

NL-Africa Tax Desk

Although the African continent consists of over 50 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.

Typical tax challenges in Africa

- Implementation of anti-treaty shopping measures
- Rules aimed at taxing capital gains (indirectly) linked to assets/subsidiaries in Africa
- Domestic permanent establishment definitions ≠ Tax Treaty definition
- High withholding taxes with a broad scope
- Gain access to local tax incentives
- Currency exchange issues
- Focus on transfer pricing and new documentation requirements
- Implementation of global Pillar Two measures, including Subject To Tax Rule



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
- Monthly NL - Africa Tax Newsletter with developments related to tax in Africa

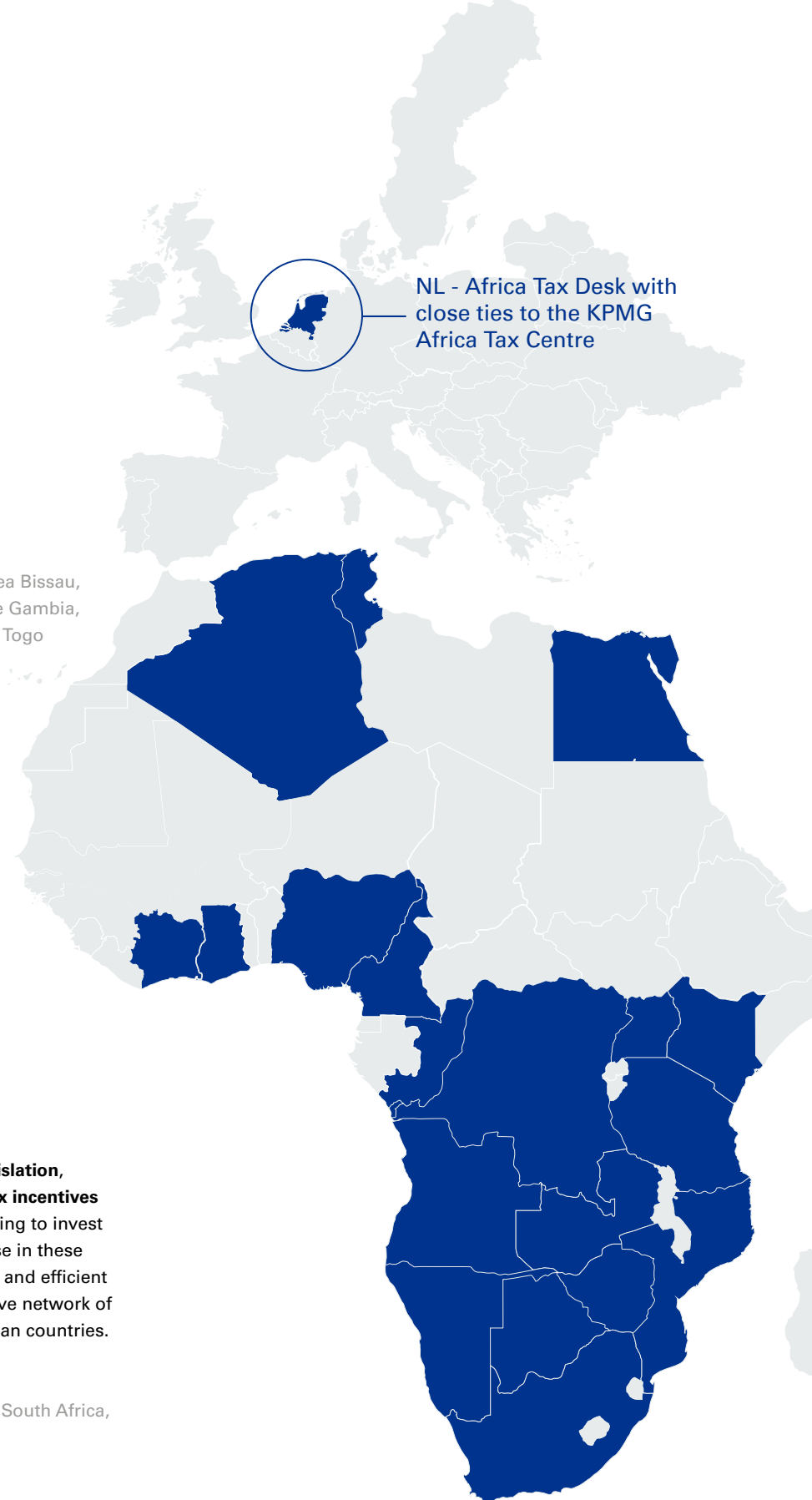
Direct access to KPMG Tax specialists across Africa

- 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 - flex-engagements 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

20 KPMG Tax firms servicing the continent

- › KPMG Algeria
- › KPMG Angola
- › KPMG Botswana
- › KPMG Cameroon: Gabon
- › KPMG Congo
- › KPMG Côte d'Ivoire: Benin, Burkina Faso, Djibouti, Equatorial Guinea, Eritrea, Guinea Bissau, Mali, Mauritania, Republic of The Gambia, Sao Tome and Principe, Senegal, Togo
- › KPMG Democratic Republic of Congo
- › KPMG Egypt: Sudan
- › KPMG Ghana: Sierra Leone
- › KPMG Kenya: Burundi, Rwanda
- › KPMG Mauritius: Comoros, Madagascar, Seychelles
- › KPMG Mozambique
- › KPMG Namibia
- › KPMG Nigeria
- › KPMG South Africa
- › KPMG Tanzania
- › KPMG Tunisia: Libya
- › KPMG Uganda
- › KPMG Zambia
- › KPMG Zimbabwe



Treaty network NL - Africa

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 and Zimbabwe), and 3 new Tax Treaties being negotiated (Kenya, Mozambique and Rwanda).
- 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.
- **More than 20 Bilateral Investment Treaties** in force with African countries.



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