

Ashburton Management Company RF Proprietary Limited

Ashburton Top 40 ETF

A portfolio in the Ashburton Collective Investment Scheme in Securities Exchange Traded Funds (“the portfolio”) registered in terms of the Collective Investment Schemes Control Act, 45 of 2002

(Incorporated in the Republic of South Africa)

(Date of incorporation: 15 October 2008)

Share Code: ASHT40

ISIN: ZAE000215364

(“ASHTOP40” or the “ETF” or the “fund”)

DISTRIBUTION ANNOUNCEMENT

The manager and trustees (namely Ashburton Management Company RF Proprietary Limited and Standard Chartered Bank) have resolved to make a quarterly distribution to holders of Ashburton Top 40 securities for the quarter ended 31 March 2021.

The aggregate distribution will amount to 55.87003 cents per Ashburton Top 40 security and is constituted as follows:

Alpha code	Dividend/Interest	Foreign/ Local	Gross Distribution (Cents per unit)	Subject to Withholding tax Yes/ No	Foreign Withholding Tax (%)	Amount Available for Distribution (Cents per unit)	* SA Withholding Tax (%)	Net Distribution (Cents per unit)
ASHT40								
	Interest	Local	0.03643	No		0.03643		0.03643
	Dividend	Local	25.82500	Yes		25.82500	20	20.66000
	Dividend	Foreign	28.41405	Yes		28.41405	20	22.73124
	Other income	Local	1.59455	No		1.59455		1.59455
			55.87003			55.87003		45.02222

1. Foreign Dividends Breakdown by Source:

Name	Source	% Breakdown	Tax withheld at Source (%)	SA Withholding Tax (%)
BRITISH AMERICAN TOBACCO	United Kingdom	7%	0	20
BHP GROUP PLC	United Kingdom	89%	0	20
NEPI ROCKCASTLE PLC	Isle of Man	4%	0	20

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

Notice is hereby given that the following dates are of importance regarding the distribution for the quarter ended 31 March 2021 by the ETF to holders of Ashburton Top 40 ETF securities:

Last day to trade “cum” distribution:

Tuesday, 20 April 2021

Securities trade “ex” distribution:	Wednesday, 21 April 2021
Record date:	Friday, 23 April 2021
Payment date:	Monday, 26 April 2021

Creations or redemptions from the fund will not be allowed during the period from 20 April 2021 to 23 April 2021, both days inclusive.

Withholding Tax on Interest (“WTI”) came into effect in April 2012 and amended on 1 March 2015.

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; or
- 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.

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.

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 following forms to their Central Securities Depository Participant (“CSDP”) or broker, as the case may be in respect of its participatory interest:

- a) a declaration that the distribution is exempt from dividends tax; and**
- b) a written undertaking to inform their CSDP or broker, 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 South African Revenue Service. South African tax resident investors are advised to contact their CSDP, to arrange for the abovementioned documents to be submitted prior to payment of the distribution, if such documents have not already been submitted.**

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 Income Tax Act No.58 of 1962 (“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, as the case may be in respect of its participatory interest:

- 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 the CSDP or broker, as the case may be, should the circumstances affecting the reduced rate change or the beneficial owner ceases 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, as the case may be, 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.

Additional information:

The dividend distribution as outlined above is subject to the Dividends Tax that was introduced with effect from April 2012. The dividend, as defined in the Act, is payable from dividends accumulated in the fund. The South African Dividend Tax rate of 20% (as amended in February 2017) has been applied to both local and foreign dividends.

There are 30 038 332 Ashburton Top 40 securities in issue. The total dividend amount payable is R 16,782,425.87.

Ashburton Top 40 ETF Income Tax number is 2144/830/14/4.

A copy of the ETF issue document can be found at:

<https://www.ashburtoninvestments.com/za/individual-investor/fund/ashburton-top-40-etf/zae000215364>

14 April 2021
Johannesburg

Debt Sponsor
Rand Merchant Bank (a division of FirstRand Bank Limited)