



Important Notice
The Depository Trust Company

B #:	16163-21
Date:	November 23, 2021
To:	All Participants
Category:	Tax Relief, Distributions
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Country:</u> South Africa <u>Security:</u> Vodacom Group Ltd <u>CUSIP:</u> 92858D200 <u>Record Date:</u> 12/03/2021 <u>Payable Date:</u> 12/13/2021

*******NOT CA WEB ELIGIBLE*******

The Depository Trust Company has received from GlobeTax the attached information regarding certain tax refunds on the above captioned dividend.

As directed in the notice, participants that have qualified beneficial holders that expect to benefit from this procedure should secure the required documentation. Any questions, please call GlobeTax at 212-747-9100.

Important Legal Information: The Depository Trust Company ("DTC") does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages. To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction.


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VODACOM GROUP LTD has announced a cash dividend and Deutsche Bank acts as Depositary for the Depositary Receipt (“DR”) program.

As outlined in the Eligibility Matrix below, all holders will receive this dividend net of the full South African withholding tax rate of 20% with the possibility to reclaim through the Quick Refund or Long Form process.

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DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	SOUTH AFRICA
ISSUE	VODACOM GROUP LTD
CUSIP#	92858D200
UNDERLYING ISIN	ZAE000132577
DEPOSITARY	DEUTSCHE BANK TRUST COMPANY AMERICAS
DR RECORD DATE	12/3/2021
ORD PAY DATE	12/6/2021
DR PAY DATE	12/13/2021
RATIO (DR to ORD)	1:1
ORD RATE	ZAR 4.20
STATUTORY WITHHOLDING RATE	20%
	NOT AVAILABLE

PLEASE NOTE:

- ALL CLAIM DOCUMENTS CAN BE SCANNED AND SENT TO SouthAfricaESP@globetax.com; **HARDCOPY DOCUMENTS ARE NOT REQUIRED FOR THIS MARKET**

FEES & DEADLINES

FILING METHOD	BATCH	PAYMENT METHOD	CUSTODIAL FEE	TAX RELIEF FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ESP)
QUICK REFUND	POST PAY DATE	VIA CHECK OR ACH	ZAR 250	UP TO \$0.009375 PER DR	USD \$25.00	1/18/2022
LONG FORM	POST PAY DATE; ONGOING	VIA CHECK OR ACH	ZAR 500	UP TO \$0.0125 PER DR	USD \$25.00	10/31/2024

MINIMUM SHARE AMOUNT REQUIRED TO FILE A QUICK REFUND CLAIM (CLAIMS RECEIVED BELOW THE FILING MINIMUM WILL BE REJECTED)

BENEFICIAL OWNER'S WITHHOLDING TAX RATE OF ENTITLEMENT	RATE OF RECLAIM	MINIMUM # OF DRs REQUIRED TO FILE (BASED OFF AN APPROX. EXCHANGE RATE USD/ZAR)
15.00%	5.00%	3,000 DRs MINIMUM
10.00%	10.00%	1,500 DRs MINIMUM
5.00%	15.00%	1,000 DRs MINIMUM
0.00%	20.00%	750 DRs MINIMUM



