Syllabus and study guide

Taxation South Africa (E1 ZAF)



December 2027

Designed to help with planning study and to provide detailed information on what could be assessed in any examination session.

Contents

1. Overall aim of the syllabus 3
2. Introduction to the syllabus 3
3. Main capabilities 4
4. Intellectual levels 4
5. The syllabus 5
6. Detailed study guide 6
7. Reading list 11
8. Approach to examining the syllabus 11
9. Guide to ACCA examination structure and delivery mode 11
10. Guide to ACCA examination assessment 12
11. Learning hours and education recognition 12

© ACCA 2027-2028 All rights reserved.

1. Overall aim of the syllabus

The overall aim of the syllabus is to develop and enable the application of technical knowledge and skills relating to the South African tax system as applicable to individuals and companies.

2. Introduction to the syllabus

The syllabus for E1 Taxation (E1 ZAF) starts by introducing candidates to the functions and systems applicable to South African tax, including sources of revenue law and practice, the system of assessment and the obligations of tax practitioners.

The syllabus then moves on to provide the core knowledge of the major technical areas of South African taxation as they affect the activities of individuals and businesses, beginning with income tax. The syllabus covers the taxation of income from employment, independent trades, property and investments, including the availability of exemptions and reliefs.

The next technical area covered by the syllabus is company tax including dividends tax for in-specie dividends. In particular the syllabus addresses the profits which are chargeable to company tax and how the company tax liability is calculated, including for small business corporations and micro businesses.

The syllabus then addresses the taxation of capital gains. The syllabus covers the basic principles of computing gains and losses and the computation of capital gains tax taking into account relevant exemptions and reliefs. Next in the syllabus is estate duty, where candidates are introduced to the principles of computing transfers of wealth and the estate duty liabilities arising on chargeable lifetime donations and on the death of an individual.

Lastly, the syllabus covers the scope, calculation and administration of value added tax (VAT).

© ACCA 2027-2028 All rights reserved.

3. Main capabilities

On successful completion of this course of study, candidates should be able to:

- Assess the operation and scope of the South African tax system, the obligations of taxpayers, their representatives, and tax authorities, and the implications of non-compliance
- Analyse and calculate the income tax liabilities of individuals
- Analyse and calculate the income tax liabilities of companies
- Analyse and calculate the effects of value added tax (VAT) on incorporated and unincorporated businesses
- Assess the impact of relevant taxes which apply in a variety of business and personal contexts

4. Intellectual levels

The ACCA Qualification syllabus is designed to progressively broaden and deepen the technical knowledge, skills and professional values demonstrated by the candidate on their journey through the qualification.

The specific learning outcomes within the detailed syllabuses and study guides are assessed at one of three intellectual or cognitive levels:

Level 1: Knowledge and comprehension
Level 2: Application and analysis
Level 3: Synthesis and evaluation

Very broadly these intellectual levels relate to the three levels of the ACCA Qualification: Knowledge, Expertise and Strategic Professional.

Each learning outcome included in the detailed study guide is given a 1, 2 or 3 superscript, denoting its intellectual level. This gives an indication of the intellectual depth at which a learning outcome could be assessed within the examination. However, while Level 1 broadly equates with the Knowledge level, Level 2 to the Expertise level and Level 3 to the Strategic Professional level of the ACCA Qualification, some lower-level skills can continue to be assessed as the candidate progresses through each level. This reflects that at each stage of study there will be the requirement to broaden, as well as deepen, capabilities.

© ACCA 2027-2028 All rights reserved.

