, while (iii) conducting conservative		
	financial operations through significant use of leasehold and security deposits from tenants in		
	order to maintain a conservative LTV ratio.		
Types of assets the	Real estate, trust beneficiary interests in real estate, real estate securities, specified assets		
AIF may invest in	and other assets.		
Techniques it may	FRI primarily considers as investment targets real estate used as suburban retail facilities and		
employ and all	buildings for retail shops in urban centers and other places, and trust beneficiary interests in		
associated risks	such types of real estate. In order to reduce risks related to rental revenues associated with		
	regional economic deterioration which are the result of focusing investment properties in		
	specific areas, as well as risks related to earthquakes and other disasters, FRI strives to		
	conduct geographically diverse investment in an aim to stabilize cash flow. In other words,		
	although almost half of FRI's properties are in Tokyo and the surrounding prefectures that		
	comprise the metropolitan Tokyo area, FRI invests in real estate in all areas of Japan as well as		
	in trust beneficiary interests in such types of real estate. FRI generally does not consider		
	unoccupied properties as investment targets. However, FRI may invest in unoccupied		
	properties, properties planned for construction or properties under development in the event		
	that tenants and leasing rates have been determined and stable earnings can be projected		
	after the property is occupied or the building construction is completed.		
	The principal risks with respect to investment in FRI are as follows:		
	(1) Risks Related to Marketability of FRI's Investment Units and Investment Corporation		
	Bonds		
	(a) Risks concerning market price fluctuations of the investment units or		
	investment corporation bonds		
	(b) Risks concerning FRI's ability to make cash distributions		
	(c) Risks concerning fluctuations in revenues and expenditures		
	(d) Risks concerning the rights of unitholders and shareholders not necessarily		
	being identical		
	(e) Risks concerning dilution of per-unit value through the issuance of new		
	investment units		

- (f) Risks concerning transactions involving the investment units in the market
- (g) Risks concerning redemption and interest payments for the investment corporation bonds
- (2) Risks Related to Management Policies of FRI
  - (a) Risks concerning specialized investment in retail facilities
  - (b) Risks concerning dependency on a limited number of tenants
  - (c) Risks concerning single-tenant properties
  - (d) Risks concerning FRI's ability to make real estate acquisitions or dispositions
  - (e) Risks concerning fund procurement through borrowings and issuance of investment corporation bonds and new investment units
- (3) Risks Related to Affiliates and the Structure of FRI
  - (a) Risks concerning dependency on the Mitsui Fudosan Group and conflicts of interest
  - (b) Risks concerning dependency on FRI's affiliates and conflicts of interest
  - (c) Risks concerning dependence on FRI's executive director and the personnel of the asset management company
  - (d) Risks concerning changes to FRI's investment policy
  - (e) Risks of FRI going bankrupt or its registration being cancelled
  - (f) Risks concerning tenant leasehold and security deposits
- (4) Legal Risks Related to Real Estate and Trust Beneficiary Rights
  - (a) Risks concerning defects and failures of real estate, including defective title and limited or invalid ownership rights
  - (b) Risks concerning lease contracts
  - (c) Risks concerning building damage, loss and deterioration due to disasters, etc.
  - (d) Risks concerning ownership liabilities, repair and maintenance costs, etc. related to real estate
  - (e) Risks concerning administrative rules and regulations and prefectural or municipal ordinances for real estate
  - (f) Risks concerning establishment of new or revisions of existing laws and regulations
  - (g) Risks arising from bankruptcy of the seller of properties
  - (h) Risks concerning subleases
  - (i) Risks concerning the status of use of real estate by tenants, etc.
  - (j) Risks concerning co-owned properties
  - (k) Risks concerning compartmentalized ownership of buildings

(I) Risks concerning properties on leased lands (m) Risks concerning leased properties (n) Risks concerning properties including land with leasehold interest for which use a permit has been obtained (o) Risks concerning properties under development (p) Risks concerning hazardous materials and environmental liabilities (q) Risks specific to real estate owned through trust beneficiary rights (r) Risks concerning conclusion of post-dated sale agreements (forward commitment contracts), etc. (s) Risks concerning properties having multiple buildings constructed as a single architectural structure (t) Risks concerning establishment of leasehold interests (5) Risks Related to Taxation (a) Risks concerning conduit requirements (b) Risks of becoming unable to satisfy conduit requirements due to correction orders as a result of taxation investigations, etc. (c) Risks that preferential tax measures associated with real estate acquisitions cannot be applied (d) Risks concerning revisions of the general tax system (6) Other Risks (a) Risks concerning reliance on professional opinions, as well as industry and market data (b) Risks that tax burdens will increase due to discrepancies between accounting treatment and tax treatment (c) Risks related to the concentration of properties in Tokyo and the metropolitan Tokyo area (d) Risks related to natural and man-made disasters (e) Risks related to holding interests in properties through preferred shares of special purpose companies (f) Risks related to holding Japanese anonymous association interests (g) Risks related to the restrictive covenants under debt financing arrangement

