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Towards Ethical Tax Leadership: A Systematic Review of Corporate Tax Governance in South Africa

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Abstract
This study examines how corporate tax governance has been conceptualised within the South African scholarly context. Using a systematic literature review and interpretive synthesis of fourteen A-list contributions, the study identified seven principle-oriented themes: ethical responsibilities, tax policy/strategy, tax risk management, tax control frameworks, the function of tax operations, co-operative compliance, and transparency and reporting. While these themes broadly align with the six VBDO (Dutch Association of Investors for Sustainable Development) and Oikos principles, the findings extend the framework through the explicit inclusion of ethical responsibility as an additional principle and refine it by framing accountability primarily through transparency rather than formal assurance mechanisms. More critically, the literature is characterised by a predominantly normative and conceptual orientation, with minimal empirical evidence and an absence of explicit theoretical grounding. The primary contribution of the study lies in consolidating fragmented perspectives into a coherent, principle-oriented framework, particularly given that none of the reviewed sources explicitly articulate corporate tax governance principles, and these had to be inferred from the literature. The findings highlight the need for more theoretically grounded and empirically informed research that explicitly conceptualises corporate tax governance principles within the South African context, rather than inferring them from implicit and fragmented discussions.

Keywords: King IV, tax, tax governance, corporate governance, South Africa.

1. Introduction
Society is demanding that companies make a positive contribution to society and be transparent. The current dissatisfaction with regard to multinational companies' tax planning practices shows that society demands companies to integrate tax governance in their corporate governance (Gribnau et al., 2018, p. 391).

As early as November 2016, the Institute of Directors South Africa (IoDSA) had the foresight to incorporate tax governance into corporate governance. The concept of corporate governance itself was introduced in South Africa in 1994, when a commission was set up under the chairmanship of retired judge Mervin King, hence the titles "King Committee" and "King reports" (Natesan, 2020). The King Committee has produced four reports to date, with King IV replacing King III in its entirety and becoming effective for financial years commencing on or after 1 April 2017 (IoDSA, 2016). The King IV Report defines corporate governance as "*the exercise of ethical and effective leadership by the governing body*" (IoDSA, 2016, p. 11).

According to the chairperson of IoDSA at the time of this study, Parmi Natesan, the King IV Report moved from the "apply *or* explain" approach to an "apply *and* explain" approach for the governing body (Natesan, 2020). The governing body is the structure that has primary accountability for the governance and performance of the organisation – in the case of a company, its board of directors (IoDSA, 2016). The King IV Report was the first instance where tax governance was introduced in the South African corporate governance sphere (Pahad, 2019). The King IV Report refers to "tax" twice, once under "Fundamental Concepts: Highlights of the King IV Code" and once in the King IV Code itself. (Note that reference to the King IV Report means the complete report itself, whereas reference to the King IV Code means Part 5 of the Report – the Code itself.)

The first reference to tax is under "Fundamental Concepts: Highlights of the King IV Code", where it states the following under the heading "Tax":

> *"Tax has become a complex matter with various dimensions. The governing body should be responsible for a tax policy that is compliant with the applicable laws, but that is also congruent with responsible corporate citizenship, and that takes account of reputational repercussions. Hence, responsible and transparent tax policy is put forward as a corporate citizenship consideration in King IV."* (IoDSA, 2016, p. 32)

The second reference to tax is in the King IV Code itself under "Principle 3: Responsible Corporate Citizenship". This principle states that the board of directors should ensure that the organisation is and is seen to be a responsible corporate citizen (IoDSA, 2016; Mabutha, 2017; Pahad, 2019; Stanley-Smith, 2017; Terblanche, 2021; Thiart, 2019; van der Walt, 2016). One of the recommended practices under the responsible corporate citizen principle states the following (IoDSA, 2016):

> *"The governing body should oversee and monitor on an ongoing basis, how the consequences of the organisation's activities and outputs affect its status as a responsible corporate citizen … in all of the following areas:*
> *a. […]*
> *b. Economy (including […] responsible and transparent tax policy)."* (p. 45)

At first glance, it appears that the King IV Report requires boards of directors to ensure that the organisation has a tax policy, and that this policy is responsible and transparent. The King IV Report leaves the interpretation of the terms *responsible* and *transparent* to the discretion of the organisation and its board of directors (Botha, 2017; Pahad, 2019). Before one seeks to answer the question of what "responsible" and "transparent" mean, the first question should be: What is good corporate tax governance in a South African context?, as good corporate tax governance could arguably not only require a responsible and transparent policy. Thiart (2019) concluded on South Africa's position on responsible and good corporate tax governance through transparency as follows:

> *Owing to the lack of South African literature on what constitutes good tax governance in the local context [emphasis added], the principles developed by VBDO and Oikos (2014) […] formed the basis of the framework that was developed in this study."* (p. 4)

Research might have been conducted on this matter since 2019, giving rise to the main research question: What is good corporate tax governance in a South African context? To answer this main research question, the following sub-research questions were formulated:

1. What studies have been performed on corporate tax governance in a South African context, either from a King IV perspective or in general?
2. What themes in respect to principles for good tax governance are derived from the identified literature?

The remainder of the paper is structured as follows: Section 2 presents the research methodology selected and applied, followed by the summary of findings in Section 3 and discussion in Section 4. Finally, Section 5 provides the conclusion of this paper, including identifying research areas and discussing limitations.

