Building Public Trust Through Tax Reporting

PwC's 10th annual tax transparency review of the top 100 companies listed on the Johannesburg Stock Exchange

25 November 2025

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01 Governance first: Building credible tax transparency

South Africa is at a turning point. With a strong history of good governance and a deep-rooted value system recognising relationships and interconnectedness with others, local businesses have a real chance to lead the way in tax transparency. This isn't about ticking boxes; it's about using transparency to create real value for society and build trust where it matters most.

The King V™ Report on Corporate Governance for South Africa, 2025[1] (King V) is here. Released by the Institute of Directors South Africa (IODSA) on 31 October 2025, this new, globally recognised corporate governance code replaces previous iterations. It applies to financial years starting on or after 1 January 2026, and early adoption is encouraged. **King V calls for a shift from aspirational vision to practical accountability, from long-term ambition to immediate responsibility.**

King V guides organisations to think beyond profit. It's about creating enduring value for current and future generations and raising the bar on transparency. It calls for a stakeholder-inclusive, systems-value mindset: long-term success depends on the health of the socio-ecological systems the organisation relies on. Organisations are encouraged to create value for those systems. Measure success by shared value and meaningful stakeholder outcomes.

In this context of responsible corporate citizenship, tax isn't just a cash outflow; it's a signal of an organisation's commitment to its economic, social and environmental ecosystems. Your tax strategy is a visible indicator of corporate integrity and an increasingly important driver of stakeholder trust.

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> A decade of tax transparency research in South Africa has shown us this: companies that can clearly communicate their tax story don't just demonstrate good governance and a commitment to sustainable development. They understand that it is inextricably linked to ethical business practices and building stakeholder trust—essential for long-term success.

PwC's latest **insights** show that sustainability isn't just the right thing to do—it's smart business. It's not a side project; it's a powerful driver of transformation, resilience, and growth. Leaders who embrace this shift aren't just future-proofing their business; they are unlocking value.

According to PwC's recent **benchmarking study,** South African companies are at a turning point in their sustainability reporting journey. Strong governance practices, widespread use of the Integrated Reporting Framework, and increasing adoption of global standards have created a solid foundation for the future of sustainability reporting. However, regulatory changes are accelerating. **PwC's Global Sustainability Reporting Survey** highlights that while some organisations are reassessing their reporting plans, many are continuing to move forward. Why? Because the pressure is real. Stakeholders still expect reliable information on how businesses manage sustainability risks and pursue opportunities.

This sustainability landscape is prompting companies to focus on what is material and measurable. Tax transparency is a key part of this shift. When integrated into broader strategy, it can help businesses anticipate fiscal changes, manage risk, and support long-term resilience.

To be effective, tax strategy should be linked to core business priorities—such as innovation, operational efficiency, and talent development. It also requires a realistic view of trade-offs. Not every sustainable tax initiative will bring an immediate bottom-line return, and not every stakeholder will be persuaded by a strategy that prioritises long-term resilience over short-term profit. But ignoring the strategic role of tax carries its own risks.

Double **materiality assessments** should consider both external impacts—such as contributions to public services—and internal implications for business models and decision-making.

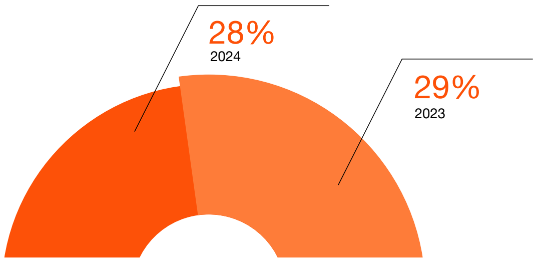
To succeed, be transparent when silence is easier, stick to a principled tax strategy when consensus on its value wavers, and act even when the global political tide turns against sustainable policy.

02 The tax transparency landscape in South Africa

This 10th edition marks a decade of supporting companies in turning tax transparency into practical action. Each year, we've applied the PwC Tax Transparency Framework (the framework) to assess the disclosures of the top 100 JSE-listed companies by market capitalisation, tracking their progress toward greater openness and stronger governance.

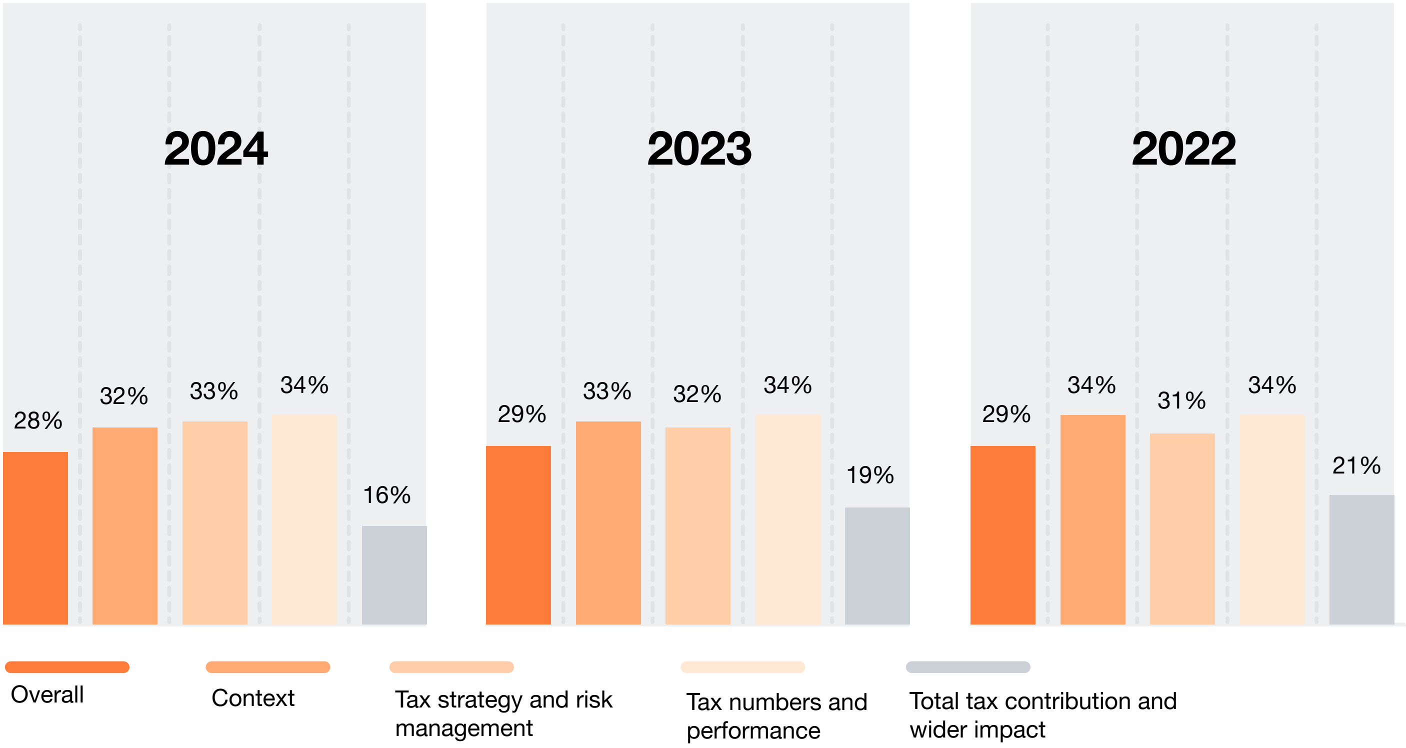
This year's findings offer timely insights to help businesses navigate the growing complexity of tax reporting. Our goal is to help you stay ahead—of regulatory developments, industry peers, and stakeholder expectations. Because when tax is approached strategically and communicated clearly, it becomes a foundation for lasting trust.

> The tax transparency landscape for the top 100 JSE-listed companies in South Africa reflects nuanced shifts in disclosure practices in 2024.



Average overall transparency

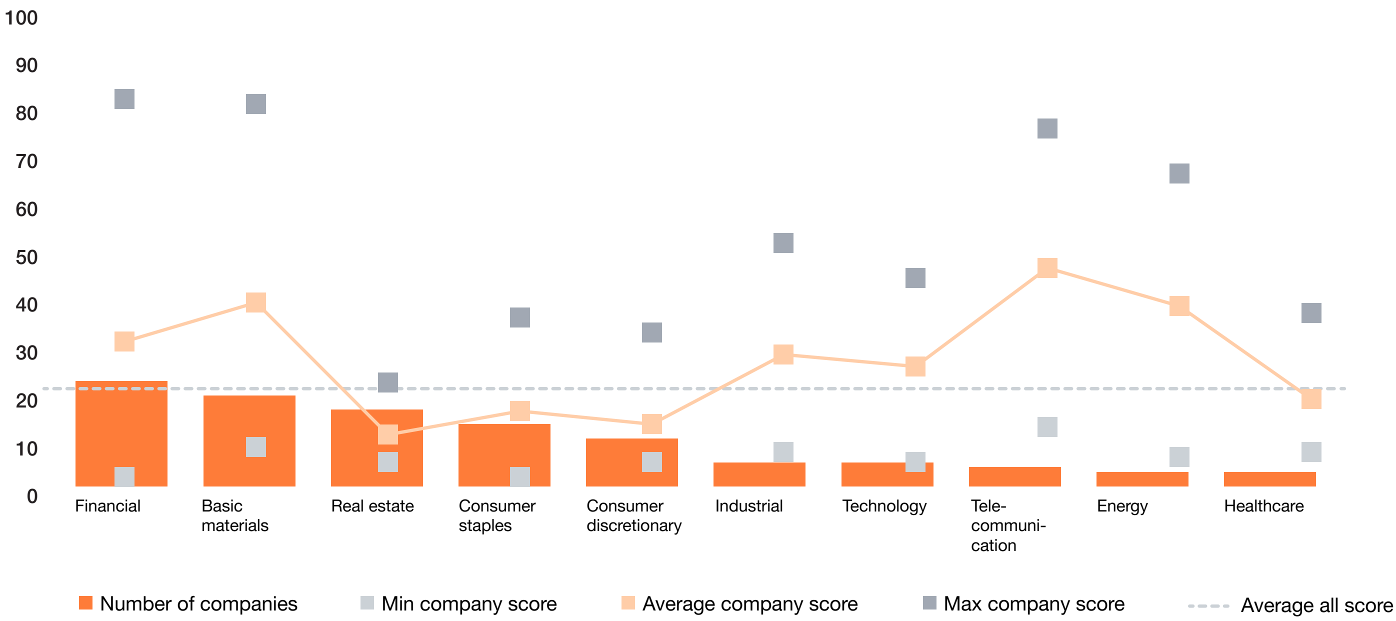
The average overall tax transparency score fell slightly to 28% compared to 29% in 2023.



