



Tax & Legislative Information Series...

... Foreign Based Employees



Last updated – April 2021
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- **Some Background Information**

- As of 1 March 2001 certain new ***laws regarding the taxation of remuneration earned by foreign based employees came into effect:***
 - Prior to March 2001 SA was a ***source based tax regime***, meaning that it was assumed that in whichever country the SA tax resident earned remuneration, such remuneration was taxed in accordance with that country's tax rules and deducted accordingly.
 - As such the ***remuneration was not taxed under the SA tax system.***
 - In March 2001 SA moved to a ***residence based tax regime***, meaning that SA tax residents, no matter where they worked in the world, ***would be taxed on their worldwide income.***
 - This did cause issues where ***double taxation on the same income*** became a reality and as such ***double taxation treaties/agreements*** were entered into between SA and many foreign countries to avoid this problem.
 - Later ***section 10(1)(o)(ii) of the Income Tax Act*** was introduced which allowed for an ***exemption (under certain circumstances) from income SA tax.***

- **Some Background Information**

- ***Section 10(1)(o)(ii) of the Income Tax Act:***

- The individual had to provide employment services outside SA for ***183 days, of which 60 had to be consecutive, in a 12 month period.***
- There have been some Interpretation Notices issued (4, 16, 34) which explain ***what constitutes a “day”***. (i.e. a day in transit, time of day, etc), which are worth reading.
- This section was introduced to ***prevent the individual from paying tax twice*** on the same income.
- If the exemption requirements were met, then relief from double taxation is provided by ***6quat***, which ***allows for a tax credit against the tax paid on employment income earned by the Employee in the foreign country.***
- NB - In the case of ***non-residents*** (i.e. inbound employees) – they ***only get taxed on what they earn in SA.***

- **Some Background Information**

- Further changes were made regarding tax on foreign earnings which ***came into effect from 1 March 2020:***
 - Prior to March 2020, SA ***tax residents received a tax exemption*** on their foreign earnings if they met the “days” requirement.
 - This ***exemption was removed and tax was due on all remuneration earned*** whilst in a foreign country. This resulted in many SA tax residents being potentially liable for up to 45% on their foreign earnings.
 - After much debate/resistance ***an annual earnings/remuneration threshold of R 1 000 000 was introduced***. This meant that only earnings/remuneration above R 1 000 000 p/a was subject to SA tax. This limit was ***later increased to R 1 250 000 p/a***. (effective March 2020)
 - This meant that only earnings/remuneration ***above R 1 250 000 was subject to SA tax***.
 - With ***the 6quat provision***, a tax credit equal to what tax had already been paid in the foreign country was allowed, ***thus ensuring that tax on those earnings/remuneration was not paid twice***.

• Some Background Information

- Further changes were introduced which ***came into effect from 1 March 2021:***
 - ***Phasing out of exchange control*** treatment of individuals commenced.
 - It was replaced with a more stringent verification test /process for those individuals who wanted to move more than R 10 mil out of SA – i.e more than the max investment allowance.
 - The ***new process includes:***
 - A ***risk assessment***/management test;
 - A more thorough ***check on tax status;***
 - Verification of ***source of funds;***
 - Compliance with ***anti-money laundering*** requirements;
 - Countering ***terror financing*** initiatives and activities.
 - Natural person emigrants and natural residents to be ***treated in exactly the same manner from a tax perspective.***
 - The current restrictions on emigrants being allowed to invest, the requirement to operate a blocked account, have bank accounts and their ability to borrow in SA, ***will be repealed.***

- **So, how does section 10(1)(o)(ii) work in practice**
 - The section 10(1)(o)(ii) exemption ***only applies if an employment relationship exists*** – i.e. that the services provided by the individual are rendered for or on behalf of the employer ***under a formal employment contract***.
 - The exemption applies ***irrespective of whether or not the employer is a resident or not***.
 - However, the exemption ***does not apply*** to independent contractors or self-employed persons.
 - ***Other excluded individuals*** are:
 - Public office holder appointed or deemed to have been appointed under an Act of Parliament;
 - Employees in the employ of national, provincial or local government, certain constitutional institutions, national, provincial public and municipal entities.

