

**Please complete one form per share account**

**Company Name**

**Dividends Tax – Non-South African Tax Resident  
Beneficial Owner Declaration of Status Form**

This form is to be completed by the person entitled to the benefit of the dividend attaching to a share(s)  
Please complete and return to Capita Asset Services as soon as possible.  
Use a black pen. Print in CAPITAL letters inside the boxes.

**A Non-South African Beneficial Owner details:**

Full name(s) of beneficial owner(s) :

Name in which shares are registered, if different from above:

Nature of person/entity (individual/  
company /trust/ pension fund/ nominee)

Trading Name (if applicable):

Identification/Passport/Registration number (where available):

South African Income tax reference number (if applicable):

Date of Birth/Inception:

Email address:

Country in which resident for tax purposes:

Contact telephone number:

Address:

Post Code

I hereby confirm that the above information is correct.

Signature:

Date:

Note: This declaration is made to Capita Asset Services as agent of Pan African Resources PLC  
Company Reg No. 3937466 Dividends Tax Ref No. 9154588173

**B** **Reduced Rate - Declaration & Undertaking to be made by the non-South African beneficial owner of a dividend**  
This part is to be completed by the person entitled to the benefit of the dividend attaching to a share (s)  
See notes on page 3 for clarity of qualifying criteria.

- This form is to be completed by the non-South African beneficial owner (of dividends, including dividends *in specie*) in order for a reduced rate of dividends tax, if applicable, referred to in sections 64FA, 64G or 64H of the South African 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 **tax 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 withholding agent, Capita Asset Services, as soon as possible - failure to do so will result in the full 15% dividends tax being withheld/payable.**
- The South African Revenue Service (SARS) may request proof of tax residency from the beneficial owner(s) and may request proof of tax residency from such beneficial owner(s) local tax authority.

Please provide details of all shares held in Pan African Resources PLC, which may be recorded under numerous account numbers. **Only include shares where you qualify for the reduced rate on this form.**

No.	Registered name of Company in which shares/ securities are held for which a South African dividend tax is applicable	Explanation of the reasons the beneficial owner meets the requirements of the DTA (eg: DTA in place with country of tax residency - see notes on page 3)
1	Pan African Resources PLC	

*Note: The declaration need only be completed once and all future dividends will be paid at the reduced rate. New declaration forms will need to be completed in the event that there is a change in the tax status or residency of the beneficial owner.*

**DECLARATION** in terms of sections 64FA(2)(a), 64G(3)(i) or 64H(3)(i) of the Act:

I  (full names in print please),

the undersigned hereby declare that all the relevant requirements 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 tax residence of the beneficial owner specified above, as well as sections 64FA, 64G or 64H of the Act (whichever is applicable) have been met and that dividends paid on the shares specified above are therefore subject to a reduced rate of .  %

\*\* (Please refer to the notes on page 3 for the list of countries with applicable DTAs or the SARS website for details of the DTA and the reduced rate that applies (<http://www.sars.gov.za/home.asp?pid=73591>).

Signature \_\_\_\_\_ Date \_\_\_\_\_  
(Duly authorised to do so)

Capacity of Signatory \_\_\_\_\_

**UNDERTAKING** in terms of section 64FA(2)(b), 64G(3)(ii) or 64H(3)(ii) of the Act:

I  (full names in print please),

the undersigned undertake to forthwith inform the Withholding Agent 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: \_\_\_\_\_

*NOTE: I am aware that it is the sole responsibility of the Beneficial Owner to ensure that this declaration and undertaking are filed timeously and that the information provided in this declaration and undertaking is accurate and complete; I agree that the Regulated Intermediary or the Issuer will under no circumstances be liable for any costs, expenses or damages including, but not limited to, any direct, indirect, special, consequential or incidental damages caused by or arising from any late submission of declarations and/or omission to submit declarations and/or any incorrect or incomplete information provided by the Beneficial Owner in the declarations; I agree that it remains at all times the sole responsibility of the Beneficial Owner to ensure that it complies with all requirements and obligations in relation to Dividends Tax as set out in the Act from time to time.*

## Additional Information - Notes

### DOUBLE TAXATION AGREEMENTS APPLICABLE TO A REDUCED RATE OF DIVIDEND WITHHOLDING TAX

Below is a summarised list of all countries with a Double Taxation Agreement which provides eligibility for a reduced rate. All other beneficial holders with tax residency in countries not included below will be subject to a 15% withholding tax on dividends.

Country with lower DTA than 15%	Tax Rate applicable
Ethiopia (Federal Democratic Republic of)	10%
Nigeria	10%
Tunisia (Republic of)	10%
China (Republic of)	5%
Croatia (Republic of)	10%
Cyprus (Republic of)	0%
India (Republic of)	10%
Iran (Islamic Republic of)	10%
Ireland (Government of)	10%
Kuwait (State of)	0%
Malaysia (Government of)	10%
Malta (Government of)	10%
Mexico (United Mexican States)	10%
Netherlands (Kingdom of the)	10%
Oman (Sultanate of)	0%
Saudi Arabia (Kingdom of)	10%
Seychelles (Republic of)	10%
United Kingdom of Great Britain & Northern Ireland (excludes Channel Islands and Isle of Man)	10%

An obligation is placed on the beneficial owner to notify Capita Asset Services in writing of a **change in beneficial ownership** (for example when shares are transferred/sold to another person) or if there is a **change in tax status or residency**.