

10X Fund Managers (RF) Proprietary Limited
 10X S&P SA Top 50 ETF
 Share Code:CTOP50
 ISIN:ZAE000204327

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 - CTOP50

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:	Tuesday, 16 January 2024
Ex-date:	Wednesday, 17 January 2024
Record date:	Friday, 19 January 2024
Payment date:	Monday, 22 January 2024

An aggregated amount of 16.20000 cents per security is declared.

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

CTOP50	Dividend		Tax Reclaim		Interest	REIT	TOTAL
	Local	Foreign SA Listed	Local	Foreign SA Listed	Local	Local	
Distribution Source type	No	No	No	No	No	No	No
Net Distribution Reinvested	No	No	No	No	No	No	No
Source of Funds (Country Code)	ZA	GB	Table 1		ZA	ZA	
Subject to Foreign Withholding tax	No	No	No	No	No	No	
Gross Foreign Rate (cents per unit)		3.00943	0.04836				
Foreign Tax % withheld at source							
Foreign Tax amount per unit							
DTA with Source Country		15%					
Foreign Tax Reclaim %							
Portfolio/Management Cost							
Interest Expense							
Other expense							
Gross ZA Distribution (Cents per unit)	11.66323	3.00943	0.04836		0.35706	1.12192	16.20000
Applicable to non-exempt South African Shareholders							
Gross Local Rate (cents per unit)	11.66323	3.00943	0.04836		0.35706	1.12192	
SA Withholding Tax %	20%	20%					
SA Withholding Tax amount per unit	2.33265	0.60189					
Local Net Rate	9.33058	2.40754	0.04836		0.35706	1.12192	13.26546

Table 1

Country	ISO Code	Split	Foreign Tax % withheld at source
Isle of Man	IM	59.78081%	0.00000%
Belgium	BE	40.21919%	0.00000%

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 declaration that the distribution is exempt from dividends tax; and
- 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. The net rate for non-residents after SA withholding tax is 0.89754.

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 declaration that the dividend is subject to a reduced rate because of the application of a DTA; and
 - 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: 12 January 2024

Sponsor : Grindrod Bank Limited