About – Foreign based Employees

- **So, how does section 10(1)(o)(ii) work in practice**
 - The income earned and tax paid ***has to be confirmed*** by the employer in that foreign country – has its challenges re GDPR. (i.e. international equivalent of POPI)
 - If there is ***income earned in SA and also in a foreign country*** then:
 - SA income ***taxed according to SA rules*** (normal IRP5 totals) – no section 10(1)(o)(ii) exemption;
 - Foreign income ***taxed according to SA rules for foreign earnings*** (foreign IRP5 totals) – section 10(1)(o)(ii) applies. NB Code 4587 “exempt amount” must be completed;
 - If a share benefit, for example, accrues to the employee over a 5 year period (e.g. 2.5 years whilst working in SA and 2.5 years whilst working outside SA) then this ***needs to be split accordingly on payout;***
 - Certain ***remuneration elements/benefits get moved to “foreign earnings” to save on tax*** – i.e. falls in the ambit of the R 1 250 000 exemption. Be careful – get advice.

- **So, how does section 10(1)(o)(ii) work in practice**
- **Remuneration:**
 - “exempt” remuneration in this instance is *more limited when compared to the definition of remuneration in the Fourth Schedule:*
 - *Accommodation*
 - *Amounts (broad based employee share plans)*
 - *Amounts received i.r.o aa share vesting*
 - *Bonus*
 - *Emoluments*
 - *Gratuity*
 - *Overtime*
 - *Special Medical Aid cover*
 - *Transport facilities/services*
 - *Allowances*
 - *Commission*
 - *Fees*
 - *Leave Pay*
 - *Salary*
 - *Taxable benefits*
 - *Wages*

- **So, how does section 10(1)(o)(ii) work in practice**
- **Remuneration:**
 - A BIG NB – all the previously listed benefits and allowances are **fully taxable:**
 - even if they are **provided due to necessity** – e.g. accommodation;
 - accommodation, for example, could be **very expensive** in a foreign country so the individual could be **heavily taxed on this benefit in SA**, despite it being an absolute necessity in enticing the individual to provide his services in that foreign country;
 - sometimes **circumstances or domestic legislation in the host country dictates the provision of free accommodation** to foreign workers – this gets expensive when adding it into the SA earnings pot for tax purposes!
 - These values all **count towards the exemption threshold** – so structuring remuneration “make up” is important!!

- So, how does section 10(1)(o)(ii) work in practice

- IRP5 Code 4587 “exempt amount”:
 - This code **will contain R 1 250 000**, in cases where **the employee earns more than this** or;
 - The **actual amount earned by the employee** if the earnings are **less than R 1 250 000**;
 - The **balance of remuneration is then subject to PAYE** – gets tricky!

SARS can review and make a final determination on assessment!!

Code	Description
	<ul style="list-style-type: none"> • ira the dependants or nominees of a deceased member of the fund. <p>Note: This code is valid from the 2017 year of assessment.</p>
4587	<p>Section 10(1)(o)(ii) exemption taken into account by the employer for PAYE purposes</p> <p>Only applicable from 2021</p> <p>Note: Basic Principles:</p> <ol style="list-style-type: none"> 1 The exemption remains an assessment determination by SARS (i.e. when the completed ITR12 return is submitted by the employee to, and processed by, SARS). 2 Employers are therefore required to declare the foreign service remuneration as per the SARS Business Requirements Specification: PAYE Employer Reconciliation or notices issued to employers in this regard. SARS will determine whether the exemption is allowable when processing the ITR12 return submitted to SARS by the employee based on the information provided in the ITR12 return together with the IRP5/IT3(a) certificate information submitted by the employer. 3 The possibility that the employee may qualify for the exemption does not automatically waive the obligation of an employer to deduct and pay PAYE. Where an employer is satisfied that the exemption will apply, the employer may choose not to deduct and pay PAYE. However, where the exemption is not allowed when the ITR12 of the employee is processed, the employer will be liable for the PAYE not deducted as well as the concomitant penalties and interest. 4 The following foreign service income source codes are included in the remuneration which qualifies for the s10(1)(o)(ii) exemption and which employers may take into account for calculating PAYE, if all requirements are met: <ul style="list-style-type: none"> • Income Source codes - 3651, 3655, 3656, 3657 • Allowance codes – 3751, 3763, 3767, 3768, 3772 • Fringe Benefit codes – 3851, 3852, 3855, 3856, 3858, 3859, 3860, 3863, 3866, 3867, 3870, 3875, 3878, 3879, 3881, 3883
4497	Total Deductions/Contributions