Graph 1: Three-year overview of average transparency in South Africa per category of the framework – all companies.

In 2024, 12 companies scored above 60% for overall tax transparency, compared to 15 in 2023. This group includes nine primary-listed and three secondary-listed entities. Meanwhile, 65 companies scored 30% or less, consistent with last year's results, indicating that transparency remains a challenge for the majority of the market.

Sector insights



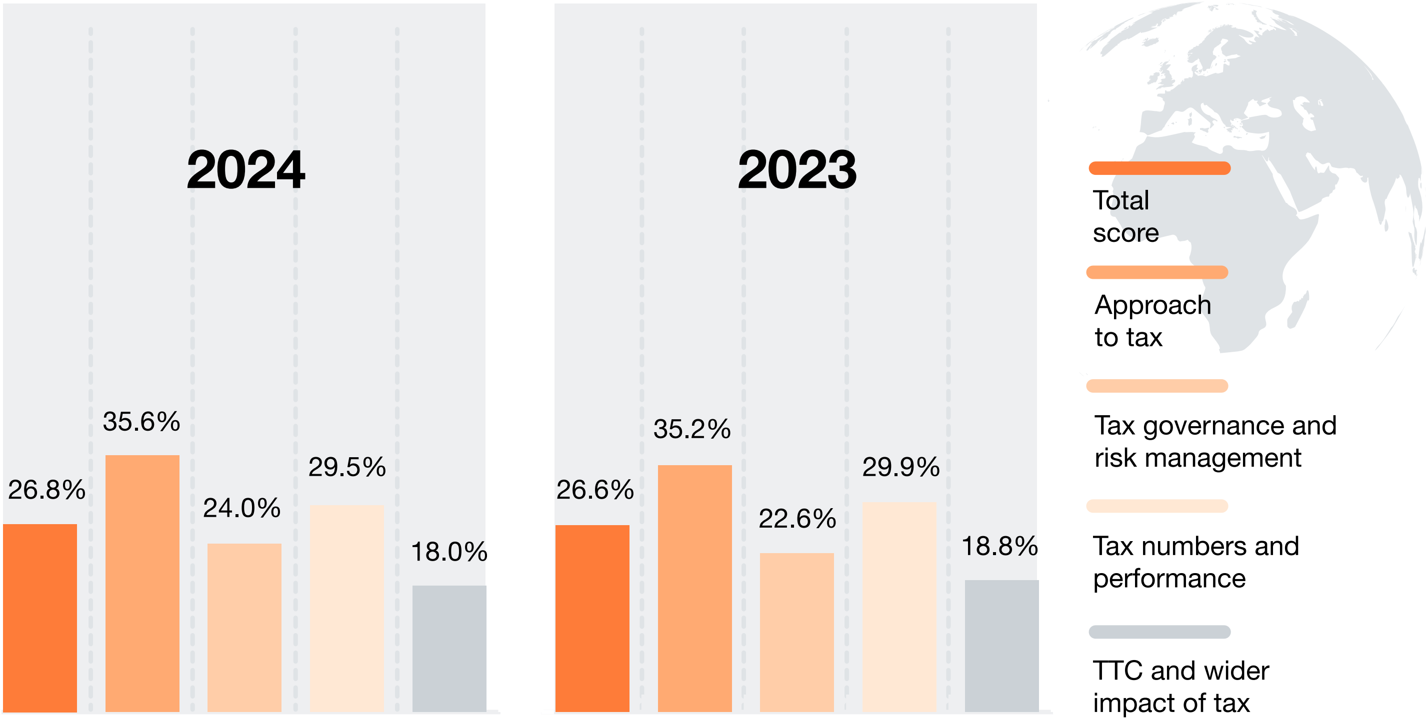
Graph 2: South Africa – presents the minimum, average, and maximum scores (out of a possible 80 points) for total tax transparency across various sectors. It highlights how companies within each sector perform relative to one another, offering a comparative view of disclosure practices.

On average, the telecommunication sector consistently provided the most effective tax transparency. Among the top 20 performers, ten are in the basic materials sector, five in the financial sector, two in the telecommunications sector and one each in the energy, industrial and technology sector.

Tax transparency in South Africa is steadily improving year on year in both quality and depth. While average scores don't always show it, the top performers are raising the bar. And with each cycle, more companies are joining the ranks.

Organisations making real progress aren't doing it for approval. They are embedding tax into their sustainability strategy because it works. It makes their tax strategies more resilient and future-fit. But when transparency is treated as a tick-box exercises or a bid for "brownie points", the value quickly fades.

Tax transparency: Africa in the global spotlight



Graph 3: Global study – Global average overall score. Insights from PwC's global tax transparency and tax sustainability reporting study 2025 covering 956 of the world's largest multinational corporations from across 24 territories[2].

Global

[PwC's Global Tax Transparency and Tax Sustainability Reporting Study 2025]

Global insights

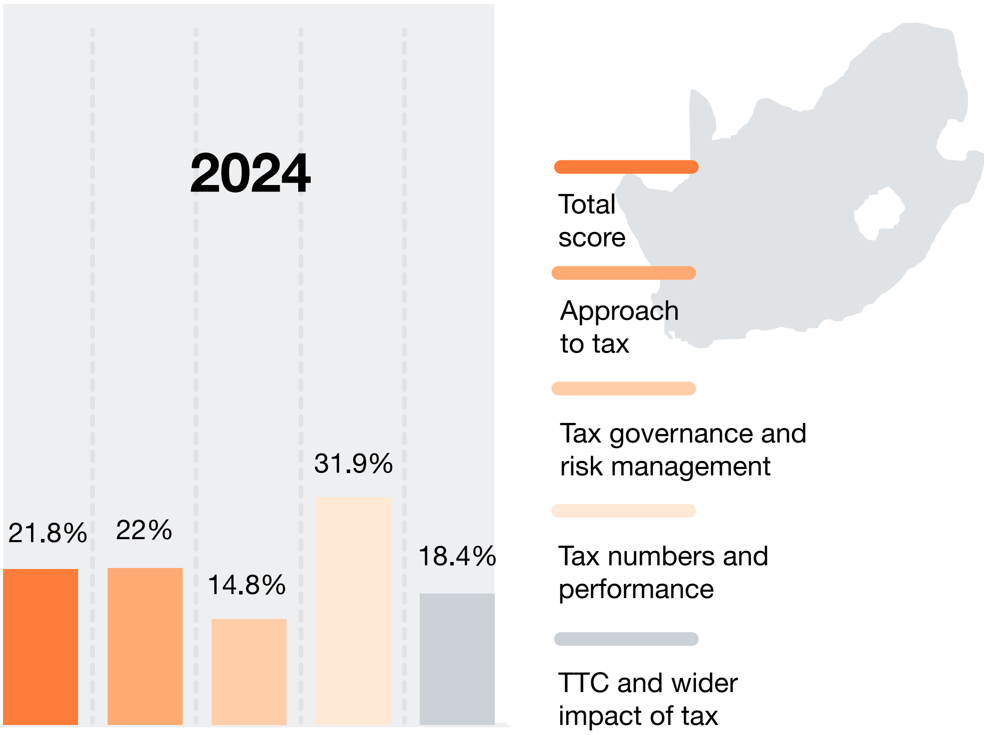
Compared with last year's study, we observed a modest overall increase in the global average score against the PwC Tax Transparency Framework. This was largely driven by incremental improvements in the Approach to Tax and Tax Governance and Risk Management sections, with several territories maintaining or building on previously higher results. Two new territories joined the review this year and recorded scores at or above the global average, which further influenced the overall movement. At the same time, there were marginal decreases in the Tax Numbers and Performance and Total Tax Contribution and Wider Impact of Tax sections. The addition of two territories with below-average scores, together with changes in the composition of stock exchange indices and an expanded sample size, contributed to moderating the overall increase and added to the variability observed across the study population. Overall, the global average score indicates gradual change, reflecting a diverse set of territories, industries, and the evolving nature of tax transparency and tax sustainability reporting practices.

