Paseo de la Reforma 115, Piso 6 Col. Lomas de Chapultepec México, Distrito Federal México 11000 Telephone +52 55 9178 7700 Fax +52 55 9178 7727



PFIC Annual Information Statement For Macquarie Mexican REIT FYE December 31, 2012

Macquarie Mexican REIT ("MMREIT") meets the Internal Revenue Code definition of a passive foreign investment company ("PFIC") for the taxable year ended December 31, 2012. This document is the PFIC Annual Information Statement for MMREIT for the taxable year ended December 31, 2012.

This PFIC Annual Information Statement contains information to enable you, should you choose, to elect to treat MMREIT as a Qualified Electing Fund ("QEF").

A U.S. holder of real estate trust certificates (*Certificados Bursátiles Fiduciarios Inmobiliarios*) ("CBFIs") issued by MMREIT who makes a QEF election for MMREIT is required annually to include in his or her income his or her pro rata share of the ordinary earnings and net capital gain for MMREIT. The QEF election is made by completing and attaching Form 8621 for each PFIC to your federal income tax return filed by the due date of the return, including extensions.

Further information on PFIC rules is available on the internet at the Internal Revenue Service website.

- (1) This PFIC Annual Information Statement applies to the taxable year of MMREIT commenced December 14, 2012 and ended December 31, 2012.
- (2) The per CBFI share of the ordinary earnings and net capital gain of MMREIT for the taxable year of MMREIT specified in paragraph (1) is as follows:

Ordinary Earnings: \$0.0039
Net Capital Gain: NONE

(3) The amount of cash and fair market value of other property distributed or deemed distributed per CBFI by MMREIT during the taxable year specified in paragraph (1) is as follows:

Cash: NONE Fair Market Value of Property: NONE

- (4) MMREIT will permit CBFI holders to inspect and copy MMREIT's permanent books of account, records, and such other documents as may be maintained by MMREIT that are necessary to establish that PFIC ordinary earnings and net capital gain, as provided in section 1293(e) of the Code, are computed in accordance with U.S. income tax principles.
- (5) MMREIT was established on November 14, 2012 in Mexico. MMREIT has no U.S. taxpayer identification number and its registration address is:

Av. Paseo de la Reforma 115, Piso 6 Col. Lomas de Chapultepec C.P. 11000 Mexico, D.F.

THIS INFORMATION STATEMENT IS PROVIDED IN ORDER TO ASSIST THOSE U.S. CBFI HOLDERS WHO HAVE MADE A QUALIFIED ELECTING FUND (QEF) ELECTION WITH RESPECT TO MMREIT IN FILING FORM 8621, AND DOES NOT CONSTITUTE TAX ADVICE. THOSE U.S. CBFI HOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF CBFIS OF MMREIT ARISING IN



THEIR OWN PARTICULAR SITUATIONS UNDER U.S. FEDERAL, STATE OR LOCAL LAW OR ANY FOREIGN LAW.

IRS Circular 230 Notice:

TO ENSURE COMPLIANCE WITH TREASURY DEPARTMENT CIRCULAR 230, YOU ARE HEREBY NOTIFIED THAT: (A) ANY FEDERAL TAX ADVICE CONTAINED HEREIN IS NOT INTENDED OR WRITTEN TO BE USED, AND CANNOT BE USED BY ANY TAXPAYER FOR THE PURPOSE OF AVOIDING PENALTIES THAT MAY BE IMPOSED UNDER THE INTERNAL REVENUE CODE, (B) THE ADVICE IS WRITTEN IN CONNECTION WITH THE PROMOTION OR MARKETING OF THE TRANSACTIONS OR MATTERS ADDRESSED HEREIN, AND (C) THE TAXPAYER SHOULD SEEK ADVICE BASED ON THE TAXPAYER'S PARTICULAR CIRCUMSTANCES FROM AN INDEPENDENT TAX ADVISOR.

Macquarie México Real Estate Management, S.A. de C.V. as attorney-in-fact of Deutsche Bank México, S.A., Institución de Banca Múltiple, as trustee of Macquarie Mexican REIT

Name: SiMON HANNA

Name: DAVID HANDELSMANN

Title: Attorney-in-Fact

Title: Attorney-in-Fact Date: NOVEMBER 19, 2013 Date: November 19, 2013