About – Foreign based Employees

- So, how does section 10(1)(o)(ii) work in practice

- Examples:

Item / Note	1	2	3
	Pre 2020	2020 no exemption	2021 with exemption
Total Remuneration - p/a	3,000,000.00	3,000,000.00	3,000,000.00
Exempt Amount	0.00	0.00	1,250,000.00
Taxable Portion of Remuneration	3,000,000.00	3,000,000.00	1,750,000.00
SA tax calculated	0.00	1,176,409.00	613,909.00
Net	3,000,000.00	1,823,591.00	2,386,091.00
less 15% tax paid in foreign country	450,000.00	450,000.00	450,000.00
total net tax	450,000.00	726,409.00	163,909.00
Net take home	2,550,000.00	1,373,591.00	1,936,091.00
Due to SARS	0.00	726,409.00	163,909.00
Saving			-562,500.00

About – Foreign based Employees

- **Double Taxation – whats this about?**

- If the remuneration is above the R 1 250 000 threshold then the ***normal SA tax calcs/tables need to be applied;***
- Whatever the tax due is, the ***individual is liable for this amount;***
- The individual may well find that the appropriate ***tax has already been calculated and paid in the foreign country;***
- There is now a ***double tax issue*** at hand!!
- This generally happens where there is ***no tax treaty in place*** between SA and that foreign country. It's an agreement:
 - which normally ***determines the rules regarding sole taxing rights;***
 - deals with ***double taxation issues;***
 - as previously mentioned – ***6quat*** comes into effect and provides for relief.

Check if there is a DTA in place with that foreign country.

About – Foreign based Employees

- **Some key “take aways”!**
 - Always ***get professional advice*** – this can be a minefield. Structuring for high earners with a multitude of allowances and benefits can get complicated particularly when:
 - Some earnings are still in SA;
 - Majority of earnings are in foreign country.
 - Get it right – many of these credits etc ***can only be utilized on assessment*** – causes cash flow issues for the individual;
 - ***Deduct/provide for the correct amount of tax each month*** – if you don’t there could be expensive surprises for employees on assessment;
 - ***Get a directive*** which factors in tax on the local earnings – see the potential difference.

About – Foreign based Employees

- The importance of a directive!

Scenario 1

Scenario 2

Item / Note	Normal Tax		Item / Note	Normal Tax	
	Tables / Rates	Directive		Tables / Rates	Directive
Total Remuneration	2,000,000.00	2,000,000.00	Total Remuneration	3,000,000.00	3,000,000.00
Exempt Amount	1,250,000.00	1,250,000.00	Exempt Amount	1,250,000.00	1,250,000.00
Taxable Portion of Remuneration	750,000.00	750,000.00	Taxable Portion of Remuneration	1,750,000.00	1,750,000.00
add SA Remuneration	200,000.00	200,000.00	add SA Remuneration	400,000.00	400,000.00
Taxable Income	950,000.00	950,000.00	Taxable Income	2,150,000.00	2,150,000.00
Tax Calculation			Tax Calculation		
Tax per tables	282,173.00	282,173.00	Tax per tables	793,909.00	793,909.00
Tax paid on the R200 000	20,286.00		Tax paid on the R400 000	76,490.00	
Directive - 44% on R200 000		88,000.00	Directive - 44% on R400 000		176,000.00
Less Foreign tax credit	200,000.00	200,000.00	Less Foreign tax credit	550,000.00	550,000.00
	61,887.00	-5,827.00		167,419.00	67,909.00
Scenario			Scenario		
Employee earns foreign remuneration of R 2 000 000			Employee earns foreign remuneration of R 3 000 000		
Tax deducted on this was R 200 000			Tax deducted on this was R 550 000		
Employee also earns R 200 000 in local remuneration			Employee also earns R 400 000 in local remuneration		
In column 1 - tax calculated on R 200 000			In column 1 - tax calculated on R 400 000		
In column 2 - tax directive of 44% on R 200 000			In column 2 - tax directive of 44% on R 400 000		

- **What happens on the IRP5**

- Standard codes to be used for foreign earnings recording - add 50 e.g.:
 - **Allowances:**
 - **3601** (Taxable Income - local) – **3651** (Taxable Income – foreign service)
 - **3606** (Commission – local) – **3656** (Commission – foreign service)
 - **3701** (Travel Allowance – local) – **3751** (Travel Allowance – foreign service)
 - **Deductions:**
 - **4587** (Exempt remuneration)