Any applicable investment restrictions

FRI is subject to investment restrictions under Japanese laws and regulations (e.g., the Act on Investment Trusts and Investment Corporations (the "ITA"), the Financial Instruments and Exchange Act (the "FIEA")) as well as its articles of incorporation.

	FRI must invest primarily in specified assets as defined in the ITA. Specified assets include, but
	are not limited to, securities, real estate, leaseholds of real estate, surface rights ( <i>chijō-ken</i> ) (i.e., right to use land for the purpose of having a structure on it) or trust beneficiary interests
	for securities or real estate, leaseholds of real estate or surface rights. A listed J-REIT must invest substantially all of its assets in real estate, real estate-related assets and liquid assets as
	provided by the listing requirements. Real estate in this context includes, but is not limited to, real estate, leaseholds of real estate, surface rights, and trust beneficiary interests for these
	assets, and real estate-related assets in this context include, but are not limited to,
	anonymous association (tokumei kumiai) interests for investment in real estate. Pursuant to
	the ITA, investment corporations may not independently develop land for housing or to
	construct buildings, but may outsource such activities in certain circumstances.
Circumstances in	FRI may take out loans or issue long- or short-term corporate bonds for the purpose of
which the AIF may	investing in properties, conducting repairs and paying distributions, as well as for operating
use leverage	capital and repaying debt (including security deposits, other debt and bonds).
The types and	Loans or investment corporation bonds. Currently, all of FRI's outstanding long- and
sources of leverage	short-term loans as well as outstanding bonds are unsecured and unguaranteed.
permitted and	
associated risks	Loans or investment corporation bonds in which FRI enters or FRI issues may be subject to
	restrictive covenants in connection with any future indebtedness that may restrict operations
	and limit its ability to make cash distributions to unitholders, to dispose of properties or to
	acquire additional properties. Furthermore, if FRI were to violate such restrictive covenants, such as with regard to loan-to-value ratios, lenders may be entitled to require FRI to
	collateralize portfolio properties or demand that the entire outstanding balance be paid.
	In the event of an increase in interest rates, to the extent that FRI has any debt with
	unhedged floating rates of interest or FRI incurs new debt, interest payments may increase,
	which in turn could reduce the amount of cash available for distributions to unitholders.
	Higher interest rates may also limit the capacity for short- and long-term borrowings, which
	would in turn limit FRI's ability to acquire properties, and could cause the market price of the
	units to decline.
Any restrictions on	The maximum amount of each loan and corporate bond issuance will be 1 trillion yen, and the
leverage	aggregate amount of all such debt will not exceed 1 trillion yen.
Any restrictions on	No applicable arrangements.
collateral and asset	
reuse arrangements	

Maximum level of leverage which the AIFM is entitled to employ on behalf of the AIF As a general rule, FRI maintains a conservative loan-to-value, or LTV ratio, which is the ratio of (x) the aggregate principal amount of borrowings, investment corporation bonds and leasehold and security deposits to (y) the total assets of FRI's portfolio, and which FRI discloses with its fiscal period results; FRI has set 60% as its maximum LTV ratio; however, FRI's LTV ratio may fluctuate as a result of property acquisitions or other events.

## **Article 23(1) (b)**

Procedure by which the AIF may change its investment strategy / investment policy Amendment of the articles of incorporation. Amendment requires a quorum of a majority of the total issued units and at least a two-thirds vote of the voting rights represented at the meeting. Unitholders should note, however that under the ITA and our articles of incorporation, unitholders who do not attend and exercise their voting rights at a general meeting of unitholders are deemed to be in agreement with proposals submitted at the meeting, except in cases where contrary proposals are also being submitted.

Additionally, the guidelines of the AIFM, which provide more detailed policies within FRI's overall investment strategy and policy, can be modified without such formal amendment of the articles of incorporation.

