

WTS Africa Quarterly Newsletter

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WTS Africa Quarterly Newsletter

Editorial

Recent tax developments in Africa

Dear Madam/Sir,

We hope you may find interesting our first edition of the WTS Africa Regional Quarterly Newsletter for 2025, where we collate and present taxation related news from nine countries on the continent.

The following participants in the WTS Global network have contributed with a diverse range of international tax topics. These contributors are from the following countries:

- > Cote d'Ivoire – FACE Africa Tax & Legal
- > Egypt – WTS Egypt
- > Ghana – WTS Nobisfields
- > Kenya – Viva Africa Consulting LLP
- > Mauritius – WTS Tax Consulting (Mauritius) Ltd
- > Nigeria – WTS Blackwoodstone
- > Senegal – FACE Africa Tax & Legal
- > South Africa – WTS Renmere
- > Togo - FACE Africa Tax & Laws, Togo

Our experts will be happy to answer any questions you may have.

We thank you for your interest.

Yours sincerely,

WTS Africa Team

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Cote d'Ivoire



2025 Tax Appendix: Key Directions to Strengthen the Ivorian Economy

Over the years, Côte d'Ivoire has implemented economic reforms aimed at promoting inclusive and equitable growth, focusing on the structural transformation of its economy.

To support these reforms, which require substantial financial resources, the Government secured an economic and financial program with development partners in May 2023. This program seeks to increase the tax-to-GDP ratio by 0.5% annually, primarily through enhanced tax revenue collection.

In March 2024, Côte d'Ivoire also signed the Resilience and Sustainability Facility with the IMF to implement an ambitious reform program aimed at adapting to and mitigating the impacts of climate change on the national economy.

To achieve these objectives, the **Medium-Term Revenue Mobilization Strategy** for 2024–2028 was adopted. This strategy focuses on maximizing tax and customs revenue collection. Many fiscal measures proposed in the 2025 Tax Appendix to the State Budget align with this framework.

Additionally, the Government proposes measures within its social policy framework to preserve the purchasing power of low-income households. Technical adjustments to improve the clarity and application of legal provisions are also included.

The 2025 Tax Appendix is structured around the following key areas:

Strengthening State Resources

Measures to expand the tax base and combat international tax evasion and fraud include:

- › Extending the tax base for advertising tax.
- › Introducing a withholding tax on capital gains from the sale of shares or equity.
- › Suspending duties and taxes under exemption regimes outlined in specific agreements between the State and companies for developmental projects.

Supporting Businesses

Measures to enhance competitiveness include:

- › Revising provisions in the General Tax Code related to withholding taxes on corporate income tax and Value Added Tax (VAT).

Streamlining and Simplifying the Tax Framework

Examples include:

- › Adjusting provisions on the mandatory issuance of standardized electronic invoices.
- › Revising rules related to taxpayer registration and tax collection for foreign companies.

Technical Adjustments

These include:

- › Modifying VAT liability rules for telecommunications companies.
- › Revising stamp duty rules in the General Tax Code.

The 2025 Tax Appendix was reviewed by the Economic and Financial Affairs Commission of the Ivorian National Assembly on 18 November 2024 and was unanimously adopted on 28 November 2024. It is expected to be published in the Official Gazette in late December 2024, taking effect in early January 2025.

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Egypt



Updated Summary of Transfer Pricing in Egypt

This circular sets out the views of the Egyptian Tax Authority (ETA) on the application of transfer pricing rules according to Article 30 of Income Tax Law No. 91 of 2005 (referred to in these guidelines as the "Law") and Articles No. 38, 39 and 40 of the Executive Regulations thereof.

Scope of Guidelines

These Guidelines shall be used for the purposes of the application of Article no. (30) of the law. They therefore apply to transactions between associated enterprises resident in Egypt, as well as to transactions between enterprises resident in Egypt and their non-resident associated enterprises.

Law Provisions

Article (30): "If associated enterprises have set conditions for their commercial or financial transactions other than those operative among independent enterprises, and such conditions led either to reduce the tax base or shift the tax burden from a taxable enterprise to an exempt or non-taxable one, ETA is entitled to determine the taxable profit on the basis of the arm's length price.

The Executive Regulations

Article (38): "ETA has the right to verify the associated enterprises' application with regard to the arm's length price in their transactions with regard to the exchange of goods, services, raw materials, capitalized equipment, and the distribution of shared expenses, royalty, interests and other commercial or Fiscal transactions that are carried out between them."

Article (39): "The arm's length price is specified, as stipulated in Article (30) of the law, according to one of the following methods:

1. Comparable Uncontrolled Price Method (CUP)
2. Cost Plus Method (CPM)
3. Resale Price Method (RPM)

Article (40): "The Comparable Uncontrolled Price (CUP) method has the first priority in the determination of the arm's length price, and in this case the required data available to apply such method, either of two methods prescribed in the preceding Article shall be applied.

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Ghana



Implementation of Electronic Invoicing of Value Added Tax - Phase Two

The Ghana Revenue Authority has issued a public notice on the launch of the second phase for the implementation of the Electronic VAT Invoicing System. An additional two thousand (2,000) VAT registered taxpayers will be onboarded on the system to issue electronic VAT invoices in the 2nd phase.

To facilitate the onboarding process, GRA invited VAT registered businesses which make up the phase two to a meeting to discuss modalities for a smooth roll-out..