2. Research Methodology

A systematic literature review (SLR) was chosen as the research method because of its effectiveness in comprehensively reviewing a limited field of study (Hazaea et al., 2021; Khatib et al., 2021; Khatib et al., 2022; Zamil et al., 2021). An SLR is transparent and allows for reproducible research, with the knowledge synthesis identifying gaps, providing direction for future research, and contributing to theory development (Endenich & Trapp, 2020; Pedrini & Ferri, 2019).

The study followed a structured six-step process consistent with prior management and governance research (Klewitz & Hansen, 2014; Pedrini & Ferri, 2019; Seuring et al., 2005), with the latter published in the Q1 journal *Corporate Governance: The International Journal of Business in Society*. This approach ensures transparency, rigour, and reproducibility while remaining appropriate for a qualitative evidence synthesis. Table 1 below summarises the steps and results of the SLR.

Table 1: Steps of the systematic literature review

Process	**Step**	**Individual step**	**Analysis from**	**No. of articles**
Search	1	Identification of keywords (King IV, tax, tax governance, governance and South Africa)	King IV Report	
	2	Development of exclusion and inclusion criteria		
	3	Specification of relevant search engines (Scopus, Emerald, EBSCO, and Google Scholar) and execution of the search	Title and keywords (automated search based on keywords)	**414**
	4	Development of C-, B-, and A-lists: C-list B-list A-list	Title and author(s) (manual) Automated search based on keywords Full text	 **262** **86** **14**
Descriptive analysis	5	Development of descriptive categories (year of publication, focus of publication, theory, and methodology applied)		
Synthesis of findings based on thematic analysis	6	Identification of central themes and interpretation of findings		

Step 1: Identification of Keywords

The identification of search keywords was guided by the objective of capturing South African academic literature on corporate tax governance, while recognising that the terminology used in the literature is neither uniform nor consistently labelled as "corporate tax governance". As the King IV Report represents the first South African corporate governance code to explicitly introduce tax governance considerations, "King IV" and "tax" were used as the initial conceptual anchors. Where these searches yielded limited results, the strategy was expanded to include "tax" AND "governance" and "South Africa". To avoid the inadvertent exclusion of relevant material, the term "corporate" was deliberately omitted at this stage, as its inclusion could have unduly narrowed the scope of the search.

Step 2: Development of Exclusion and Inclusion Criteria

The initial scope of this SLR was defined with reference to the release of the King IV Report on 1 November 2016. Accordingly, publications using the keywords "tax", "King IV", and "tax governance" published during the period 2016 to 2025 were reviewed, reflecting the body of South African literature available at the time the review was conducted. To ensure academic quality, the review initially focused on peer-reviewed journal articles published in English.

However, given the limited number of peer-reviewed studies identified and to ensure comprehensive coverage of South African corporate tax governance literature, the scope was subsequently broadened. The time restriction was removed, and the review was extended to include scholarly and professional publications using the combined keywords “tax”, “governance”, and “South Africa”. This approach ensured that relevant South African contributions predating King IV were not inadvertently excluded.

Step 3: Specification of Relevant Search Engines and Execution of the Search
The third step involved the selection of bibliographic databases to ensure both reliability and breadth of coverage within the South African academic context. Scopus was selected as a primary database due to its status as one of the largest curated abstract and citation databases, offering high-quality enriched metadata for scholarly publications (Baas et al., 2020). Its frequent use in prior SLRs further supports its suitability for academic synthesis (Khatib et al., 2022; Pedrini & Ferri, 2019).

To further strengthen the robustness of the review, databases commonly used in the financial sciences domain were also incorporated, namely, Emerald and EBSCOhost. Emerald provides access to a wide range of business and management journals, while EBSCOhost offers multidisciplinary coverage through databases such as Academic Search Ultimate and Business Source Ultimate.

Despite the use of these established scholarly databases, the number of relevant South African publications identified remained limited. Accordingly, the search was extended to include Google Scholar as a supplementary search engine, with the purpose of identifying potentially relevant academic and professional literature not indexed in curated databases. Prior studies have demonstrated that Google Scholar provides highly inclusive citation coverage across disciplines (Harzing, 2013; Martín-Martín, Orduna-Malea, & Delgado López-Cózar, 2018; Mingers & Lipitakis, 2010; Prins et al., 2016), and empirical comparisons indicate that it offers broader coverage than Web of Science and Scopus (Martín-Martín, Orduna-Malea, Thelwall, & Delgado López-Cózar, 2018).

The automated database searches were finalised on 24 January 2026, with the results presented in Table 2. Inevitably, the results included duplications across databases, which were subsequently addressed in Step 4 of the review process.

Table 2: Results of automated searches based on keywords

Search #	Search string	Scopus	Emerald	EBSCO host	Google Scholar	Total
1.	Title: “Tax” Keyword: “King IV” Years: 2016–2025	2	3	1	30	36
2.	Title: “King IV” Keyword: “Tax” Years: 2016–2025	0	0	0	14	14

3.	Title: “King IV” Keyword: – Years: 2016–2025	4	1	11	87	103
4.	Title: “Tax governance” Keyword: “King IV” Years: 2016–2025	1	0	1	5	7
5.	Title: “Tax governance” Keyword: “South Africa” Years: –	2	0	6	61	69
6.	Title: “Tax” and “Governance” Keyword: “South Africa” Years: –	4	4	21	156	185
Total		**414**				

Step 4: Development of C-, B-, and A-Lists

The fourth step involved refining the search results to address database overlap and eliminate duplicate records, ensuring that only potentially relevant sources proceeded to detailed screening. This refinement was conducted in three stages, culminating in the development of C-, B-, and A-lists.