## **Article 23(1) (c)**

Description of the main legal implications of the contractual relationship entered into for the purpose of investment, including jurisdiction, applicable law, and the existence or not of any legal instruments providing for the recognition and enforcement of judgments in the

FRI has entered into the following agreements with its sponsor, Mitsui Fudosan Co., Ltd.:

- Basic Agreement concerning Shopping Center (SC) Management;
- Master lease agreement under which FRI leases properties to Mitsui Fudosan Co., Ltd. under a master lease agreement, and Mitsui Fudosan Co., Ltd. subleases such properties to subtenants;
- Direct lease agreements with Mitsui Fudosan Co., Ltd. as tenant;
- Purchase and sale agreements regarding certain FRI assets originally held by the sponsor, and other contracts with regard to such assets.

All of the above agreements are governed by Japanese law.

FRI is not involved in or threatened by any legal arbitration, administrative or other proceedings, the results of which might, individually or in the aggregate, be material.

## Article 23(1) (d)

territory where the AIF is established

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The identity of the	AIFM (Asset Manager): Mitsui Fudosan Frontier REIT Management Inc.
AIFM, AIF's	Auditor: Ernst & Young ShinNihon LLC
depository, auditor	Institutional administrator agent and Custodian: Sumitomo Mitsui Trust Bank, Ltd.
and any other	Accounting administrator agent: Heiseikaikeisha Tax Corporation
service providers	Transfer Agent: Sumitomo Mitsui Trust Bank, Limited
and a description of	Service providers owe contractual obligations under their respective agreements with the AIF
their duties and the	or AIFM, as the case may be. In addition, the FIEA provides that an asset manager owes a
investors' rights	J-REIT a fiduciary duty and must conduct its activities as the asset manager in good faith. The
thereto	FIEA also prohibits an asset manager from engaging in certain specified conduct, including
	entering into transactions outside the ordinary course of business or with related parties of
	the asset manager that are contrary to or violate the J-REIT's interests. Pursuant to the ITA,
	the unitholders have the right to approve the execution or termination of the asset
	management agreement at a general meeting of unitholders.
Article 23(1) (e)	
Description of how	Not applicable.
the AIFM complies	
with the	
requirements to	
cover professional	
liability risks (own	
funds / professional	
indemnity	
insurance)	
Article 23(1) (f)	
Description of any	Not applicable. There is no delegation of such functions beyond the AIFM, which is
delegated	responsible for portfolio and risk management, and the Custodian, which is responsible for
management	safekeeping activities.
function such as	
portfolio	
management or risk	
management and of	
any safekeeping	
function delegated	
by the depositary,	
the identification of	
the delegate and	
any conflicts of	
interest that may	

arise from such	
delegations	
Article 23(1) (g)	
Description of the	FRI makes investment decisions based on its investment strategies and in accordance with its
AIF's valuation	articles of incorporation and based on the results of due diligence, including the valuation of
procedure and	properties and consideration of the property appraisal value. The methods and standards that
pricing	FRI uses for the evaluation of assets are based on the Regulations Concerning the Calculations
methodology,	of Investment Corporations, as well as the Regulations Concerning Real Estate Investment
including the	Trusts and Real Estate Investment Corporations and other regulations stipulated by ITA, in
methods used in	addition to Japanese GAAP. J-REITs may only use the valuation methods prescribed in the
valuing	rules of the Investment Trusts Association, Japan, which emphasize market price valuation.
hard-to-value assets	
	Regarding hard to value assets, such assets comprise tenant security deposits. Security
	deposits from tenants are not subject to fair value disclosure because they are not
	marketable, and actual deposit period is not estimable as leases may be cancelled, renewed
	or re-signed even if a lease term is set in the lease contract. This makes a reasonable estimate
	of future cash flows difficult. Valuation of such hard to value assets is included in the notes to
	our financial statements.
	If asset valuation methods other than those mentioned in the paragraphs above are to be
	used in order to determine values for asset management reports, etc., valuation shall be
	conducted in the following manner.
	(1) Real estate, real estate leasehold rights and surface rights
	In principle, valuation shall be based on the appraisal by a real estate appraiser.
	(2) Trust beneficiary interests and equity interests in anonymous associations and voluntary
	associations
	Valuation shall be made by calculating the value of the equity interests in anonymous
	associations or voluntary associations in relation to real estate, real estate leasehold rights or
	surface rights, or the value of the trust beneficiary interests obtained by subtracting the
	amount of liabilities from the aggregate value of assets after (i) determining valuation as
	described in (1) above with respect to trust assets or the assets of anonymous associations
	composed of real estate, real estate leasehold rights or surface rights and (ii) determining
	valuation in accordance with general accepted accounting principles in Japan with respect to
	trust assets or the assets of anonymous associations or voluntary associations composed of
	financial assets.

