



## Deloitte School of Tax Corporate Tax Bootcamp

We have the pleasure of inviting you to our two-day Corporate tax Bootcamp Workshop. This workshop will serve as both an introduction to and a refresher of Corporate Tax principles and the application of these principles to the day-to-day functions performed in a corporate tax role.

The workshop consists of the following:

<b>Session</b>	<b>Subject</b>
Session 1 (morning day 1)	Corporate Tax Back to Basics
Session 2 (afternoon day 1)	Capital Gains Tax
Session 3 (morning day 2)	Fixed Assets and Capital Allowances
Session 4 (afternoon day 2)	Completing the Company Tax Return (Including the new ITR14 changes)

The workshop will run at the Deloitte offices over two days as follows:

<b>Region</b>	<b>Day 1 (sessions 1 &amp; 2)</b>	<b>Day 2 (sessions 3 &amp; 4)</b>
Durban	16 October 2017	17 October 2017
Cape Town	16 November 2017	17 November 2017
Johannesburg	07 December 2017	08 December 2017

Please refer to pages 4 onwards for a detailed agenda

Facilitator(s):

*Day 1*

**Catherine Wright** is a Manager in the Deloitte School of Tax team. Catherine's focus is corporate and international tax. She has a Master's Degree in Taxation from the University of Pretoria. Catherine regularly coordinates and presents tax technical training to Deloitte clients and Deloitte staff.

*Day 2*

**Richard Loyson** was a Senior Lecturer in the School of Accounting at Nelson Mandela Metropolitan University (NMMU). Richard specializes in taxation and financial accounting and lectures at post graduate level at NMMU. Richard consults largely on corporate tax and provides corporate tax services to a number of large listed corporate clients. Richard also provides a range of tax services to smaller to medium sized clients in the Eastern Cape. Richard has been involved with accounting and tax training at various levels over several years. Richard is a Chartered Accountant and has a Masters in Taxation.

Cost:

You may elect any combination of the four sessions required. If you are booking for less than all four of the sessions, you will need to book each session individually. The pricing below is per person. The discounted scale is only applicable if the same individual is attending more than one session.

<b>Sessions booked</b>	<b>Cost excluding VAT</b>	<b>Cost including VAT</b>
One session only	R1 275.00	R1 453.50
Two sessions	R2 425.00	R2 764.50
Three sessions	R3 500.00	R3 990.00
All four sessions	R4 525.00	R5 158.50

Payment is due after the seminar date.

Company Discount: 10% for 2 or more participants from the same company and region. The discount applies from participant 2 onwards and per individual session.

Alumni Discount: 10% for Deloitte alumni. This applies if you are a former employee of Deloitte and have registered as Deloitte alumni. ([Click here](#) to register as an alumnus)

You will only qualify for one of either the 10% Company / Alumni discounts.

Cancellation Policy:

Our standard cancellation policy is to invoice 50% of the cost of the workshop, for attendance not cancelled within **48 business hours**. This is to recover the overhead costs incurred relating to your planned attendance and the cost of the course material.

Time:

- Morning sessions (1 & 3): 8:30 – 12:30 (registration from 8:00)
- Afternoon sessions (2 & 4): 13:00 – 17:00 (registration from 12:30)

Each session will contribute to 4 hours CPD/CPE

RSVP:

Please note that we use an online booking system. Kindly complete the online booking form using the link below.

The link will open the booking page of the Deloitte School of Tax but it will not select the course or region for you. Please be sure to select the correct course, date and region from the drop-down menu.

You will be able to register several people using one form. (Please contact us at [dsot@deloitte.co.za](mailto:dsot@deloitte.co.za) if you wish to make bookings for more than 10 people at once.)

[Register Here](#)

Course Material:

This will be a paperless course. We will email you the course material within 48 hours of the planned session date. You will then have the option to bring the course material on your laptop/tablet, or should you prefer, to print the material. We will have plug points in the venues for laptops/tablets

Contact us:

Should you have any administrative questions regarding this workshop, please contact us at [dsot@deloitte.co.za](mailto:dsot@deloitte.co.za)

[Deloitte School of Tax Website](#)

Sincerely,

The Deloitte School of Tax Team



# Session 1: Morning (Day 1) - Corporate Tax Back to Basics

The introductory session will be an overview of the fundamental principles of corporate tax and will establish important building blocks for the upcoming sessions.

There is often a need for staff, at all levels, to have a more comprehensive understanding of some of the basic "corporate tax" principles in the Income Tax Act. So, for example, whether to treat an expense as revenue or capital in nature, and if capital, whether there is an allowance which may be claimed, and which is the correct allowance? These types of decisions can have a significant cumulative impact on the tax that a business pays or saves. The workshop will systematically work through a selection of relevant corporate tax principles where we often see mistakes or misunderstanding on the correct principles to apply.

The aim of the session is to assist participants to make the correct "tax decisions" when initially dealing with a set of facts, and thus to cut down on the amount of time spent on reviewing and correcting these decisions. Participants will be able to identify and understand the core principles behind key areas that affect any corporate tax calculation and will be equipped to take a more holistic approach to their work tasks.

