



Call us Now  
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6 October 2006

Dear Executive

In my experience as a tax lawyer and tax risk specialist consulting with large corporates, it has become apparent that tax compliance as we generally know it, really only takes up 25% to 30% of an organisation's total tax risk, leaving 70%-75% exposed in unidentified areas.

You might believe that a comprehensive tax compliance strategy puts you in a more comfortable position with your tax risk. However, ignoring the other areas of tax risk, yet unidentified, will continue to expose your organisation into the future.

Statistics show how tax collections by SARS over the past six years have leapt by 300% for corporates generally as SARS have closed the tax gap. SARS have got their act together. They have done this by forming specialised assessment units, and assessor teams. South African corporates can expect to be audited by SARS on an ongoing basis.

In conjunction with my work in South Africa, I have undertaken significant research in the USA, UK, Canada and Australia to enhance my knowledge of this topic. The upcoming Tax Risk Masterclass for Executives crystallizes essential skills and insights into a practical framework for managing tax risk and the SARS relationship with your organization.

I would like to extend my personal invitation to you and your senior management team to attend on the 14<sup>th</sup> & 15<sup>th</sup> November 2006, as well as participate in the High-level Discussion Forum and Case Law Workshop on the 16<sup>th</sup> November (also available as a separately bookable day).

I have included some detailed information on my credentials and the agenda we will cover during the class.

I urge you to take advantage of this opportunity to quickly and effectively update your skills in this critical area – the class size has been limited, so book now to ensure your place. ONLY 30 PEOPLE may attend - this programme will be highly participative, focused and interactive.

***Call us now on 011 706 4565 to book or if you have any queries. We look forward to hearing from you, and meeting you on this prestigious event.***

Best wishes and kind regards,

***Daniel Erasmus***

Attorney and Tax Risk Specialist

## Daniel Erasmus is a

pioneer in the area of The Constitutional Rights of Taxpayers, and is at the forefront of tax research in this area. Daniel lectures extensively on various specialist subjects in the field of taxation in South Africa and abroad.

Daniel started his tax career in 1985 at Deloitte & Touche. Shortly thereafter he joined the tax department of Hofmeyr Attorneys, where he was soon appointed equity director of that firm. He left to form his own tax law firm, attracting various multinational clients, and later headed the tax department of former 100 year old law firm Moss Morris.

He is co-founder and former lecturer of Rand Afrikaans University's Diploma in Tax Practice programme, co-authored VAT for Lawyers: A Guideline; CGT: A Guideline, and more recently Butterworth's Amnesty Handbook.

Daniel has recently completed an 8 week course on Tax Risk Management, presented by GIBS (Gordon Institute of Business Science).

Many sources of information on tax issues are highly technical, jargon-ridden and complex to apply on a practical basis in the myriad of situations that organizations face. Daniel Erasmus has the unique and compelling ability to bring case studies to life, make the implications clear and provide simple, relevant frameworks for going forward. His reviews resound with appreciation for his talent at keeping the audience alert and participating, even through the unraveling of difficult sections of tax law.

This unique programme has been designed by Daniel Erasmus, specifically for senior tax executives.

### The consequences of tax exposure can be irreversibly severe.

Can you **CONFIDENTLY** answer the following questions? Call us Now to Book your Place on the Tax Masterclass and ensure your organization's future tax health.

- Where do you think your **greatest Tax Risk** lies?
- What is your documented **tax policy/strategy**?
- How good is your tax departments's **communication** with the rest of your organization?
- Do they understand what your organisation's **REAL TAX RISK** is?
- Do you know how **Corporate Governance** affects **Tax Risk Management**?
- How do you manage your relationship with your **largest business partner, the South African Revenue Service**?

### By the end of this programme you will:

- Build a capability to **draw SARS to a level of interaction at an administrative level** where litigation is avoided
- Enhance your techniques of **reviewing and adjusting tax department objectives** to reflect all changing demands – both external to and within the organization
- Develop the skills to **create proper systems in line with SOX 404** work to incorporate all areas of tax risk
- Plan for **optimal communication and co-operation within your organization**, ensuring a high degree of tax awareness in the business, and facilitating this starting at board level through to key managers
- Develop the mindset that **SARS should be seen as a business partner** with the rest of the business to facilitate a good relationship
- Understand why corporate South Africa has not kept up with the developments in the taxation industry and are currently overwhelmed by compliance issues and multiple assessments being served on them
- Know how to design and create **efficient and lean operational processes**
- Understand the relationship between general management and **governance on tax risk management**
- Become aware of **regulatory changes** and be able to **educate your organization** effectively around them
- Gain insight into **reviewing transactions in light of legislative and regulatory changes, consistency of legal arguments and concentration of risk**
- Comprehend the importance of **getting involved with the audit committee** of the organization
- **Understand the impact that SARS has on corporations since their formation of specialized assessment units and assessor teams**
- **Understand historic tax issues** and the positive impact that establishing an ongoing relationship with SARS will have on their organisations

You will be a part of a **restricted senior level audience**, composed of fellow Senior Managers, Financial Directors, Accounting and Legal Professionals, Tax Managers and Directors, Risk Managers and Directors, Corporate Lawyers, Managing Directors, and Chief Financial Officers.

