

**OCTODEC INVESTMENTS LIMITED**  
(Incorporated in the Republic of South Africa)  
(Registration number 1956/002868/06)  
JSE share code: OCT ISIN: ZAE000192258  
(Approved as a REIT by the JSE)  
("Octodec" or "the company" or "the guarantor")



**PREMIUM PROPERTIES LIMITED**  
(Incorporated in the Republic of South Africa)  
(Registration number 1994/003601/06)  
JSE alpha code: BIPPL  
LEI: 37890059F4C0AE114761  
("Premium Properties")

(collectively the "Group")

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## DECLARATION OF CASH DIVIDEND, TAX TREATMENT AND SALIENT DATES AND AVAILABILITY OF ANNUAL RESULTS OF GUARANTOR

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### DECLARATION OF DIVIDEND

The board of directors of Octodec has declared a final cash dividend of 80 cents per share, on 28 October 2022, for the year ended 31 August 2022, out of the company's distributable income.

The salient dates and times for the cash dividend are as set out below:

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Last day to trade shares <i>cum</i> dividend	Tuesday, 15 November 2022
Shares trade <i>ex</i> dividend	Wednesday, 16 November 2022
Record date to receive cash dividend	Friday, 18 November 2022
Electronic transfer into personal bank account of certificated shareholders	Monday, 21 November 2022
Accounts credited by CSDP or broker to dematerialised shareholders with the cash dividend payment	Monday, 21 November 2022

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Notes:

- Shares may not be dematerialised or rematerialised between Wednesday, 16 November 2022 and Friday, 18 November 2022, both days inclusive. The above dates and times are subject to change. Any changes will be announced on SENS.*
- Where the transfer secretaries do not have the banking details of any certificated shareholders, the cash dividend will be held by the company pending receipt of the relevant certificated shareholder's banking details, whereafter the cash dividend will be paid via electronic transfer into the personal bank accounts of shareholders.*

### Tax implications for non-resident shareholders

Dividends received by non-resident shareholders from a REIT will not be taxable as income and will be exempt from income tax in terms of the exemption in section 10(1)(k)(i) of the Income Tax Act. Any dividend received by a non-resident from a REIT is subject to dividend tax at 20%, unless the rate is reduced in terms of any applicable agreement for the avoidance of double taxation agreements (DTA) between South Africa and the country of residence of the non-resident shareholders. Assuming dividend tax will be withheld at a current rate of 20% the net dividend amount due to non-resident shareholders is 64 cents per share.

A reduced dividend tax in terms of the applicable DTA may only be relied on if the non-resident shareholder has submitted the following forms to his/her CSDP or broker, as the case may be, in respect of uncertificated shares, or the transfer secretaries, in respect of certificated shares:

- A declaration that the dividend is subject to a reduced rate as a result of the application of the DTA; and
- A written undertaking to inform the CSDP, broker or the transfer secretaries, 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 Services (SARS).

If applicable, non-resident shareholders are advised to contact the CSDP, broker or the company, as the case may be, to arrange for the above-mentioned documents to be submitted prior to payment of the dividend, if such documents have not already been submitted.

### **Tax implications for South African resident shareholders**

Dividends received by or accrued to South African tax residents must be included in the gross income of such shareholders. They are not exempt from income tax in terms of the exclusion to the general dividend exemption contained in section 10(1)(k)(i)(aa) of the Income Tax Act because they are dividends distributed by a REIT.

These dividends are, however, exempt from dividend withholding tax (dividend tax) in the hands of South African resident shareholders, provided that the South African resident shareholders have made submissions to the CSDP or broker, as the case may be, in respect of uncertificated shares, or the company in respect of certificated shares, a DTD (EX) (Dividend tax declaration that the dividend is exempt from dividends tax and 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 ceases to be the beneficial owner, both in the form prescribed by the Commissioner for the South African Revenue Services (SARS)).

If resident shareholders have not submitted the above-mentioned documentation to confirm their status as a South African resident they are advised to contact their CSDP or broker, as the case may be, to arrange for the documents to be submitted prior to payment of the cash dividend.

Shareholders are encouraged to consult with their professional advisors should they be in any doubt as to the appropriate action to take.

The number of shares in issue at the date of this declaration is 266 197 535 and Octodec's tax reference number is 9925/033/71/5.

### **AVAILABILITY OF RESULTS OF GUARANTOR**

Noteholders are advised that Premium Properties' guarantor, Octodec, has publicly released its reviewed provisional results for the year ended 31 August 2022 ("the Octodec provisional results") on Tuesday, 1 November 2022.

The Octodec provisional results are available for inspection at the registered address of the guarantor, at CPA House, 101 Du Toit Street, Tshwane, 0002 with immediate effect.

Noteholders can also contact Elize Greeff at [elizeg@octodec.co.za](mailto:elizeg@octodec.co.za) to request an electronic version. In addition, the Octodec provisional results are available on the guarantor's website, at [https://octodec.co.za/financial\\_results/provisional-results-fy2022/](https://octodec.co.za/financial_results/provisional-results-fy2022/).

1 November 2022

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Equity Sponsor to Octodec

JAVACAPITAL

Debt Sponsor to Premium Properties

Nedbank Corporate and Investment Banking, a division of Nedbank Limited

