



0224197

THE UNITED REPUBLIC OF TANZANIA

Certificate of Incentives

(Section 17 of the Tanzania Investment Act, 1997)

No: 024450

This is to certify that

.....
EP (T) EAST AFRICA LIMITED
.....

of address..... P. O. BOX 2284

.....
IRINGA
.....

has been granted a Certificate of Incentives to invest in a new, ~~rehabilitation / expansion~~
~~or expansion of the~~ enterprise known as

.....
EP (T) EAST AFRICA LIMITED
.....

Which is located at FARM NO. 563 & 584 MGAGAO

.....
KILOLO - IRINGA
.....

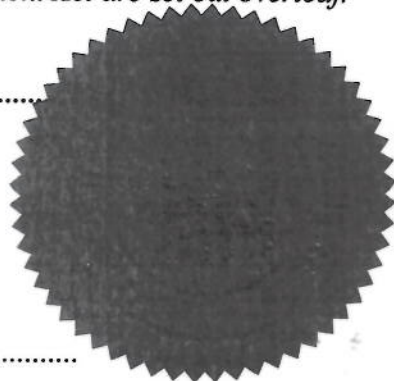
Further particulars required by Section 17 of the Tanzania Investment Act are set out overleaf.

.....
Executive Director

Certified True Copy of the Original
Sign: **FSM** Date: **29/9/20**
FATUMA SALUM MGUNYA
Advocate, Notary
Public & Commissioner for Oaths

Tanzania Investment Centre
P.O.Box 938, Dar es Salaam

Dated 23RD SEPTEMBER 2019



This Certificate is issued in accordance with the provisions of Section 17 of the Tanzania Investment Act, 1997 and subject to the conditions prescribed under item 14 and 15 hereafter:-

1.	Shareholders	Nationality	Shareholding (%)
	Linton Park Plc	UK	0.00018
	Robertson Bois	UK	0.00018
	Dickson Anderson Ltd		
	Luke J. Edwards	UK	0.00018
	Unallotted	Tanzania	99.99946

2. Proposed Activities: To establish and operate a project for Avocado and Macadamia Farming

3. Sector: Agriculture Subsector: Mixed Farming

4. Investment cost: Foreign USD 19m. Local - Total USD 19m.

5. Project Financing: USD 19m. Equity - Loans - Total USD 19m.

6. Source, terms and conditions of loan.....

7. Assets to be invested:

Capital items: Foreign USD 19m. Local - Total USD 19m.

8. Technology Agreement None

9. Date of TIC Registration: 23rd September 2019

10. Implementation period September 2019 - August 2022

11. Operative date September 2022

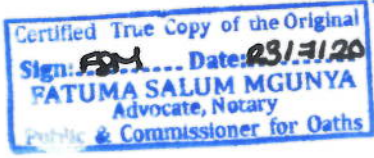
12. Investment Incentive Grade: As defined in part III Section 19(1), (2) and Section 20 of the Tanzania Investment Act, 1997

- (i) Applicable Import Duty EAC Customs Management Act. 2004 and VAT Act. 2014
- (ii) Applicable with-holding Tax As per Income Tax Act. 2004 (as amended)
- (iii) Eligibility of Capital Allowances As per Income Tax Act. 2004 (as amended)

13. Protection of Investment, Arbitration and Transfer of Foreign Currency as defined in part III Section 21, 22 and 23 of the Act.

14. Conditions attached to this Certificate of Incentives

- (i) Date of Commencement of investment has to be notified to the Centre.
- (ii) Certificate not to be transferred, assigned or amended
- (iii) Failure to commence implementation within two years invalidates Certificate
- (iv) Failure to operate investment must be notified to the Centre
- (v) Changes in shareholding, project activities and level of invested capital must be notified to the Centre



15. Additional conditions attached to Certificate

None

Handwritten signature