

10X Fund Managers (RF) Proprietary Limited
10X SA Property Income ETF
Share Code:CSPROP
ISIN:ZAE000273165

A portfolio in the 10X Exchange Traded Fund Scheme registered as such in terms of the Collective Investment Schemes Control Act, 45 of 2002, managed by 10X Fund Managers (RF) Proprietary Limited.

DISTRIBUTION ANNOUNCEMENT - CSPROP

Holders of the security are advised that a distribution will be made in respect of the three months ended 31 December 2023.

The following dates are of importance with regards to the distribution

Last day to trade cum distribution:

Ex-date:

Record date:

Payment date:

Tuesday, 16 January 2024

Wednesday, 17 January 2024

Friday, 19 January 2024

Monday, 22 January 2024

An aggregated amount of 36.84001 cents per security is declared.

The nature and source of the distribution is explained in the following table:

CSPROP	Dividend (64N > DTA)	Tax Reclaim	Tax Reclaim	Interest	REIT	TOTAL
Source	Foreign SA Listed	Foreign SA Listed	Foreign SA Listed	Local	Local	
Net Distribution Reinvested	No	No	No	No	No	
Source of Funds (Country Code)	GG	GB	IM	ZA	ZA	
Subject to Foreign Withholding tax	Yes	No	No	No	No	
Gross Foreign Rate (cents per unit)	1.03291	0.00205	0.02040			
Foreign Tax % withheld at source	16.40%					
Foreign Tax amount per unit	0.16940					
DTA with Source Country						
Foreign Tax Reclaim %	16.40%					
Portfolio/Management Cost	0.03737					
Interest Expense						
Other Costs						
Gross ZA Distribution (Cents per unit)	0.82614	0.00205	0.02040	0.36656	35.62486	36.84001
Applicable to non-exempt South African shareholders						
Gross Local Rate (cents per unit)	0.99554	0.00205	0.02040	0.36656	35.62486	
SA Withholding Tax %	20%					
SA Withholding Tax amount per unit	0.19911					
Local Net Rate	0.62703	0.00205	0.02040	0.36656	35.62486	36.64090

The net rate for Local REIT distributions for non-residents after SA withholding tax is 28.49989

Table 1

Country	ISO Code	Split	Foreign Tax % withheld at source	DTA with Source Country
Great Britain	GB	46.98913%	0.00000%	15.00000%
Guernsey	GG	28.99687%	0.00000%	0.00000%
Mauritius	MU	3.92407%	0.00000%	10.00000%

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 Central Securities Depository Participant (CSDP) or broker with the following:

a) a declaration that the distribution is exempt from dividends tax; and

b) a written undertaking to inform their CSDP or broker, 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, to arrange for the abovementioned documents to be submitted prior to payment of the distribution, if such documents have not already been submitted.

Distributions by Real Estate Investment Trusts (REITs) are subject to income tax for South African tax residents and for non-residents it is subject to 20% SA withholding tax.

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.

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

Investors are advised that to the extent that the distribution amount comprises 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.

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 in respect of its participatory interest:

a) a declaration that the dividend is subject to a reduced rate because of the application of a DTA; and

b) a written undertaking to inform the CSDP or broker 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 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.

Date of announcement: 11 January 2024

Sponsor : Grindrod Bank Limited