



WERKSMANS
ATTORNEYS

Tax

Practice
area

› Keep us close





Tax law in South Africa has been elevated to a highly specialised area of practice as a result of ongoing and annual changes to tax legislation, as well as developments in the courts and efforts internationally to reduce base erosion and profit shifting. Our tax lawyers rank among South Africa's best and regularly receive recognition for their outstanding services.

The team, which has offices in Johannesburg and Stellenbosch, is able to respond swiftly and efficiently to client requests regarding South African and international tax and related legal matters. The team members have many years of experience in consulting to the commercial sector and to high-net-worth families, providing integrated advice and assistance on a wide range of local and international tax issues.

We are networked internationally, not only formally through the LEX Africa legal network

but also informally through our membership of the International Fiscal Association (IFA), Society of Trust and Estate Practitioners (STEP), The International Academy of Estate and Trust (TIAETL), the International Bar Association (IBA) and other international professional organisations.

➤ **Unrivalled expertise, up-to-date tax advice**

Our tax team is responsive to the vast changes to tax policy adopted by the Organization for Economic Cooperation and Development (OECD) and implemented in domestic law and internationally. We are well versed in the implications of key initiatives such as the Multilateral Convention to Implement Tax Treaty

Related Measures and Prevent Base Erosion and Profit Shifting (2017 MLI) and the various OECD transfer pricing initiatives.

The tax team's focus is on assisting corporates and high-net-worth families who seek comprehensive, up-to-date tax advice and planning. The tax team's services range from advising on and implementing the tax aspects of clients' commercial dealings to interacting on their behalf with the tax authorities. This includes seeking rulings and other dispensations on their behalf, and dealing with disputes.

Each member of our tax team takes their continuous professional development seriously, thereby standing ready to assist clients based on the latest tax and exchange control law and practice.



» **Our special areas of expertise include:**

- the income tax, capital gains tax, value-added tax and other transaction tax aspects of commercial activities such as mergers and acquisitions, private equity and BEE empowerment transactions, employee incentive schemes, property-related transactions and corporate re-organisations;
- international tax services related to inward and outward investment and offshore structuring, such as advice on double tax treaties (DTAs) and multilateral tax treaties, advice on transfer pricing, controlled foreign companies and debt structuring, and advice on setting up and running foreign private equity funds;
- the tax aspects of wealth, succession and estate planning for high-net-worth families (both domestically and internationally), such as advice on trust establishment and restructures, emigration and immigration, foreign pensions, charitable foundations and the drafting of wills and trust deeds;
- tax dispute resolution in the tax court and in the higher courts, where our tax specialist litigation lawyers deal with high-value disputes and provide innovative solutions for their resolution;
- the tax-related aspects of family law litigation and dispute resolution involving trusts and foundations, including tax and exchange control advice and succession planning arising from divorce cases;
- tax compliance, including the review of tax return submissions and assisting with Voluntary Disclosure Programme (VDP) applications. We do not, however, provide tax eFiling services;
- exchange control advice and applications, including special approvals relating to merger and acquisition transactions and to foreign investment.

Our Tax team has achieved the below rankings:

- Global Chambers: Band 2
- Legal500: Tier 2
- ITR World Tax: Tier 2





› Meet the Team



Director and Head of Tax

Michael Honiball
Johannesburg

T +27 11 535 8136
E mhoniball@werksmans.com



Director

Robyn Armstrong
Johannesburg

T +27 11 535 8333
E ramstrong@werksmans.com



Director

Erich Bell
Johannesburg

T +27 11 535 8250
E ebell@werksmans.com



Director

Kyle Fyfe
Johannesburg

T +27 11 535 8241
E kfyfe@werksmans.com



Director

Ryan Killoran
Johannesburg

T +27 11 535 8258
E rkilloran@werksmans.com



Director

Doelie Lessing
Stellenbosch

T +27 21 809 6147
E dlessing@werksmans.com



Director

Ernest Mazansky
Johannesburg

T +27 11 535 8448
E emazansky@werksmans.com



Senior Associate

Varshani Ramson
Johannesburg

T +27 11 535 8317
E vramson@werksmans.com



Associate

Luke Magerman
Stellenbosch

T +27 21 809 6183
E lmagerman@werksmans.com



About us

Established in the early 1900s, Werksmans Attorneys is a leading South African corporate and commercial law firm, serving multinationals, listed companies, financial institutions, entrepreneurs and government.

Operating in Gauteng and the Western Cape, the firm is connected to an extensive African legal alliance through LEX Africa. LEX Africa was established in 1993 as the first and largest African legal alliance and offers huge potential for Werksmans' clients seeking to do business on the continent by providing a gateway to Africa.

With a formidable track record in mergers and acquisitions, banking and finance, business rescue and restructuring, commercial litigation and dispute resolution, Werksmans is distinguished by the people, clients and work that it attracts and retains. Werksmans' more than 200 lawyers are a

powerful team of independent-minded individuals who share a common service ethos. The firm's success is built on a solid foundation of insightful and innovative deal structuring and legal advice, a keen ability to understand business and economic imperatives and a strong focus on achieving the best legal outcome for clients.



» Keep us close

**THE CORPORATE &
COMMERCIAL LAW FIRM**
A member of the LEX Africa Alliance
www.werksmans.com