5. The syllabus

A The South African tax system and its administration

1. South African taxes
2. Principal sources of revenue law and practice
3. The system for self-assessment, the making of returns, submission of information, claims and the procedures relating to enquiries, appeals and disputes
4. Tax practitioners

B Income tax liabilities

1. The scope of income tax
2. Income from employment
3. Income from independent trades
4. Property and investment income
5. The comprehensive computation of taxable income and income tax liability
6. The use of exemptions and reliefs in deferring and minimising income tax liabilities.
7. Penalties for non-compliance

C Company tax liabilities including dividends tax for in-specie dividends

1. The scope of company tax
2. Profits chargeable to company tax
3. The comprehensive computation of company tax liability including dividends tax for in-specie dividends
4. Penalties for non-compliance

D Chargeable capital gains

1. The scope of the taxation of capital gains
2. The basic principles of computing gains and losses
3. The computation of the tax on capital gains and the use of exemptions and reliefs

E Estate duty and donations tax

1. The basic principles of computing transfers of wealth
2. The liabilities arising on chargeable lifetime donations and on the death of an individual
3. The use of exemptions in deferring and minimising donations tax and estate duty liabilities
4. Payment of estate duty and donations tax

F Value added tax

1. The value added tax (VAT) registration requirements
2. The computation of VAT liabilities
3. Administration of VAT and penalties for non-compliance

© ACCA 2027-2028 All rights reserved.

6. Detailed study guide

A The South African tax system and its administration

1. South African taxes

a) Explain the difference between direct and indirect taxation.[1]

b) Summarise the different types of capital and revenue tax.[1]

c) Recommend an appropriate ethical action or response to a given tax situation.[2]

2. Principal sources of revenue law and practice

a) Explain the overall structure of the South African tax system.[1]

b) Summarise the different sources of revenue law.[1]

c) Compare and contrast tax avoidance and tax evasion and summarise the aim of the General Anti-Abuse Rule (GAAR).[2]

d) Explain the role of the South African Revenue Service (SARS) and its terms of reference.[1]

e) Assess the purpose of double taxation agreements.[2]

3. The systems for assessment, the making of returns, submission of information, claims and the procedures relating to enquiries, appeals and disputes

a) Analyse the features of the assessment system as it applies to individuals.[2]

b) Analyse the features of the assessment system as it applies to companies.[2]

c) Apply the time limits that apply to the filing of returns and the making of claims and apply the due dates for the payment of tax, including provisional tax, and the consequences of late payment.[2]

d) Summarise the obligations and responsibilities of employers in respect of employee's tax.[1]

e) Summarise the information and records which taxpayers need to retain for tax purposes.[1]

f) Summarise the powers of SARS with regard to assessments and returns.[1]

g) Analyse the procedures for dealing with appeals, additional tax and interest.[2]

h) Analyse the procedures for audit, investigation, search, seizure and access to information.[2]

4. Tax practitioners

a) Explain the requirement to register as a tax practitioner.[1]

b) Analyse and apply the rules for the reporting of unprofessional conduct.[2]

B Income tax liabilities

1. The scope of income tax

a) Explain how the residence of an individual is determined.[1]

2. Income from employment

a) Assess the factors which determine whether an engagement is treated as employment or self-employment.[2]

b) Analyse the basis of assessment for employment income.[2]

c) Calculate the income assessable.[2]

d) Analyse the allowable deductions.[2]

© ACCA 2027-2028 All rights reserved.

e) Analyse and apply the use of travel and other allowances.[2]

f) Explain the employees tax system.[1]

g) Calculate the amount of employee benefits assessable.[2]

h) Analyse the treatment of a person who comes to South Africa to work or a person who leaves South Africa to take up employment overseas.[2]

3. Income from independent trades

a) Analyse the basis of assessment for independent trade income.[2]

b) Compare and contrast 'carrying on a business' and 'carrying on a trade'.[2]

c) Analyse the expenditure which is allowable in calculating the tax-adjusted trading profit.[2]

d) Analyse the relief that can be obtained for pre-trading expenditure.[2]

e) Capital allowances:

(i) Explain what constitutes plant and machinery for capital allowances purposes.[1]
(ii) Calculate wear and tear allowances.[2]
(iii) Calculate manufacturing buildings allowance.[2]
(iv) Calculate the commercial buildings allowance.[2]
(v) Calculate the tax effects on the disposal of a capital asset.[2]

f) Relief for assessed losses:

