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2021/22 Budget surprisingly simple

The 2021 Budget Speech, delivered Wednesday 24 February, by Finance Minister Tito Mboweni may have contained a little good news for middle-class income taxpayers, but arguably, not much has been changed.

This is according to Bernard Sacks, Tax partner at Mazars in South Africa, who says that the most prominent announcements from this year's Budget Speech, seem to be the above-inflation increases in personal tax brackets and rebates (providing some relief for struggling taxpayers), and an 8 per cent increase in excise duties on tobacco and alcohol products. "To some degree, I am a bit more worried about the points that the Minister did not include."

Points that weren't covered

Sacks states that there should be some concern that Treasury still has not presented an answer regarding the Public Sector Wage Bill. "It is a vital aspect of government spending and Treasury needs to give the country an update on how it would be handling this issue as a matter of urgency."

The second point that Sacks says deserved more clarity in the speech is the issue of South Africa's rapidly increasing debt. "The debt-to-GDP ratio is now expected to peak at 88.9% in 2025/26. To place this into perspective, South Africa's debt-service costs now exceed the amount spent on health in this country."

Corporate sector receives mixed news

David French, Tax consulting director at Mazars in South Africa, says that one of Treasury's more creative moves in this year's Budget, was the changing of the corporate tax rate to 27% from next year. "On the surface it looks like a decrease in the corporate tax rate, which was definitely done in order to make South Africa more competitive to international corporations. However, if you take a closer look, you'll realise that the effective tax rate for corporations has in fact not decreased."

French explains that Treasury will also be limiting interest deductions and the use of assessed losses. "As the Minister explained, the tax decrease will be done in a revenue-neutral manner, which, in effect, tells us that the tax decrease does not really mean anything."

Good news for the middle-class taxpayer

Althea Soobyah, Director of tax consulting at Mazars in South Africa, notes that the changes relating to the individual taxpayer are quite interesting.

"Income tax brackets are going to be increased by 5 per cent, which means that bracket creep will not play a role this year. Along with the increase in rebates, it will mean that even individuals who do not receive a salary increase this year will not be subjected to any higher taxes and may in fact get just a little more money back."

She adds that it is good to see Treasury acknowledge that increasing taxes in any meaningful way will likely become detrimental to tax collection efforts.

"Another particularly interesting point for me was that Government is not only taking a harder look at high-income individuals who are using complex structures to pay less tax, but that they have apparently already identified the individuals that they would target."

Lastly, the Minister's statement that no new taxes would be introduced to fund new vaccines, was welcomed, Soobyah says.

Avoiding the debt trap

Tertius Troost, Senior tax manager at Mazars in South Africa, says that while South Africa's debt-to-GDP ratio will still be uncomfortably high at 88.9%, the forecast is not as bad as we expected by the end of last year. "There was a shortfall in tax collections, as one would expect, but it was actually smaller than predicted. Gross tax revenue for 2020/21 is expected to be R213.2 billion lower than projected in the 2020 Budget, but it is still notably higher than estimated in the October 2020 MTBPS."

Troost adds that South Africa only saw a slight economic recovery over the last year. "It would seem that Treasury's projected debt-to-GDP ratio of around 95% was, in fact, an over-estimation in the first place. So, the country is at least doing better than expected – for now.

However, the country still has a long way to go before we are clear of the looming debt trap," Troost concludes.

Authored by Mazars communications

Potential VAT Relief for Property Developers:
Is section 18B of the VAT Act making a comeback?

In the Budget review for 2021, a proposal in relation to the review of the current VAT treatment of the temporary letting of residential property was put forward.

The letting of a residential property as a dwelling (generally referred to as the supply of residential accommodation) is an exempt supply in terms of section 12(c)(i) which means that no output VAT is levied on any rental charged. The vendor making the supply cannot however claim any input VAT on any expenditure relating to that residential property.

A "dwelling" is defined in the VAT Act and means (except where it is used in the supply of commercial accommodation) "any building, premises, structure, or any other place, or any part thereof, used predominantly as **a place of residence or abode of a natural person** or which is intended for use predominantly as a place of residence or abode of any natural person, including fixtures and fittings belonging thereto and enjoyed therewith".

Property developers construct or acquire residential properties with **the intention to sell** them i.e. the properties constitute trading stock in their hands. From a VAT perspective, the developer (being a registered VAT vendor) will claim input VAT on all expenditure incurred relating to that property (of which the biggest would be the construction or acquisition costs) and would then levy output VAT on the subsequent sale thereof.