2. The global study references data for financial year-ends in 2024 and comparatives for 2023. However, as the study was published in 2025, tables and charts published online reflect 2025 as the current year and 2024 as the prior year.

Tax and tax-related sustainability reporting trends in Africa

South Africa

Out of the 24 territories in the global study, South Africa ranked 14th overall in terms of total average overall score per country, with Nigeria 20th, Kenya 21st, and Uganda 22nd.

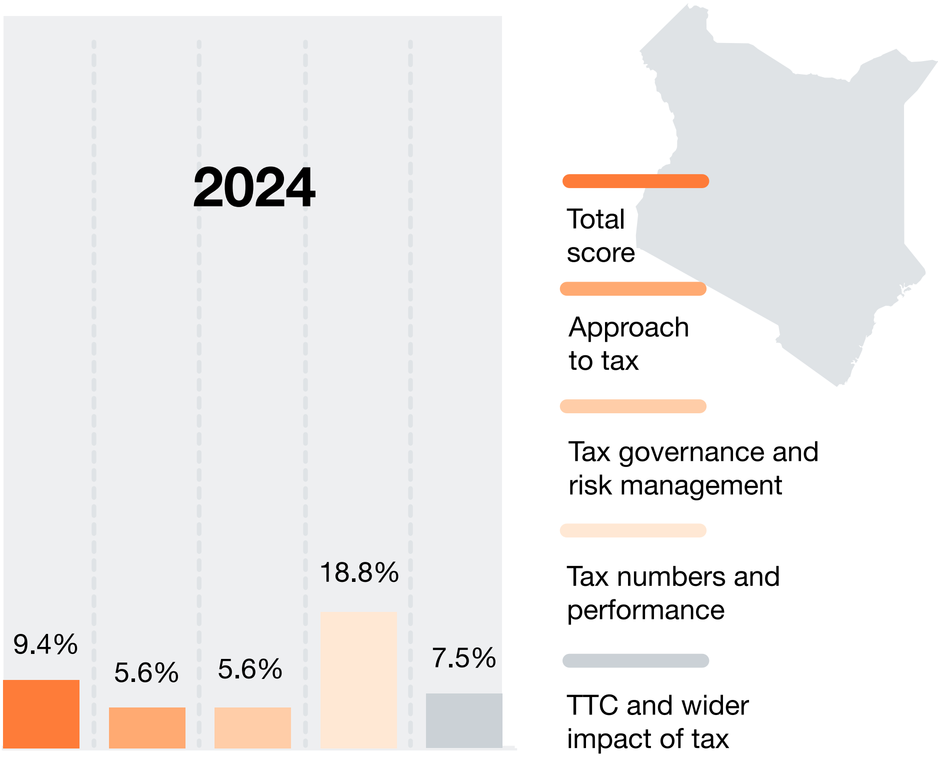


Graph 4: Global study – an extract representing the average transparency per category of the PwC framework for South African companies.

Although both the global and South African studies are based on the PwC Tax Transparency Framework, the South African study applies an extended version with 43 criteria, compared to 37 in the global study. Of the 266 entities listed on the JSE, 100 primary-listed South African companies are included in the global study. In contrast, the South African study includes 100 companies comprising both primary and secondary listings. As a result, the average South African scores shown in Graph 1 differ slightly from those in Graph 4.

Highlights from the study

Kenya



Graph 5: Global study – an extract representing the average transparency per category of the PwC framework for Kenyan companies.

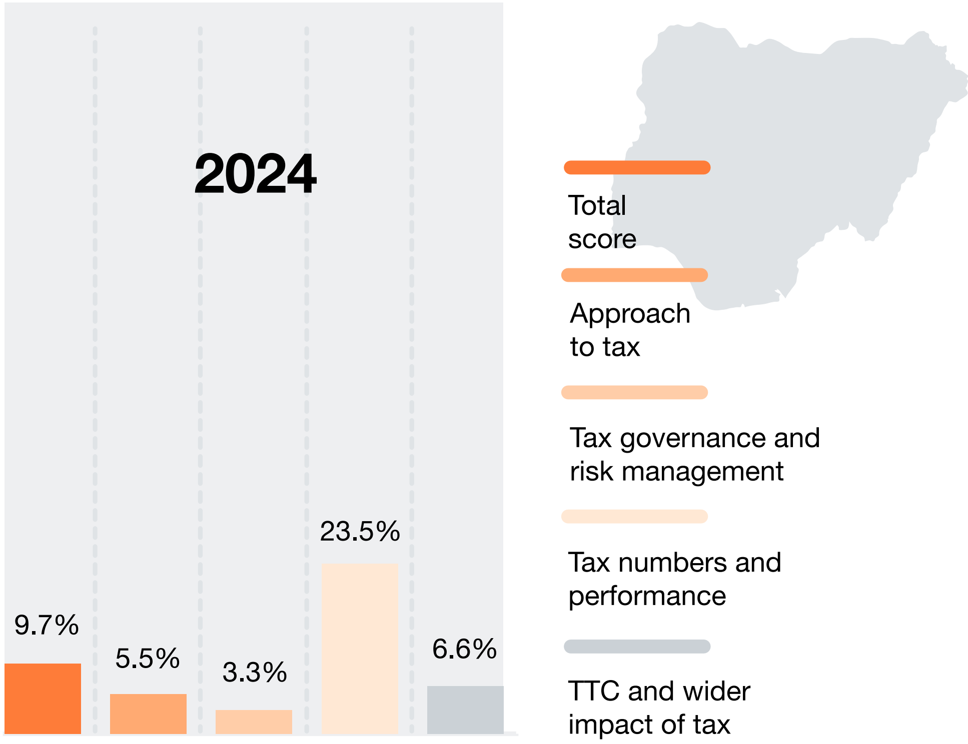
The landscape

In 2021, the Nairobi Securities Exchange (NSE) published an ESG Disclosures Guidance Manual to standardise ESG information for listed companies. However, the manual does not mandate or provide guidance on tax transparency, including public tax disclosures, leaving most companies reliant on international reporting standards and frameworks such as GRI 207 Standard and the S&P Global Corporate Sustainability Assessment (CSA).

While there were slight improvements compared to the 2024 study, Kenyan companies still have considerable room to enhance tax disclosures based on international sustainability frameworks. Most are at an early stage in their sustainability reporting journey, and we expect both the scope and quality of disclosures to improve gradually.

Highlights from the study

Nigeria



Graph 6: Global study – an extract representing the average transparency per category of the PwC framework for Nigerian companies.

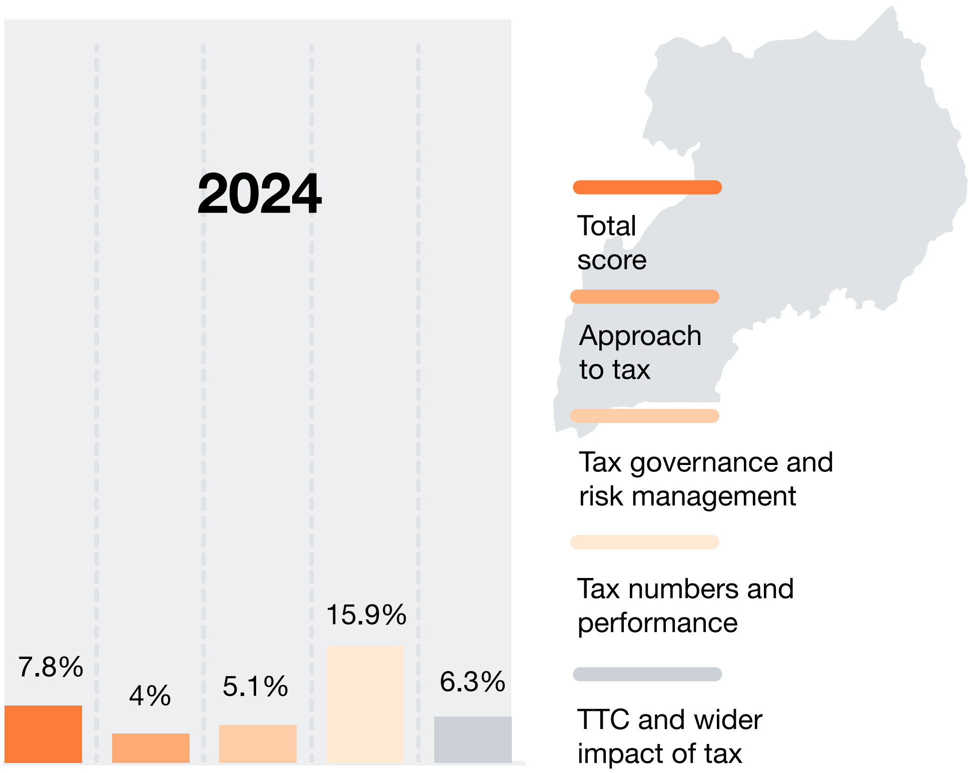
The landscape

The landscape for tax transparency and tax-related sustainability reporting in Africa continues to evolve, with Nigerian companies gradually aligning with global standards. This is evidenced by more Nigerian companies becoming increasingly aware of the need to align business practices with global standards for tax transparency and sustainability reporting. The shift is largely driven by the need to foster economic growth, ensure fair tax practices, and contribute to the achievement of the UN's SDGs. While there has been measurable progress in tax transparency and tax-related sustainability reporting among Nigerian corporates, significant gaps remain. The findings underscore the need for regulatory reforms to mandate tax strategy disclosures, enhanced taxpayer education to build trust and accountability, and integration of tax into broader ESG frameworks to align with global best practices.

