



TAX EXEMPTION UNIT

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PBO No.*
930018108

Our Reference No.*
MM/049/10/05

Date
12 October 2005

The Trustee
9 Silwood Road
BRAMLEY
2090

Attention : Mr L. Hirschmann

South African Revenue Service

Tax Exemption Unit (TEU)

Pro – Equity Court
1250 Pretorius Street,
Hatfield
0083

PO Box 11955
Hatfield,
0028

Switchboard (012) 422 8800
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*Please quote both reference numbers in your correspondence with TEU.

Dear Sir

INCOME TAX EXEMPTION : THUSANANI CHILDRENS FOUNDATION TRUST

Your application for exemption from income tax refers.

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 donations by or to the public benefit organisation are exempt from donations tax in terms of section 56(1)(h) of the Act;
 - 1.3 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.

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1.4 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, and

1.5 the public benefit organisation is exempt from the payment of the skills development levy in terms of section 4(c) of the Skills Development Levies Act No, No. 9 of 1999.

2. Kindly note that the relevant exemptions are subject to the following conditions:

2.1 Annual returns of income and accounts must be submitted to the Tax Exemption Unit, together with a statement showing how the income has been expended;

2.2 The public benefit organisation will, if necessary, within a period of five years, formally amend the founding document to comply with the provisions of section 30 of the Act on or before 15 July 2006 or whenever an amendments is effected to the founding document, whichever date occurs first.

2.3 The exemptions approved in paragraph 1 above, are subject to review on an annual basis upon receipt of the financial statements.

2.4 Within 90 days from date hereof the following information relating to the public benefit organisation be submitted to this office :

2.4.1 Value Added Tax (VAT) reference number;

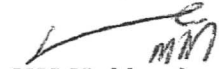
2.4.2 PAYE reference number;

If not registered for any of the above, please furnish reasons

2.5 Registered in terms of section 13(5) of the Non-Profit Organisations Act,1997, within a period of 12 months.

Please note that the Tax Exemption Unit is a dedicated national office that has been established by the Commissioner to provide a quality service to all our clients. Should you therefore have any further queries pertaining to tax exemption matters, please do not hesitate to revert to the undersigned at your earliest convenience.

Sincerely

A handwritten signature in black ink, appearing to be 'MM Makhushe', written over a horizontal line.

MM Makhushe (Ms)

Tax Exemption Analyst

for The Commissioner for the South African Revenue Services