## Agenda:

Topic	Content	Timing
Registration		8:00a.m. – 8:30a.m.
Setting the Scene	Basic framework of a corporate tax calculation.	8:30a.m. – 8:40a.m.
Gross Income	Focus on the definition of gross income, discussing the key principles of this definition.	8:40a.m. – 9:10a.m.
Exempt Income	Basics of exemptions seen in a corporate environment including dividends and Government Grants.	9:10a.m. – 9:30a.m.
Deductions	The deductions sessions will be split into three sub-sections: 1. The general deduction formula 2. The "special deductions" 3. Capital allowances. The session will be a high level introduction in anticipation of the fixed assets session on day two.	9:30a.m. – 10:15a.m.
Tea – 15 Minutes		

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Practical

Work through a practical example of a tax calculation starting with net profit before tax.

10:30a.m. – 12:15p.m.

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Wrap-up & Questions – 15 Minutes

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Session Ends

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## **Session 2: Afternoon (Day 1) - Capital Gains Tax**

The session will commence with a revision of the key basic mechanics of capital gains tax. Having established this basic platform, we will then move onto a discussion of where capital gains items are disclosed on the new ITR14 Tax return for companies, discussing the basic principles and related recent amendments relevant to the workings and disclosure required on the ITR14.

With the spate of recent and proposed amendments relating to debt and interest deduction restrictions, an understanding of the tax implications of the impact of a waiver or reduction of debt is of fundamental importance to understand. As a preparer or reviewer of an income tax calculation, it is also important to understand the many capital loss restrictions in place in the Income Tax Act, and we include a discussion of the key paragraphs and sections in the Income Tax Act which will adjust, disregard or ring fence a capital loss, that you as a preparer or reviewer need to be aware of.

We also find that there is still confusion relating to company distributions, and have prepared a session which discusses the basic principles relating to distributions, and then which also focuses on the impact of specific types of transactions, including share buy-backs and returns of capital, both to the company making the distribution and to the company receiving the distribution.

Finally, we pick up on certain specific topics which we believe will be of interest, including the CGT impact where assets are acquired or disposed of for unquantified amounts, tax planning opportunities around replacement assets, and the impact of CGT on your provisional tax estimates and payments.

## Agenda:

Topic	Content	Timing
Introduction	<p>This session will cover the basic principles of CGT and includes:</p> <ol style="list-style-type: none"><li>1. Introduction and overview of the core rules</li><li>2. Disposals and deemed disposals</li><li>3. Basic CGT calculation</li><li>4. Determination of proceeds</li><li>5. Determination of base cost</li><li>6. Determination of aggregate capital gain or loss</li><li>7. Inclusion of capital gain in taxable income</li></ol>	1:00p.m. – 2:00p.m.
ITR14 CGT disclosure requirements	<p>This session will cover the ITR14 CGT disclosure requirements relating to the disclosure of capital gains/losses. The session will include a discussion of the treatment of foreign capital gains/losses.</p>	2:00p.m. – 2:10p.m.
Waiver of debt	<p>Various recent amendments to Income Tax legislation have meant that taxpayers have had to focus more closely on their debt structure. This session will cover the income tax and CGT principles in respect of the waiver of debt, both from the creditor and the debtor's perspective, including:</p> <ol style="list-style-type: none"><li>1. The basic CGT and income tax implications of waiver/reduction of debt</li><li>2. Waiver of debt in a group of companies</li><li>3. Waiver of debt in course of liquidation or deregistration</li><li>4. Waiver of debt vs conversion of shareholder loans</li></ol>	2:10p.m. – 2:35p.m.
Tea – 15 Minutes		

Capital losses	<p>You have calculated a capital loss on a transaction, but are you aware of all of the sections and paragraphs in the Income Tax Act which impact on how you have calculated this loss, and whether you may need to disregard or ring fence this loss? This session will cover a selection of paragraphs and sections in the Income Tax Act which impact on the amount, and use of, a capital loss which a taxpayer may claim. This will include discussion on:</p> <ol style="list-style-type: none"> <li>1. Kink tests where there are losses on assets valued on valuation date</li> <li>2. para 56 and 39 - disposals between connected persons</li> <li>3. para 39A - disposal of asset for unaccrued amounts of proceeds</li> <li>4. para 19 - "dividend stripping" losses on disposal of certain shares</li> <li>5. para 42 - "bed and breakfasting" short term disposals and acquisitions of identical financial instruments</li> <li>6. para 43A - dividends treated as proceeds</li> <li>7. para 64B - disposal of equity shares in foreign companies</li> <li>8. section 45(5) - disposal by transferee company within 18 months after acquiring in an intragroup transaction</li> <li>9. section 103(2) - assessed loss anti-avoidance provisions</li> </ol>	2:50 p.m. – 3:35p.m.
Value-Shifting arrangements	The value-shifting provisions are directed at a particular type of tax avoidance and are contained in a number of different paragraphs. This session will provide an understanding of what a value-shifting arrangement is and the CGT impact thereof.	3:35p.m. – 3:45p.m.
Company distributions	<p>This session will cover the CGT implications of distributions by companies, including:</p> <ol style="list-style-type: none"> <li>1. Returns of capital</li> <li>2. Dividend in specie</li> <li>3. Share buy-backs</li> <li>4. Liquidation distributions</li> </ol>	3:45p.m. – 4:15p.m.
Unquantified and unaccrued amounts	This session will cover the CGT treatment where assets are acquired or disposed of for unquantified amounts.	4:15p.m. – 4:25p.m.
Allowance assets	This session cover the CGT principles that apply on the disposal or replacement of an allowance asset and certain practical implications on disposal.	4:25p.m. – 4:35p.m.
CGT and provisional tax	Provisional taxpayers are required to make an estimate of their taxable income that will be derived for a year of assessment for the purposes of determining their first and second provisional tax payments. Are you aware of the rules which determine into which of these estimates capital gains needs to be included?	4:35p.m – 5:00p.m.