In some instances a developer may **temporarily let** out the residential unit as a dwelling due to unfavourable economic circumstances which might be preventing the sale of the property. These could include various circumstances of which the current Covid19 pandemic could be a potential one.

Even though this decision is temporary, a **change in use adjustment** is triggered for VAT purposes as the supply of a dwelling for rental is an exempt supply. This means that an output tax adjustment equal to the tax fraction (15/115) multiplied by the open market value of the property is required to be made (in terms of section 18(1) of the VAT Act). This leaves property developers in a precarious position as they are required to account for output VAT on a property that hasn't even been sold, resulting in severe cash flow implications for the relevant vendor.

Section 18B of the VAT Act was brought in from the 10th of January 2012 to the 31st of December 2017 and provided temporary respite for property developers by relieving them of the requirement to account for the change in use adjustment until a later stage (there was generally a 36-month window period of relief). Section 18B however expired and property developers were once again required to account for the change in use adjustment at the time of the change. Though Binding General Ruling 55 (BGR55) provides that the subsequent sale of the property does not trigger VAT for the property developer where a change in use adjustment was made, there has been no alternative to replace section 18B.

Per the 2021 Budget review, Treasury has suggested that it would "...investigate and determine an equitable value and rate of claw-back for developers as the current treatment is disproportionate to the exempt temporary rental income...", meaning that rental income generated was usually considerably less than the VAT that was required to be paid to SARS for the change in use.

The 2021 Budget review proposes that the VAT Act be amended to take into account the disproportionate treatment of income earned from the rental of the dwelling compared to the VAT required to be paid on the change in use adjustment. No guidance was provided as to the manner in which the VAT Act was to be amended and to what extent which leaves the question...

Is section 18B making a comeback?

Hopefully vendors will obtain clarity on the matter sooner rather than later.

Other noteworthy changes relate to the fuel levy and Road Accident Fund. There was an inflation-linked general fuel levy increase of 15c/litre for petrol and diesel, with the Road Accident Fund increasing above inflation by 11c/litre. The carbon tax component of the levy has increased by 1c/litre for both petrol and diesel. These increases will be implemented with effect from 7 April 2021.

Leila Wright
Assistant manager, tax consulting

Leonard Willemse
Senior manager, tax consulting

A smile can mean a thousand words:
But it can also hide a thousand problems

Minister Tito Mboweni tabled one of the most anticipated budget speeches in years on 24 February 2021. From behind our face masks we waited for the expected and unexpected tax increases. However, Minister Tito Mbomeni presented the budget with the flamboyance of a veteran motivational speaker. A few jokes and no real tax increases made us feel at ease, and for a moment those smiles hide a thousand problems...

Some of the **thousand problems** hiding behind Minister Tito Mbowen's jokes, which in fact was acknowledged in the budget are; a weak economy; massive unemployment; one of the highest budget deficits in history; and rapidly growing public debt.

Also, the jokes and smiles also hide a thousand problems for unsuspected taxpayers.

COVID-19 had a severe impact on our struggling economy, and as a result, the expected tax base growth has deteriorated significantly since the 2020 budget. Personal income tax collection has been affected by rising job losses and lower earnings for those who are employed, while Corporate income tax collections have been contracting since 2018/19.

One plus one isn't two anymore, and it would be normal for a taxpayer to start to feel uneasy. What was not said in the budget... why no increases?

With no real tax increases and a shrinking tax base, SARS intends to increase the collection of taxes by focussing on tax that **should be collected but is not**. To increase its collection capabilities, the budget provided for additional spending of R3 billion to SARS.

We all giggled when Minister Tito Mboweni was as confused as us when he started to explain that SARS is expanding its **machine learning capabilities**, and could have missed what was said after that. SARS will use that R3 billion to expand its specialised audit and investigative skills.

This brings us to what was not said in the budget speech.

Section 234(2) of the Tax Administration Act No 28 of 2011, (the **TA Act**), was changed by the Tax Administration Laws Amendment Act No 24 of 2020, which commenced on 20 January 2021. Yes, the new section 234(2) of the TA Act commenced only a month before the budget speech.

Section 234(2) of the TA Act list a few things, that if a taxpayer fails to do them **wilfully** or **negligently** then such a person is guilty of an offence, and is **liable, upon conviction, to a fine or to imprisonment for a period not exceeding two years**.

