

## **Blackstone Alternative Investment Funds Plc (“the Fund”)**

Reporting period end 31 December 2022

Date: 28 June 2023

Dear Shareholder,

Your shareholding in the Fund constitutes an interest in an offshore fund from a United Kingdom (“UK”) taxation perspective, with each share class treated as a separate ‘offshore fund’ for these purposes.

The UK Offshore Funds Regulations came into effect on 1 December 2009 and provide that if an investor resident in the United Kingdom for taxation purposes holds an interest in an offshore fund and that offshore fund is a ‘non-reporting fund’, any gain accruing to that investor upon the sale, redemption or other disposal of that interest will be charged to United Kingdom tax as income rather than a capital gain. Alternatively, where an investor holds an interest in an offshore fund that has been a ‘reporting fund’ for all periods of account for which they hold their interest, any gain accruing upon sale, redemption or other disposal of the interest will be subject to tax as a capital gain rather than income.

Reporting funds have an annual requirement to calculate and report to UK investors and HMRC the reportable income per share and distributions made for each share class. Provided the share classes comply with this annual reporting requirement, any gain accruing upon sale or other disposal of the interest by each UK shareholder will be subject to tax as a capital gain rather than income.

### **What does this mean for investors?**

Investors will be required to include in their tax return any distributions received (which does not include sums received on redemption of shares) during the year and their proportionate share of any excess reportable income. The proportionate share of the excess reportable income is calculated as follows:

Total number of shares held by the investor x excess reportable income per share in each class at year end (i.e. 31 December 2022)

The excess reportable income per share must be multiplied by the total number of shares you held in each share class at 31 December 2022 in order to derive the total excess reportable income to be included in your tax return.

The timing of the receipt of income is as follows:

### **UK corporate investors (including UK fund investors)**

The deemed distribution date for excess reportable income over any cash distributions received is 6 months after the end of the accounting period. As the accounting year end of the Fund is 31 December 2022, the deemed distribution date is 30 June 2023. This reportable income must be included in your corporate tax return for the relevant accounting period in which this date falls.

## UK individual investors

Excess reportable income for the year ended 31 December 2022 is deemed to arise on 30 June 2023, which falls within the UK fiscal year ended 5 April 2024 for UK individual investors. This must therefore be included in your 2023/2024 personal tax return.

### Reportable income for the year ended 31 December 2022

A: Reporting period

B: Class currency

C: Distributions paid in respect of the period

D: Dates any distributions were made

E: Excess reportable income

F: Fund distribution date

G: Equalisation in relation to any interest acquired in the fund

H: Did the share class continue to be a reporting fund as at this date?

Blackstone Diversified Multi-Strategy Fund:

Name	ISIN	A	B	C	D	E	F	G	H
Class I (AUD) Acc	IE00BTRF4T52	01/01/2022 - 31/12/2022	AUD	0	No Distribution	0.0490	30/06/2023	0.0583	Yes
Class I (CHF) Acc	IE00BN8SY932	01/01/2022 - 31/12/2022	CHF	0	No Distribution	0.0455	30/06/2023	0.0000	Yes
Class A (EUR) Acc	IE00BYXDW303	01/01/2022 - 31/12/2022	EUR	0	No Distribution	0.0000	30/06/2023	0.0006	Yes
Class I (EUR) Acc	IE00BN8SY486	01/01/2022 - 31/12/2022	EUR	0	No Distribution	0.0476	30/06/2023	0.0267	Yes
Class A (EUR) Dist	IE00BYXDW410	01/01/2022 - 31/12/2022	EUR	0	No Distribution	0.0000	30/06/2023	0.0000	Yes
Class I (GBP) Acc	IE00BN8SY593	01/01/2022 - 31/12/2022	GBP	0	No Distribution	0.0437	30/06/2023	0.0077	Yes
Class I (GBP) Dist	IE00BN8SYD72	01/01/2022 - 31/12/2022	GBP	0	No Distribution	0.0000	30/06/2023	0.0073	Yes
Class I (JPY) Acc	IE00BTRF4S46	01/01/2022 - 31/12/2022	JPY	0	No Distribution	4.9196	30/06/2023	4.2342	Yes
Class A (SEK) Acc	IE00BYXDVF52	01/01/2022 - 31/12/2022	SEK	0	No Distribution	0.0000	30/06/2023	0.0671	Yes
Class I (USD) Acc	IE00BN8SY379	01/01/2022 - 31/12/2022	USD	0	No Distribution	0.0516	30/06/2023	0.0485	Yes
Class I (USD) Distributing	IE00BN8SYB58	01/01/2022 - 31/12/2022	USD	0.0533 0.0532 0.0713 0.0315	01/04/2022 01/07/2022 03/10/2022 03/01/2023	0.0000	30/06/2023	0.0004	Yes
Class C (USD) Acc	IE00BYNJFF17	01/01/2022 - 31/12/2022	USD	0	No Distribution	0.0190	30/06/2023	0.0000	Yes
Class A (USD) Acc	IE00BYXDVH76	01/01/2022 - 31/12/2022	USD	0	No Distribution	0.0000	30/06/2023	0.0021	Yes

## Double taxation relief

Per regulation 99 of the Offshore Fund (Tax) Regulations 2009 (S.I.2009/3001), in order to avoid double taxation, any excess reported income deemed to be received by UK investors can be treated as expenditure for the acquisition of their holdings in the fund. In effect, the acquisition cost of your interest in the Fund shall be increased by the amount of excess reportable income in the calculation of capital gains. We set out below how such relief works in principle.

Proceeds	x
Original acquisition cost	(x)
Excess reported income	(x)
Capital gain	x

If you have any queries please contact your tax advisor.