Improving tax transparency and sustainability reporting in Nigeria will not only align local practices with global expectations but also enhance investor confidence and support long-term economic development across the continent.

Highlights from the study

Uganda



Graph 7: Global study – an extract representing the average transparency per category of the PwC framework for Ugandan companies.

The landscape

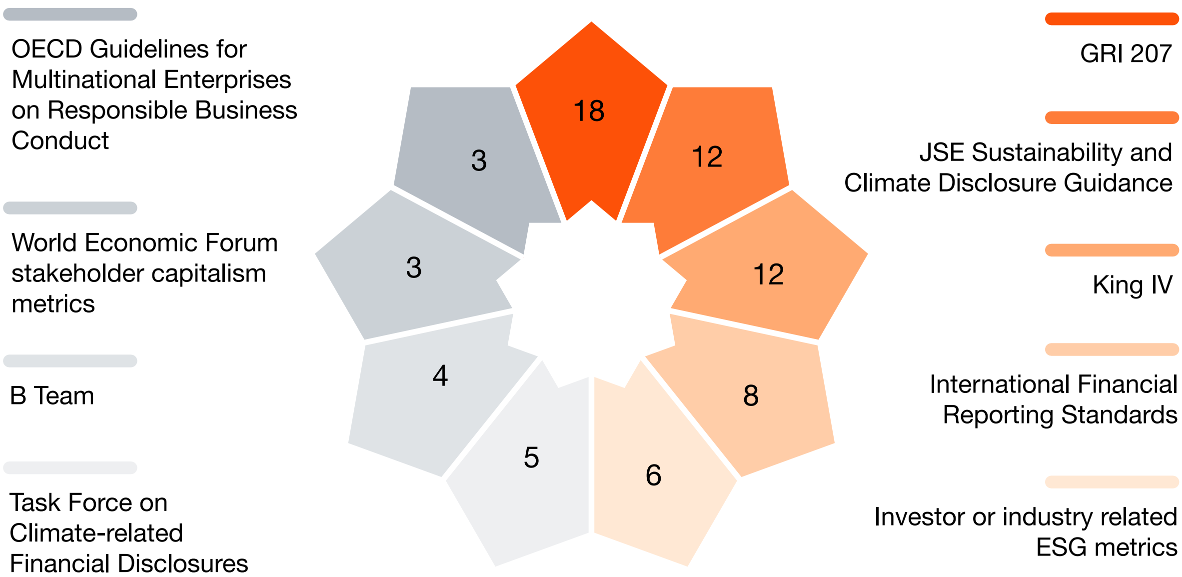
There remain significant gaps in tax transparency and sustainability reporting in Uganda, underscoring the substantial progress required to align with international standards and foster greater accountability.

While the Uganda Stock Exchanges (USE) listing rules 10 require baseline financial reporting disclosures, most listed companies do not go beyond these requirements to provide additional voluntary information to stakeholders.

There is currently no legal obligation for Ugandan listed companies to publish a tax strategy or disclose detailed information on tax governance and risk management. This absence of regulation has resulted in considerable variation in the quality and depth of tax-related disclosures.

03 Local, trusted and preferred guidance–rooted in governance excellence

To understand which frameworks are guiding the most effective tax reporting, we looked at disclosures from 18 primary-listed South African companies that specifically expressed support for tax transparency frameworks.



Graph 8: Frameworks mostly used by primary-listed companies that effectively provide transparency of their taxes and discuss their support for these frameworks.

It is noteworthy that 12 of these companies specifically referenced the King IV™ Report on Corporate Governance for South Africa (King IV) (now replaced by King V) and the JSE Sustainability Disclosure Guidelines—showing a strong reliance on South African-specific guidance for tax reporting.

While South African guidance is locally grounded—it complements global frameworks such as the Global Reporting Initiative (GRI), helping companies demonstrate robust governance to both local and international investors—boosting credibility and comparability.

The data shows a strong alignment with GRI 207: Tax 2019 (GRI 207). All 18 companies reported adequately in line with this standard, which requires organisations to disclose their tax strategy, governance over tax, risk management, and how tax decisions align with business objectives, including country-by-country reporting (CbCR) where applicable. This is not unexpected, as GRI 207 has been shown to improve comparability, credibility, and accountability in tax reporting—helping stakeholders better understand tax risks, performance, and how tax contributes to sustainable value creation.

Adoption of climate-related frameworks such as the Task Force on Climate-related Financial Disclosures (TCFD), and the World Economic Forum stakeholder capitalism metrics is more selective, suggesting opportunities for broader integration of global ESG and sustainability frameworks into tax reporting. The varied use of frameworks also creates a benchmarking opportunity: companies can strengthen their reporting by mapping tax disclosures across multiple frameworks to improve consistency and clarity.

King V's focus on risk governance and integrity supports a stronger license to operate, especially in a volatile environment. It also meets growing investor and stakeholder expectations for principled sustainability practices. Importantly, local guidance is seen as practical and relevant, making it easier for South African companies to implement, assure, and integrate across annual reports, sustainability disclosures and integrated reports. The result is a more mature governance framework and greater investor confidence.

Globally, the shift from voluntary to mandatory tax disclosure is gaining momentum. Initiatives like Public Country-by-Country Reporting (pCbCR) and the EU's Corporate Sustainability Reporting Directive (CSRD)—covered in detail in our **previous report**—are now starting to take effect. While progress is being made, tax still tends to be underrepresented in sustainability reporting. That's a gap—and an opportunity.

Global insights

PwC's **analysis** of 250 CSRD statements across Europe found that only 6% of companies presently identify tax as a material sustainability topic, with most doing so from a positive impact perspective that recognises tax's role in social responsibility and its influence on economic and social outcomes. The takeaway is that tax remains under-represented in sustainability reporting, even as some firms acknowledge its double materiality—its impact on society and its financial implications.

Investors are increasingly recognising responsible tax practices and transparency as important when evaluating companies. In fact, PwC's Global Investor Survey 2024 shows that 18% of investors cite tax transparency and responsibility among the most important non-financial factors, placing tax almost on par with other topics such as health, safety, and well-being. This signal growing expectations for tax to be treated as a sustainability topic, and TTC can serve as a foundation for companies to meet those expectations. Limited recognition of tax in sustainability reporting could leave companies exposed to regulatory gaps, investor scrutiny, and reputational challenges; those that embed tax early are better positioned to build credibility and trust.

PwC's Global Tax Transparency and Tax Sustainability Reporting Study 2025

A compass to achieve robust tax governance

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We assessed this year's findings through the lens of the four governance outcomes set out in King V. This marks a clear shift toward outcomes-based governance evaluation and, importantly, focuses on real, measurable results—not lists of rules. Corporate governance should generate value for the organisation within its economic, social, and environmental context, and this value arises from four core outcomes.

Good governance is outcomes-based: it's judged by its consequences, not just by implementing recommended practices. The focus is on value, trust, and managing risk. What matters is evidence—case studies, data, and feedback—not just policies on paper. Reporting should connect actions to outcomes, highlighting both the gaps and the fixes. The goal? Embedding a culture, strategy, and reporting that genuinely improves how the organisation operates—and how it's perceived.

Ethical culture is the foundation. It shapes how organisations achieve **performance and value creation**, ensure **conformance and prudent control**, and earn **legitimacy**. Performance drives innovation, but without ethical guardrails it can lose direction. Conformance keeps things on track, but without purpose it can become too risky. Legitimacy builds stakeholder confidence, but it only lasts if ethics are real and embedded.

Together, these outcomes reframe **tax governance** as a strategic tool. Companies that align tax practices with ethical culture don't just meet standards—they set them. They turn transparency into a competitive edge, drive sustainable impact, and build trust that lasts.

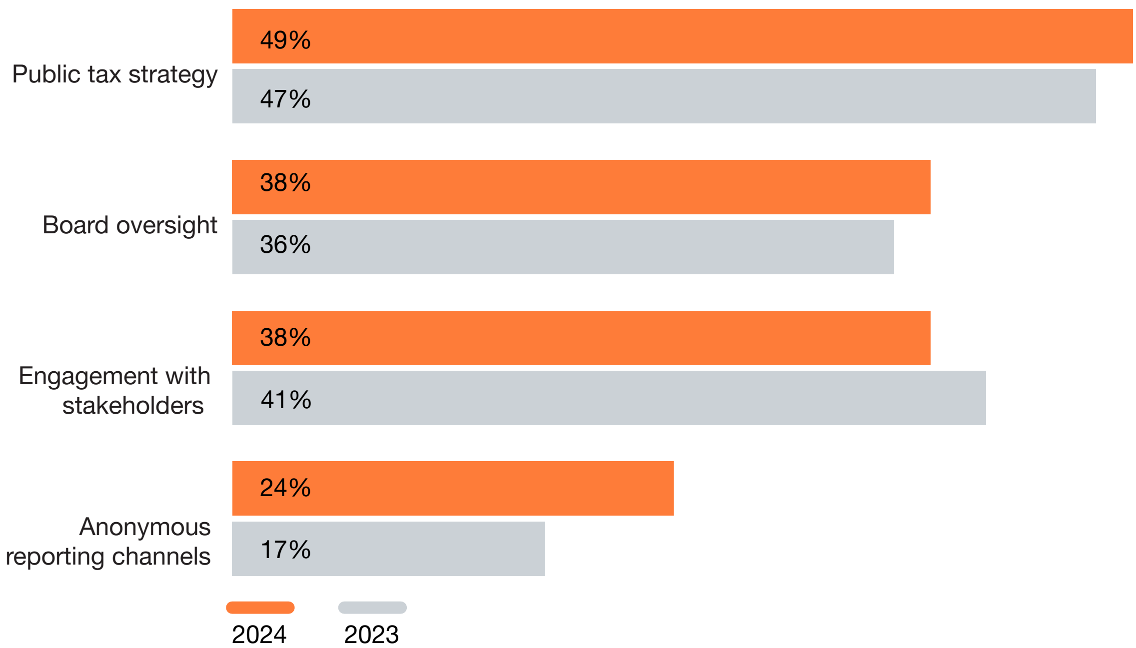
Robust governance is the foundation of credible tax transparency. Without clear oversight, controls and real accountability, an organisation cannot provide a reliable, decision-useful message on its approach to tax.