ELIGIBILITY MATRIX – QUICK REFUND & LONG FORM

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
UNFAVORABLE – 20%	0%	NON-TREATY COUNTRIES AND ENTITIES NOT MENTIONED AS FAVORABLE OR EXEMPT BELOW	1. NONE	1. N/A
FAVORABLE - 15%	5%	ALGERIA, AUSTRALIA, AUSTRIA, BELARUS, BELGIUM, BOTSWANA, BRAZIL, BULGARIA, CAMEROON, CANADA, CHILE, CONGO (DEM. REP.), CZECH REPUBLIC, DENMARK, EGYPT, ESWATINI, FINLAND, FRANCE, GERMANY, GHANA, GREECE, HUNGARY, INDONESIA, ITALY, JAPAN, KOREA, REPUBLIC OF (SOUTH), LESOTHO, LUXEMBOURG, MOZAMBIQUE, NAMIBIA, NEW ZEALAND, NORWAY, PAKISTAN, POLAND, PORTUGAL, ROMANIA, RUSSIA, SLOVAK REPUBLIC, SPAIN, SWEDEN, SWITZERLAND, TAIWAN, THAILAND, TURKEY, UGANDA, UKRAINE, UNITED STATES OF AMERICA	1. COVER LETTER 2. DTD (RR) 3. POWER OF ATTORNEY** ** ONLY REQUIRED IF FINANCIAL INSTITUTION SIGNS DTD FORM ON BEHALF OF THE INVESTOR	1. FINANCIAL INSTITUTION 2. BENEFICIAL HOLDER OR FINANCIAL INSTITUTION ON BEHALF OF THE INVESTOR WITH A VALID POWER OF ATTORNEY 3. YES – BENEFICIAL OWNER
FAVORABLE - 10%	10%	CROATIA, CYPRUS, ETHIOPIA, HONG KONG, INDIA, IRAN, IRELAND, KENYA, MALAYSIA, MALTA, MAURITIUS, MEXICO, NETHERLANDS, NIGERIA, OMAN, QATAR, SAUDI ARABIA, SEYCHELLES, SINGAPORE, TUNISIA, UNITED ARAB EMIRATES, UNITED KINGDOM, ZIMBABWE	1. COVER LETTER 2. DTD (RR) 3. POWER OF ATTORNEY** ** ONLY REQUIRED IF FINANCIAL INSTITUTION SIGNS DTD FORM ON BEHALF OF THE INVESTOR	1. FINANCIAL INSTITUTION 2. BENEFICIAL HOLDER OR FINANCIAL INSTITUTION ON BEHALF OF THE INVESTOR WITH A VALID POWER OF ATTORNEY 3. YES – BENEFICIAL OWNER
FAVORABLE – 5%	15%	CHINA	1. COVER LETTER 2. DTD (RR) 3. POWER OF ATTORNEY** ** ONLY REQUIRED IF FINANCIAL INSTITUTION SIGNS DTD FORM ON BEHALF OF THE INVESTOR	1. FINANCIAL INSTITUTION 2. BENEFICIAL HOLDER OR FINANCIAL INSTITUTION ON BEHALF OF THE INVESTOR WITH A VALID POWER OF ATTORNEY 3. YES – BENEFICIAL OWNER
EXEMPT - 0%	20%	RESIDENTS OF KUWAIT	1. COVER LETTER 2. DTD (EX) 3. POWER OF ATTORNEY**	1. FINANCIAL INSTITUTION 2. BENEFICIAL HOLDER OR FINANCIAL INSTITUTION ON BEHALF OF THE INVESTOR WITH A VALID POWER OF ATTORNEY 3. YES – BENEFICIAL OWNER
		GOVERNMENT ENTITIES OF OMAN, QATAR, SAUDI ARABIA, SINGAPORE, UNITED ARAB EMIRATES, UNITED STATES OF AMERICA**	** ONLY REQUIRED IF FINANCIAL INSTITUTION SIGNS DTD FORM ON BEHALF OF THE INVESTOR	

***Note:** All documents listed in [BLUE font](#) are generated by GlobeTax's ESP website after submission of beneficial owner data.

DESCRIPTION OF VARIOUS DOCUMENTATION		
DOCUMENT NAME	DESCRIPTION	ORIGINAL / COPY
COVER LETTER (APPENDIX A)	- Listing of beneficial owners certifying position on Record Date	- SCANNED DOCUMENTS ACCEPTABLE
DTD(RR) (APPENDIX B)	- Dividend tax declaration & undertaking to be made by the beneficial holder of a dividend (reduced rate of tax)	- SCANNED DOCUMENTS ACCEPTABLE
DTD (EX) (APPENDIX C)	- Dividend tax declaration & undertaking to be made by the beneficial holder of a dividend (exemption from tax)	- SCANNED DOCUMENTS ACCEPTABLE
IRS FORM 6166	<ul style="list-style-type: none"> - Issued by the Internal Revenue Service, stating the name and tax payer identification number of the beneficial owner - https://www.irs.gov/individuals/international-taxpayers/form-6166-certification-of-u-s-tax-residency <p>NOTE: An IRS 6166 form or certificate of residency is not required however, the South African tax authorities reserve the right to request one</p>	- SCANNED DOCUMENTS ACCEPTABLE
CERTIFICATE OF RESIDENCY	<ul style="list-style-type: none"> - Certified by tax administration of beneficiary's country of residence, stating the name and tax payer identification number of the beneficial owner - Must state the tax year/period which encompasses the dividend's ordinary pay date <p>NOTE: A certificate of residency is not required however, the South African tax authorities reserve the right to request one</p>	- SCANNED DOCUMENTS ACCEPTABLE
POWER OF ATTORNEY	- Document appointing financial institution authority to act on behalf of the investor	- SCANNED DOCUMENTS ACCEPTABLE