The first stage of Step 4 involved a manual screening process. The 414 records identified through the automated database searches were reviewed based on titles and authors to remove duplicate records and non-English publications. Following this initial screening, 262 records remained and constituted the C-list.

The second stage focused on relevance screening to develop the B-list. Records in the C-list were assessed to exclude publications not relevant to the focus of this study, namely, corporate tax governance from a King IV or South African corporate governance perspective. This stage involved a combination of automated keyword filtering and manual review. All records referring explicitly to King IV were retained. Records that did not reference King IV but addressed “tax”, “governance”, and “South Africa” in combination were manually reviewed to assess their relevance to corporate tax governance in the South African context. Following this screening process, 86 items remained and formed the B-list.

The final stage of Step 4 involved the identification of A-list contributions that adopted a substantive focus on corporate tax governance from a corporate perspective. To ensure completeness and enable an in-depth qualitative assessment of principle-oriented emphases in the South African literature, the 86 B-list items were subjected to a manual full-text review. This process resulted in the identification of 14 A-list contributions. Of these, only three studies (Botha, 2017; Gribnau et al., 2018; Thiart, 2019) examined corporate tax governance as an overarching governance concept, while the remaining contributions focused on one or more underlying themes of corporate tax governance, such as tax risk management (TRM) or transparency. These A-list contributions formed the analytical basis for the identification and synthesis of principle-oriented themes in the South African academic evidence base.

Step 5: Development of Descriptive Categories

The fifth step involved a descriptive analysis of the 14 contributions. The analysis captured key attributes, including authorship, year of publication, source type, focus of publication, and, where applicable, theoretical and methodological approaches, to trace the development of the literature over time and to identify dominant areas of emphasis. The results of the descriptive analysis are summarised in chronological order in Table 3 below under the sub-heading "Descriptive Analysis".

Step 6: Identification of Central Themes and Synthesis of Findings

The final step involved an interpretive qualitative synthesis of the 14 A-list contributions to identify recurring, principle-oriented emphases in the South African corporate tax governance literature. McKerchar (2008) stated, "*[i]f text data is to be analysed manually, it does help strengthen the findings if it is done in a systematic fashion*" (p. 16). Hence, a structured manual process was applied. Each contribution was read multiple times to achieve familiarity with the data. ATLAS.ti was used as a supporting tool to assist with the organisation and retrieval of coded text segments. Semantic coding was applied to explicit and implicit references to corporate tax governance, resulting in codes such as responsible corporate citizenship, tax morality, internal engagement, operational procedures, and public transparency.

The coded extracts were reviewed iteratively to identify patterns of meaning and to assess how these patterns aligned with, extended, or diverged from existing international conceptualisations of corporate tax governance, particularly those proposed by VBDO (Dutch Association of Investors for Sustainable Development) and Oikos (2014). This interpretive and primarily inductive process allowed themes to emerge from the data while remaining sensitised to established governance frameworks. Coding was applied systematically across all selected contributions, with codes refined and grouped through repeated engagement with the data to ensure consistency and conceptual coherence. Related codes were synthesised into higher-order, principle-oriented themes, with attention given to identifying context-specific emphases and underdeveloped principles within the South African literature. These clusters are referred to as principle-oriented themes, as they reflect governance-relevant principles underpinning scholarly conceptions of good corporate tax governance in the South African context.

3. Findings

3.1 Descriptive Analysis

The descriptive analysis presented in Table 3 indicates that South African corporate tax governance remains a markedly under-researched area. The distribution of publications over time reflects limited scholarly engagement, suggesting that the topic has not yet gained sustained academic traction. Of the 14 identified contributions, only 5 are peer-reviewed journal articles. Notwithstanding their limited number, these studies are published in reputable journals, predominantly ranked in the Q1 and Q2 quartiles, indicating acceptable academic quality. The dispersion of these studies across journals with differing disciplinary orientations further suggests that corporate tax governance has attracted attention not only within taxation and accountancy but also within broader managerial and sustainability-focused scholarship. With regard to theoretical foundations, none of the contributions explicitly articulate a single guiding theoretical framework. One study, by Gribnau et al. (2018), acknowledges political and ethical theories as potential analytical lenses but identifies their absence as a limitation rather than integrating them into the research design.

In methodological terms, the South African corporate tax governance literature is predominantly qualitative and normative in nature. Only a limited number of contributions depart from this pattern. Two studies employed quantitative methods, namely, Thiart (2019), who analysed corporate tax governance compliance among large Johannesburg Stock Exchange–listed companies, and Donkor et al. (2022), who examined the relationship between integrated reporting quality and corporate tax avoidance. A single study, that of Thiart (2023), employed a mixed-methods design, using qualitative content analysis to derive a tax transparency measure and quantitative correlation analysis to explore its association with Environmental, Social and Governance (ESG) ratings.

