

**SATRIX COLLECTIVE INVESTMENT SCHEME****SATRIX PROPERTY PORTFOLIO**

JSE code: STXPRO

ISIN Code: ZAE0000240131

("Satrix Prop")

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

**DISTRIBUTION FINALISATION ANNOUNCEMENT QUARTER END 31 DECEMBER 2020**

The Manager and Trustees of the Satrix Collective Investment Scheme (being Satrix Managers (RF) (Pty) Limited and Standard Chartered Bank), respectively, have declared a distribution to holders of Satrix Prop securities ("investors") recorded in the register on Friday, 15 January 2021 in respect of the quarter ended 31 December 2020.

An aggregate amount of 12.71000 cents (R0.12710) per Satrix Property security constituted as follows:

Alpha code	Dividend/ Interest	Foreign/ Local	Source of funds	Gross distribution (Cents per unit)	Foreign Withholding (Cents per unit)	Amount available for distribution (Cents per unit)	Subject to SA Dividends tax Yes/ No	SA Dividends Tax (%)	Net Distribution (Cents per unit)
STXPRO	Dividend	Local		0.58427	n/a	0.58427	Yes	20	0.46742
	Dividend	Foreign (S64N)	UK	0.59678	(0.12480)	0.47198	Yes	<sup>5</sup> (Note 1)	0.44214
	Dividend	REIT		11.65375	n/a	11.65375	Yes	20	9.32300
						<b>12.71000</b>			<b>10.23256</b>

**Note 1****NET FOREIGN DIVIDEND NOT TAXED (S64N REBATE)**

Gross dividend	0.62400
Less portfolio costs	(0.02722)
<b>Gross distribution</b>	<b>0.59678</b>
Foreign withholding tax (20% of Gross dividend)*	(0.12480)
<b>Amount available for distribution</b>	<b>0.47198</b>
SA Dividend withholding tax payable (5% on Gross distribution)*	(0.02984)

**Net Distributable****0.44214**

\* A 5% rebate is reclaimable from the UK's HM Revenue & Customs, resulting in an effective UK withholding tax rate of 15%. Therefore, depository receipt holders who are not exempt from the South African dividends tax will be subject to an additional 5 percent South African dividends tax, after the application of the section 64N rebate.

Those depository receipt holders who qualify for exemption from the South African tax (e.g. South African companies and non-residents of South Africa) must ensure that they have filed the relevant exemption forms with their brokers/ banks in order to ensure that no South African tax is withheld.

Notice is hereby given that the following dates are of importance in regard to the distribution for the quarter ended December 2020 by the ETF to holders of Satrix Property securities:

Last day to trade "cum" distribution:	Tuesday, 12 January 2021
Securities trade "ex" distribution:	Wednesday, 13 January 2021
Record date:	Friday, 15 January 2021
Payment date:	Wednesday, 20 January 2021

**The distribution will be paid on Wednesday, 20 January 2021 to all securities holders recorded in the register on Friday, 15 January 2021.**

**Withholding Tax on Interest (WTI) came into effect on 1 June 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 dividends 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.

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8 January 2021

Sponsor:  
Vunani Corporate Finance