Article 23(1) (h)

Description of the AIF's liquidity risk management, including redemption rights in normal and exceptional circumstances and existing redemption arrangements with investors

FRI seeks to manage the capital resources and liquidity sources to provide adequate funds for current and future financial obligations and other cash needs and acquisitions. FRI has entered into credit lines in the amount of 15 billion yen as of June 30, 2016, and has entered into loans and has issued investment corporation bonds in the past. While loans and bonds are exposed to liquidity risk, such risk is managed by keeping the ratio of interest-bearing liabilities to total assets at a low level, as well as by diversifying fund procurement means, spreading out lending financial institutions and repayment dates, establishing commitment lines and securing liquidity on hand, and also by controlling risks by preparing monthly fund management plans.

FRI is a closed-end investment corporation, and unitholders are not entitled to request the redemption of their investment.

## **Article 23(1) (i)**

Description of all fees, charges and expenses and a maximum amount which is directly / indirectly borne by the investors

#### • Compensation:

The articles of incorporation provide that the AIF may pay its executive and supervisory officers up to 800,000 yen and up to 500,000 yen per month, respectively. The board of officers is responsible for determining a reasonable compensation amount for the executive officer and each of the supervisory officers.

• Asset Management Fee:

The AIF will pay the Asset Manager an asset management fee as follows:

Management Fees 1 – The amount equivalent to up to 0.3% per annum multiplied by total assets will be payable.

Management Fees 2 – The amount equivalent to up to 2% of operating income prior to deduction of Depreciation, Management Fees 1 and 2 as calculated on each closing date will be payable.

Acquisition/Disposition management Fee – In the event that Real Estate is newly acquired/disposed of, compensation equivalent to up to the total amount of the acquisition/disposition price of said Real Estate multiplied by 0.5% will, in principle, be payable, provided, however, that the applicable rate in a transaction with a related party will be 0.25%.

• Custodian Fee: The AIF will pay the Custodian as follows:

A monthly fee calculated as follows:

The amount of total assets as indicated at the end of the previous period x  $0.03\% \div 12$ 

• Investor Registry Administrator Fee (Standard Fee):

Standard fees are for services such as the preparation, maintenance and storage of FRI's unitholder register; and preparation of materials concerning end-of-period unitholder statistical data (number of unitholders, total units held, distribution per geographic area). Monthly standard fees are determined by calculating one sixth of the total number of unitholders falling under each section as shown below. There is a minimum monthly fee of ¥210,000.

Up to 5,000	86 yen
5,001 to 10,000	73 yen
10,001 to 30,000	63 yen
30,001 to 50,000	54 yen
50,001 to 100,000	47 yen
More than 100,001	40 yen

The rate for removal of a unitholder from the registry is 50 yen per person.

FRI also pays certain other fees in addition to the standard fee in connection with the administration and handling of distributions (minimum of 350,000 yen per distribution) and other shareholder related functions.

#### Auditor Fee:

FRI may pay the accounting auditor up to ¥15 million per fiscal period. The board of officers is responsible for determining the compensation amount for the accounting auditor.

## Accounting Service Fee:

A monthly fee calculated as follows:

The sum of one twelfth of a yearly flat fee of up to \$30 million and an amount equal to a variable amount of up to \$100,000 multiplied by the number of properties at the end of the month in excess of a base number of properties.

• Institutional administrator agent fees

FRI will pay institutional administrator agent fees as follows:

A flat fee of 200,000 yen per month for services related to the board of officers meeting and a flat fee in the same amount for services related to the meeting of unitholders

## Miscellaneous

FRI also pays fees to certain service providers in connection with:

- o Administration of special accounts;
- REIT office management;
- Property control;