CONTACT DETAILS	
PRIMARY CONTACT	WONJAE LEE
DOMESTIC PHONE (U.S.)	1-800-876-0959
DOMESTIC FAX (U.S.)	1-866-888-1120
INTERNATIONAL PHONE	1-212-747-9100
INTERNATIONAL FAX	1-212-747-0029
GROUP EMAIL	SOUTHAFRICAESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	KEVIN HUGHES, JR

Deutsche Bank Trust Company Americas offers ESP powered by GlobeTax, an electronic withholding tax submission system. This system allows for the secure and simplified transfer of beneficial owner level data from the Participant to Deutsche Bank Trust Company Americas and creates applicable documentation on the Participants behalf.

Submit the data online through the web site below, print out the document on letterhead, sign, and mail to Deutsche Bank / GlobeTax.

These claims should be submitted through the following web site.
(Requires a one-time registration)

<https://ESP.GlobeTax.com>

Please contact us through the [ESP Service Desk](#) or 212-747-9100 if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)

Where do I send the documentation?	Scanned paper may be sent to SOUTHAFRICAESP@GLOBETAX.COM
When is the deadline?	Relevant deadlines are listed on Page 2 under Fees & Deadlines.
I'm a custodian/broker, can I sign the dividend tax form on behalf of the investor?	Yes, as long as a valid power of attorney is also enclosed.
How do I know if my client qualifies for an exemption or reduced tax based on percentage of ownership?	The investor will have to consult with their tax advisor.
Does the beneficiary's name on the dividend tax form need to match the POA?	Yes, the Beneficiary's name on both documents should be identical.
Will GlobeTax accept claims filed directly to them by beneficial owners?	GlobeTax only accepts claims filed by the DTC participant who was holding the securities through DTC and only the extent that DTC has reported these holdings to us as valid record date holdings. Beneficial Owners are required to file their claims through the custody chain to the DTC participant of record. All claims not received directly from the DTC participant will be returned to the beneficial owner.
Do the Quick Refund and Long Form processes have a minimum position requirement per Beneficial Holder?	No, there is a minimum fee of \$25.00 per Beneficial Holder which may be waived on an exceptional basis for clients reclaiming less than \$50. In such instances, a fee of 50% of the reclaimed amount will be applied.
What is the statute of limitations for filing South African reclaims?	It is three (3) years from the local market pay date. Claims received after our submission deadline will be filed on good faith.
Is the process offered by Deutsche Bank Trust Company Americas an optional process?	Yes, this is a discretionary, optional service. However, in the South African market, the South African custodians will not accept claims from anyone except those processed through Deutsche Bank Trust Company Americas.

I / We certify that to the best of my knowledge the individual beneficial owners are eligible for the preferential rates as stated herein and I declare that I have performed all the necessary due diligence to satisfy myself as to the accuracy of the information submitted to me by these beneficial owners.

In consideration of the services provided by Deutsche Bank Trust Company Americas contemplated hereby and the assistance provided by the issuer of the shares underlying the ADRs (the "Issuer"), we agree to indemnify, defend, hold and save Deutsche Bank Trust Company Americas, the Issuer and their respective affiliates, and the respective directors, offices, agents and employees of Deutsche Bank Trust Company Americas, the Issuer and each of their affiliates from and against any and all costs, damages or liabilities (including, without limitation, tax payments, interest charges, penalties or other costs assessed by relevant tax and administrative authorities, and the reasonable fees and disbursements of counsel), and any of them, arising out of or relating to the information provided by the undersigned in, or in connection with, this document.

Warning and Disclaimer:

The information and data contained in this Notice is based on information obtained from multiple sources believed to be reliable. However, Deutsche Bank Trust Company Americas and its agents do not warrant or guarantee the accuracy or completeness of, nor undertake to update or amend, this information or data. We and our agents expressly disclaim any liability whatsoever for any loss howsoever arising from or in reliance upon any of this information or data. The information contained in this Notice is subject to change, including in the and subject to discretion of third parties, and/or pre-emption or being superseded by local market rules, and practices or actions taken by non-U.S. agents or tax authorities. Deadlines often differ from statutory deadlines. You should file claims as soon as possible, and at least six months prior to the specified deadline.