



## **Deloitte School of Tax & Legal** The Debt Forgiveness & Anti-Dividend Stripping Rules

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We have the pleasure of inviting you to our **Debt Forgiveness & Anti-dividend Stripping Rules Workshop** aimed at assisting your business in navigating the amendments to these important structuring sections. The rules around debt forgiveness as well as the anti-dividend stripping rules have been areas of focus by the policy makers lately with far reaching amendments being made to relevant sections of the Income Tax Act.

The workshop will cover the latest developments in the debt forgiveness and dividend stripping landscape in South Africa. Particular focus will be on the aspects of wider implications of the recent amendments and issues impacting your business.

The session will provide insight into the rationale for the changes, the practical challenges that arise from the amendments as well as a discussion around the direction that the legislation is intended to go in, in future.

The agenda for the workshop is as follows:

Topic	Content	Timing
Registration		8:00a.m. – 8:30a.m.
Background landscape to debt forgiveness	This session will look at how the debt forgiveness rules in South Africa came into being, past treatment of debt forgiveness and the rules prior to the 2017 amendments	8:30a.m. – 09:15a.m.
Reasons for 2017 amendments	The purpose of this session is to look at the rationale behind the amendments brought about by the Taxation Laws Amendment Act, 2017.	9:15a.m. – 09:45a.m.
Current legislation including 2017 amendments	This session will explore the recent debt forgiveness related developments including; <ul style="list-style-type: none"> <li>• Definition of 'debt benefit'</li> <li>• Definition of 'concession / compromise'</li> <li>• New s19 group exclusion</li> </ul>	09:45a.m. – 10:30a.m.
Tea – 15 Minutes		
Current legislation including 2017 amendments	Session continues, focusing on specific mechanics of debt forgiveness application <ul style="list-style-type: none"> <li>• Legal meaning of waiver of debt</li> <li>• Debt being extinguished by prescription</li> <li>• Settling debt at market value</li> <li>• Redeemable preference shares</li> <li>• Meaning of 'debt'</li> </ul>	10:45a.m. – 11:05p.m.
The future of debt forgiveness legislation	The focus of this session is discussions with national treasury on feedback that they have received from stakeholders and where they intend to take legislation in the next round of amendment acts.	11:05p.m. – 11:35p.m.
Anti-dividend stripping rules	This session will cover <ul style="list-style-type: none"> <li>• Background to the anti-dividend stripping rules</li> <li>• Rationale for 2017 amendments to these rules</li> <li>• Current legislation and practical challenges</li> <li>• Future of the anti-dividend stripping rules</li> </ul>	11:35a.m. – 12:25p.m.
Wrap-up & Questions		

## Facilitators:

### **Karen Van Wyk (Johannesburg)**

Karen is a chartered accountant. She has a passion for taxation and has lectured at a post-graduate level at the University of Johannesburg and the University of the Witwatersrand. She has also been involved in various initiatives of the South African Institute of Chartered Accountants (SAICA), lecturing on the Thuthuka programme and marking and umpiring the Initial Test of Competence (formerly known as the Qualifying Examination Part 1 for trainee accountants). Karen is also a regular presenter of advanced taxation CPD sessions and webinars.

### **Lance Collop (Cape Town)**

Lance is a qualified chartered accountant. He has been with Deloitte for eight years. He consults widely on all aspects of corporate tax and international tax and works with clients in a wide range of industries.

Lance also facilitates internal and external training sessions at Deloitte and has also lectured at the University of Cape Town on postgraduate taxation courses.

Lance has been involved in a number of due diligences and tax structuring assignments, many of which have been cross border assignments where he has worked with various Deloitte offices across Africa and Europe.

## Dates and Venues:

The workshops will be held at our Deloitte offices on the below dates:

**21 August 2018** Johannesburg

**22 August 2018** Cape Town (Please note date change, previously 24 August 2018)

## Cost:

R1 794 (inclusive of VAT) / R1 560 (exclusive of VAT)

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.

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 the 10% discounts

## Cancellation Policy:

Our standard cancellation policy is to invoice 50% of the cost of the workshop for attendance not cancelled within 2 business days of the planned session date. This is to recover the overhead costs incurred relating to your planned attendance and the cost of the course material.

Time:

**8:30 a.m. – 12:30 p.m.** (Registration from 8:00)

The course 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 & Legal 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 20 people at once.)

[Register Here](#)

Course Material:

In the interests of the environment, and to move with technology, this will be a paperless course. We will email you the course material within 2 business days 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 & Legal Website](#)

Sincerely,

The Deloitte School of Tax & Legal Team



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