Session Ends

# Session 3: Morning (Day 2) - Fixed Assets and Capital Allowances

This session is a refresher course aimed at revising the basic and fundamental tax principles regarding fixed assets. The workshop focuses on a basic tax theoretical framework to apply when making decisions on how to classify expenditure incurred relating to fixed assets, for example, whether to capitalise or not, and if capitalised, which allowance to correctly apply.

The workshop will address the key income tax principles regarding capital allowances of the major categories of fixed assets with a focus on the practical application thereof using examples. The workshop will also address the tax principles regarding leased assets and common mistakes made in practice regarding the tax accounting of leased assets, as well as key relevant capital gains tax principles to apply.

All participants will receive a training manual which will contain the essential information on the key tax principles that they will then have as a reference source after the training session.

## Agenda:

Topic	Content	Timing
Registration		08:00a.m. – 08:30a.m.
Basic Theoretical Framework: Classification of expenditure	We will discuss the basic tax theoretical framework to apply when making decisions on how to classify expenditure incurred relating to “repairs and maintenance” and will focus on the following key sections of the Income Tax Act: <ol style="list-style-type: none"><li>1. Section 11(a) &amp; 23(g) - General deduction formula</li><li>2. Section 11(d) - Deduction of expenditure on repair of property</li></ol> The session will focus on the practical application of the theoretical framework to common examples which are encountered in practice.	08:30a.m. – 9:15a.m.
Capital Allowances	This session will work through the key principles of the main categories of assets allowances, including recoupments and capital gains tax principles. The session will cover: <ol style="list-style-type: none"><li>1. Section 11(e) Wear &amp; tear allowance on non-manufacturing plant or equipment</li><li>2. Section 12B Renewable energy allowance</li><li>3. Section 12C Manufacturing plant or equipment allowance</li><li>4. Section 13(1) Manufacturing building allowance</li><li>5. Section 13quin Commercial building allowance</li></ol> We will work through examples focusing on the practical application of the theory of the key areas covered in the session.	9:15a.m. – 10:30a.m.
Tea – 15 Minutes		

Capital Allowances	Session Continues	10:45a.m. – 11:10a.m.
Leased Assets	<p>This session will refresh the key principles regarding the tax treatment of leased assets, including recoupments and capital gains tax principles. We will also work through basic examples on order to understand the practical application of these principles.</p> <p>In this session we will cover:</p> <ol style="list-style-type: none"> <li>1. Capital allowances available to lessor and lessee: <ul style="list-style-type: none"> <li>- Section 11(g): Leasehold improvement allowance</li> <li>- Section 11(f): Deduction of lease premiums</li> <li>- Section 11(h): Lessor Special Allowance</li> </ul> </li> <li>2. Section 8(5) recoupments</li> <li>3. Limitation of deductions available to lessor (Section 23A)</li> <li>4. Sale and leaseback arrangements (Sections 23D &amp; 23G)</li> <li>5. Tax accounting treatment of operating and finance leases</li> </ol>	11:10a.m. – 12:15a.m.
Wrap-up & Questions – 15 minutes		
Session Ends		

## Session 4: Afternoon (Day 2) - Completing the Company Tax Return

### Agenda:

Topic	Content	Timing
Registration		12:30p.m– 13:00p.m.
Before completing the ITR14	A Company must verify and update their legal entity data (public officer details) etc. on a separate form, the RAV01.	13:00p.m.– 13:10p.m.
Information to create the ITR14	This session will work through explanations of each of the key sets of questions which a taxpayer must complete on the first page of the ITR14, inclusive of the new questions which have been added in the latest version.	13:10p.m.– 15:00p.m.
Tea Break – 15 minutes		
Information to create the ITR14	Session continues	15:15p.m.– 16:10p.m

Completion of the ITR14	This session will consider and discuss the key areas of the tax return to complete that have not yet been discussed in the "information to create the ITR14" session.	16:10p.m.– 16:30p.m.
Submission of the ITR14	Do you know what needs to be uploaded with the ITR14? In this session we will discuss all the supplementary documentation that is required to be uploaded on eFiling	16:30p.m.– 16:50p.m.
Corrections to the ITR14	I have made a mistake in submitting my tax return - what now?	16:50p.m.– 17:00p.m.
Session Ends		

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