- **What happens on the IRP5**

6.1 Normal Income Codes

Code	Description	Explanation
3601 (3651)	Income (PAYE)	<p>An amount which is paid or payable to an employee for:</p> <ul style="list-style-type: none"> • Services rendered; <p>Examples include:</p> <ul style="list-style-type: none"> • Salary/wages • Backdated salary/wages/pension (Accrued in the current year of assessment) • Remuneration paid to migrant/seasonal workers/full time scholars or students; etc. <p>Note:</p> <ul style="list-style-type: none"> • For Years of Assessment 2003 to 2018, such income as paid to a director must be reflected under code 3615. • Code 3651 MUST only be used for foreign service income. • With effect from 2010 to 2019 years of assessment, amounts previously included under code 3607/3657 must be included in this code (3601/3651). • Amounts previously declared under codes 3603/3653 and 3610/3660 must be included under this code (3601/3651) in respect of the 2010 to 2012 year of assessment.

NB!



- What happens on the IRP5

Code	Description	Explanation
3602 (3652)	Non-Taxable Income (Excl)	<p>Any non-taxable income excluding foreign service remuneration for RSA residents that are exempt <u>i.t.o.</u> section 10(1)(o)(ii), non-taxable allowances and fringe benefits. This code accommodates all payments of a capital nature.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Non-taxable pension paid on a regular basis (e.g. war pension, etc.) excluding pension for foreign service income • Non-taxable income of a capital nature • Non-taxable portion of an arbitration award, where applicable. • Non-taxable portion of a compulsory annuity purchased from a retirement fund (e.g. due to non-residency and the relevant DTA). • Non-taxable (capital element) of a section 10A voluntary purchased annuity. • Non-taxable amounts paid on a regular basis (excluding lump sums) from a loss of income policy with effect from 1 March 2015 (2016 year of assessment). <p>Note:</p> <ul style="list-style-type: none"> • Code 3652 MUST only be used for foreign service income, <ul style="list-style-type: none"> ○ excluding foreign service remuneration for residents who must qualify for exemption <u>i.t.o.</u> section 10(1)(o)(ii) – use code 3651 ○ including pension/annuities paid from an RSA fund, received from a foreign fund <u>i.r.o.</u> services rendered outside the RSA • With effect from 2010 year of assessment, amounts previously included under codes 3604/3654, 3609/3659 and 3612/3662 must be included in this code (3602/3652).

NB!

- **What happens on the IRP5**

<p>3603 (3653)</p>	<p>Pension (PAYE)</p>	<p>Any compulsory pension or qualifying purchased annuity paid on a regular basis (from a pension or pension preservation fund) as well as backdated pension or compulsory purchased annuity payment (from a pension or pension preservation fund) (for current tax year).</p> <p>Note:</p> <ul style="list-style-type: none"> • Amounts paid on a regular basis i.t.o. a Loss of Income Policy up to 28 February 2015 (up to the 2015 year of assessment) • Code 3653 MUST only be used for foreign service income taxable in the RSA • The value of this code must be included in the value of code 3601/3651 for the 2010, 2011 and 2012 years of assessment. • This includes taxable disability benefit. • Valid for the 1999 to 2009 and from the 2013 years of assessment. The Foreign Service income codes (codes in brackets) are valid from the 2002 to 2009 and from the 2013 years of assessment.
<p>3604 (3654)</p>	<p>Pension (<u>Excl</u>) Not applicable from 2010 Year of Assessment</p>	<p>Any pension paid on a regular basis that is not taxable, for example war pensions, etc.</p> <p>Note:</p> <ul style="list-style-type: none"> • Code 3654 MUST only be used for foreign service income. • The value of this code must be included in the value of code 3602/3652 with effect from the 2010 year of assessment.