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	o Property transfer;
	o Referral of tenants;
	<ul> <li>Property maintenance, improvement and other related services;</li> </ul>
	Tax administration; and
	<ul> <li>Administration for corporate bonds governance.</li> </ul>
Article 23(1) (j)	
Description of the	Under Article 77 paragraph 4 of the ITA, which applies the requirements of Article 109
AIFM's procedure to	paragraph 1 of the Companies Act to investment corporations, investment corporations are
ensure fair	required to treat unitholders equally depending on the number and content of units held. In
treatment of	addition, upon liquidation, the allotment of residual assets to unitholders is required to be
investors and	made equally depending on the number units held under Article 77 paragraph 2 item 2 and
details of any	Article 158 of the ITA.
preferential	
treatment received	
by investors,	
including detailing	
the type of	
investors and their	
legal or economic	
links with the AIF or	
AIFM	
Article 23(1) (k)	
The latest annual	Additional information may be found in our most recent semi-annual report prepared in
report referred to in	accordance with Article 22 of the AIFMD, which is available at the Asset Manager's office
Article 22(1)	located at Kojun Building, 6th Floor, 6-8-7 Ginza, Chuo-ku, Tokyo 104-0061.
Article 23(1) (I)	
The procedure and	FRI is authorized under the articles of incorporation to issue up to 4 million units. Its units
conditions for the	have been listed on the Tokyo Stock Exchange since August 2004. Secondary market sales and
issue and sale of the	transfers of units will be conducted in accordance with the rules of the Tokyo Stock Exchange.
units	Unit prices on the Tokyo Stock Exchange are determined on a real-time basis by the
	equilibrium between bids and offers. The Tokyo Stock Exchange sets daily price limits, which
	limit the maximum range of fluctuation within a single trading day. Daily price limits are set
	according to the previous day's closing price or special quote.
Article 23(1) (m)	
Latest net asset	FRI's unit's latest market price is publicly available at the Tokyo Stock Exchange or from
value of the AIF or	financial information vendors at
latest market price	http://www.reuters.com/finance/stocks/overview?symbol=8964.T
latest market price of the unit or share	http://www.reuters.com/finance/stocks/overview?symbol=8964.T

of the AIF				
Article 23(1) (n)				
Details of the	The units of FRI were listed	on the Tokyo Stock E	Exchange in August 2	2004.
historical	The most recent five fiscal p	eriod performance o	of the units is as follo	ows.
performance of the				
AIF, where available				
	Fiscal period (six months	Total Assets	Total Net Assets	Net Assets per unit
	ended)	(JPY millions)	(JPY millions)	(base value) (JPY)
	June 30,2016	267,353	151,587	305,620
	December 31,2015	268,098	151,928	306,307
	June 30,2015,	269,014	151,762	305,972
	December 31,2014	263,035	151,934	306,320
	June 30, 2014	264,946	151,991	306,435
	A two for one split of invest	ment units has been	implemented with.	January 1, 2014 as the
	effective date. Net Assets per unit are calculated based on the assumption that the			
	investment unit had been sp	olit at the beginning	of the previous fisca	l period.
Article 23(1) (o)				
Identity of the	Not applicable.			
prime broker, any				
material				
arrangements of the				
AIF with its prime				
brokers, how				
conflicts of interest				
are managed with				
the prime broker				
and the provision in				
the contract with				
the depositary on				
the possibility of				
transfer and reuse				
of AIF assets, and				
information about any transfer of				

liability to the prime broker that may			
exist			
Article 23(1) (p)			
Description of how	The AIFM will disclose the matters described in Articles 23(4) and 23(5) periodically through		
and when periodic	the AIF Internet w	vebsite and semi-annual report.	
disclosures will be			
made in relation to			
leverage, liquidity			
and risk profile of			
the assets, pursuant			
to Articles 23(4) and			
23(5)			
Article 23(2)			
The AIFM shall	Not applicable.		
inform the investors			
before they invest			
in the AIF of any			
arrangement made			
by the depository to			
contractually			
discharge itself of			
liability in			
accordance with			
Article 21(13)			
The AIFM shall also	Not applicable.		
inform investors of			
any changes with			
respect to			
depositary liability			
without delay			
Article 23(4)(a)			
Percentage of the AIF's assets which TI		There are no assets that are subject to special arrangements arising from	
are subject to special	arrangements	their illiquid nature.	
arising from their illiquid nature. The			
percentage shall be calculated as the			
net value of those ass	sets subject to		
special arrangements	divided by the		