This practical, intensive class will take a minimum amount of your time out of the office to ensure a measurable and vital increase in your skills in managing the tax risk in your organization.

#### When you book on this executive programme, you will receive:

- Instruction from one of South Africa's foremost tax risk experts over 2-3 days
- PLUS delegate documentation
- Full hospitality including a 3-course lunch and refreshments on each day
- Free parking in a secure area
- A FREE 1-year subscription to Tax Talk magazine and the weekly newsletter – the publication that keeps **individuals and corporate tax executives** abreast of current tax developments...valued at over R600!

# Agenda

## 14 November

### {TRM} Tax Risk Management Systems

- Introduction: Tax Morality; Legality & Fraud
- Tax Risk Management and the Constitution

### (SARS) The South African Revenue Service

- An introduction to SARS
- The Forming of Specialised Tax Assessment Units
- The (LBC) Large Business Centre, Megawatt Park

### Tax Risk Assessment & Tax Compliance

- Assessing your Tax Risk Profile
- Your potential tax gap
- Guidance on how to address and manage your tax risk going forward Methodology for finalizing major tax risk problems
- Managing the assessment & settlement of tax risk areas

## 15 November

### (Cont)

- Addressing tax sensitive Tax Risk issues
- Ongoing Tax Queries in the corporation
- Identifying tax risk in your company
- Why is a skilled trial advocate part of your legal team?

### Tax Planning

- How big is the Tax Planning opportunity?
- How big should it be?
- Where do the opportunities lie?
- Where is the Tax Planning done?
- Who is ultimately responsible for the tax planning in the corporation?

### Taxpayer's Fundamental Constitutional Rights

- Assessments & Post Assessments
- Taxpayer's fundamental Constitutional Rights;
- Enquiry Phase, Delegation of Powers & Discretion, Enquiry Provisions
- Secrecy Provisions, Information Provisions
- Pay-now-argue-later ("PNAL") principal

## 16 November

### Practical Tax Workshop

#### Case Studies:

- A case against additional tax or penalties in tax
- Tax Business Partnering: Guest Speaker - Forensic Audits
- A Corporate Case Study: DVD Speaker Presentation – How a major multi-national got their tax risk management {TRM} in order - The Tax Strategy.
- A World Class Tax Risk Management Team: Guest Speaker: The Tax Strategy

Each of the 3 days will run according to the following time schedule:

Registration & Early Morning Refreshments	- 07:30
Start	- 08:00
Tea & Coffee	- 10:00 – 10:30
Lunch	- 12:00 – 13:00
Tea & Coffee	- 14:30 – 15:00
End	- 16:30

### Special EARLY BIRD Offer

Book and Pay before the 16<sup>th</sup> of October, and you will receive a 1 hour private tax risk consultation with Daniel Erasmus (**valued at R3500**) **absolutely FREE**.

## RAVE REVIEWS!!!

"I found the seminar **very informative**. Daniel certainly has a good handle on his subject and has the ability to transfer knowledge in a **very clear manner**."

- Claudelle von Eck, Manager, SAICA, 2002

"**One of the best** Tax seminars I have attended: **direct and to the point!**"

- W. Coetzee, Willem Coetzee Inc, 2005

"Knowledge of the interaction of the South African tax legislation and the constitution is a **vital component** for dealing with the South African Revenue Service. Daniel Erasmus delivered an **excellent presentation** to our people, together with course notes, which concisely demonstrated this interaction."

Deborah Tickle, Partner: Tax Services, KPMG, 2003

## Reviews from GIBS Strategic Risk Management Class, 2006

"Daniel is an **energetic and captivating** lecturer"

"Excellent course for **high level strategic purposes**"

"Daniel has **remarkable preparedness to share his "trade secrets"** and is a **consummate speaker** and lecturer"

"It's been a privilege to be coached in his **incisive thinking and strategic tax game plan**"

"It is not easy to stay awake and benefit from new material after long days in the office, but **this course was easy to concentrate in and fun at the same time** - Quite a feat!!"

"Good practical course – **first of it's kind** to explain SARS process and responses that can be used"

"Many thanks for sharing this **valuable information**"

- S. Godfrey, Ernst & Young, 2005

**CALL US NOW on [011 706 4565](tel:0117064565) to book – See the next page for the Registration Form**