• What happens on the IRP5

Code	Description	Explanation
3605 (3655)	Annual payment (PAYE)	<p>An amount paid or payable to an employee which is defined as an annual payment.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Annual bonus • Incentive bonus • Leave pay (on resignation or encashment of leave credits) • Merit awards • Bonus/incentive amount paid to an employee to retain his/her service for a specific period; etc. <p>Note: Code 3655 MUST only be used for foreign service income.</p>
3606 (3656)	Commission (PAYE)	<p>An amount derived mainly in the form of commission based on sales or turnover attributable to the employee.</p> <p>Note: Code 3656 MUST only be used for foreign service income.</p>
3607 (3657)	Overtime (PAYE) Not applicable from 2010 to 2019	<p>An amount paid as overtime for rendering services. The tax on such payments is calculated as on income taxable.</p> <p>Note:</p> <ul style="list-style-type: none"> • Code 3657 MUST only be used for foreign service income. • The value of this code must be included in the value of code 3601/3651 with effect from the 2010 to 2019 years of assessment.
3608 (3658)	Arbitration award (PAYE)	<p>The taxable portion of a settlement agreement between an employer and an employee as ordered by Court or allocated via a settlement out of Court or in respect of Labour disputes.</p> <p>Note: Code 3658 MUST only be used for foreign service income.</p>

- **Common Questions**

- Many SA tax residents are already or are seeking to **work internationally**:
 - Some are **forced to due to there being no opportunity** in SA currently for them to apply their skill set; (i.e. limited to no work available)
 - Some are **seeking opportunity to increase their experience, increase their career opportunities** and/or simply to earn remuneration in a foreign currency (i.e. financial gain), either with a new foreign company or with a foreign branch of their current employer;
 - Some wish to simply **move to a foreign country on a permanent basis**;
 - In many instances **individuals intend to return to SA after a period** whilst others wish to remain a SA citizen but live/earn in a foreign country on a more permanent basis.

- **Common Questions**

- Irrespective of the motive and/or the planned period of being away, consideration needs to be given to:
 - The **nature of the work assignment** – i.e. is it as a formally employed person or as a person operating as an independent contractor;
 - The **tax implications** – ie the section 10(1)(o) exemption only applies to a formally employed individual and not to an independent contractor;
 - How the **remuneration** (i.e. when formally employed) will be structured in relation to salary VS allowances VS benefits, etc – they all have varying tax implications;
 - The **audit process** that they now need to go through; (i.e. from a SARS perspective)
 - The **need to financially emigrate or simply apply for the foreign investment allowance** – these can both have major financial implications depending on which route is followed;
 - **SARS has stepped up its scrutiny** of HNW individuals and those requesting clearance certificates to enable them work or move funds offshore.

- **Common Questions**

- Irrespective of the motive and/or the planned period of being away, consideration needs to be given to:
 - The tax rules relating to **how earnings are taxed in that foreign jurisdiction;**
 - What **tax treaties**, if any, are in place between SA and the foreign country that dictates how an individual's earnings and other income must be taxed;
 - Making sure that **passports/travel documents are kept up to date and accurate** – SARS will look at this when establishing the no of days outside SA (i.e. in accordance with the 183 day/60 day consecutive rule). Be aware that there are implications when working for a foreign company but actually performing the work from here in SA;
 - The various financial intelligence acts and tax treaties that are in place between SA and other foreign countries **provide for the sharing/flow of financial information about each others' citizens**, so SARS may know more about your earnings, income etc. in that foreign country than you think!!
 - In all cases – **get proper tax advice** to ensure you don't fall on the wrong side of SARS.

About – Foreign based Employees

- **Common Questions** - When are which codes on the IRP5 relating to Subsistence Allowances paid to be used?
 - Code 3704 (local payment – where payment **exceeds the permissible rates** as published by SARS - taxable)
 - Code 3705 (local payment – where the amount paid **does not exceed the permissible rates** as published by SARS – non-taxable)
 - Codes 3754 and 3755 to be used for equivalent foreign service income

Code	Description	Explanation
3704 (3754)	Subsistence allowance – local travel (IT)	An allowance paid for expenses in respect of meals and / or incidental costs for local travel, which exceeds the deemed amounts. Note: Code 3754 MUST only be used for foreign service income.
3705 (3755)	Subsistence allowance (Excl) Not applicable from 2010	An allowance paid for expenses in respect of meals and/or incidental costs for local travel, which does not exceed the deemed amounts. Note: <ul style="list-style-type: none"> • Code 3755 MUST only be used for foreign service income. • The value of this code must be included in the value of code 3714/3764 with effect from the 2010 year of assessment.

