

To: Lectori Salutem
From: Mr Pjotr Schade
Evenpar General Partner b.v. (EP)
The Netherlands

CC: International Climate Finance Accelerator (ICFA)
9, Rue du Laboratoire, L-1911 Luxembourg
Luxembourg

Date: 22 November 2023
Description: Request for proposal for a South African Tax Adviser

Introduction

Evenpar is a Dutch-African investment fund manager that engages in renewable energy, WASH and recycling projects in emerging markets in Africa. Evenpar builds on its experience and expertise to invest in cashflow stable projects with high returns.

In these emerging markets resources are available but technologies are not used effectively. Evenpar therefore invests in decentralized solutions, using available feedstock in regulated markets allowing for infrastructure projects with stable cash-flow and value spikes between scale-up and operational stability.

Typical Evenpar investors are development finance institutions, foundations, high-net worth individuals (HNWI), pension funds, corporates, family offices and impact investors. EP is in the process of closing an investment in South Africa in waste water treatment.

Given that South Africa is an important target market, EP needs to assess the legal structure and risks of the South African market. To close the fund, Evenpar is seeking proposals from tax advisors to provide advice on our fund documentation.

Scope of Services

EP is seeking proposals for legal advice for the Fund, focussing on:

- Review of Company setup and organizational structure sanity check
- Tax review and sanity check
- Drafting of a written opinion setting out the possible South African tax allowances available in respect of the infrastructure assets,
- Drafting opinion on the proposed capital funding structure/ mechanism.
- Assistance on the execution of proper tax setup and registration

Pro-active interaction with EP is essential, executed in:

- (2) Weekly progress call
- Ad hoc calls when required for negotiating and advice

Proposal submission

Please note that only service providers with relevant expertise in the South African fiscal law and project finance structuring are eligible to provide proposals. Furthermore a profound understanding of the EP Fund and its challenges is needed. The services offering is to start as soon as possible and is finalized when the transaction is closed.

Please provide a proposal that includes the following components:

a) Technical proposal

- A brief summary of the firm
- Names and bios of people who will work on the assignment
- Relevant experience of fund structuring and documentation
- Workplan, targets and timeline for completing work

b) Financial proposal

- Fixed Fee estimate based around the Scope of Work. (expressed in 'number of hours' x 'hourly rate' per month).

Interested service providers shall submit their proposal in writing to info@evenpar.nl, copying info@icfa.lu, by 17h00 CET Dec 6th 2023.

Contact Evenpar:

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