Taxpayers might be shocked to know that the obligations include actions such as not keeping the required records or failure to submit a tax return.

To name only a few, a person might be in violation of section 234(2) of the TA Act if he/she:

- Fails to register for income tax if he/she is required to do so;
- Fails to retain records;
- Fails to disclose any material fact to SARS;
- Fails to submit a return to SARS.

The previous wording of section 234(2) of the TA Act only used the word wilfully. Wilfully is defined by the Oxford Dictionary as an act with the **intention of causing harm or being deliberate**.

By only including the word wilfully in the previous section 234(2) of the TA Act, taxpayers potentially could defend their actions by arguing that even if they did fail to comply with a certain section of the tax act, they never did so deliberately.

However, with the inclusion of the word **negligently**, SARS now only needs to show that a person did not take the care a normal person would have taken.

The well known legal maxim, **Ignorantia juris non excusat**, which simply means that ignorance of the law excuses not, is now part of section 234(1) of the TA Act.

With the budget giving SARS an additional R3 billion to **put their money where their mouth is**, taxpayers should be aware and take the necessary steps to get their tax affairs in order.

Even though the courts in the past recognised that our law developed in such a way that it could be wrong to assume that every person should know the law, especially complicated law like tax law, going through the process of defending your actions, might be costly and burdensome, with an added possibility of jail time.

However, with the increased capacity the 2021 budget is creating at SARS, and in conjunction with the wider scope of the new section 234(1) of the TA Act, taxpayers should take the prudent step to approach professional assistance and advice where in doubt concerning their tax affairs.

Franscois Celliers
Consultant, tax consulting

"One plus one isn't two anymore, and it would be normal for a taxpayer to start to feel uneasy."

Leaving South Africa?

You will now pay tax on your retirement savings and it may be locked in for a minimum of 3 years

When you cease to be a tax resident of South Africa, you are deemed to have sold your worldwide assets on the day before you cease to be a tax resident. This triggers a capital gains tax (CGT) event, which is often referred to as "exit tax".

Currently, your interest in a South African retirement fund is not subject to this exit tax.

One of the key announcements in the 2021 Budget on 24 February 2021 is a proposed exit tax on retirement fund interests where an individual ceases to be resident for tax purposes.

The proposal is motivated by the fact that individuals who cease to be South African tax residents often becomes a tax resident of another country where a tax treaty provides the taxing right to the foreign resident country, resulting in South Africa forfeiting its taxing rights, in this case, on the withdrawal from a retirement fund.

To address this anomaly, government proposes an exit tax be calculated on an interest in a South African retirement fund at the time that the member ceases to be resident for tax purposes.

It is proposed that an individual will now be deemed to have withdrawn from the fund on the day before he/she ceases to be a South African tax resident, while retaining his/her investment in the South African retirement fund.

The withdrawal tax payment (including associated interest), calculated in terms of the withdrawal lump sum table, will be deferred until payments are received from the retirement fund or as a result of retirement.

When the individual eventually receives payments from the fund and South Africa has the right to tax the payments, the tax will be calculated based on the prevailing tables. A tax credit arising from the deemed withdrawal tax calculated when the individual ceased to be a South African tax resident will be set off against any taxes due at the time funds are received from the fund.

One must also not forget that the January 2021 Taxation Laws Amendment Act locks in benefits from preservation and retirement annuity funds for a minimum period of three years with effect from 1 March 2021.

Where a South African is contemplating emigrating from South Africa and considering retaining his/her investment in a preservation or retirement fund until retirement, the individual needs to factor in the new tax treatment on their retirement fund. Tax will be calculated based on the withdrawal lump sum table on cessation of tax residency, on the full value of the interest in the fund, as opposed to the retirement lump sum table. When an individual is considering accessing the funds after the three year lock in period has lapsed, he/she will have to be mindful that he/she would have already suffered the punitive withdrawal tax, irrespective of whether they opt to wait for retirement or not.

For any South African who was planning to emigrate hoping to rely on a tax treaty exemption, this proposal is unwelcome news as he/she will now not escape tax in South Africa on their interest in a retirement fund.

Elzahne Henn
Tax Director

Sharon MacHutchon
Manager, tax consulting

Tax madness time:

Maybe not so mad this time?