Table 3: Descriptive analysis of A-list results

#	Author(s)	Year	Title	Publication	Focus of publication
1	van der Walt	2016	Tax confidentiality: A relic from a bygone era	TAXtalk *(Journal of the South African Institute of Taxation)*	Tax
2	Hlongwane, Bennett, and Schneider, as cited in Schaller	2016	The state of tax in South Africa	TAXtalk	Tax
3	Stanley-Smith	2017	Constitutions: Could paying a 'fair share' of tax already be enshrined in law?	International Tax Review	Tax
4	Botha	2017	Tax governance and King IV	TaxBreaks	Tax
5	Mabutha	2017	Tax ethics education within the chartered accountant curriculum in South Africa	Master's dissertation	Corporate tax
6	Segal et al.	2017	The perceived relevance of tax risk management in a South African context	Meditari Accountancy Research *(peer-reviewed journal)*	Accountancy, especially focused on its social impact
7	Gribnau et al.	2018	Codes of conduct as a means to manage ethical tax governance	INTERTAX *(peer-reviewed journal)*	Tax

#	Author(s)	Year	Title	Publication	Focus of publication
8	Pahad	2019	Ethical corporate tax policy: An application of King IV	Master's dissertation	Corporate tax
9	Terblanche	2019	Tax: A vital component of a company's social license to operate	Tax Professional *(journal of the South African Institute of Professional Accountants)*	Tax
10	Thiart	2019	Tax governance compliance: An exploratory study of the 50 largest JSE-listed companies	SAJAR *(peer-reviewed journal)*	Accountancy, including auditing, taxation, management, ethics, and information systems
11	Smit	2021	Is poor tax compliance akin to culpable homicide?	TAXtalk	Tax
12	Terblanche	2021	In-house tax directors and boards: Beware of the tax risks ahead	TAXtalk	Tax
13	Donkor et al.	2022	Integrated reporting quality and corporate tax avoidance practices in South Africa's listed companies	Sustainability Accounting, Management and Policy Journal *(peer-reviewed journal)*	Sustainable development: social and environmental sustainability challenges in accounting and management
14	Thiart	2023	The correlation between ESG ratings and the transparency in JSE companies' tax practices	South African Journal of Economic and Management Sciences *(peer-reviewed journal)*	Interdisciplinary research on the interaction between economic, environmental, and social perspectives as applicable to the broader management sciences

3.2 Interpretive Synthesis of Principle-Oriented Themes

This section presents the principle-oriented themes identified through an inductive interpretive synthesis of the South African corporate tax governance literature. The findings reflect recurring normative and governance-related principles evident across the 14 A-list contributions and indicate how corporate tax governance is framed, emphasised, and justified within the local scholarly context.

Seven principle-oriented themes were identified through the coding of explicit and implicit references to corporate tax governance (Table 4). Importantly, only two contributions explicitly reproduced the six VBDO principles (Botha, 2017; Thiart, 2019) but did not critically examine, analyse, or contextually elaborate on them. Furthermore, the remaining studies do not present clearly articulated governance principles. Instead, the themes were analytically derived from the literature, requiring the researcher to interpret underlying normative positions, governance expectations, and recurring patterns in the discussion. As such, the identified themes reflect an interpretive abstraction of implicit principles, rather than a direct consolidation of explicitly stated frameworks.

Table 4: Categorisation of A-list publications

Principle-oriented theme	**Number of articles**	**Articles**
Ethical responsibilities	13	Botha (2017), Donkor et al. (2022), Gribnau et al. (2018), Mabutha (2017), Pahad (2019), Schaller (2016), Segal et al. (2017), Stanley-Smith (2017), Terblanche (2019, 2021), Thiart (2019, 2023), van der Walt (2016)
Tax policy/ strategy	10	Botha (2017), Gribnau et al. (2018), Pahad (2019), Schaller (2016), Smit (2021), Stanley-Smith (2017), Terblanche (2019, 2021), Thiart (2019, 2023)
TRM	8	Botha (2017), Donkor et al. (2022), Pahad (2019), Schaller (2016), Segal et al. (2017), Terblanche (2021), Thiart (2019), van der Walt (2016)
Tax control framework (TCF)	7	Botha (2017), Donkor et al. (2022), Pahad (2019), Schaller (2016), Segal et al. (2017), Terblanche (2021), Thiart (2019)
Function of tax operations	7	Botha (2017), Donkor et al. (2022), Schaller (2016), Segal et al. (2017), Smit (2021), Terblanche (2021), Thiart (2019)
Co-operative compliance	7	Botha (2017), Gribnau et al. (2018), Mabutha (2017), Pahad (2019), Smit (2021), Terblanche (2021), Thiart (2019)
Transparency and reporting	6	Botha (2017), Gribnau et al. (2018), Pahad (2019), Terblanche (2021), Thiart (2019, 2023), van der Walt (2016)

While Table 4 maps the distribution of themes across the literature, Table 5 provides a consolidated summary of the principle-oriented themes, their key characteristics, and associated limitations identified in the South African context.

