

**ATTACQ LIMITED**

(Incorporated in the Republic of South Africa)  
 (Registration number 1997/000543/06)  
 JSE share code: ATT ISIN: ZAE000177218  
 (Approved as a REIT by the JSE)  
 ("Attacq" or "the company")

**DIVIDEND: TAX TREATMENT AND SALIENT DATES**

Shareholders are referred to Attacq's condensed unaudited consolidated interim financial results for the six months ended 31 December 2022, published on SENS on 14 March 2023, wherein shareholders were advised of the interim gross dividend of 29.00000 cents per share for the six months ended 31 December 2022 ("the dividend").

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

	2023
Last day to trade cum dividend	Monday, 3 April
Shares trade ex dividend	Tuesday, 4 April
Record date	Thursday, 6 April
Payment date	Tuesday, 11 April

## Notes:

- Share certificates may not be dematerialised or rematerialised between Tuesday, 4 April 2023 and Thursday, 6 April 2023, both days inclusive.
- Payment of the dividend will be made to shareholders on Tuesday, 11 April 2023. In respect of dematerialised shareholders, the dividend will be transferred to the Central Securities Depository Participant ("CSDP") account or broker account on Tuesday, 11 April 2023. Certificated shareholder dividend will be deposited on or about Tuesday, 11 April 2023.
- Where the transfer secretaries do not have the banking details of any certificated shareholders, the cash dividend will be held in trust by the transfer secretaries 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 certificated shareholders.

In accordance with Attacq's status as a Real Estate Investment Trust ("REIT"), shareholders are advised that the dividend meets the requirements of a "qualifying distribution" for the purposes of section 25BB of the Income Tax Act, No. 58 of 1962 ("Income Tax Act"). The dividend on the shares will be deemed to be a dividend, for South African tax purposes, in terms of section 25BB of the Income Tax Act.

**Tax implications for South African resident shareholders**

The dividend 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 it is a dividend distributed by a REIT. This dividend is, however, exempt from dividend withholding tax in the hands of South African tax resident shareholders, provided that the South African tax resident shareholders provide

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 dividend is 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.

### **Tax implications for non-resident shareholders**

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 20.0%, 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 20.0%, the net dividend amount due to non-resident shareholders is 23.20000 cents per share.

A reduced dividend withholding rate in terms of the applicable DTA, may only be relied upon 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 dividend is 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 dividend if such documents have not already been submitted, if applicable.

The number of shares in issue as at 31 December 2022 and the date of this announcement is 751 551 292 ordinary shares of no par value which includes 46 427 553 treasury shares. Attacq's tax reference number is 9241/038/64/6.

14 March 2023