It's March! With March always comes the "what now?" after the budget speech, which was presented on 24 February this year by our current Minister of Finance, Tito Mboweni.

In light of the announced reduction to the corporate tax rates to 27% for years of assessment commencing 1 April 2022, I thought it was a good time to remind you of the requirements in accounting for these changes in accordance with the applicable accounting standards.

According to both IFRS and IFRS for SMEs, tax and deferred tax is measured using the tax rates and tax laws that are enacted or substantively enacted by the end of the entity's reporting period.

Current tax is measured at the amount expected to be paid or recovered (IAS 12.46) (IFRS for SME 29.6). Deferred tax must be measured at the tax rates that are expected to apply to the period in which the underlying asset or liability is realised or settled (IAS 12.46) (IFRS for SME 29.27).

So, with the tax rate only changing for years of assessment beginning 1 April 2022, will this have an impact on the 2021 financial statements? The key question to then ask is: when is a change in tax rates considered to be substantively enacted?

1. When the Minister announces it?
2. On the effective date of the announcement?
3. When it is approved by Parliament? or
4. When it is signed by the President?

In South Africa, historically when the Minister announces a rate change to an existing tax it is applied without any further changes. Due to this high degree of certainty changes in tax rates, the decrease in the corporate tax rate is therefore considered to be substantively enacted from the time it is announced.

A change in a tax law or a tax rate linked to a change in tax law, would only be considered substantively enacted when they have been approved by Parliament and signed by the President. An example of this would be the proposed change limiting the use of assessed losses. This is considered a proposed change to the tax law.

The changes to the rates and laws should be applied to the period to which they relate. For example, the Minister annually announces a change in tax rate at the budget speech but it is only effective from 1 April… usually that same year; this year he made it only effective in 2022. The impact depends on your year-end as to what numbers are affected.

Let's work through a simple example of companies with three different year-ends.

- Company A with a 31st January 2021 year-end
- Company B with a 28th February 2021 year-end
- Company C with a 30th June 2021 year-end.

The Minister of Finance makes his announcement on 24th of February 2021 which includes a change in corporate tax down to 27%, effective for years commencing 1 April 2022.

This is a change to a tax rate for a law that already exists, therefore we consider it substantively enacted as at 24th of February 2021. The IFRS for SMEs includes the wording in its measurement paragraphs mentioned above "An entity shall regard tax rates as substantively enacted when the remaining steps in the enactment process have not affected the outcome in the past and are unlikely to do so."

The effect on the 2021 year-ends would be recorded as follows:

Year-end 2021	Company A	Company B	Company C
Current tax rate:	28%	28%	28%
Opening deferred tax rate:	28%	28%	28%
Adjustment included in deferred tax reconciliation:			
Effect of Deferred tax rate change on opening balance:	---	---	(1%)
Effect of Deferred tax rate change on closing balance:	---	(1%)	---
Closing deferred tax rate:	28%	27%	27%
Other comments:	Subsequent event note: Effect on deferred tax due to the rate change	Note that the effect on deferred tax will be adjusted for those deferred tax benefits or deductions expected to be obtained or incurred during the period to the effective date, i.e. in the 2021 and 2022 financial years.	

Tax madness time:

Maybe not so mad this time?

Because the effective date is for years of assessment beginning on or after 1 April 2022, the 2022 and 2023 financial year is also provided:

Year-end 2022	Company A	Company B	Company C
Current tax rate:	28%	28%	28%
Opening deferred tax rate:	28%	27%	27%
Adjustment included in deferred tax reconciliation:			
Effect of Deferred tax rate change on opening balance:	(1%)	---	---
Effect of Deferred tax rate change on closing balance:	---	---	---
Closing deferred tax rate:	27%	27%	27%
Other comments:	Note that the effective deferred tax rate will not be 27% as it will be adjusted for those deferred tax benefits or deductions expected to be obtained or incurred during the period to the effective date.		

Year-end 2023	Company A	Company B	Company C
Current tax rate:	28%	28%	27%
Opening deferred tax rate:	28%	27%	27%
Adjustment included in deferred tax reconciliation:			
Effect of Deferred tax rate change on opening balance:	---	---	---
Closing deferred tax rate:	27%	27%	27%
Other comments:	Company C's year of assessment started after 1 April 2022, their current tax will therefore be 27%, while Company A and Company B will only qualify for the 27% in the next year.		