Table 5: Principle-oriented themes: core focus, characteristics, and limitations

Principle-oriented theme	Core focus	Key characteristics in South African literature	Key limitations identified
Ethical responsibilities	Moral expectations of corporate tax behaviour	Strong emphasis on "fair share" of tax; stakeholder-oriented framing according to literature, while King V aligns it with responsible corporate citizenship	Predominantly normative; limited clarity on what constitutes "fair share of tax"; lack of empirical grounding
Tax policy/ strategy	Governance and articulation of organisational tax approach	Board-level oversight; stakeholder-oriented positioning; emphasis on transparency and communication	Conceptual ambiguity between policy and strategy; limited evidence of impact on actual behaviour
Function of tax operations	Integration of tax within organisational processes	Emphasis on integrated thinking; tax function positioned as supporting business strategy	Limited exploration of practical challenges; unclear strategic influence of tax function
TRM	Identification and oversight of tax-related risks	Focus on reputational and stakeholder risk; integration into broader governance frameworks; board and executive responsibility	Emphasis on risk awareness over practical risk management; limited empirical evidence of implementation
TCF	Formal structures and controls for managing tax	Limited but role differentiation suggested	Lack of detailed operationalisation and role clarity
Co-operative compliance	Collaborative engagement with tax authorities to ensure compliance	Framed as collaborative and trust-based; emphasis on transparency and pro-active engagement	Idealised view; limited consideration of power imbalances and strategic behaviour
Transparency and reporting	Central mechanism for accountability and stakeholder trust	Linked to integrated, stakeholder-oriented reporting; accessible and meaningful communication	Assumes transparency leads to better governance

4. Discussion of the Findings

When compared with the six principles proposed by VBDO and Oikos (2014), the principle-oriented themes identified in this paper broadly align with the international framework but reveal a notable addition, namely, the explicit prominence of ethical responsibility. Furthermore, a contextual refinement also appears within the South African academic literature, where accountability is primarily framed through transparency rather than formal assurance mechanisms.

4.1 Ethical Responsibilities

During the interpretive synthesis, references relating to moral restraint in tax planning, the payment of a "fair share" of tax, responsible tax conduct, and broader societal expectations regarding corporate tax behaviour were grouped under the principle-oriented theme of ethical responsibilities.

The prominence of ethical considerations within the South African literature reflects a clear shift away from a purely compliance-based understanding of corporate tax governance. Several authors emphasised that adherence to the letter of the law alone is insufficient, arguing instead that ethical tax conduct requires consideration of the societal impact of tax practices and the organisation's contribution to the public good. Mabutha (2017), for example, distinguished tax avoidance from tax evasion, but nonetheless characterised avoidance as falling short of the "ethical minimum" where it results in the payment of less than a fair share of tax.

This ethical framing is reinforced by Donkor et al. (2022), who situated corporate tax behaviour within broader stakeholder and legitimacy concerns, noting that tax avoidance undermines government revenue and, in turn, the state's capacity to provide public goods. From this perspective, the payment of a fair share of tax is treated as a moral obligation rather than a discretionary outcome of technical tax planning. However, even though the expectation that organisations should prioritise societal outcomes over shareholder value is frequently asserted, it is rarely critically examined in relation to competing fiduciary responsibilities. Similarly, Segal et al. (2017) observed an emerging shift in South African corporate practice away from an exclusive focus on reducing effective tax rates towards a more morally and socially informed approach:

> *"This moral sentiment of paying tax is increasing among customers and filtering through to companies and is certainly improving the moral awareness in South African corporates. Respondents particularly noted that there has been a movement away from extreme capitalism (in the sense of decreasing company's effective tax rates) towards a more moral and social approach […]. A sense that "qualitative" factors are starting to emerge and that "quantum" tax savings are less significant […]."* (p. 90)

However, all the above contributions appear to be largely normative rather than empirically substantiated. While authors consistently advocated for the payment of a "fair share" of tax and morally responsible tax behaviour, there is limited interrogation of how such ethical expectations are defined, measured, or enforced in practice. Moreover, the literature tends to treat ethical tax behaviour as conceptually unproblematic, despite the inherent ambiguity surrounding what constitutes a "fair" share of taxation. This lack of conceptual clarity raises questions about the practical applicability of the ethical framework being advanced.

This ethical positioning is further reinforced by contributions that explicitly condemn the use of aggressive or artificial tax avoidance structures. Pahad (2019) characterised tax avoidance practices that exploit legal form while undermining substantive fairness as inconsistent with ethical tax conduct, even where such practices remain legally permissible. However, the rejection of aggressive tax avoidance is often presented as a normative conclusion rather than as an empirically grounded finding. As a result, the ethical discourse may reflect aspirational governance ideals, with insufficient attention to the structural and economic incentives that continue to drive corporate tax planning behaviour. Similarly, van der Walt (2016) criticised the strategic use of tax avoidance structures that prioritise the minimisation of tax liabilities over societal contribution. Such approaches, he argued, erode public trust and conflict with emerging expectations of responsible and ethical corporate behaviour.

A final interpretive observation concerns the conceptual boundaries of this theme. It could be argued that, within the South African context, the cluster of concepts grouped under tax ethics might alternatively be framed as responsible corporate tax citizenship, by reference to Principle 3 of the King IV Code, under which tax policy was positioned at the time several of the reviewed contributions were published. However, the South African literature reflects a framing that extends beyond transparency in tax policy or responsible citizenship narrowly conceived. Across the reviewed contributions, the emphasis predominantly encompasses moral judgement, societal impact, and expectations regarding the ethical quality of corporate tax behaviour itself. This broader ethical orientation aligns more closely with King IV's definition of corporate governance, which foregrounds ethical leadership and ethical culture as core governance outcomes. The subsequent repositioning of tax under Principle 2 on the governance of ethics in King V further supports this interpretation.

