

REDUCED RATE OF DIVIDENDS TAX

Notes on completion of this form:

- This form is to be completed by the beneficial owner of dividends in specie in order for the reduced rate of dividends tax referred to in section 64FA(2) of the Income Tax Act, 1962 (Act No 58 of 1962) ('**the Act**') as well as the provisions of the Agreement for the Avoidance of Double Taxation and Prevention of Fiscal Evasion ('**DTA**') between the Republic of South Africa and the country of residence of the beneficial owner, to apply.
- In order to qualify for the reduced rate referred to above this declaration and written undertaking should be submitted to the declaring company within the period required by the latter (provided it is before payment of the dividend) - failure to do so will result in the full 20% dividends tax being payable.
- Where the beneficial owner is a foreign resident but does not qualify for a reduced rate this form should NOT be completed.

PART A: WITHHOLDING AGENT

Registered name: **Distell Group Holdings Limited**
 Dividends tax reference number: **9759621163**
 Contact details: **Lizelle Malan**
Distell Group Holdings Limited, Aan-de-Wagenweg, Stellenbosch, 7600
dwt@distell.co.za
+27 (0)21 809 8103

PART B: BENEFICIAL OWNER

(This part is to be completed by the person entitled to the benefit of the dividend attaching to a share(s))

Registered name of Shareholder: _____

Number of Shares: _____

Nature of person / entity:

Individual

Listed company

Unlisted company

Trust (any type)

Government, Provincial Administration, Municipalities

Retirement Fund (Pension, Provident, Benefit, RA etc.)

Other (if selected please provide a description / explanation of nature of the entity /person):

Identity / Passport / Registration number: _____

Date of birth / Inception: _____

Income tax reference number: _____

Physical address: _____

Postal address: _____

Country in which resident for tax purposes: _____

PART C: REDUCED RATE

(This part is to be completed by the person entitled to the benefit of the dividend attaching to a share(s))

Please provide the following details for all shares held in respect of which a reduced rate of tax is applicable:

Registered company name	Explanation of the reasons the beneficial owner meets the requirements of the DTA
Distell Group Holdings Limited	

DECLARATION in terms of section 64FA(2)(a) of the Act:

I _____ (*full names in print please*), the undersigned hereby declare that all the relevant requirements in terms of Article _____ of the Agreement for the Avoidance of Double Taxation and Prevention of Fiscal Evasion (DTA) in force on the relevant date between the Republic of South Africa and the country of residence of the beneficial owner specified above, as well as section 64FA of the Act, have been met and that dividends paid on the shares specified above are therefore subject to a reduced rate of ____ %.

Signature: _____ Date: _____

(Duly authorised to do so)

Capacity of Signatory (if not the beneficial owner): _____

UNDERTAKING in terms of section 64FA(2)(b) of the Act:

I _____ (*full names in print please*), the undersigned undertake to forthwith inform the Withholding Agent (see Part A above) in writing should the circumstances of the beneficial owner referred to in the declaration above change.

Signature: _____ Date: _____

(Duly authorised to do so)

Capacity of Signatory (if not the Beneficial Owner): _____