Ethical culture

Shared values, beliefs, and everyday practices that shape how an organisation thinks about taxes and how tax-related decisions are made

An ethical culture ensures tax decisions are made with integrity, aligning with what society considers fair. It's not just about following the law—it's about being transparent, even when you don't have to be. The tone at the top matters. Senior leaders and the board set clear expectations about tax risks, disclosures, and how to engage with tax authorities.

This filters down. When values are clear, teams make better decisions—especially when navigating grey areas. They know how to assess, document and evaluate uncertain tax positions. Transparency improves too. A culture of honesty leads to clearer disclosures, more accurate reporting, and proactive communication with stakeholders. Avoiding errors is important, but trust is earned through consistent and credible actions.



Graph 9: South Africa - tax disclosure related to ethical culture.

A clear, public tax strategy builds trust–it shows how ethics is incorporated in the organisation's approach to tax.

49 companies published a tax strategy (2023: 47). Of these, 42 provided a detailed explanation of the strategy and how it links to the organisation's business strategy.

Board oversight of the tax strategy supports the tone at the top.

38 companies (2023: 36) clearly indicated that the governing body has ultimate ownership of the tax strategy, reviews it regularly and approves it, or explain how this role is delegated.

Integrity-driven engagement — Proactive stakeholder communication

38 companies (2023: 41) disclosed how they engage with stakeholders on tax issues, detailing the types of stakeholders involved (internal teams, customers, suppliers, government, NGOs, funding organisations, industry bodies, etc.) and the processes used to collect and weigh these views. Of these, 24 reported active involvement in tax policy discussions, advocacy, or lobbying considering the wider tax implications of reform and its impact on government receipts. Among them, 15 provided a detailed account of their lobbying activities related to tax, the reasons for these efforts, and their stances on significant tax issues addressed in public policy advocacy (e.g. industry taxes, global rules, development of environmental tax policy such as carbon pricing initiatives, waste and plastics, etc., aligned with net-zero targets).

Anonymous reporting channels expose hidden risks early–turning potential crises into trust-building moments

Less than a quarter of the companies disclosed safe mechanisms for stakeholders (e.g. employees) to raise concerns about unethical or unlawful behaviour in relation to tax.

Risk of getting it wrong

Tax policies exist, but they're not embedded in day-to-day decisions—opening the door to aggressive tax positions.

When tax is seen as a pure cost, it makes it hard to balance cost savings with staying compliant.

Without proper governance and oversight, blind spots emerge.

Reputational risks increase, exposing the organisation to scrutiny and potential criticism around the credibility of its broader sustainability commitments.

The takeaway

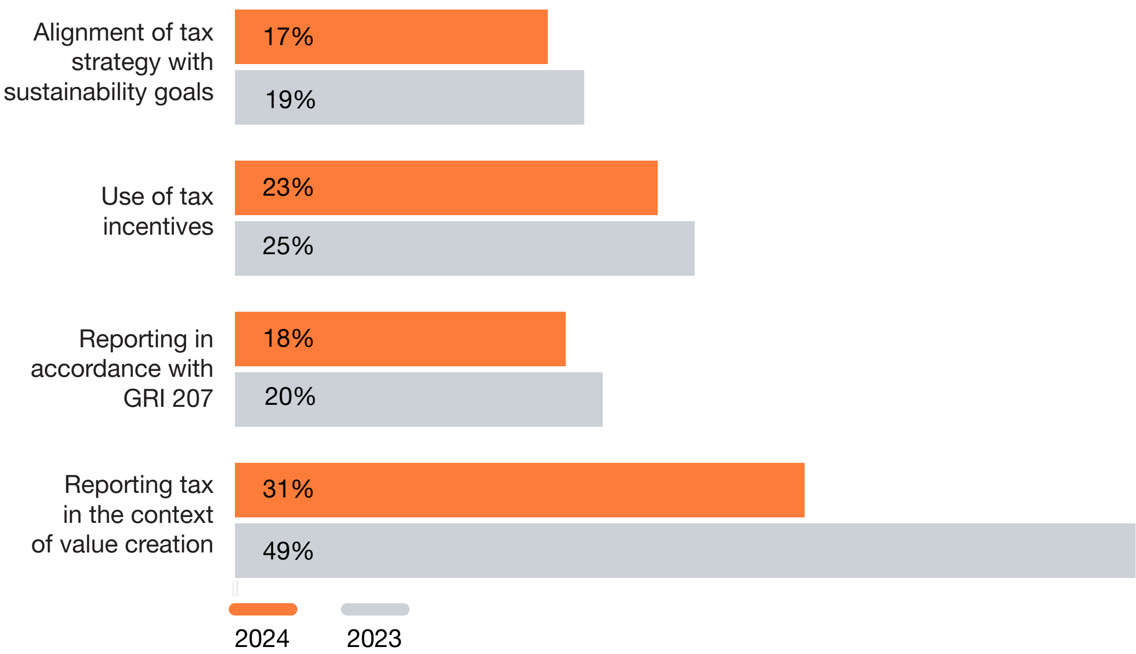
A culture that embodies ethical values and disciplined practices in tax lays a foundation for strong governance and genuine transparency. When tax decisions are guided by ethical principles, the benefits are lasting: reduced tax risk, stronger compliance, and greater trust with stakeholders through clear, responsible disclosures.

Performance and value creation

Creating sustained value within the organisation's economic, social, and environmental context in a sustainable manner through its approach to tax and contributions: Are we using tax strategically to create value responsibly?

A performance-driven approach to tax balances efficiency with accountability. It's about delivering outcomes that support both business growth and societal good, while managing risk to protect long-term value. Transparency plays a key role—it shows how the tax strategy creates measurable impact and benefits communities.

Working closely with strategy, risk, and sustainability teams—under the oversight of the board and risk-committee—helps ensure tax positions align with governance, environmental, and social commitments. Adapting tax approaches to societal needs builds trust and strengthens legitimacy.



Graph 10: South Africa - tax disclosure related to performance and value creation.

Alignment of tax strategy with sustainability goals

A declining trend has emerged with only 43 companies (2023: 59) associating tax with broader sustainability agendas. Only 17 of these companies integrated tax discussions comprehensively within their ESG frameworks, indicating a gap in the holistic approach to a sustainable development strategy. The link between tax and sustainability has weakened year-on-year, suggesting a need to reassert tax's role in value creation and driving stakeholder outcomes.

Tax policies should actively support sustainable investments

Similarly, there was a decline in the disclosure of the use of tax incentives, with 23 (2023: 25) companies indicating that they used tax incentives and only 14 disclosed examples of such incentives. What's needed now is a shift toward prioritising R&D, energy efficiency and green projects where the incentives are justified. Companies should identify and capture legitimate opportunities, like green energy credits or training subsidies with rigorous documentation to deliver value while meeting sustainability goals. Anticipating potential environmental taxes or carbon pricing, companies should build compliance into their risk planning and report where they are exposed and how they are managing it. Taken together, these shifts tell a bigger story, tax is no longer just about compliance—it's becoming a strategic tool that can drive sustainability, build stakeholder trust, and unlock long-term value. To stay ahead businesses need to invest with intent. That means putting real focus on tax to drive growth and resilience with a sharper focus on tax credits and incentives.

Meeting reporting framework requirements

Frameworks are being adopted—but not always followed through.
33 companies say their sustainability reports are prepared in accordance with the GRI Standards, but only 18 reported adequately against GRI 207. That is a gap between intention and execution.

Reporting tax in the context of value creation

Integrated reports are meant to show how strategy and governance drive value across the six capitals (financial, manufactured, intellectual, human, social and relationship, and natural). These six capitals within the Integrated Reporting Framework collectively refer to the resources and relationships that an organisation uses or affects. More companies are linking the six capitals to sustainability—which is great—but tax is still being left out of the story. Only 31 (2023: 49) organisations explicitly included tax in their value creation narrative. That's a missed opportunity. Tax touches everything: cash flow, investment, innovation, people, stakeholder trust, and environmental impact. When companies map tax contributions across the six capitals, the story becomes more transparent, credible, and aligned with societal needs.

Risk of getting it wrong

KPIs ignore tax risk, cash tax, and long-term value.

When tax outcomes aren't tied to business and sustainability strategy; capital allocation, risk exposure and reputation may suffer.

Poor data and siloed reporting hide tax risk and impact.

Without scenario planning, companies lack a clear view as global and local rules shift.