4.2 Tax Policy/Strategy

During the interpretive synthesis, references relating to the articulation, governance, and communication of an organisation's approach to tax were grouped under the principle-oriented theme of tax policy and strategy. The South African literature frequently uses the terms "tax policy" and "tax strategy" interchangeably, which suggests a degree of conceptual ambiguity that is not explicitly addressed in the literature. This lack of distinction may obscure important differences between high-level governance intent and operational execution.

Across the reviewed contributions, the responsibility for establishing and overseeing tax policy/strategy is consistently associated with the board of directors and, in many cases, the audit committee. Several authors situated tax policy/strategy within the governing body's oversight role, emphasising that tax-related decisions are no longer treated as purely technical or operational matters but as governance-relevant issues requiring board-level attention (Bennet, as cited in Schaller, 2016; Botha, 2017; Gribnau et al., 2018; Terblanche, 2021). While this reflects an important shift towards recognising tax as a governance issue, the discussion remains largely procedural and declarative. There is limited critical engagement with the effectiveness of such policies in shaping actual tax behaviour or influencing decision-making within organisations.

In addition to governance responsibility, the literature reflects a preference for a stakeholder-oriented approach to tax policy, in which the interests of a wider range of stakeholders are considered, as opposed to an exclusive focus on shareholder value maximisation (Segal et al., 2017; Thiart, 2023). Although stakeholder-oriented approaches to tax policy are widely advocated, the literature does not sufficiently interrogate the potential tensions between stakeholder expectations and financial performance objectives. As a result, tax policy is often presented as a mechanism for demonstrating accountability, without critically assessing whether such policies meaningfully constrain opportunistic tax behaviour or merely serve a signalling function. Relatedly, authors highlighted the importance of articulating the organisation's tax approach in a manner that is understandable to stakeholders and aligned with broader governance and sustainability considerations (Gribnau et al., 2018; Terblanche, 2019). Transparency in tax policy is therefore not framed merely as a disclosure exercise, but as a means of demonstrating responsible intent and accountability in relation to tax conduct.

With respect to content, some authors provided indicative guidance on the elements that may be addressed within a tax policy/strategy. Terblanche (2021), for example, suggested that such documents may articulate the organisation's attitude towards tax planning, its approach to accountability for tax decisions, its tax risk appetite, and its approach to engagement with tax authorities. While these elements are not presented as prescriptive requirements, they illustrate the breadth of issues that tax policy or strategy may encompass within a governance context.

Finally, the literature indicates that tax policy/strategy should not be treated as static documents but should be maintained and periodically reviewed by senior management and/or the governing body to ensure continued alignment with the organisation's governance objectives and external expectations (Smit, 2021). This emphasis on review and oversight reinforces the treatment of tax policy/strategy as an ongoing governance concern rather than a once-off compliance exercise.

4.3 Tax Risk Management

During the interpretive synthesis, references relating to the identification, oversight, and governance of tax-related risks were grouped under the principle-oriented theme of TRM. Across the South African literature, TRM is framed as a governance-relevant concern rather than a purely technical or compliance-focused activity, reflecting a broader understanding of risk within contemporary corporate governance discourse.

Several authors associated responsibility for awareness and oversight of tax risks with the board of directors and senior executive management, emphasising that tax risk is not confined to the operational tax function but requires attention at the highest levels of the organisation (Botha, 2017; Hlongwane, as cited in Schaller, 2016; Pahad, 2019). Within this framing, governing bodies and the C-suite are expected to understand the nature of tax risks faced by the organisation and to ensure that such risks are appropriately managed within the broader governance structure.

A recurring theme in the literature is that tax risk extends beyond financial exposure and encompasses significant reputational and legitimacy dimensions. Multiple authors highlighted that public, civil society, and media scrutiny of corporate tax behaviour often focuses less on technical compliance and more on perceptions of fairness and ethical conduct (Pahad, 2019; Segal et al., 2017; Terblanche, 2021; van der Walt, 2016). Schneider (as cited in Schaller, 2016) noted that tax is "often underestimated as a financial risk" (p. 76), while van der Walt (2016) anticipated a shift away from aggressive exploitation of tax technical provisions towards greater attention to reputational risk. This emphasis reflects an understanding of tax risk as a qualitative governance concern as much as a quantitative financial one. While this reflects an expanded understanding of risk beyond financial exposure, literature tends to prioritise risk awareness over risk management practices.

In addition, the literature situates TRM within the organisation's wider governance, risk, and assurance framework, emphasising the importance of alignment with integrated thinking and reporting practices. Donkor et al. (2022) and Terblanche (2021) highlighted the role of both the in-house tax director and the board of directors in ensuring that tax risks are considered alongside other strategic and operational risks, rather than managed in isolation. This alignment reinforces the treatment of tax risk as an integral component of enterprise-wide risk governance.

Some contributions further suggest that effective TRM should be embedded within organisational culture and day-to-day activities, rather than treated as an episodic or reactive process. Terblanche (2021), in particular, emphasised that TRM should form part of the organisation's ongoing decision-making processes, reflecting a sustained commitment to responsible corporate tax governance rather than a narrow focus on risk mitigation in response to external scrutiny. However, the integration of tax risk into broader enterprise risk management frameworks is often asserted rather than critically examined. There is little empirical evidence demonstrating how such integration occurs in practice or whether it leads to improved governance outcomes. This suggests that TRM, as presented in the literature, remains conceptually aligned with governance principles but insufficiently developed at an operational level.

