# Simplified Tax Restructuring Summary for Clients

South African tax law offers several provisions that allow you to restructure companies, merge assets, or simplify your group structure without paying immediate Capital Gains Tax (CGT). These apply when you're:  
  
- Swapping shares between companies (Section 42 or 43)  
- Merging or amalgamating two businesses (Section 44)  
- Moving assets within your group of companies (Section 45)  
- Restructuring a group by unbundling shareholding (Section 46)  
- Distributing assets during company liquidation (Section 47)  
  
Key Benefits:  
- No immediate tax payable if rules are followed.  
- Your cost and value carry over to the new shares or assets.  
- Special “anti-avoidance” rules apply if you sell too soon (usually within 18 months).  
- All transactions must be properly documented and meet SARS compliance.  
  
We will help you determine the right approach, ensure compliance, and prepare the necessary documents for SARS and CIPC.