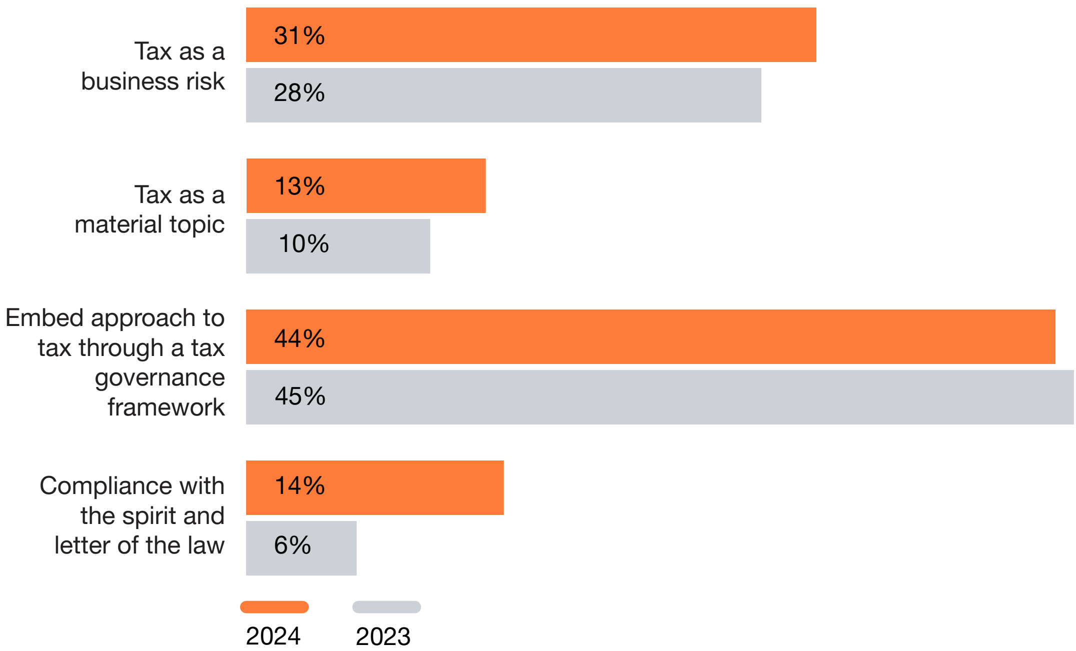
The takeaway

Businesses that reshape tax strategies to pair efficiency with transparency don't just achieve outcomes for shareholders–they create sustainable value for everyone. By staying ahead of regulatory shifts and public sentiment, organisations move faster, turning tax governance into a driver for innovation. This means embedding tax strategies and controls that reflect ESG goals: aligning incentives, ensuring airtight documentation and transfer pricing substance, and making the most of legitimate ESG tax breaks like green energy credits. Transparent communication about how tax fuels sustainable value–not just compliance–build trust and spark stakeholder confidence. The result? Tax becomes a measurable advantage, helping organisations adapt quickly to new and deliver long-term social and financial returns.

Conformance and prudent controls

Doing the right things right: Are we following all rules and proving it transparently?

Conformance and prudent control is at the core of solid tax governance. It's about adhering to the spirit and intent of applicable tax laws and meeting global standards with precision. Transparency means showing exactly how compliance works in practice, it communicates that "here is exactly how we ensure we are operating within the law " by putting in place effective internal controls and clear accountability mechanisms, strengthening the focus on integrity and shaping investor and regulator confidence.



Graph 11: South Africa - tax disclosure related to conformance and prudent controls.

Elevate tax as a risk driver with integration in sustainability material assessments

Almost half of organisations described their approach to tax risk, including how tax risks are identified, managed, and monitored. Board-level engagement and audit-committee discussions and on tax are common. However, only 31 companies formally recognise tax as a significant business risk (2023: 28), highlighting the need to elevate tax in principal risk assessments.

From a sustainability reporting perspective, the gap is even wider. Only 13 organisations (2023: 10) identified tax as a material topic in sustainability reports, or tax disclosures. And fewer than a quarter disclosed the amount of their tax controversy exposures and the potential impact on stakeholders.

Tax must be elevated within sustainability frameworks. It should be fully embedded in double materiality assessments to capture the full picture of impacts, risks, and opportunities. The environmental (E) aspect is clear—carbon, waste, and pollution taxes shape strategy and drive investment in green technology and innovation. But tax also runs deep through the social (S) and governance (G) pillars. It funds public services, reflects fiscal policy and signals corporate responsibility. It comes down to a choice. Companies can either demonstrate responsible tax approaches through transparent narrative and data—or risk falling short of what society expects. Aligning tax with sustainable business strategy isn't optional anymore. Poor tax governance—whether across policies, reporting, or planning—is increasingly seen as a red flag. But when it's done right, integrating environmental taxes and ensuring fairness builds public trust and strengthens a company's licence to operate.

Lift tax governance visibility through a formal framework and a clear commitment to compliance

Less than half of the companies (44, 2023: 45) clearly articulated how tax is embedded in their organisation through a formal tax governance framework—covering, policies, key principles, risk management, reporting, and clearly defined roles and controls.

52 companies disclosed their commitment to comply with tax law and regulation, but only 14 (2023: 6) went further, stating they aim to comply with both the spirit and the letter of the law. More than half discussed changes to local and global tax legislation, regulation, and tax policy, with 51 disclosing general Pillar Two implications. Yet only five disclosed the actual top-up tax payable and just three shared detailed insights into the expected future impact of Pillar Two on their tax position.

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Global insights

In 23 of the 24 territories (all except the US), IFRS now require in-scope companies to disclose the impact of Pillar Two top-up taxes in their financial statements. 509 companies made a Pillar Two disclosure, representing 55% of all companies reviewed in those territories. It means that companies are required to gather more tax data points than ever before, often from outside central systems, stretching already pressured tax functions. Many companies are turning to technology, automation, and AI to manage the scale and complexity of **Pillar Two**. This first wave of disclosures is a significant moment in international taxation—creating a new baseline for transparency and government expectation. Going forward, organisations should strengthen data foundations, harness technology strategically and build credibility by positioning Pillar Two disclosures as part of a broader tax transparency journey.

Risk of getting it wrong

Fines, penalties, settlement costs or dragged-out legal battles.

Losing the right to operate in key markets.

Publicised tax failures erode trust and stakeholder confidence.

The takeaway

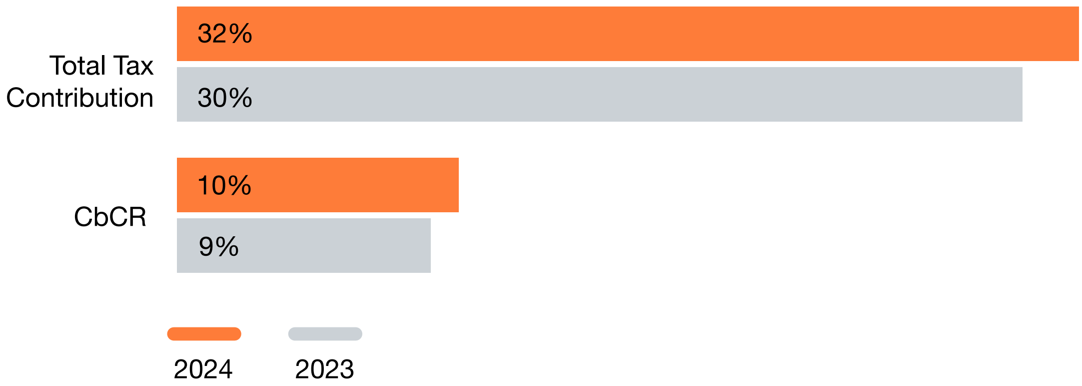
Businesses that lead with airtight compliance frameworks don’t just tick boxes—they build stability in uncertain times. By laying down strong tax controls, they stay ahead of regulatory changes and adapt quickly. This isn’t just about rules—it’s about earning investor confidence and turning tax governance into a strategic asset.

Legitimacy

A reputable and trustworthy responsible corporate citizen and taxpayer that maintains strong relationships with its stakeholders.

Legitimacy in tax governance is earned through responsible corporate citizenship and proactive stakeholder engagement. It's not enough to make public promises—organisations need to back them up with hard data.

This means showing exactly where profits are made and taxes paid. No vague statements. Just clear, credible information that proves tax contributions match the values a company claims to stand for.



Graph 12: South Africa - tax disclosure related to legitimacy.

TTC and CbCR: Turning tax data into a trusted narrative

32 companies (2023: 30) reported their total tax contribution (TTC), in a consolidated format. Most (30) included year-on-year comparisons—but only six included explanations for variances. Additionally, only six companies provided a regional breakdown of their TTC, and 20 companies delivered a detailed breakdown on a country-by-country basis.

Global insights

This year, 270 companies disclosed their TTC—an increase of 22% on last year's review and representing close to 30% of all companies in the study. Of these, 167 published a full profile covering both taxes borne and taxes collected, reporting a total of US$904 billion in TTC (US$369 billion in taxes borne and US$535 billion in taxes collected). These figures underline the scale of the contributions made by these companies to the public finances globally.

For many businesses, simply collecting **TTC** data has become a practical first step. Even if disclosure is considered later, having a consolidated dataset builds readiness for new **tax reporting** requirements, such as pCbCR and **CSRD**, and it gives tax teams more control in an environment where they are being asked to do more with less. At the same time, TTC provides visibility into taxes that are often overlooked in public debate.