4.4 Tax Control Framework

While the South African literature engages extensively with tax risk at a conceptual and governance level, only limited attention is given to the formalisation of tax control mechanisms. Most contributions emphasise awareness, oversight, and reputational sensitivity rather than the systematic design of tax control structures. Terblanche (2021), who linked TRM to the implementation of a TCF, argued that:

> *"The tax control framework should be a best fit for the organisation to proactively address internal and external tax risk, with clearly defined roles and responsibilities at an executive level, within specialist tax functions that facilitate and oversee tax risk management and compliance and at the level of line functions that own and manage risks. Due consideration should be given to who in the organisation is accountable for tax governance and it is important to satisfy the degree to which the highest governance body in the organisation has oversight thereof."* (p. 3)

This contribution is notable for its explicit emphasis on role differentiation and responsibility allocation across executive management, specialist tax functions, and operational line functions, as well as for its recognition of board-level oversight in corporate tax governance. However, such explicit engagement with roles and responsibilities remains the exception rather than the norm within the South African academic literature. More commonly, TRM is framed at a high-level governance or risk awareness level, without systematic theorisation of role clarity or responsibility allocation. This relative absence of explicit role-based analysis highlights a gap in the South African literature.

4.5 Function of Tax Operations

During the interpretive synthesis, references relating to the organisation and functioning of tax activities within the business were grouped under the principle-oriented theme of tax operational functions. In contrast to the governance-level focus evident in earlier themes, this theme captures how tax is positioned within the organisation's operational architecture and how tax-related activities are integrated into broader business processes; that is, tax is generally portrayed as a function that supports and is aligned with the business rather than operating as an independent profit centre.

A dominant emphasis in the South African literature is the application of integrated thinking to tax operations. Several authors highlighted the importance of drawing the tax function out of a traditional organisational silo and embedding it within the wider business, such that tax considerations are actively connected to operational decision-making and value-creation processes (Botha, 2017; Donkor et al., 2022; Hlongwane, as cited in Schaller, 2016; Segal et al., 2017; Terblanche, 2021). Within this framing, effective tax operations are associated with an understanding of the interdependencies between business units, capital allocation, and tax outcomes, consistent with integrated reporting and integrated thinking principles.

In summary, the literature recognises the importance of integrating tax into broader business operations and decision-making processes. However, this discussion remains conceptually broad and insufficiently developed in operational terms. While integrated thinking is frequently advocated, there is limited examination of the practical challenges associated with embedding tax considerations across organisational functions. The assumption that tax can be seamlessly integrated into business processes is not critically questioned, particularly in light of organisational complexity and competing functional priorities. In addition, the role of the tax function is generally described in supportive terms, without critically assessing its strategic influence within the organisation. The extent to which tax functions are empowered to influence decision-making, or are instead constrained by broader commercial objectives, remains largely unexplored.

4.6 Co-operative Compliance

During the interpretive synthesis, references relating to adherence to tax laws, engagement with tax authorities, and accountability for tax outcomes were grouped under the principle-oriented theme of co-operative compliance.

Across the reviewed contributions, tax-compliant behaviour is treated as the norm, with several authors emphasising that compliance extends beyond strict adherence to the letter of the law to include observance of its spirit (Botha, 2017; Gribnau et al., 2018; Mabutha, 2017). In this sense, compliance is not portrayed as a minimal threshold but as an expression of responsible adherence to corporate tax obligations.

A recurring emphasis within this theme is the notion of co-operative compliance, which is presented as an approach grounded in collaboration, openness, and ongoing engagement between taxpayers and tax authorities. Several authors highlighted co-operative compliance as a mechanism through which organisations can enhance certainty, reduce disputes, and foster more constructive relationships with revenue authorities (Pahad, 2019; Terblanche, 2019, 2021; Thiart, 2019). As Terblanche (2019) observed:

> *"Co-operative compliance could be a powerful tool that is a cost-effective and efficient solution for the benefit of both business and tax administrations. It could also help in enhancing certainty for business, which is an important driver for trade and investment."* (p. 12)

Therefore, co-operative compliance is presented in the literature as a mutually beneficial approach that enhances certainty, reduces disputes, and fosters trust between organisations and tax authorities. However, this perspective appears to be rather idealised, with limited consideration of its practical limitations and potential risks.

In addition to collaborative engagement, the literature associates compliance with accountability for non-compliance and the proactive management of tax uncertainty. Pahad (2019) noted the importance of mechanisms such as advance tax rulings as tools for mitigating uncertainty and supporting compliant behaviour. Relatedly, authors emphasised the need for organisations to be able to commercially motivate and substantiate their tax positions through appropriate documentation and supporting information, particularly in interactions with tax authorities (Bennet, as cited in Schaller, 2016; Smit, 2021). However, the literature does not sufficiently engage with the imbalance of power and information between taxpayers and tax authorities, nor does it critically examine the conditions under which co-operative compliance is likely to be effective. The assumption that organisations will voluntarily adopt transparent and co-operative behaviours may overlook the strategic considerations that influence corporate tax decision-making.

