



Taxation information for investors about interim dividend

Further to the company's announcements in December 2016, an interim dividend of AUD \$0.05860935 per share was paid to investors on 7 February 2017 by BGP Holdings PLC (the **Company**) (the **Interim Dividend**).

Introduction

The following information is intended to provide a general overview of the Australian taxation implications for investors and is not intended to be a complete statement of all tax consequences that may be relevant. The taxation position of each investor may vary depending on its specific circumstances. Investors should obtain advice on the taxation implications taking into account their specific circumstances.

The following summary only applies to investors with all of the following features:

- investors who are residents of Australia for taxation purposes and not resident of any other country; and
- investors who hold their shares on capital account for Australian income tax purposes; and
- investors who are not exempt from tax in Australia; and
- investors who hold their shares in the Company under a separate trust in the name of The Trust Company (Australia) Limited (ACN 000 000 993) (**Trustee**).

This summary is based on the tax law in Australia in force as at the date of this document.

The Company and its directors, officers, employees, agents, taxation advisers and other advisers disclaim all liability and responsibility to any investor or other party in respect of any taxation consequences connected with the dividend distribution.

Tax consequences of the Interim Dividend

The Company is incorporated as a public limited company under the laws of Malta. The company is not a resident of Australia for tax purposes. The shares in the Company held by the Trustee are assumed to be held for each investor by the Trustee under a "transparent trust" for Australian tax purposes.

As a foreign company, the Company does not pay income tax in Australia and does not generate any franking credits. Under the Australian tax law:

- the Interim Dividend forms part of your assessable income;
- the full amount of the Interim Dividend should be included in your tax return for the year of receipt as assessable (dividend) income;
- there are no franking credits in respect of the Interim Dividend;
- no part of the distribution is a capital amount for tax purposes;
- there is no foreign tax credit applicable to the Interim Dividend; and
- subject to any deductions and other credits that may be available to you, you will be subject to tax on the Interim Dividend at your applicable rate of taxation (eg depending on whether you are a company, individual, superannuation fund or trustee of a trust estate).

The information on taxation in this summary is applicable only to the Interim Dividend on 7 February 2017. Future distributions may give rise to different tax implications.

8 May, 2017