P O Box 3125 Pretoria 0001 South Africa
370 Helen Joseph Street Pretoria 0002
+27 12 313 3911 / 0861 12 7272
www.resbank.co.za

South African Reserve Bank
Financial Surveillance Department

14/6/2_2025

2025-10-22

Exchange Control Circular No. 15/2025

Income transfers

Flowing from representations made by the Authorised Dealers, the South African Revenue Service (SARS) and other market participants, certain amendments, relating to tax compliance, are required to section B.3 of the Currency and Exchanges Manual for Authorised Dealers (Authorised Dealer Manual).

The following amendments to the Authorised Dealer Manual are outlined:

Section B.3(A)(ii)(c)

The subsection has been deleted.

Section B.3(A)(iv)

The subsection has been amended as follows:

(iv) Authorised Dealers may allow the transfer of income from pensions and/or compulsory annuities including living annuities to South African residents temporarily abroad.

Section B.3(A)(v)

The following new subsection has been added:

(v) Requests to transfer any other income to South African residents temporarily abroad must form part of the single discretionary allowance and/or foreign capital allowance. See section B.4(G)(i) of the Authorised Dealer Manual.

Section B.3(B)(i)(b)

The current subsection has been renumbered as (c) and a new subsection has been added as follows:

(b) Authorised Dealers may allow the transfer of dividends distributed by a South African company, provided the following is obtained from SARS:

(aa) if the beneficiary is not registered on the SARS registered database, a Manual Letter of Compliance - International Transfer; and

(bb) if the beneficiary is registered on the SARS registered database, a TCS – AIT PIN.

Section B.3(B)(iii)(a)(cc)

The following new subsection has been added:

(cc) the following must be obtained from SARS:

(1) if the beneficiary is not registered on the SARS registered database, a Manual Letter of Compliance – International Transfer; and

(2) if the beneficiary is registered on the SARS registered database, a TCS – AIT PIN.

Section B.3(B)(iv)(a)

The subsections have been deleted and replaced with the following:

(a) Authorised Dealers may allow the transfer of income from trusts created in terms of a Last Will and Testament and inter vivos trusts provided that:

(aa) it can be confirmed that the beneficiary is a non-resident or private individual who ceased to be a resident for tax purposes in South Africa; and

(bb) the following must be obtained from SARS:

(1) if the beneficiary is not registered on the SARS registered database, a Manual Letter of Compliance - International Transfer; and

(2) if the beneficiary is registered on the SARS registered database, a TCS – AIT PIN.

Section B.3(B)(v)(a)

The subsection has been amended as follows:

(a) Authorised Dealers may allow the transfer of income accruing in the form of rental on fixed/moveable property and income from rental pool agreements, provided that;

(aa) the application is accompanied by a copy of the rental or rental pool agreement;

(bb) the client confirms to the Authorised Dealer that the amount is reasonable in relation to the value of the property in question; and

(cc) the following must be obtained from SARS:

(1) if the beneficiary is not registered on the SARS registered database, a Manual Letter of Compliance -International Transfer; and

(2) if the beneficiary is registered on the SARS registered database, a TCS – AIT PIN.

Section B.3(B)(vi)(a)(cc)

The following new subsection has been added:

(cc) the following must be obtained from SARS:

(1) if the beneficiary is not registered on the SARS registered database, a Manual Letter of Compliance -International Transfer; and

(2) if the beneficiary is registered on the SARS registered database, a TCS – AIT PIN.

Section B.3(B)(vii)

The subsection has been amended as follows:

(a) Authorised Dealers may allow the transfer of pension and/or annuity payments paid by registered funds or licenced insurers only.

(b) Private individuals who are non-residents (including private individuals who ceased to be residents for tax purposes in South Africa), can transfer compulsory annuities (including living annuities) or pensions (and any late payment interest) from a South African registered and approved retirement fund or licenced insurer offshore without the requirement of obtaining a TCS of good standing once a year.

(c) Authorised Dealers may transfer these amounts, if reflected or will be reflected on an IRP5/IT3(a) under tax codes 3602/3652 (as long as not accompanied by code 3611 or code 3661), 3603/3653, 3610/3660 and/or 3618/3668.

(d) Evidence is to be presented to the Authorised Dealer in the form of a confirmation from the South African registered and approved retirement fund, their administrator or the licenced insurer as to the above. This can be in the form of:

(aa) the latest/most recent IRP5/IT3(a) tax certificate issued for the pension or annuity payment (e.g. 2024/2025 certificate will be presented at the start of the 2025/2026 tax year); or

(bb) a payment advice detailing the tax code that the income will be reported under for the first payment of a new compulsory annuity or pension; or

(cc) a payment advice detailing the tax code/s that the income will be reported under.

(e) The confirmation is only required at the inception of any new contract or for an existing contract before the first payment of the tax year following the update of this subsection. In this regard, Authorised Dealers may allow subsequent transfers accordingly.

Section B.3(B)(x)(a)

The subsection has been replaced as follows:

(a) Authorised Dealers may allow the transfer of salaries and/or fees payable to bona fide non-residents and private individuals who ceased to be residents for tax purposes in South Africa. See section B.3(C) below.

Section B.4(G)(i)(g)

The subsection has been amended as follows:

(g) Residents temporarily abroad may receive pension and/or compulsory annuities including living annuities as mentioned in section B.3(A)(iv) of the Authorised Dealer Manual as well as monetary gifts and loans as mentioned in subsection (A)(x) above. Any voluntary annuity transfers must be done in terms of (a) above. No other foreign currency except as outlined in (a) above may be availed of without the specific prior written approval of the Financial Surveillance Department.

The amended Authorised Dealer Manual may be accessed on the South African Reserve Bank website, www.resbank.co.za, by following the path: Home>What we do>Financial Surveillance>Financial Surveillance documents.

Head of Department: Financial Surveillance