KPMG
Private Enterprise

Family office & Private client

KPMG Southern Africa

Strategic Tax Planning

Tax Consulting services: Individual

KPMG can advise on any aspect of the tax legislation that may impact either or both of:

You as an individual

- Tax residency determination and analysing the impact of a relevant Double Tax Agreement (**DTA**).
- Assistance with residency applications through foreign investment.
- Assistance in seeking tax efficiency for retirement savings in terms of the appropriate DTA.
- KPMG can assist with advising on the tax implications of donations made to and by individuals and trusts, as well as the applicable exemptions.

Your family office's legal/governance structure, i.e. trust/ foundation or corporate entity

- A review of the tax compliance status of each entity and investment within the structure.
- A Tax opinion setting out the:
  - Tax implications of the flows of income and capital within the structure, or to the ultimate family beneficiaries to the structure.
  - Tax incentives associated with any social or environmental project the family wishes to implement or support.

Tax support with any transaction the family or family office is considering entering into, including:

Tax due diligence

Tax implications associated with the structuring of the transaction outcome

- Keeping you up to date with any tax legislation changes which may impact on the above.

Estate planning advice

KPMG can advise on:

- The Estate Duty implications of a Will, including what constitutes "property" (inclusions and exclusions) and "deemed property", and the valuation of property for Estate Duty purposes.
- Whether trust property will be included in the estate of the deceased, as deemed "property".
- The allowable deductions, abatement / portable spousal deduction, calculation of the dutiable amount, and the applicable Estate Duty rates and thresholds.
- The advantages and disadvantages of setting up a testamentary trust versus an intervivos trust.
- Trust Deed amendments required to remove any provisions which may impact your estate negatively.
- The taxation of deceased estates.
- The Exchange Control considerations for a deceased estate.

© 2026 KPMG Services Proprietary Limited, a South African company with registration number 1999/012876/07 and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

KPMG
Private Enterprise

Strategic Tax Planning (cont.)

Trusts: Legal advice

KPMG can assist with the setting up of a trust for you including:

- Advising on the different types of trusts and the advantages, disadvantages and pitfalls of using a trust.
- Advising on the legal obligations i.e. the proper administration of the trust appointment of independent trustees, settlements out of a trust, etc.
- Assisting with the review and amendment to the wording of a Trust Deed.

Exchange control advice

KPMG can provide exchange control advice on the implications of being an exchange control resident and the restrictions on the flow of funds applicable to all individuals.

Tax and exchange control compliance: individuals, corporate entities and trusts

- In assisting you with your annual income tax return and provisional tax returns, KPMG is able to work with your financial and legal advisors (where relevant) to ensure that all income tax implications have been considered in respect of your financial investments.
- We are able to prepare and submit your tax returns review your income tax assessments for accuracy, and attend to any requests for information and/or documents from the SARS.
- In addition, we are available to provide assistance with the application for the appropriate tax clearance certificate from SARS in respect of foreign investment and the necessary tax clearance forms for the remittance of retirement fund benefits.

Voluntary disclosure of non-compliance

KPMG can assist with the application for relief in terms of the Voluntary Disclosure Programme (**VDP**) operated by SARS including:

- Drafting and submitting a VDP letter setting out the detailed grounds for the application and the request for the remittance of penalties.
- Preparation or review of VDP calculations.
- Liaising with the VDP consultant appointed by SARS.
- Review of the VDP Agreement issued by SARS to ensure accuracy of information and figures reflected in the agreement.

Dispute resolution

KPMG is able to provide guidance and assistance throughout the process of a dispute with SARS including:

1. Drafting and submitting a Notice of Objection or a Notice of Appeal against an incorrect assessment issued by SARS.
2. Attending an Alternative Dispute Resolution (**ADR**) meeting with SARS.
3. Submitting a request for suspension of payment of an amount of tax under dispute.
4. Submitting a request for remittance of penalties and interest levied by SARS.

© 2026 KPMG Services Proprietary Limited, a South African company with registration number 1999/012876/07 and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

KPMG
Private Enterprise



Contact us



Ziyaad Ravat
Partner, Head of Private Enterprise
M: +27 82 717 5133
ziyaad.ravat@kpmg.co.za



Creagh Sudding
Lead:Family Office & Private Client
M: +27 66 010 8755
creagh.sudding@kpmg.co.za



Mohammed Maiter
Partner
M: +27 66 010 2425
mohammed.maiter@kpmg.co.za



Tanette Nel
Associate Director
M: +27 82 719 2179
tanette.nel@kpmg.co.za



Angela Jacobs
Associate Director
M: +27 82 719 1974
angela.jacobs@kpmg.co.za



Zaheera Moosa
Senior Tax Manager
M: +27 82 719 5411
zaheera.moosa@kpmg.co.za

kpmg.com/socialmedia

Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.

KPMG is a global organization of independent professional services firms providing Audit, Tax and Advisory services. KPMG is the brand under which the member firms of KPMG International Limited ("KPMG International") operate and provide professional services. "KPMG" is used to refer to individual member firms within the KPMG organization or to one or more member firms collectively.

© 2026 KPMG Services Proprietary Limited, a South African company with registration number 1999/012876/07 and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization. For more detail about our structure, please visit home.kpmg/governance.