

**TAX EXEMPTION UNIT**



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**Reference \***  
RG/0020/07/07

**PBO File No. \***  
930 023 319

**Date**  
4 July 2007

Ms. E Wessels  
KPMG Services (Pty) Ltd  
PO Box 4609  
CAPE TOWN  
8000

**South African Revenue Service**

SARS: TEU  
Pro-Equity Court  
1250 Pretorius Street  
Hatfield, 0028

PO Box 11955  
Hatfield, 0028

Switchboard: (012) 422 8800  
SARS online: [www.sars.gov.za](http://www.sars.gov.za)  
E-mail: [teu@sars.gov.za](mailto:teu@sars.gov.za)

\*Please quote our reference numbers in  
your correspondence with TEU.

Dear Madam

**EXEMPTION FROM TAXES AND DUTIES AND APPROVAL IN TERMS  
OF SECTION 18A: GROOTBOS GREEN FUTURES FOUNDATION**

We write with reference to your fax dated 18 May 2007.

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 organisation 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;

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- 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.
  - 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 relevant exemptions are subject to the following conditions:
- 2.1 Annual returns of income be submitted to the Tax Exemption Unit, together with financial statements and supporting documentation which must include full particulars of the receipts issued in respect of tax deductible donations in terms of section 18A and how these funds were expended;
  - 2.2 The following information must be given on the tax deductible receipts issued:
    - 2.2.1 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.)
    - 2.2.2 the date of the receipt of the donation;
    - 2.2.3 the name of the public benefit organisation, which received the donation, together with an address to which enquiries may be directed in connection therewith;
    - 2.2.4 the name and address of the donor;

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- 2.2.5 the amount of the donation or the nature of the donation (if not made in cash); and
- 2.2.6 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.
- 2.3 The public benefit organisation must, formally amend the founding document to comply with the provisions of section 30 of the Income Tax Act within a period of 12 months from the date hereof.
- 2.4 The exemptions approved in paragraph 1 above, are subject to review on an annual basis upon receipt of the financial statements.

Sincerely



Mrs. RM Gomes

Tax Exemption Analyst

for THE COMMISSIONER SOUTH AFRICAN REVENUE SERVICE



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Mr Michael Lutzeyer  
Grootbos Green Futures Foundation  
PO Box 148  
Gansbaai

Our ref 134836

23 July 2007

Dear Michael

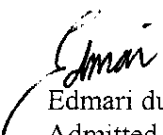
**Exemption from taxes and duties and approval in terms of section 18A: Grootbos Green Futures**

Please find attached the original letter received from the South African Revenue Service ("SARS") confirming that the Grootbos Green Futures Foundation has been approved as a public benefit organisation and was approved for the purposes of section 18A. We include certified copies of the original letter for your use.

Should you have any queries in this regard, please do not hesitate to contact us.

Yours sincerely

KPMG Services (Pty) Ltd

  
Edmari du Plessis  
Admitted Attorney  
*Senior Manager, Tax Services*

cc:

Sean Privett  
Joan de Villiers

KPMG Services (Proprietary) Limited, a company incorporated under the South African Companies Act and a member firm of the KPMG network of independent member firms affiliated with KPMG International, a Swiss cooperative.

KPMG Services (Proprietary) Limited is not a Registered Auditor in terms of the Auditing Profession Act, 26 of 2005 and does not provide audit services as defined in Section 1 of this Act.

Policy Board: RM Kgosa (Chairman) TW Grieve (Chief Executive)  
TH Bashall BG Bauer DC Duffield J Geel A Hari TH Hoole  
D Jackson GI Maile AM Mokgabudi CM Read YGH Suleman  
D van Heerden JM Vice

The company's principal place of business is at KPMG Crescent, 85 Empire Road, Parktown, where a list of the directors' names is available for inspection.

Registration number 1999/012876/07  
FSP number 8484