

Although the African continent consists of 54 countries, there are typical challenges that MNEs and investors come across when investing, executing M&A deals and developing business activities in Africa. These challenges show that managing your tax position

in Africa is not a 'one-off' exercise, but requires specific expertise and continuous monitoring of the latest developments. In this regard, the NL-Africa Tax Desk assists you with a smooth landing on the African continent.

Implementation of antitreaty shopping measures

Rules aimed at taxing capital gains (indirectly) linked to assets/subsidiaries in Africa

Domestic permanent establishment definitions ≠ Tax Treaty definition

Typical tax challenges in Africa

High withholding taxes with a broad scope

Gain access to local tax incentives

Currency exchange issues

Focus on transfer pricing and new documentation requirements

## What does the NL-Africa Tax Desk offer?

### Tax services in Africa and the Netherlands

- Single point of contact and liaison for Africa tax-related services
- Tax compliance for companies and branches in Africa
- Reviewing corporate structures based on latest developments in international tax law (e.g., BEPS, MLI and EU directives)
- Advice on transfer pricing policies and local transfer pricing documentation obligations
- Tax due diligence in Africa
- Tax structuring for investments into Africa
- Provide updates on local African tax developments and changes to Tax Treaties → key to stay compliant with local tax obligations

## **Direct access to KPMG Tax** specialists across Africa

- Based on our high-end knowledge and experience in international tax advisory, Meijburg & Co is well-placed to organize and coordinate African tax advice for international investors and MNEs
- Close collaboration between the NL-Africa Tax Desk and the KPMG Africa Tax Centre ensures that our knowledge and expertise is used to the client's best advantage
- Through this close collaboration Meijburg & Co promotes:
  - Streamlined KYC processes flexengagements that give worldwide access to the international KPMG network, without obligations;
  - Quality control; and
  - Sanity checks on fee expectations and transaction timing
- The NL-Africa Tax Desk team includes French speaking professionals.

# KPMG Tax in Africa and the NI-Africa Tax Desk

#### 27 KPMG Tax firms servicing the continent

- KPMG Algeria
- KPMG Angola
- KPMG Botswana
- ► KPMG Cameroon: Central African Republic, Chad
- ► KPMG Congo (Brazzaville) ► KPMG Mali
- KPMG Côte d'Ivoire: Burkina Faso, Guinea, Niger
- KPMG Democratic Republic of Congo
- KPMG Egypt: Sudan
- KPMG Equatorial Guinea
- KPMG Gabon

- KPMG Ghana: Liberia, Sierra Leone, The Gambia
- KPMG Kenya: Eritrea, Ethiopia, Somalia, South Sudan
- KPMG Mauritius: Comoros, Madagascar, Seychelles
- KPMG Morocco
- KPMG Mozambique
- KPMG Namibia
- KPMG Nigeria
- KPMG Rwanda: Burundi

- ► KPMG Senegal: Cabo Verde, Djibouti, Guinea-Bissau, Mauritania
- KPMG South Africa: Malawi, Lesotho, eSwatini
- ► KPMG Togo: Benin
- KPMG Tanzania
- KPMG Tunisia: Libya
- KPMG Uganda
- KPMG Zambia
- KPMG Zimbabwe



close ties to the NL-Africa

**Tax Desk** 

The Netherlands has stable and modern corporate legislation, almost 100 bilateral Tax Treaties in force and various tax incentives which provide advantages to investors and MNEs looking to invest in Africa.

Through our NL-Africa Tax Desk and expertise in these areas we assist investors and MNEs in setting-up solid and efficient investment structures. The Netherlands has an extensive network of Tax Treaties and Bilateral Investment Treaties with African countries.

- 11 Tax Treaties in force (Algeria, Egypt, Ethiopia, Ghana, Morocco, Nigeria, South Africa, Tunisia, Uganda, Zambia, Zimbabwe), 2 Tax Treaties signed but not yet in force (Kenya and Malawi) and 2 new Tax Treaties being negotiated (Mozambique and Senegal).
- The Netherlands also allows for unilateral relief for double taxation via a tax exemption or tax credit in respect of designated developing countries in Africa without a tax treaty.
  - 23 Bilateral Investment Treaties in force (Algeria, Benin, Burundi, Cameroon, Cabo Verde, Egypt, Ethiopia, Gambia, Ghana, Côte d'Ivoire, Kenya, Malawi, Mali, Morocco, Mozambique, Namibia, Nigeria, Senegal, Sudan, Tunisia, Uganda, Zambia and Zimbabwe) and 1 Bilateral Investment Treaty signed but not yet in force (Eritrea).



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