Because there is so much confusion about this in South Africa, the Financial Reporting Standards Council issued Financial Reporting Pronouncement 1 to explain exactly this. Please refer to this should you need any guidance.

With these impacts plus the proposed reduction in what corporates may claim against their assessed losses, one has to consider whether this will really be a tax relief...?

Justine Combrink
Partner

Corporate tax rate change:
Encouraging or discouraging

While the proposal to reduce corporate tax rates is well received, it should be noted that the interest and loss limitation rules most probably neutralise this effect. Taxpayers, especially in the new investment sector, may still face cash flow constraints through these measures.

As industry, we were all delighted when the Minister of Finance announced the reduction in Corporate Income Tax rate from 28% to 27% for years of assessments commencing on or after 1 April 2022. This seems to suggest that Treasury is encouraging growth in the private sector. This would hopefully assist with providing much needed relief to South Africa's massive unemployment, not to mention the effects that COVID 19 has had on job losses.

Although this rate change is encouraging for South African business there is a sting in the tail with the announcement. The Minister used the following specific wording in conjunction with the announcement: "This will be done alongside a broadening of the corporate income tax base by limiting interest deductions and assessed losses."

These limitations were announced by the Minister in the 2020 budget speech and were supposed to be introduced from 1 January 2021. However, due to COVID 19, the implementation was postponed until at least 1 January 2022.

What do these proposals mean for companies?

For assessed losses, Treasury is proposing that when a previously loss-making company starts making a profit, it can only use its balance of assessed losses to shield 80% of its taxable profits. If the assessed losses exceed this amount these can be carried forward to future years. Thus, a newly profitable company must start paying tax (on 20% of its profits in the year) even if it still has unutilised assessed losses.

As a practical example, a company has an assessed loss carried forward of R1 000. In year 1 its taxable income is R300. Under the current rules it would pay no tax, and the assessed loss is reduced to R700.

Under the proposed rule, the company must pay tax on R60 (at 27% this would amount to a tax liability of R16.20), and it can carry forward assessed losses of R740.

This effectively means that Treasury will be collecting revenue irrespective of a company being in an assessed loss position. Ultimately, this would be most pronounced on start-up companies or new investments into South Africa, as they generally only turn profitable within two to three years of commencement of business.

To compound this, Treasury has proposed to tighten the interest limitation rules. In the original discussion paper on the interest limitation rule, Treasury indicated the possibility of limiting the deduction of all interest – whether paid to related or third parties. Fortunately, they have retracted somewhat from this position. However, the proposed interest limitation would appear to apply to any related party loan, whether the lender is situated in South Africa or not.

"If our company has support from a related party in its start-up phase, it may be in a situation where it must pay tax before recouping all of its losses and is possibly denied a deduction of some or all of its interest which it incurred on the loan utilised to fund its operations. So, while the proposal to reduce corporate tax rates, but expand the tax base through the interest and loss limitation rules are revenue neutral for the country, taxpayers in the new investment sector may face greater cash flow constraints through these measures. Would these terms be favourable for foreign, or even local, investment into our economy?"

Louwrens Basson
Senior tax manager

Mohamed Bulbulia
Tax manager

Is the sun setting on Section 12J?

In a move that came as somewhat of a surprise Finance Minister Tito Mboweni announced during the 2021 Budget that the section 12J incentive would not be extended past its sunset clause of June 30. This move is likely to be the final nail in the coffin for this generous incentive, in terms whereof investors in a section 12J approved Venture Capital Company (VCC) benefit from a full tax deduction upfront in the tax year in which the investment is made.

In providing reasons for its decision, National Treasury alluded to the fact that the majority of investments were made into "low-risk moveable asset rental structures" and "low-risk income-producing investments and guaranteed-return real estate investments." According to National Treasury these low-risk ventures "would have attracted funding without the incentive."

The move by National Treasury to not extend the sunset clause therefore seems to be driven by their view that the section 12J incentive had been abused by the implementation of certain (in their view abusive) structures. Most notably the fact that National Treasury is of the view that the majority of VCC funding was not utilized in the manner originally contemplated by National Treasury i.e. investments in high-risk startup companies.

The question needs to be asked whether this was the right decision, specifically given the impact Covid-19 had on the SA economy and the desperate need for investment in SA. If one takes the example of the "real estate investments" structures, as mentioned by National Treasury, it is common knowledge that these (perceived) structures arose as a result of the anomaly contained in the definition of impermissible trades. In essence, an impermissible trade is *inter alia* defined as any trade carried on in respect of immovable property, "other than a trade carried on as a hotelkeeper".