net asset value of the AIF concerned	
Overview of any special	There are no such special arrangements.
arrangements, including whether	
they relate to side pockets, gates or	
other arrangements	
Valuation methodology applied to	There are no such special arrangements.
assets which are subject to such	
arrangements	
How management and performance	There are no such special arrangements.
fees apply to such assets	
Article 23(4)(b)	
Any new arrangements for managing	Any new arrangements or change in applicable arrangements will be
the liquidity of the AIF	disclosed at an appropriate time.
For each AIF that the AIFM manages	Any new arrangements or change in applicable arrangements will be
that is not an unleveraged closed-end	disclosed at an appropriate time.
AIF, notify to investors whenever they	
make changes to its liquidity	
management systems (which enable	
an AIFM to monitor the liquidity risk	
of the AIF and to ensure the liquidity	
profile of the investments of the AIF	
complies with its underlying	
obligations) that are material in	
accordance with Article 106(1) of	
Regulation (EU) No 231/2013 (ie.	
there is a substantial likelihood that a	
reasonable investor, becoming aware	
of such information, would reconsider	
its investment in the AIF, including	
because such information could	
impact an investor's ability to	
exercise its rights in relation to its	
investment, or otherwise prejudice	
the interests of one or more investors	
in the AIF).	

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Immediately notify investors where	Any new arrangements or change in applicable arrangements will be
they activate gates, side pockets or	disclosed at an appropriate time.
similar special arrangements or	
where they decide to suspend	
redemptions	
Overview of changes to liquidity	Any new arrangements or change in applicable arrangements will be
arrangements, even if not special	disclosed at an appropriate time.
arrangements	
Terms of redemption and	FRI is a closed-end investment corporation, and unitholders are not entitled
circumstances where management	to request the redemption of their investment.
discretion applies, where relevant	
Also any voting or other restrictions	There are no voting or other restrictions on the rights attaching to units.
exercisable, the length of any lock-up	
or any provision concerning 'first in	
line' or 'pro-rating' on gates and	
suspensions shall be included	
Article 23(4)(c)	
The current risk profile of the AIF and	The appropriateness and effectiveness of the risk management structure
the risk management systems	are regularly evaluated and enhanced by the AIFM.
employed by the AIFM to manage	
those risks	Deposits are exposed to risks of failure of the financial institution holding
	the deposit and other credit risks, but FRI manages credit risk by restricting
	the term of the deposit to relatively short periods and setting a minimum
	credit rating requirement for the deposit-taking financial institutions, along
	with taking heed of security by depositing an amount that is no more than
	the total amount of borrowings from each of the financial institutions that
	are holding the deposits.
	Funds from debts and investment corporation bonds are mainly used for
	asset acquisition or debt repayment, etc. While floating-rate short- and
	long-term loans are exposed to the risk of interest rate hike, the impact
	that interest rate rises have on operations is limited by maintaining the
	proportion of debt that is long-term fixed-rate debt at high levels, and
	setting a procurement limit depending on the economic and financial
	environment and other factors.
	Furthermore, derivative transactions (interest rate swap transactions) are
	available as hedging instruments to mitigate the risks of rises in floating

	interest rates.
	Tenant security deposits are exposed to liquidity risk arising from vacating of properties by tenants due to the termination of contract.  FRI limits the liquidity risks by keeping the ratio of liabilities to total assets including tenant and security deposits at a low level, as well as, similarly with borrowings and other risks mentioned above, diversifying fund procurement means, establishing commitment lines and securing liquidity on hand, and also controls risks by preparing monthly fund management plans.
Measures to assess the sensitivity of	No such measures have been implemented.
the AIF's portfolio to the most	
relevant risks to which the AIF is or	
If risk limits set by the AIFM have	No such situation has occurred.
been or are likely to be exceeded and	No such situation has occurred.
where these risk limits have been	
exceeded a description of the	
circumstances and the remedial	
measures taken	
Article 23(5)(a)	
Any changes to the maximum amount	Any new arrangements or change in applicable arrangements will be
of leverage which the AIFM may	disclosed at an appropriate time.
employ on behalf of the AIF,	
calculated in accordance with the	
gross and commitment methods. This	
shall include the original and revised	
maximum level of leverage calculated	
in accordance with Articles 7 and 8 of	
Regulation (EU) No 231/2013,	
whereby the level of leverage shall be	
calculated as the relevant exposure	
divided by the net asset value of the	
AIF.	

Any right of the reuse of collateral or	No such right or guarantee exists.	
any guarantee granted under the		
leveraging agreement, including the		
nature of the rights granted for the		
reuse of collateral and the nature of		
the guarantees granted		
Details of any change in service	Any new arrangements or change in applicable arrangements will be	
providers relating to the above.	disclosed at an appropriate time.	
Article 23(5)(b)		
Information on the total amount of	The aggregate amount of debt with interest is JPY 78,840 million as of	
leverage employed by the AIF	June 30,2016.	
calculated in accordance with the		
gross and commitment methods		