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| **RFI NUMBER:** | RAF/2026/00053 |
| **DESCRIPTION:** | Request for Information – appointment of a suitable Tax Expert Specialising in Belgian Tax Law. |
| **PUBLISH DATE:** | 19 August 2026 |
| **CLOSING DATE:** | 26 August 2026 |
| **CLOSING TIME:** | 11:00 A.M. |
| **COMPULSORY BRIEFING SESSION** | Not applicable, interested parties are requested to use the email address below to seek clarification where required |
| **RESPONSES MUST BE EMAILED TO:** | bacsecretariat@raf.co.za |
| **ATTENTION:** | SCM – Demand Management |

**BIDDING STRUCTURE**

| Indicate the type of bidding structure by marking with an **'X'**: | |
|---|---|
| Individual bidder | |
| Joint venture | |
| Consortium | |
| Using subcontractors | |
| Other | |

| **If individual bidder, indicate the following:** | |
|---|---|
| Name of bidder | |
| Registration number | |
| VAT registration number | |
| Contact person | |
| Telephone number | |
| Fax number | |
| E-mail address | |
| Postal address | |
| Physical address | |

| **If using subcontractors, indicate the following:** | |
|---|---|
| Name of prime contractor | |
| Registration number | |
| VAT registration number | |
| Contact person | |
| Telephone number | |
| Fax number | |
| E-mail address | |
| Postal address | |
| Physical address | |
| E-mail address | |
| Postal address | |
| Physical address | |

| **If joint venture or consortium, indicate the following:** | |
|---|---|
| Name of prime contractor | |
| Registration number | |
| VAT registration number | |
| Contact person | |
| Telephone number | |
| Fax number | |
| E-mail address | |
| Postal address | |
| Physical address | |

| **If using subcontractors, indicate the following**: (*To be completed for each subcontractor*) | |
|---|---|
| Name of subcontractor | |
| Registration number | |
| VAT registration number | |
| Contact person | |
| Telephone number | |
| Fax number | |
| E-mail address | |
| Postal address | |
| Physical address | |

**ENQUIRIES**

Enquiries regarding this Request for Information should be submitted via e-mail to:

**BID ENQUIRIES:**

| | |
|---|---|
| Ayanda Danca | bacsecretariat@raf.co.za |

Enquiries should reference specific paragraph numbers, where appropriate.

All questions/ enquiries must be forwarded in writing prior to the submission date.

## 1. BACKGROUND OF THE RAF

1.1 The Road Accident Fund (RAF) is a schedule 3A public entity established in terms of the Road Accident Fund Act, 1996 (Act No. 56 of 1996), as amended. Its mandate is the provision of compulsory social insurance cover to all users of South African roads, to rehabilitate and compensate persons injured as a result of the negligent driving of motor vehicles in a timely and caring manner, and to actively promote the safe use of our roads.

## 2. SPECIAL INSTRUCTION TO BIDDERS

2.1 The service provider must be an eligible, registered Service Provider in terms of the applicable laws of the Country and included in the National Treasury Central Supplier Database.

2.2 It is expected of bidders to have their Tax matters in order when the proposals are submitted.

2.3 Companies or Director that are included on the National Treasury register for Restricted Suppliers and/ or Tender Defaulters will be automatically disqualified from the process.

2.4 The RAF reserves the right to use the bidder's proposal in any other procurement method where required and may result in an award.

## 3. BACKGROUND

The Road Accident Fund (RAF) wishes to appoint wishes to appoint a suitable Tax Expert specialising in Belgian Tax Law.

## 4. SCOPE OF WORK

4.1 The expert is required to do assessment of the claimant's net income basis, considering Belgium tax and pension legislation, compile a report for RAF Actuaries as well as testify in open court.

- Belgian Tax Expert to provide accurate net income calculations.
- The current actuary projections are calculated on a gross income basis. In a high tax jurisdiction such as Belgium, this materially inflates the plaintiff's alleged loss.
- Proper expert evidence from a tax practitioner who understands the Belgium taxing system is required to determine the true net earnings differential before contingencies and apportionment are applied.

**Objective of the Appointment**

- The purpose of this appointment is to secure the specialized expertise of Tax Expert to directly counter the unadjusted gross calculations presented by the Plaintiff.
- The expert is required to analyse, value, and provide a legally robust quantification of complex Belgium social security, pension accrual, and multi-tiered taxation structures applicable to the claimant's loss of earnings quantification.
- This appointment is critically necessary to establish an accurate net income baseline, rectify omissions in the Plaintiff's actuarial data, and mitigate a material risk of over-settlement.

