

# Mediclinic Intl plc- Tax Treatment for South African Dividends

December 11, 2019  
RNS Number : 4074W  
Mediclinic International plc  
11 December 2019

Mediclinic International plc  
(Incorporated in England and Wales)  
Company Number: 08338604  
LSE Share Code: MDC  
JSE Share Code: MEI  
NSX Share Code: MEP  
ISIN: GB00B8HX8Z88  
LEI: 2138002S5BSBIZTD5I60  
South African income tax number: 9950122714  
("Mediclinic", the "Company", or the "Group")

11 December 2019

## **TAX TREATMENT OF ORDINARY SHARE DIVIDEND FOR SHAREHOLDERS ON THE SOUTH AFRICAN REGISTER**

### **Background**

Shareholders on the South African register of the Company are referred to Mediclinic's announcement of the results for the six months ended 30 September 2019 and dividend declaration released on the Stock Exchange News Service and on the Regulatory News Service on 14 November 2019, confirming that the Board of Directors of Mediclinic had declared an interim dividend from retained earnings of 3.20 pence per ordinary share for the six months ended 30 September 2019.

The interim dividend will be paid on Tuesday, 17 December 2019 to all ordinary shareholders who are on the register of members at the close of business on the record date of Friday, 6 December 2019.

Shareholders on the South African register will be paid the ZAR cash equivalent of 60.83200 cents (48.6656 cents net of dividend withholding tax)

per share. A dividend withholding tax of 20% will be applicable to all shareholders on the South African register who are not exempt therefrom. The ZAR cash equivalent has been calculated using the following exchange rate: GBP1: ZAR19.01, being the five-day average GBP/ZAR exchange rate (Bloomberg) on Friday, 8 November 2019 at 15:00 GMT.

### **Tax treatment for shareholders on the South African register**

#### *South African tax resident shareholders on the South African register:*

In terms of the Company's Dividend Access Trust structure, eligible South African tax resident shareholders on the South African register set out below will receive the full dividend, namely 60.83200 cents per share, from the Dividend Access Trust and therefore regarded as a local South African dividend. For purposes of South African dividend withholding tax, the entire dividend of 60.83200 cents per share is taxable at a rate of 20%, unless one of the following applicable exemptions apply:

1. in the case of shares held in certificated form, eligible shareholders who are registered on the South African register with an address in South Africa (other than PLC Nominees Proprietary Limited (or any successor entity through which shares held in dematerialised form are held)); and
2. in the case of shares held in dematerialised form, in respect of whom the South African transfer secretaries of the Company have determined, in good faith and by reference to the information provided to them by the eligible shareholders and/or their brokers and/or central securities depository participants, that such eligible shareholders are either (i) tax resident in South Africa or (ii) have an address in South Africa and have not expressly indicated that they are not tax resident in South Africa as at the dividend record date.

#### *Non-South African tax resident shareholders on the South African register:*

Non-South African tax resident shareholders on the South African register will be paid the dividend by the Company in the usual way and not through the Dividend Access Trust. The entire dividend of 60.83200 cents per share payable to such shareholders will therefore be regarded as a foreign dividend and exempt from South African dividend withholding tax, provided that the relevant exemption forms have been completed and submitted as prescribed.

### **About Mediclinic International plc**

Mediclinic is an international private healthcare services group, established in South Africa in 1983, with divisions in Switzerland, Southern Africa (South Africa and Namibia) and the United Arab Emirates.

The Group's core purpose is to enhance the quality of life.

Its vision is to be the partner of choice that people trust for all their healthcare needs.

Mediclinic is focused on providing specialist-orientated, multi-disciplinary

services across the continuum of care in such a way that the Group will be regarded as the most respected and trusted provider of healthcare services by patients, medical practitioners, funders and regulators of healthcare in each of its markets.

Mediclinic comprises 77 hospitals, five sub-acute hospitals, 13 day case clinics and 22 outpatient clinics. Hirslanden operates 17 hospitals, two day case clinics and three outpatient clinics in Switzerland with more than 1 900 inpatient beds; Mediclinic Southern Africa operations include 53 hospitals (three of which in Namibia), five sub-acute hospitals and nine day case clinics (four of which are operated by Intercare) across South Africa, and more than 8 500 inpatient beds; and Mediclinic Middle East operates seven hospitals, two day case clinics and 19 outpatient clinics with more than 900 inpatient beds in the United Arab Emirates.

The Company's primary listing is on the London Stock Exchange ("LSE") in the United Kingdom, with secondary listings on the JSE Ltd in South Africa and the Namibian Stock Exchange in Namibia.

Mediclinic also holds a 29.9% interest in Spire Healthcare Group plc, a leading private healthcare group based in the United Kingdom and listed on the LSE.

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**Joint corporate brokers:** Morgan Stanley & Co International plc and UBS  
Investment Bank

**JSE sponsor:** Rand Merchant Bank (A division of FirstRand Bank Limited)

**NSX sponsor:** Simonis Storm Securities (Pty) Ltd

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