



TAX EXEMPTION UNIT

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South African Revenue Service

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*Please quote our reference number in your correspondence with TEU.

Dear Sir/Madam

EXEMPTION FROM TAXES AND DUTIES AND SECTION 18A APPROVAL: SYMPHONIA FOR SOUTH AFRICA

Your application for exemption from income tax refers.

1. It is confirmed that:-

- 1.1 the association has been approved as a public benefit organisation in terms of section 30 of the Income Tax Act (the Act) and the receipts and accruals are exempt from income tax in terms of section 10(1)(cN) of the Act;
- 1.2 the public benefit organisation has been approved for purposes of section 18A(1) (a) of the Act and donations to the organization will be tax deductible in the hands of the donors in terms of and subject to the limitations prescribed in section 18A of the Act;
- 1.3 donations by or to the public benefit organisation are exempt from donations tax in terms of section 56(1) (h) of the Act;
- 1.4 bequests or accruals from the estates of deceased persons in favour of the public benefit organisation are exempt from the payment of estate duty in terms of section 4(h) of the Estate Duty Act, 45 of 1955; and

1.5 in terms of section 4(1)(f) of the Stamp Duties Act, 1968, any instrument which is executed by or on behalf of the public benefit organisation is exempt from stamp duty, if the duty thereon would be legally payable and borne by the public benefit organisation.

2. Kindly note that the exemptions and approval is subject to the following conditions:

2.1 The exemptions and approval will be reviewed annually on receipt of the income tax return, together with the annual financial statements, which must be submitted to the Tax Exemption Unit. Furthermore, a statement and supporting documentation which must include full particulars of the receipts issued in respect of deductible donations in terms of section 18A and how these funds were expended must also be submitted.

2.2 The public benefit organisation will within a period of 12 months; formally amend the founding document to comply with the provisions of section 30 of the Act or whenever an amendment is effected to the founding document, whichever date occurs first.

2.3 **The public benefit organisation *may not issue tax deductible receipts* i.r.o. any donation to the extent that the donation will be utilised in carrying on the approved public benefit activities listed in Part I of the Ninth Schedule to the Act. This include the following activities of the organisation: Sharing of life stories and reigniting conversation of possibility in South Africa.**

2.4 **The public benefit organisation *may only issue tax deductible receipts* in respect of any donation to the extent that the donation will be utilised solely in carrying on the public benefit activities contemplated in Part II of the Ninth Schedule to the Act. This includes the following activity of the organisation: Community leaders for South Africa.**

2.5 **The public benefit organisation must together with its annual return for a year of assessment submit to the Commissioner an audit certificate confirming that all donations received or accrued in that year in respect of which tax deductible receipts were issued were utilised in the manner contemplated in 2.4 above.**

2.6 The following information must be given on the tax deductible receipts issued:

2.5.1 the reference number of the public benefit organisation, issued by the Commissioner for the purposes of this section; (the reference number quoted on this letter.)

2.5.2 the date of the receipt of the donation;

2.5.3 the name of the public benefit organisation, which received the donation, together with an address to which enquiries may be directed in connection therewith;

2.5.4 the name and address of the donor;

2.5.5 the amount of the donation or the nature of the donation (if not made in cash); and

2.5.6 a certification to the effect that the receipt is issued for the purposes of section 18A of The Income Tax Act, 1962, and that the donation has been or will be used exclusively for the object of the public benefit organisation concerned.

Please note that the Tax Exemption Unit is a dedicated national office that has been established by the Commissioner to provide a quality service to all our clients. Should you therefore have any further queries pertaining to tax exemption matters, please do not hesitate to revert to the undersigned at your earliest convenience.

Yours faithfully



UFR Muller (Ms)

Tax Exemption Analyst

FOR THE COMMISSIONER OF THE SOUTH AFRICAN REVENUE SERVICES