

Our ref: 562287/jca

23 July 2007

The Klapmuts Renosterveld Conservancy PO Box 210 **Stellenbosch** 7599

Attention: Adèle Toua

PricewaterhouseCoopers Tax Services (Pty) Limited Reg-nr. 1993/008289/07 19 Oewerpark Rokewood Avenue Stellenbosch 7600 P O Box 57 Stellenbosch 7599 South Africa Telephone +27 (21) 808 0400 Facsimile +27 (21) 808 0501 www.pwcglobal.com/za

THE KLAPMUTS RENOSTERVELD CONSERVANCY TAX EXEMPTION

We refer to the above and confirm that your application for tax exemption has been approved.

Please find attached herewith the letter of confirmation from SARS for your attention.

Take special note of the conditions of exemption in paragraph 2.1 and 2.2 of the letter from SARS: The financial statements, returns of income and accounts, together with supporting documents that reflect the spending of income, as well as particulars of receipts in terms of section 18A, must be submitted to the Tax Exemption Unit annually; Specific information is required on the tax deductible receipts.

Do not hesitate to contact Jacoba Kotzé at (021) 887 2828 should you have any questions.

Kind regards

ILSE KOCH ESTATE ADVISOR

T P Blandin de Chalain - National Tax Leader

Executive directors – Stellenbosch H J Louw Bloemfontein G J Nel Durban P G Bailey, C Lakhani Johannesburg M P Badenhorst, T P Blandin de Chalain, J L Coetzer, S de Reus, L J le Grange, G P Lennox, T P J McCarthy, A D Seccombe, G M Seegers, G N M Soverall, J L van Rhyn, I Wilson Cape Town C G de Wet, C du Toit, D M Fairbank, D Lermer, A Seccombe, L Swanepoel, J P van Wyk Pretoria G Beckwith, B J Botha

TAX EXEMPTION UNIT

Enquiries MRS EJ VAN ZYL

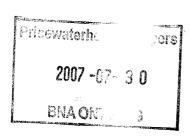
Telephone 012 422 8813

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Email evzyl@sars.gov.za

PBO Reference No 930023258

Date 23 July 2007



The Estate Advisor
PriceWaterhouseCoopers
PO Box 57
STELLENBOSCH
7599

Attention: Ms J Alberts



South African Revenue Service

Tax Exemption Unit (TEU)
Pro Equity Court
1250 Pretorius Street
Hatfield, 0083

PO Box 11955 Hatfield, 0028

SARS online: www.sars.gov.za Email: teu@sars.gov.za Switchboard: 012 422 8800

All correspondence must be addressed to The Head: Tax Exemption Unit at the abovementioned postal address.

Dear Madam

EXEMPTION FROM TAXES AND DUTIES AND SECTION 18A APPROVAL: KLAPMUTSKOP RENOSTERVELD CONSERVANCY

We write with reference to your application for exemption from income tax.

- 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;
 - 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 aforementioned Act;
 - 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 a 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 PBO 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;
 - 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 exemptions approved in paragraph 1 above, are subject to review on an annual basis upon receipt of the financial statements and income tax return.

Estelle van Zyl (Mrs)
Tax Exemption Analysi

A COMMISSIONER FOR THE SOUTH AFRICAN REVENUE SERVICE