(i) Analyse how trading losses can be carried forward.[2]
(ii) Analyse and apply the assessed loss ring fencing provisions.[2]
(iii) Analyse how trading losses can be claimed against total income and chargeable gains.[2]

g) Partnerships and limited partners:

(i) Analyse how a partnership and its partners are assessed to tax and calculate the tax.[2]
(ii) Calculate the assessable profits for each partner following a change in the profit-sharing ratio or a change in the membership of the partnership.[2]

h) The taxation of micro business (turnover tax):

(i) Analyse the determination of qualifying turnover.[2]
(ii) Analyse the determination of taxable turnover.[2]

i) Analyse and apply the transfer pricing rules.[2]

j) Analyse and apply the taxation treatment of foreign exchange gains and losses.[2]

4. Property and investment income

a) Calculate taxable income from property.[2]

b) Compare and contrast the treatment of taxable investment income and exempt investment income.[2]

c) Calculate withholding taxes on passive income.[2]

d) Apply exemptions from foreign dividends and interest.[2]

e) Assess whether the use of a tax-free investment is suitable based on the taxpayer's circumstances.[2]

5. The comprehensive computation of taxable income and income tax liability

a) Prepare a basic income tax computation involving different types of income.[2]

b) Analyse and calculate exempt income, deductions and capital allowances.[2]

© ACCA 2027-2028 All rights reserved.

c) Calculate the amount of income tax payable.[2]

d) Calculate the amount of employee's tax payable.[2]

e) Calculate medical tax credits.[2]

f) Calculate foreign tax credits for investment income.[2]

6. The use of exemptions and reliefs in deferring and minimising income tax liabilities.

a) Assess and calculate the relief given for contributions to retirement schemes.[2]

b) Assess and calculate the relief given for donations to public benefit organisations.[2]

7. Penalties for non-compliance

a) Calculate late payment interest.[2]

b) Assess and calculate the penalties that can be charged.[2]

C Company tax liabilities including dividends tax for in-specie dividends

1. The scope of corporate income tax

a) Assess the residence of a company.[2]

b) Assess how a company qualifies as a small business corporation (SBC) and calculate the company tax of a SBC.[2]

c) Analyse and calculate turnover tax for micro businesses (as for individuals).[2]

d) Assess the treatment of the purchase by a company of its own shares.[2]

2. Profits chargeable to company tax

a) Analyse gross income.[2]

b) Assess the gross income which is exempt in determining income. [2]

c) Assess the expenditure that is allowable in calculating taxable income.[2]

d) Assess and apply the relief that can be obtained for pre-trading expenditure.[2]

e) Analyse and apply the tax deduction available for companies engaged in research and development.[2]

f) Capital allowances:

(i) Calculate plant and machinery for capital allowances purposes.[2]
(ii) Calculate wear and tear allowances.[2]
(iii) Calculate manufacturing buildings allowance.[2]
(iv) Calculate the commercial buildings allowance.[2]
(v) Calculate the tax effects on the disposal of a capital asset.[2]
vi) Calculate the SBC capital allowances.[2]
(vii) Recommend the most suitable capital allowances based on the corporate circumstances.[2]

f) Assess and apply the treatment of interest paid and received and whether any limitations apply.[2]

g) Analyse how trading losses can be carried forward.[2]

h) Calculate the taxable income for companies, including small business corporations.[2]

i) Analyse and apply the transfer pricing rules.[2]

j) Analyse and apply the taxation treatment of foreign exchange gains and losses.[2]

k) Analyse whether any assessed loss use limitations apply.[2].

© ACCA 2027-2028 All rights reserved.

