The Sygnia Itrix Collective Investment Scheme Sygnia Itrix $\mathbf{4}^{\text{TH}}$ Industrial Revolution Global Equity ETF JSE code: SYG4IR

ISIN: ZAE000252433

("SYG4IR")

A portfolio in the Sygnia Itrix Collective Investment Scheme in Securities, registered as such in terms of the Collective Investment Schemes Control Act, 45 of 2002.

DISTRIBUTION FINALISATION ANNOUNCEMENT PERIOD END DECEMBER 2018

The Manager and Trustees of the Sygnia Itrix Collective Investment Scheme (being Sygnia Itrix (RF) (Pty) Limited and Standard Bank of South Africa Limited), respectively, have declared a distribution to holders of SYG4IR securities ("investors") recorded in the register on **Friday**, **4 January 2019** in respect of the period ended December 2018.

An aggregated amount of 0.64905 ZAR cents (R0.0064905) per SYG4IR security is declared as follows:

Alpha code	Dividend/Interest	Foreign/Local	Source of funds	Gross Distribution (cents per unit)	Subject to withholdin g tax (yes/no)	Withholdin g Tax (%)	Net Distribution (cents per unit)
SYG4IR	Dividend	Foreign (S64N rebate)	USA	0.64905	No		0.64905
Total				0.64905			0.64905

Notice is hereby given that the following dates are of importance in regard to the distribution for the period ended December 2018 by the ETF to holders of SYG4IR securities:

Last day to trade "cum" distribution: Monday, 31 December 2018
Securities trade "ex" distribution: Wednesday, 2 January 2019
Record date: Friday, 4 January 2019
Payment date: Monday, 7 January 2019

The distribution will be paid on Monday, 7 January 2019 to all securities holders recorded in the register on Friday, 4 January 2019.

1 NET FOREIGN DIVIDEND NOT TAXED (S64N rebate)

Gross dividends	6.26300
Foreign dividend withholding tax	-1.58000
Less Portfolio costs	-4.03395
Distributable dividend	0.64905
SA dividend withholding tax	
Gross dividend	6.26300
Less Portfolio costs	-4.03395
Net dividend	2.22905
SA dividend withholding tax	0.44581

SA tax 0.44581 cents (20%) will not be deducted as foreign **dividend** withholding tax has already been deducted (SECTION 64N). Equalisation amount has been proportionally net off against all categories.

Withholding Tax on Interest (WTI) came into effect on 1 March 2015.

Interest accruing from a South African source to a non-resident, excluding a controlled foreign company, will be subject to withholding tax at a rate of 15% on payment, except interest,

- arising on any Government debt instrument
- arising on any listed debt instrument
- arising on any debt owed by a bank or the South African Reserve Bank
- arising from a bill of exchange or letter of credit where goods are imported into South Africa and where an authorized dealer has certified such on the instrument
- payable by a headquarter company
- accruing to a non-resident natural person who was physically present in South Africa for a period exceeding 183 days in aggregate, during that year, or carried on a business through a permanent establishment in South Africa Investors are advised that to the extent that the distribution amount comprise of any interest, it will not be subject to WTI by virtue of the fact that it is listed debt instruments and/or bank debt.

No **dividend** withholding tax will be deducted from **dividend**s payable to a South African tax resident qualifying for exemption from **dividend** withholding tax provided that the investor has provided the following forms to their Central Securities Depository Participant ("CSDP") or broker, as the case may be in respect of its participatory interest:

- a) a declaration that the distribution is exempt from dividends tax; and
- b) a written undertaking to inform their CSDP or broker, as the case may be, should the circumstances affecting the exemption change or the beneficial owner cease to be the beneficial owner,

both in the form prescribed by the South African Revenue Service. South African tax resident investors are advised to contact their CSDP or broker, as the case may be, to arrange for the abovementioned documents to be submitted prior to payment of the distribution, if such documents have not already been submitted.

Non-resident investors for South African income tax purposes

The dividend distribution received by non-resident investors will be exempt from income tax in terms of section

10(1)(k)(i) of the Act, but will be subject to **dividend** withholding tax. **Dividend** withholding tax is levied at a rate of 20%, unless the rate is reduced in terms of any applicable agreement for the avoidance of double taxation ("DTA") between South Africa and the country of residence of the non-resident investor.

A reduced **dividend** withholding rate in terms of the applicable DTA may only be relied on if the non-resident investor has provided the following forms to their CSDP or broker, as the case may be in respect of its participatory interest:

- a) a declaration that the dividend is subject to a reduced rate as a result of the application of a DTA; and
- b) a written undertaking to inform the CSDP or broker, as the case may be, should the circumstances affecting the reduced rate change or the beneficial owner cease to be the beneficial owner,

both in the form prescribed by the South African Revenue Service. Non-resident investors are advised to contact their CSDP or broker, as the case may be, to arrange for the abovementioned documents to be submitted prior to the **payment** of the distribution if such documents have not already been submitted.

Both resident and non-resident investors are encouraged to consult their professional advisors should they be in any doubt as to the appropriate action to take.

24 December 2018

Manager

Sygnia Itrix (RF) (Proprietary) Limited

Trustee

The Standard Bank of South Africa Limited

Sponsor

Vunani Corporate Finance