**Mandate Of the Expert**

**The appointed expert will be required to conduct the following:**

- Analyse the Belgian income tax regime applicable to the claimant for purposes of determining the applicable taxation structure, inter alia:

✓ Applicable marginal tax brackets considering that claimants' premorbid scenario postulation is exceeding € 49,840 which is the maxim threshold for 50% deduction.

✓ Municipal and regional taxes.

✓ Social security contributions.

✓ Pension-related deductions.

✓ Professional expenses and statutory deductions.

- Determine whether the claimant's projected earnings fall within the higher Belgian tax brackets and quantify the nett earnings after lawful deductions.
- Quantify and actuarially calculate the claimant's hypothetical pre - accident earnings and projected future earnings using nett income calculations instead of gross income assumptions.

- Deduct mandatory Belgian social security charges, professional expenses, and statutory pension contributions. This is required to correct the Plaintiff's flawed pre-morbid baseline, which treated gross revenue as disposable nett income.
- Conduct deep comparative research into the Belgian social security frameworks, specifically assessing the differing regulatory structures, pension levels, and legislative mechanisms governing employed, state - employed, and self-employed professionals.
- Analyse and model the impact of the Belgian tax regime which may approximate a 50% tax rate within the claimant's high-earning bracket to transition the gross postulations into a legally accurate nett earnings assessment.
- Mathematically compute the actuarial present values of the claimant's projected lifetime income, pension accruals, and social insurance benefits under both the hypothetical pre-accident trajectory and the actual post-accident reality. This will account for the distinct benefit structures governing employed, state-employed, and self-employed professionals in Belgium.
- Engage directly with Eurozone fiscal authorities, accountants, and European benefit specialists to verify underlying commercial profiles. The foundational data models created under this mandate will be systematically replicated across pending parallel Belgian claimant matters to ensure a uniform corporate defence and eradicate cost duplication.

**Deliverables**

- The appointed expert shall provide:

✓ A comprehensive taxation report.

✓ Supporting calculations and schedules.

✓ Joint minutes where applicable;

✓ Trial attendance and testimony if required; and

✓ Ongoing assistance to the legal team relating to foreign tax and benefit quantification.

## 5. Mandatory Requirements

**Service Providers must indicate by ticking (√) correct box indicating that they Comply OR do Not Comply.**

| No | Description | Comply | Not comply |
|---|---|---|---|
| 1 | **Registration**<br><br>The Tax Expert proposed by the service provider must be registered with the **Actuarial Society of South Africa (ASSA).**<br><br>The service provider must submit a **valid** copy of registration with Actuarial Society of South Africa (ASSA) for the Tax Expert.<br><br>The RAF reserves the right to validate and confirm the proof of registration submitted. | | |

| Number | Description | Comply | Not Comply |
|---|---|---|---|
| 2 | **Company Experience**<br><br>The service provider must provide a **minimum of one (1)** client reference at which Belgian Tax services were rendered.<br>The service provider must complete the company experience requested on the **Bidder's Client References** table provided in this bid document.<br>The RAF reserves the right to validate and confirm the information. | | |

## 6. PRICING SCHEDULE

| NO. | ITEM DESCRIPTION | UNIT OF MEASURE | RATE PER UNIT |
|---|---|---|---|
| **1** | Assess Belgian Tax (As per specification) | Per Hour | |
| **2** | Testify in Court (As per specification) | Per Hour | |
| **3** | Joint Minutes | Per Hour | |
| **4** | Report | Per Report | |

## 7. BIDDER'S CLIENT REFERENCES

Bidders are requested to provide the required information in instances where you are currently or have previously rendered the required services:

| No | Project Description | Services rendered | Contract start date | Contract End date | Client Name (An entities that obtained your services and not your sub-contractor) | Client Contact Person | Client contactable details: Email Address and or telephone number |
|---|---|---|---|---|---|---|---|
| 1. | | | | | | | |
| 2. | | | | | | | |
| 3. | | | | | | | |
| 4. | | | | | | | |

**Notes:**

1. Bidders may provide any additional documents to support the information above
2. Any falsified or misrepresented information indicated above will lead to disqualification from the procurement process
3. The RAF reserves the right to contact the client/s listed above to authenticate the information

Name of Bidder: ____________________________________________________

Signature of Bidder: _________________________ Date: _____________________