About – Foreign based Employees

- **Common Questions** - When are which codes on the IRP5 relating to Subsistence Allowances paid to be used?
 - Code 3716 (foreign travel – where payment **does not exceed the permissible rates** as published by SARS – non taxable) this code was discontinued in 2009

Code	Description	Explanation
3716 (3766)	<p>Subsistence allowance – foreign travel (Excl)</p> <p>Applicable from 2005 to 2009 year of assessment</p>	<p>An allowance paid for expenses in respect of meals and/or incidental costs for foreign travel, which does not exceed the deemed amounts.</p> <p>Note:</p> <ul style="list-style-type: none"> • Code 3766 MUST only be used for foreign service income. • The value of this code must be included in the value of code 3714/3764 with effect from the 2010 year of assessment.
3715 (3765)	<p>Subsistence allowance – foreign travel (IT)</p> <p>Applicable from 2005 year of assessment</p>	<p>An allowance paid for expenses in respect of meals and/or incidental costs for foreign travel, which exceeds the deemed amounts.</p> <p>Note: Code 3765 MUST only be used for foreign service income.</p>

• Common Questions

1. We have an employee who has been seconded to work for another company in another country to gain experience for the past 2 tax years, but our company (in SA) is still responsible for paying his monthly salary and we have been deducting tax from him. He is still providing services to our company. How do we record his income on the IRP5?
2. If we decide to give him the exemption on his salary, do we need to use the 183 days rule to determine if he qualifies?
3. He is also receiving subsistence allowance directly from the foreign company, do we have to record that on his IRP5? If so, which codes do we use.
4. Also do we need to worry about his pension contributions made in SA and the tax benefit received?

Your assistance will be highly appreciated.

Thank you.

- 1 - If the individual intends claiming under the Section 10(1)(o) exemption then you must declare his earnings on the IRP5 under the correct codes for foreign earnings (ie same as local codes – just add 50 to get the corresponding foreign code)
- 2 – yes - the 183 days / 60 consecutive day rule applies
- 3 – must be declared – code 3754 (if the amount paid exceeds the SARS allowed limit) and code 3755 (if the amount is not taxed as it is in line with the SARS allowed limits)
- 4 – yes - the contributions you make on behalf of the employee will attract FB tax – you need to make sure there is sufficient local earnings to cover this or there will be a tax liability on assessment

- **Common Questions - Will SARS consider the Tax paid in the Foreign Country on any earning paid out there? Overseas allowances etc. Salary is still paid in SA.**

1 – If the employee has been paid by the foreign company then ordinarily that country's tax rules would have been applied (ie there would have been tax deducted on those earnings). As such to avoid the double taxation issue there would a) normally be a treaty/agreement in place between SA and that country to avoid having to pay tax twice on the same earnings and b) SARS would take into consideration the tax already paid by the employee in the foreign country and reduce the SA calculated tax liability by that amount accordingly.

2 – If the employee meets the 183 day/60 day consecutive rule and is still paid entirely from the SA company then the section 10(1)(o) exemption applies on those earnings only that were accrued to the employee during that period of work outside SA. Any remaining amount (ie accrued whilst working in SA) will be taxed under normal SA tax rules.

- **Common Questions - Will SARS consider the Tax paid in the Foreign Country on any earning paid out there? Overseas allowances etc. Salary is still paid in SA.**

3 – the two groups of earnings - ie 1) whilst outside SA and 2) whilst working in SA, must be shown separately on the IRP5 using the relevant local and foreign service codes.

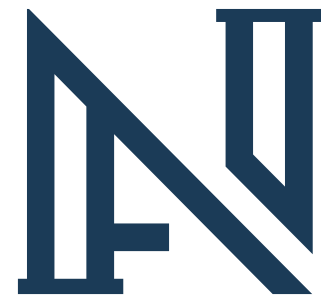
4 – if the benefits only (eg retirement fund/medical aid contributions made by the employer) are the only items paid in SA then there would still be a fringe benefit implication. As such if the employee did not have sufficient earning to accommodate the fringe benefit tax then this tax would be payable on assessment. Be careful how this is managed as it could cause interest and penalties implications for the employee and the employer.

- **Common Questions** – If a person is a non-citizen, but considered a resident, are the Emigration rules for RA payments of lumpsums the same?

Yes - rules will mostly be the same.

See:

<https://www.sars.gov.za/wp-content/uploads/Ops/Guides/IT-AE-33-G01-Tax-Directive-for-Emigration-and-cessation-of-visas-External-Guide.pdf>



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