



Kyle Fyfe

DIRECTOR

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Kyle Fyfe is a Director in the Tax & Exchange Control practice area. He specialises in tax dispute resolution, international and domestic corporate taxation, trusts and estate planning, value-added tax, employees' tax and South African exchange controls.

PRACTICE AREAS

- Tax

EXPERTISE

- Tax dispute resolution
- International and domestic corporate tax advisory
- Taxation of financial instruments and insurance products
- Value-added tax
- Employees' tax
- South African exchange control

RELEVANT EXPERIENCE

- Representing SARS in approximately tax appeals by a group of companies and related individuals, which were settled in favourable terms to SARS
- Representing taxpayers in tax appeals relating to depreciation allowances, the general anti avoidance rules, prospecting allowances and value added tax
- Advising listed and unlisted corporates on the establishment and taxation of employee incentive schemes
- Advising listed and unlisted corporates, trusts and individuals on the use of corporate rollover relief rules
- Advised high net worth individuals on the exchange control and tax aspects of emigration
- Advice to trustees and high-net worth individuals regarding the application of South African tax laws to offshore trust structures

CAREER

- Admitted as an Attorney, South Africa, 2015
- LLB, University of the Witwatersrand, 2012 (with distinction)
- LLM, University of Pretoria (Tax Law), 2017 (with distinction)
- Admitted as a Solicitor, England and Wales, 2023

HIGHLIGHTS

- Recognised by *ITR* as a Notable Practitioner | Tax Controversy | 2024, 2025.
- Kyle received numerous academic awards for his academic achievements in his studies, including the Dean's List award and the Jane Ewing Memorial Prize for Public International Law.