Every business model creates a distinct tax footprint—from payroll taxes to irrecoverable value-added tax (VAT). TTC helps contextualise those contributions beyond corporate income tax alone. By turning raw data into a compelling story, companies can show how their tax contribution reflects their business model and underpins their positive contribution to society—positioning tax as more than just a compliance exercise.

PwC's Global Tax Transparency and Tax Sustainability Reporting Study 2025

The landscape for CbCR disclosure remains largely unchanged, with only nine companies (2023: 10) meeting seven or more CbCR requirements. Similar to the previous year, full CbCR disclosure was provided by just two companies.

Global insights

CbCR remains sparse—even with EU and Australian regulations taking effect in 2025, with first reports due in 2026. This year, just 33 companies (3.5%) published full CbCR, up from 24 (2.7%) last year. Another 124 shared partial data, down from 150. The drop reflects changes in the territories and indices reviewed and a shift by some European companies from GRI to ESRS, which has no dedicated tax or CbCR requirement.

Expect **pCbCR** to grow more complex—and more fragmented. In the EU, Member States have implemented the directive with different filing deadlines, data requirements, and approaches for aggregation and presentation. **Australia** adds another layer of complexity, with its own list of territories requiring disaggregated reporting and a mandatory 'approach to tax' statement disclosure. Companies subject to both regimes face a tough task.

Disclosures must be accurate, consistent, and comparable across frameworks that don't line up. Companies that show firm governance over their tax data—and back it with clear, transparent narrative—will be better positioned to navigate an evolving regulatory landscape, build stakeholder credibility, and avoid misinterpretation. That is why pCbCR is not a box-ticking exercise. It is a public benchmark of corporate trust.

PwC's Global Tax Transparency and Tax Sustainability Reporting Study 2025

Make sure you're prepared for pCbCR with PwC's 10 step strategy

Risk of getting it wrong:

Lack of clarity or fairness in tax practices can damage trust.

Companies may face public criticism, activist pressure, or accusations of exploiting loopholes.

Inconsistent TTC or CbCR data can attract regulatory scrutiny—and potential penalties.

Without clear tax governance benchmarks, companies risk falling behind competitors.

The takeaway

Proactive CbCR builds trust—and turns sceptics into supporters. By publishing clear, auditable tax breakdowns, businesses move beyond compliance and into credibility. This is transparency done right. It's a chance to show you've got nothing to hide, to prove fairness and to strengthen your social licence to operate. Done right, it leaves a legacy of integrity that stakeholders can believe in.

King V: Key points for boards & tax executives

Own the strategy, don't delegate it.

The board is accountable for the tax strategy and its outcomes—this is governance, not just management.

Take action: Formally approve and publicly own the tax strategy. Treat it as core to your values and corporate citizenship.

Turn vision into measurable action

A tax strategy is meaningless without approved policies and plans that deliver clear, measurable outcomes. The board can delegate the work, not the responsibility.

Take action: An implementation plan with specific, quantifiable KPIs for responsible tax conduct. Review performance regularly.

Make transparent reporting your accountability engine

External reporting isn't a hurdle. It drives rigorous review and continuous improvement.

Take action: Use reporting as a strategic tool. Run an annual review in which tax performance directly shapes next year's strategy.

Effective governance is multi-dimensional

Effective governance needs active oversight across all dimensions—not a narrow focus on one area.

Take action: Build these four dimensions into your regular governance rhythm. Require management reporting to cover each dimension to maintain balance and avoid operational blind spots.

- **Inward:** Ensure a robust tax control environment, clear accountability, and capabilities to execute on tax.
- **Outward:** Track regulatory, economic, and societal expectations. Engage transparently with stakeholders.
- **Present:** Oversee current compliance and report clearly on past performance, audits, and remediation.
- **Future:** Approve a forward-looking approach to tax that anticipates change and supports sustainable value creation.

Proactively shape your tax narrative

Tax disclosures should address both financial and impact materiality.

Take action: Collaborate to explain how tax contributes to the company's value and how the company's tax conduct affects the wider economy and society. Don't just publish data—explain what it means.

Mandate clarity and conciseness

Tax reports must be clear, concise, and anchored in outcomes-focused metrics.

Take action: Conciseness starts in the planning stage. Use clear metrics to demonstrate results. Let tax disclosures speak directly to the needs of your stakeholders. Avoid technical jargon and generic phrases.

Final approval sits with the board

The board must formally approve every external report—tax included.

Take action: Coordinate early with reporting teams. Build tax into the reporting calendar—not as a last-minute addition—so it's properly reviewed and integrated. Only publish what the board has approved.

The board should be satisfied that the organisation's tax purpose, policy, behaviour, and disclosures align with its purpose and values. That means evidence of fair, transparent outcomes—tax paid in the right places, stable effective rates, and conduct consistent with both the letter and the spirit of the law. On this basis, the board can credibly state that the tax approach reflects responsible corporate citizenship.

04 Confronting poignant and trending challenges in public tax reporting head-on: The voice of our judging panel

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In this year's report, we capture expert insights from our judging panel on opportunities to build trust, its impact, and collate their actionable recommendations, designed to spark meaningful progress.

Encouraging disclosure: A voluntary imperative

Opportunity to build trust

Most large, listed companies in South Africa still aren't disclosing detailed tax information—even when global frameworks are there to guide them. It's not just a gap. It's a critical opportunity to step up, build trust and lead by example.

Impact

Transparency suffers—and so does accountability. Without clear, consistent disclosure, it's harder to build trust, track progress, and foster a culture of continuous improvement.

Act decisively. Lead with transparency

- **Move fast on frameworks:** Don't wait for the industry to catch up—get ahead by adopting recognised standards like GRI 207, King V, or consider the PwC Tax Transparency Framework to lay foundations for trust.
- **Make governance count:** Put tax transparency on the board's agenda. When leadership is involved, accountability becomes real.
- **Start with the basics:** Publicly disclose your tax strategy and how you manage risk. It's the foundation for everything that follows.
- **Level up your reporting:** Go beyond the basics. Add insights on your effective tax rate (ETR), CbCR, and TTC. Show the bigger picture.
- **Know where you stand:** Benchmark against your peers. It's how you spot trends, uncover opportunities, and demonstrate leadership.
- **Turn compliance into a competitive edge:** Transparency isn't a burden—it's a strategic tool. Use it to enhance reputation, unlock value, and drive better outcomes.

Enhanced reporting with deeper insights

Opportunity to build trust

Standard tax disclosures fail to capture the full socio-economic value organisations create and offer a limited view. There is a clear opportunity to go further—and earn trust by showing the bigger picture.

Impact

When reporting lacks depth, stakeholders are left guessing. Without a full view of your organisation's economic footprint, it's harder to build confidence and meaningful engagement. It's time to shift to reporting that reflects real-world impact

Drive meaningful disclosure

- **Move beyond single-year figures:** Use multi-year trends to highlight progress, consistency, and long-term impact.
- **Explain the numbers:** Don't just report variations—explain why they happened. Break down the financial drivers, like rate differentials, in plain language
- **Bridge the gap:** Clarify timing differences between accounting charges and cash taxes paid. Reconcile cash and accrual accounting to build understanding.
- **Connect tax to impact:** Show how your tax contributions support jobs, local suppliers, and broader economic value. Make it real.
- **Add context to CbCR:** Pair country-by-country data with clear narratives that show substance.
- **Be clear on assurance:** Let stakeholders know what is audited, assured, or prepared by management to build trust in data reliability.

Integrating tax strategy with green goals

Opportunity to build trust

Environmental taxes are a critical junction between tax and sustainability strategy. They are not just regulatory hurdles—they are strategic levers. These taxes shape behaviour, influence pricing and investment, and connect directly to carbon strategies. Yet, they are often underreported, misunderstood, and lack standardised disclosure.

Impact

Without clear disclosure, it is hard to see how organisations manage these exposures or align them with broader sustainability goals. To shape the future, organisations must evolve and bring this integration into focus.

Lead the transition

- **Reframe the role of environmental taxes:** Position them as tools for sustainable growth—not just costs to manage.
- **Show the numbers and the impact:** Report how these taxes affect pricing, capital decisions, and internal carbon pricing. Make the financial influence clear.
- **Highlight cross-functional collaboration:** Explain how tax and sustainability teams work together to shape strategy and drive outcomes.
- **Tell a bigger story:** Embed environmental tax into broader sustainability reporting. Show how it fits into your overall impact narrative.
- **Assess climate risks:** Identify and prioritise climate-related risks and opportunities. Make it part of your strategic planning.
- **Stay ahead of regulatory change:** Track new sustainability regulations and incentives and use them to your advantage.
- **Set clear goals:** Publish measurable targets for reducing climate impact and show how the tax strategy supports them.
- **Use green taxes and incentives to accelerate change:** Leverage government tools to help you drive the transition to a low-carbon economy.

Redefine, elevate, mitigate and enhance

Opportunity to build trust

We are at a turning point—where **regulatory change meets digital transformation**. New frameworks—Pillar Two, TTC, and pCbCR demand a new approach. They require granular, entity-level data that's accurate, timely, and consistent across jurisdictions. The quality of your tax data is no longer optional—it's essential.

Impact

Tax reporting is no longer a once-a-year exercise. It's a continuous strategic function. When done right, it fuels smarter decisions, strengthens resilience, and helps manage risk across the value chain. This shift transforms compliance into a source of insight—and a foundation for trust.