3. The comprehensive computation of company tax liability including dividends tax for in-specie dividends

a) Calculate the normal tax liability for companies, including for small business corporations and micro businesses.[2]

4. Penalties for non-compliance

a) Calculate late payment interest.[2]

b) Assess and calculate the penalties that can be charged.[2]

c) Apply the due dates for payment of provisional tax by companies, including the calculation of such provisional tax payments.[2]

D Chargeable capital gains

1. The scope of the taxation of capital gains

a) Analyse the scope and application of capital gains tax.[2]

b) Assess how the residence and ordinary residence of an individual is determined.[2]

c) Explain which assets are excluded.[1]

2. The basic principles of computing gains and losses

a) Calculate capital gains and losses for both individuals and companies.[2]

b) Calculate capital gains and losses on assets acquired before 1 October 2001.[2]

c) Calculate the amount of capital gains to be included in the taxable income for both individuals and companies.[2]

d) Analyse and apply the treatment of capital losses for both individuals and companies.[2]

e) Analyse disallowed capital losses.[2]

f) Assess the identification of connected persons for capital gains tax purposes and explain the tax implications of transfers between connected persons.[2]

g) Assess and apply the rules for part-disposals of assets.[2]

3. The computation of the tax on capital gains and the use of exemptions and reliefs

a) Analyse and apply the exclusion for personal use assets and other specific exclusions.[2]

b) Calculate the gain or loss on the disposal of a primary residence.[2]

c) Assess and apply the treatment of transfers between spouses.[2]

d) Apply the annual exclusion.[2]

e) Assess and apply the treatment where an asset is damaged, lost or destroyed, and the implications of receiving insurance proceeds and reinvesting such proceeds in replacement assets.[2]

f) Analyse and apply rollover relief as it applies to individuals and companies.[2]

g) Analyse and apply the rules for the disposal of small business and micro business assets.[2]

E Estate duty and donations tax

1. The basic principles of computing transfers of wealth

a) Explain which persons are chargeable.[1]

b) Assess and apply the meaning of property, deemed property, and dutiable estate.[2]

c) Assess and apply valuation principles for estate duty purposes and donations tax.[2]

© ACCA 2027-2028 All rights reserved.

d) Analyse and apply the rules for property, deemed property and inclusions/exclusions in the gross estate.[2]

2. The liabilities arising on chargeable lifetime donations and on the death of an individual

a) Analyse and apply the tax implications of lifetime donations and calculate the relevant donations tax liabilities.[2]

b) Analyse and calculate the estate duty liability on an estate.[2]

c) Assess and apply the deduction for property accruing to a surviving spouse.[2]

d) Assess and apply the abatement (section 4A) in computing the dutiable estate.[2]

3. The use of exemptions in deferring and minimising donations tax and estate duty liabilities

a) Assess and apply the following exemptions:[2]

(i) annual donations exemption.
(ii) donations between spouses.
(iii) public benefit organisation exemptions or deductions.

4. Payment of estate duty and donations tax

a) Assess who is responsible for the payment of estate duty or donations tax and the due dates for payment.[2]

F Value added tax

1. The value added tax (VAT) registration requirements

a) Assess the circumstances in which a person must register or deregister for VAT (compulsory) and when a person may register or deregister for VAT (voluntary).[2]

b) Assess the circumstances in which pre-registration input VAT can be recovered.[2]

c) Explain which information must be included on a VAT invoice or reduced invoice.[1]

2. The computation of VAT liabilities

a) Calculate the amount of VAT payable/recoverable.[2]

b) Assess and apply the tax point when goods or services are supplied.[2]

c) Assess and apply the principles regarding the valuation of supplies.[2]

d) Contrast the treatment of zero rated and exempt supplies.[2]

e) Calculate the apportionment ratio for mixed supplies and apply it to a scenario.[2]

f) Analyse and apply the circumstances in which input VAT is non-deductible.[2]

g) Analyse and apply the relief that is available for impairment losses on trade debts.[2]

h) Analyse and apply the VAT treatment of imports, exports and trade outside South Africa. [2]

i) Assess and apply the treatment of the sale of a business as a going concern.[2]

3. Administration of VAT and penalties for non-compliance

a) Analyse how VAT is accounted for and administered.[2]

b) Calculate late payment interest and the penalties which can be applied.[2]

© ACCA 2027-2028 All rights reserved.