4.7 Transparency and Reporting

During the interpretive synthesis, references relating to the disclosure of tax-related information, communication with stakeholders, and the public visibility of corporate tax practices were grouped under the principle-oriented theme of transparency and reporting. Within the South African academic literature, transparency is consistently framed as a key mechanism through which organisations demonstrate accountability for corporate tax governance and build trust with both internal and external stakeholders. Pahad (2019), for example, conceptualised tax transparency as "*the clear and truthful disclosure of an organisation's tax strategies, tax practices and tax results in a manner that enables stakeholders to measure the organisation against ethical tax standards*" (p. 3). This definition reflects the broader emphasis in the literature on transparency as an evaluative and communicative practice that enables stakeholder assessment, rather than as a narrow compliance-driven reporting exercise. While the emphasis on disclosure reflects broader trends in corporate reporting, the literature tends to assume that increased transparency will necessarily lead to improved governance outcomes.

A recurring emphasis across the reviewed contributions is the need to approach tax reporting from a stakeholder-oriented perspective. Authors highlighted the importance of communicating tax-related information in a manner that is accessible and meaningful to a broad range of stakeholders, including investors, regulators, civil society, and the public (Terblanche, 2021; Thiart, 2019). Transparency is therefore positioned as a communicative practice that supports accountability and legitimacy, rather than as an end in itself.

Several contributions further point to a paradigm shift from tax confidentiality towards increased tax transparency. van der Walt (2016), in particular, noted a movement away from historically entrenched norms of tax secrecy towards expectations of more open disclosure regarding corporate tax practices. This shift is reinforced by literature emphasising the importance of transparency not only in external reporting but also in organisations' relationships with tax authorities, where open communication and collaboration are seen as integral to responsible corporate tax governance (Thiart, 2019).

The literature also reflects a growing emphasis on the use of integrated reporting as a vehicle for tax transparency. Rather than treating tax disclosures as a compliance-driven add-on, authors argued that integrated reporting should be used strategically to explain how tax practices are connected to value creation, governance structures, and broader sustainability objectives (Donkor et al., 2022; Segal et al., 2017). Within this framing, tax transparency contributes to the organisation's broader narrative of accountability and long-term value creation.

With respect to content, several authors identified specific categories of tax-related information that may be disclosed to enhance transparency. These include the disclosure of tax policies or strategies, TRM approaches, and, in some cases, TCF (Botha, 2017; Pahad, 2019; Terblanche, 2021; van der Walt, 2016). More technically detailed disclosures are also discussed, such as information on total taxes paid and collected, allocations of taxes to tax authorities, cross-border related-party transactions, country-by-country reporting, and transfer pricing policies (Pahad, 2019; Thiart, 2019). In addition, some authors highlighted the disclosure of foreign tax incentive schemes or preferential tax regimes, tax-related disputes and penalties, and the provision of tax services by external auditors as further elements that may support transparency (Pahad, 2019).

Finally, the literature encourages the use of established reporting guidance frameworks to support consistent and credible tax disclosure. Thiart (2023), for example, noted the relevance of instruments such as the Global Reporting Initiative and sustainability-related disclosure guidance in shaping tax transparency practices. Across the reviewed contributions, tax transparency is repeatedly associated with the building of public trust and the articulation of the organisation's broader story of value creation and accountability (Terblanche, 2019, 2021; Thiart, 2023).

From a conceptual perspective, the findings suggest that corporate tax governance in the South African context is framed less as a normative governance construct centred on ethics, transparency, and stakeholder accountability. This shifts the understanding of tax governance away from a purely technical or compliance-based function towards a broader socio-ethical governance domain. However, the lack of theoretical grounding and operational clarity limits the ability of the current literature to support a coherent and practically applicable governance framework.

5. Conclusion

This study examined how corporate tax governance has been conceptualised within the South African scholarly context through an SLR and interpretive synthesis of 14 A-list contributions. The findings indicate that the literature remains limited in volume and uneven in depth, characterised by a reliance on normative and conceptual work, with minimal empirical evidence and an absence of explicit theoretical grounding. Seven principle-oriented themes were identified: ethical responsibilities, tax policy/strategy, TRM, TCF, function of tax operations, co-operative compliance, and transparency and reporting. While these themes broadly align with international frameworks such as VBDO and Oikos (2014), the findings extend the existing framework by introducing ethical responsibility as an additional principle and by refining the notion of accountability, which is primarily framed through transparency rather than formal assurance mechanisms in the South African context.

The study's primary contribution lies in consolidating fragmented literature into a coherent, principle-oriented framework and critically demonstrating that current scholarship is skewed towards normative and aspirational constructs. Across the identified themes, ethical considerations, transparency, and stakeholder accountability are strongly emphasised, yet these are often presented as aspirational ideals rather than empirically grounded practices. Furthermore, conceptual ambiguities (particularly around tax policy versus strategy) and unexamined tensions between ethical expectations, stakeholder demands, and fiduciary responsibilities limit the practical applicability of the literature. Similarly, approaches such as co-operative compliance and transparency are frequently idealised, with inadequate attention to structural constraints, power dynamics, and behavioural incentives.

Collectively, these findings suggest the need for more theoretically grounded and empirically informed research that rigorously examines how tax governance functions in real-world corporate contexts. The study is limited by the scarcity of empirical research in the South African context. Future research should therefore focus on how these principles are operationalised in practice and their implications for governance effectiveness and organisational outcomes.

6. AI Disclosure Statement

The authors used ChatGPT-4o strictly for language editing and to improve the readability of the manuscript. The intellectual content, data analysis, and conclusions were developed solely by the authors, who take full responsibility for the integrity and accuracy of the work.

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