

DIPULA INCOME FUND LIMITED

(Incorporated in the Republic of South Africa)

(Registration number 2005/013963/06)

JSE share code: DIA ISIN: ZAE000203378

JSE share code: DIB ISIN: ZAE000203394

(Approved as a REIT by the JSE)

("Dipula" or "the Company")



SHORT-FORM ANNOUNCEMENT: UNAUDITED CONDENSED CONSOLIDATED INTERIM RESULTS FOR THE SIX MONTHS ENDED 28 FEBRUARY 2021

SALIENT FEATURES

- A-share distributable earnings per share up 2.9% to 59.02029 cents (2020: 57.35694 cents)
- B-share distributable earnings per share up 16.8% to 45.09965 cents (2020: 38.61409 cents)
- Basic earnings per share up 43.9% to 58.38 cents (2020: 40.57 cents)
- Headline earnings per share up 35.9% to 60.01 cents (2020: 44.15 cents)
- NAV per share up 4.0% to R10.59 (2020: R10.18)
- Revenue down 0.3% to R678.4 million (2020: R680.2 million)
- Net operating profit down 1.6% to R432.8 million (2020: R439.7 million)
- Attributable comprehensive income up 43.9% to R309.0 million (2020: R214.7 million)

BUSINESS OVERVIEW

Dipula is an internally managed, South African focused Real Estate Investment Trust ("REIT") that owns a sectoral and geographically diversified portfolio of retail, office, industrial and residential rental assets in all provinces of South Africa, with most assets located in Gauteng. The company's strategy is to own a quality, defensive and diversified portfolio with a retail bias.

PAYMENT OF DIVIDEND

The board has approved, and notice is hereby given of the interim gross dividend (dividend number 18) for the period 1 September 2020 to 28 February 2021 of 59.02029 cents per A-share and 45.09965 per B-share.

The dividend is payable to Dipula shareholders in accordance with the timetable set out below:

Last day to trade cum dividend	Tuesday, 1 June 2021
Shares trade ex-dividend	Wednesday, 2 June 2021
Record date	Friday, 4 June 2021
Payment date	Monday, 7 June 2021

Share certificates may not be dematerialised or rematerialised between Wednesday, 2 June 2021 and Friday, 4 June 2021, both days inclusive. The dividend will be transferred to dematerialised shareholders' CSDP accounts/broker accounts on Monday, 7 June 2021. Certificated shareholders' dividend payments will be paid to certificated shareholders' bank accounts on or about Monday, 7 June 2021.

TAX TREATMENT

In accordance with Dipula's status as a REIT, shareholders are advised that the dividends meet the requirements of a "qualifying distribution" for the purposes of section 25BB of the Income Tax Act, No. 58 of 1962 ("Income Tax Act") and will be deemed to be dividends, for South African tax purposes, in terms of section 25BB of the Income Tax Act.

The dividends received by or accrued to South African tax residents must be included in the gross income of such shareholders and will not be exempt from income tax (in terms of the exclusion to the general dividend exemption, contained in paragraph (aa) of section 10(1)(k)(i) of the Income Tax Act) because they are dividends distributed by a REIT. The dividends are, however, exempt from dividend withholding tax in the hands of South African tax resident shareholders, provided that such shareholders provide the following forms to their Central Securities Depository Participant ("CSDP") or broker, as the case may be, in respect of uncertificated shares, or the company, in respect of certificated shares:

(a) a declaration that the dividends are exempt from dividends tax; and

(b) a written undertaking to inform the CSDP, broker or the company, 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 Commissioner for the South African Revenue Service. Shareholders are advised to contact their CSDP, broker or the company, as the case may be, to arrange for the abovementioned documents to be submitted prior to payment of the dividend, if such documents have not already been submitted.

Dividends received by non-resident shareholders will not be taxable as income and instead will be treated as an ordinary dividend which is exempt from income tax in terms of the general dividend exemption in section 10(1)(k)(i) of the Income Tax Act. Any distribution received by a non-resident from a REIT will be subject to dividend withholding tax at 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 shareholder. Assuming dividend withholding tax will be withheld at a rate of 20%, the net dividend amount due to non-resident shareholders is 47.21623 cents per A-share and 36.07972 cents per B-share. A reduced dividend withholding rate in terms of the applicable DTA may only be relied on if the non-resident shareholder has provided the following forms to their CSDP or broker, as the case may be, in respect of uncertificated shares, or the company, in respect of certificated shares:

- (a) a declaration that the dividends are subject to a reduced rate as a result of the application of a DTA; and
- (b) a written undertaking to inform their CSDP, broker or the company, 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 Commissioner for the South African Revenue Service. Non-resident shareholders are advised to contact their CSDP, broker or the company, as the case may be, to arrange for the abovementioned documents to be submitted prior to payment of the dividends if such documents have not already been submitted, if applicable.

A-shares in issue at the date of declaration of the dividends: 264 665 819.

B-shares in issue at the date of declaration of the dividends: 264 665 819.

Dipula's income tax reference number: 9743/798/14/3.

The dividend may have tax implications for resident as well as non-resident shareholders. Shareholders are therefore encouraged to consult their professional advisors should they be in any doubt as to the appropriate action to take.

SHORT-FORM ANNOUNCEMENT

The contents of this short-form announcement are the responsibility of the board of directors of Dipula. The information above is extracted from the unaudited condensed consolidated interim results for the six months ended 28 February 2021 and does not contain full or complete details of the financial results. Any investment decisions made by investors should be based on consideration of the full announcement as a whole and shareholders are encouraged to review the full announcement, which has been released on SENS and is available for viewing on Dipula's website at <https://www.dipula.co.za/downloads/2021/interim-results-feb-2021.pdf> and on the JSE website at <https://senspdf.jse.co.za/documents/2021/JSE/ISSE/DPL/HY2021.pdf>

Due to the lockdown restrictions imposed as a result of the COVID-19 pandemic, shareholders will not be able to obtain any copies of the full announcement from the offices of Dipula. As such, copies of the full announcement may be requested via email from Dipula (taryn@dipula.co.za) or Dipula's JSE sponsor (sponsor@javacapital.co.za).

Johannesburg

17 May 2021

Directors

ZJ Matlala* (Chairperson)

IS Petersen (CEO)

BH Azizollahoff*#

R Asmal (FD)

E Links*

Y Waja*

SA Halliday*

* Independent non-executive

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Company secretary
Acorim Proprietary Limited

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Articulate Capital Partners

Independent Auditors
Mazars Gauteng