7. Reading list

Fundamentals of South African Income Tax (published by Hedron Tax Consulting and Publishing cc – www. hedron.co.za). Current year edition.

Notes on South African Income Tax (published by Hedron Tax Consulting and Publishing cc – www.hedron.co.za). 2026 edition.

Questions on SA Tax with selected solutions (published by Juta Academic – www.jutaacademic.co.za). Current year edition.

Tax ZAF Exam Notes 2026/27 Volume 1 (published by Lawrence Maqekoane - www.QeTax.co.za)

8. Approach to examining the syllabus

The syllabus for E1 Taxation (E1 ZAF) is assessed by a three-hour computer-based examination.

The examination will consist of two sections:

Section A will contain 15 two-mark objective test questions (OTs).

Section B will contain six constructed response questions (CRs). Four of the CR questions will be worth 10 marks each and two of the CR questions will be worth 15 marks each. The two 15-mark questions will focus on income tax liabilities (syllabus area B) and company tax liabilities including dividends tax for in-specie dividends (syllabus area C).

All other questions can cover any areas of the syllabus.

Tax rates, allowances and information on certain reliefs will be given in the examination.

9. Guide to ACCA examination structure and delivery mode

The structure of examinations varies, depending on the level of the qualification.

The Expertise examinations contain 100% compulsory questions to encourage candidates to study across the breadth of each syllabus.

All Expertise examinations are assessed by three-hour computer-based examinations.

The pass mark for all Expertise examinations is 50%.

© ACCA 2027-2028 All rights reserved.

10. Guide to ACCA examination assessment

ACCA reserves the right to examine anything contained within the study guide at any examination session. This includes knowledge, techniques, principles, theories, and concepts as specified.

For specified financial accounting, audit and tax examinations, except if indicated otherwise, ACCA will publish examinable documents once a year to indicate exactly what regulations and legislation could potentially be assessed within identified examination sessions. For most examinations (not tax), regulation issued, or legislation passed on or before 31 August annually, will be assessed from 1 September of the following year to 31 August of the year after. Please refer to the examinable documents for the examination (where relevant) for further information.

Regulations issued or legislation passed in accordance with the above dates may be examinable if the effective date is in the future, unless explicitly stated otherwise in the syllabus and study guide or examinable documents. The terms 'issued' or 'passed' relate to when regulation or legislation has been formally approved.

The term 'effective' relates to when regulation or legislation must be applied to entity transactions and business practices.

The study guide offers more detailed guidance on the depth and level at which the examinable documents will be examined. The study guide should therefore be read in conjunction with the examinable documents list, where applicable.

For E1 ZAF, generally examinations in June and December will be based on legislation passed by the previous 30 September. Note: Exceptionally, the examination in June 2027 will be based on legislation passed by 30 September 2025 and only the examination in December 2027 will be based on legislation passed by 30 September 2026.

11. Learning hours and education recognition

The ACCA Qualification does not prescribe or recommend any particular number of learning hours for examinations because study and learning patterns and styles vary greatly between people and organisations. This also recognises the wide diversity of personal, professional and educational circumstances in which ACCA candidates find themselves.

As a member of the International Federation of Accountants, ACCA seeks to enhance the education recognition of its qualification on both national and international education frameworks, and with educational authorities and partners globally. In doing so, ACCA aims to ensure that its qualifications are recognised and valued by governments and regulatory authorities and employers across all sectors. To this end, ACCA qualifications are currently recognised on the educational frameworks in several countries. Please refer to your national education framework regulator for further information about recognition.

© ACCA 2027-2028 All rights reserved.