This exclusion opened the door for a VCC to deploy its capital and make an investment into real estate, but always ensuring that it indeed is carrying on the trade as hotelkeeper. A possible manner in which the concerns voiced by National Treasury could be alleviated would be to amend the definition of impermissible trade and remove the "loophole" pertaining to hotelkeeper. Such an amendment could possibly open the door for a reinstatement of the section 12J allowance.

The final decision on the future of section 12J now lies with Parliament, who is faced with the decision on whether to accept the proposal by National Treasury or to decide upon a different course of action. However, for the time being, it seem as if the sun is indeed setting on section 12J.

Etienne Louw
Senior manager, tax consulting

Amendment to section 45 intra-group transactions

Following the Budget Speech held 24 February 2020, Annexure C was released and confirmed proposed changes to section 45 intra-group transactions to address certain anomalous situations which could arise.

An intra-group transaction envisaged in section 45 of the Income Tax Act allows for the tax neutral transfer of assets between companies forming part of the same group. Any tax liability that would have been triggered will be deferred as a result. However, to prevent abuse of the corporate flexibility it allows, certain anti-avoidance provisions have been enacted.

The anti-avoidance provisions

The first and foremost is the "de-grouping charge" which may rear its head for up to six years following the conclusion of the intra-group transaction. The de-grouping charge provides that if the transferor (i.e. the company relinquishing the asset) and the transferee (i.e. the recipient of the asset) companies cease to form part of the same group within 6 years of the conclusion of the intra-group transaction, then any deferred tax benefit obtained from the transaction is triggered in the hands of the transferee.

The second is the "zero base cost rule" contained in section 45(3A) of the Act which applies where an asset is transferred by the transferor to the transferee in exchange for debt (i.e. where an asset is sold on loan account) or non-equity shares and deems the debt or non-equity shares to have been acquired for nil consideration. This prevents the transferor from disposing of the debt (i.e. a loan claim) or non-equity shares to an external party without triggering an adversely large tax liability. It should be noted that this anti-avoidance provision applies for an indefinite period of time in its current iteration.

The third is the "early disposal provision" which applies to ring-fence the gain or loss on disposal of an asset acquired in terms of an intra-group transaction in the hands of the transferee where they disposed of the asset within 18 months following the conclusion of the transaction.

The 2020 amendment

In certain instances, a taxpayer could have the unfortunate luck of triggering multiple anti-avoidance provisions simultaneously. For example, the intra-group transaction could be implemented in a manner where the transfer of an asset is funded by the issue of debt or non-equity shares by a group company – thereby leaving the door open to the zero base cost rule, and a de-grouping subsequently occurs within six years – thereby triggering the de-grouping charge.

Effectively, the above will trigger the reversal of the tax benefit in terms of the de-grouping and a greater capital gain on disposal of the debt or non-equity shares in terms of the zero base cost rule.

As a result, section 45(3B) was inserted with effect from 1 January 2021 which suspends the application of the zero base cost rule on the day on which the transferee and the transferor de-group/on application of the de-grouping provision.

The proposed 2021 amendments

During the 2021 Budget Speech, it has been proposed that the legislation be changed so that the zero base cost rule only apply for six years after the intra-group transaction, thereby aligning it with the period applicable to the de-grouping charge.

In keeping with the above, it has also been proposed that the legislation be amended so that the zero base cost rule ceases to apply when the early disposal provision applies.

Additionally, to avoid unduly adverse consequences triggered where a de-grouping occurs within 18 months and the transferee company sells the asset within 18 months (i.e. triggering the early disposal provision), it has been proposed that if the de-grouping charge has applied, the early-disposal provision will not.

We will await the draft tax law amendments to see how these changes will be legislated, but in general these are welcome and long overdue changes to section 45 intra-group transactions.

Tarynn Isaacs
Consultant, tax consulting

"It has been proposed that the legislation be changed so that the zero base cost rule only apply for six years after the intra-group transaction..."

Your tax deadlines for March 2021

- 5 March – Monthly PAYE submissions and payments
- 25 March – VAT manual submissions and payments
- 30 March – Excise Duty payments
- 31 March – VAT electronic submissions and payments
- 31 March – Corporate Income Tax Provisional Tax payments where applicable.

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