Turning tax data into strategic insight that drives value

To unlock the full value of your tax data, a fundamental shift in operations is needed. Focus on these strategic actions: to build tax capabilities that inform decision-making.

- **Automate core tax processes:** Standardise core tax processes to reduce manual work, enforce controls, and ensure data integrity from source to report.
- **Establish a digital tax control framework:** Create a technology-enabled structure to manage risk, document policies, and demonstrate strong governance.
- **Connect directly to your ERP:** Integrate tools for seamless data flow–eliminating manual reconciliation and breaking down siloed systems.
- **Enable real-time monitoring and analytics:** Continuously validate transactions against regulatory requirements and proactively identify issues.
- **Deploy Agentic AI:** Move to 24/7, autonomous oversight of controls and processes to catch anomalies and opportunities instantly.

Tax in a GenAI world

Opportunity to build trust

Generative AI is changing how we work—boosting productivity and reshaping decision-making. But in tax reporting, where trust is everything, its role is still emerging, presenting a strategic challenge. Trust is a combination of competence and taking a **responsible approach to AI adoption**.

Impact

To move forward, we need clarity. That means defining how AI can turn compliance into strategic value—and use it to strengthen stakeholder confidence.

Transform with trust

- **Reframe tax reporting:** Position AI as a driver of transformation—from routine compliance to high-impact value creation.
- **Automate and enhance:** Use AI to automate reconciliations, generate narratives, and build intuitive data interfaces that make reporting smarter.
- **Look ahead:** Leverage AI to model scenarios, assess exposures, and benchmark against peers—so you can anticipate, not just react
- **Build a strong data foundation:** AI is only as good as the data behind it. Invest in secure, high-quality **data strategies** to protect trust.
- **Put governance first:** Anchor AI verified data, audit trails, and human oversight. Guardrails are important.
- **Lead with people:** Adopt a **'human-led, tech-powered'** model. Let experts guide inputs, validate outputs, and make the final call. Skills like communication, analytical thinking, and curiosity are more important than ever.
- **Be transparent:** Clearly communicate how AI is used and how data is safeguarded to build trust internally and externally.
- **Align AI with your values:** Use AIs to support—not replace—your tax strategy and ethical principles. Make sure it fits your culture.

05 Findings from our judging panel

Each year, our independent judging panel commends companies with a primary listing on the JSE that demonstrate the highest level of tax transparency, based on the PwC Tax Transparency Framework. The companies recognised here delivered strong, consistent, and comprehensive reporting across all categories of the Framework and addressed the majority its criteria.

We extend our sincere thanks to the judging panel for their time, expertise, and commitment to this initiative. Their independent assessments and thoughtful feedback continue to drive progress in transparency and accountability.

Below we present the panel's findings, along with some well-deserved comments made by them.

Best performance in tax reporting

Nedbank

The panel recognised Nedbank for consistently delivering high-quality tax reporting, marked by its clarity and stakeholder focus. Complex tax matters are presented in a way that is easy to understand making the information accessible without losing depth.

Nedbank's disclosures offer a comprehensive view of its tax contributions—both in scale and diversity—supported by detailed data and thoughtful narrative. The report goes beyond the numbers, including forward-looking insights, multi-year trends, and commentary on emerging legislation. This level of context helps stakeholders make informed decisions, builds trust, and reinforces Nedbank's commitment to transparency and accountability.

Highly commended for most significant improvement in tax reporting

Omnia

The panel commended Omnia for its first Tax Transparency Report in 2024—a significant step forward in openly communicating its approach to tax. The report reflects a clear commitment to transparency and willingness to engage meaningfully with stakeholders on tax matters.

One of the standout features is how well tax disclosures are integrated across Omnia's broader reporting suite. The group aligns with global standards like GRI 207 and connects tax information to its integrated and sustainability reporting. By showing how tax contributes to value creation and broader societal outcomes, Omnia positions tax as a key part of its social licence to operate.

Highly commended for consistent performance in tax reporting

Impala, Old Mutual and Vodacom

The judging panel recognised these companies (in alphabetical order) for consistently delivering high-quality, value-adding tax disclosure based on the framework's criteria, with each setting an example in its sector and beyond.

Below, we share selected comments from the panel in recognition of their strong and ongoing commitment to transparency.

> Effectively balances a broad overview with specific details, integrating taxation seamlessly across the reporting suite.

> Visually effective analysis significantly aids stakeholder understanding of the tax landscape.

> Improvements in content density enhance transparency.

> Breadth and candour demonstrate a serious commitment to transparency in a challenging operating context.

> A frank discussion of the drivers of changes in the ETR, tax controversies and risk, ensures investors can clearly understand both current and future tax dynamics.

> Offers valuable insight not only into the 'what' of tax paid but also the 'why' behind the figures.

Our judging panel

Carolynn Chalmers

Carolynn Chalmers is an internationally recognised authority in corporate governance and sustainability, dedicated to advancing responsible leadership and long-term value creation. She serves as Chief Executive Officer of the Good Governance Academy and Chief Strategy Officer of The ESG Exchange, both founded by Professor Mervyn King. She co-edited ISO 37000, the first global standard for the governance of organisations, and was the lead editor of ISO 37004, the Governance Maturity Model, as well as ISO 37014, the Governance Maturity Model for organisational groups. She chairs South Africa's Technical Committee (TC 309), ensuring that South Africa contributes actively to the international governance discourse. With more than 20 years in leadership roles—including CIO, CTO, board member and adviser—Carolynn brings together expertise in governance, sustainability, technology and systems thinking.
Her career spans multiple industries, from financial services and healthcare to energy, education and construction.

Prof. Madeleine Stiglingh

Madeleine Stiglingh is the Head: CA Programme at the University of Pretoria. She is a CA(SA) and a Master Tax Practitioner with a PhD in Financial Management. Her research focuses on accounting education and the tax burden of corporates and acknowledges the interdependence of financial and tax related reporting and stakeholder behaviour as a reaction to the total tax burden of a corporation. She is also the editor of a leading South African taxation reference work used by both practitioners and students, Silke on South African Income Tax.

Tracy Johnson

Tracy Johnson is the Head of Postgraduate Taxation in the Department of Finance and Tax, Faculty of Commerce, at the University of Cape Town. She is also a member of UCT's Tax Unit for Fiscal Research and serves on the Executive Committee of the International Fiscal Association (IFA) – South Africa. After a career in corporate taxation at PwC, she joined UCT's Faculty of Commerce, where she lectures in the Bachelor of Commerce (Honours) in Taxation programme and has convened the Master of Commerce in Taxation programmes. Tracy holds a master's degree in taxation and is a Chartered Tax Advisor (CTA (SA)).
She also serves on the Education Committee of the South African Institute of Tax Professionals (SAIT).

Zubair Wadee

Zubair is the Head of the Wits Margo Steele School of Accountancy at the University of the Witwatersrand (Wits). He is a member of the Integrated Reporting and Connectivity Council and the SAICA Accounting Practices Committee. He has previously served on several local and international governance and reporting committees and used to be a partner at PwC.

06 Methodology

The PwC Tax Transparency Framework

Many organisations consider their tax disclosures in terms of "for whom and for what purpose" they are reporting—moving beyond a tick-the-box approach. There is no right way to do this. What works depends on a company's geography, sector, and other factors. Different businesses will come to different conclusions about what to disclose and when, all in the name of building trust.

Our goal is to help companies navigate the complexity of tax transparency and turn it into something practical. With this in mind, we closely monitor developments in voluntary tax reporting and regularly update the framework to stay aligned with global frameworks and best practice. We also ensure that our criteria are clear, consistent, and comparable.

The PwC Tax Transparency Framework is designed to help companies build a tax transparency strategy that works for them. In this publication, we share the results of our review of the top 100 JSE-listed by market capitalisation as of 31 December 2024, using the Framework as our lens.

We looked at annual reports, corporate social responsibility reports, annual financial statements, integrated reports, tax reports, sustainability reports, and other relevant publicly available information for the 2024 financial year. While we've aimed to include all relevant public data, we acknowledge that our sources may not be exhaustive.

The framework includes 43 broadly defined tax transparency criteria that reflect what we consider to be the basis of good practice in voluntary tax reporting. Companies can score up to a maximum of 80 points.

We assess companies across four key categories, outlined below.

A: Context

- Effective tax transparency: easy to find and well communicated
- Value reporting
- Integration of tax related disclosures with other company related disclosures
- Importance of tax transparency to the organisation
- Frameworks supported

B: Tax strategy and risk management

- Tax strategy
- Tax as a business risk
- Tax risk management, tax governance, tax reporting, and oversight
- Tax controversy
- Stakeholder engagement
- Tax in the context of ESG

C: Tax numbers and performance

- Key financial indicators
- Effective tax rate vs cash tax rate
- Tax incentives
- Clear and understandable rate reconciliation
- Adjusted tax rate
- Future performance of tax rates

D: Total tax contribution and wider impact

- Jurisdictions, entities, and primary activities
- Total economic contributions per tax type, jurisdiction, and year
- Other economic contributions to government
- Tax and wider value creation
- Tax and SDGs/corporate citizenship

We hope this report is a useful tool for companies developing their tax transparency narrative and preparing for new global standards and regulatory disclosures. If you'd like to explore ways to enhance your tax reporting and governance, we are here to help. On request, we can provide high-level feedback reports that benchmark your company's voluntary tax disclosures against your peers.

Get in touch

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