Tax Treaty Negotiations

The Head of the Tax Policy Unit at Ghana's Ministry of Finance has announced that the Ministry is working on the introduction of income tax treaties with several countries, amongst which includes ongoing negotiations for tax treaties with Egypt, Hungary, Israel, South Korea, the United Arab Emirates and Spain.

Any resulting treaty would be the first of its kind between Ghana and the respective countries and must be finalized, signed, and ratified before entering into force.

It is worth mentioning that earlier in the year, the Commissioner-General issued an administrative guideline on the procedural requirements that must be met for a person to avail itself of the benefits provided under a DTT between Ghana and another country.

The guideline also spelt out the procedures to obtain a tax credit for foreign tax paid, initiate a Mutual Agreement Procedure (MAP), and eliminate double taxation resulting from primary transfer pricing adjustments in a country with which Ghana has no DTT.

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Kenya



Good Corporate Governance in the Kenyan Context

In today's interconnected world, corporate governance has become a cornerstone of organizational success. Companies operate within societal norms, legal frameworks, and stakeholder expectations, making governance essential for fostering trust, resilience, and long-term value.

Good governance is the system by which organizations are directed, controlled, and held accountable. It is founded on transparency, accountability, fairness, and integrity. Effective governance demands balancing the needs of diverse stakeholders. It requires embedding governance into operations and policies.

In Kenya, corporate governance plays a pivotal role in economic development and organizational performance. Key frameworks in this regard are the **Mwongozo Code of Governance for State Corporations** (Mwongozo), developed by the State Corporations Advisory Committee (SCAC) and **The Code of Corporate Governance Practices for Issuers of Securities to the Public 2015**. Mwongozo outlines best practices for state corporations, focusing on leadership, accountability, transparency, and sustainability. It guides boards of directors in promoting ethical leadership, enhancing oversight, and driving efficiency, and aligns state entities with Kenya's broader economic goals under Vision 2030.

The Champions of Governance (CoG) Awards, organized by the Institute of Certified Secretaries (ICS), recognizes organizations excelling in governance, including adherence to frameworks like Mwongozo. These awards create awareness of good governance and encourage practices that enhance accountability and sustainable growth.

Kenyan companies also align with Environmental, Social, and Governance (ESG) principles to remain competitive in global markets. By adopting strong governance, local organizations attract investment, improve confidence, and contribute to national development.

Technology is revolutionizing governance. Tools like eBoards enhance decision-making transparency, while data analytics offer insights for accountability. Cybersecurity safeguards organizational data, and Artificial Intelligence streamlines tasks like compliance. By embracing technology, organizations improve governance.

Why Good Governance Matters

Strong governance prevents mismanagement and promotes resilience. Historical scandals like Enron and the 2008 financial crisis highlight the costs of governance failures. Conversely, companies like Unilever and Apple show how governance fosters innovation and stakeholder alignment. Governance starts with the board of directors, who shape ethical behavior and strategic priorities, and cascades through all levels of the organization, embedding a culture of accountability and integrity.

Failures in governance lead to fines, lawsuits, and reputational damage. However,

organizations that prioritize governance attract talent, inspire confidence, and gain a strategic edge. Governance is not just a safeguard; it is a driver of excellence.

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As trends like ESG gain prominence, governance is evolving to address global challenges like climate change and inequality. Companies that embrace these responsibilities will lead their industries while building sustainable entities.

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Good corporate governance is non-negotiable. It ensures compliance, builds trust, and creates value in a world where trust is currency. For Kenyan organizations and beyond, governance is a true game changer.

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Mauritius



Structuring of Investment Funds in Mauritius: Taxation of Limited Partnerships

Investment Funds are often structured as Limited Partnerships. Under Mauritius tax laws, a Limited Partnership is tax resident in Mauritius if it has its seat in Mauritius and includes a Limited Partnership which has at least one limited partner resident in Mauritius.

A tax-resident Limited Partnership is treated as fiscally transparent and not subject to tax in Mauritius. Rather, every limited partner is subject to tax on its share of income at the rate of 15%. Where the limited partners are non-residents of Mauritius and the Limited Partnership only derives foreign source income, no tax liability should arise for the limited partners in Mauritius.

However, a Limited Partnership which holds a Global Business Licence ("GBL") may elect to be subject to tax in Mauritius in the same manner as a company. Where a resident Limited Partnership is subject to tax in Mauritius, it may claim eligibility to preferential tax regimes on specified income streams, subject to satisfaction of economic substance requirements. Where the Limited Partnership holds a Collective Investment Scheme Licence or a Closed End Fund licence, for example, such preferential tax regime may imply an exemption of 80% of its non-interest income streams and 95% of its interest income. Alternatively, at its discretion, it may claim credit for foreign taxes suffered against its Mauritius tax liability.

A Limited Partnership is normally liable to a 2% Corporate Social Responsibility ("CSR") levy based on its preceding year's chargeable income. However, a Limited Partnership holding a GBL is not liable to CSR.

Under the recently enacted Corporate Climate Responsibility Levy ("CCR Levy") legislation, a Limited Partnership is also liable to a 2% CCR levy on its chargeable income and such tax is required to be paid together with the annual tax return filed

by the Limited Partnership. The CCR Levy is not applicable where the Limited Partnership has a "turnover" of less than MUR 50 million (approx. USD 1.1 million). There is no equivalent exemption, as for CSR, in respect of Limited Partnerships holding a GBL.

Unlike CSR, the CCR Levy falls under the definition of "income tax" under the Mauritius tax laws. The same tax laws also explicitly provide that that no resident Limited Partnerships shall be liable to income tax. Accordingly, it appears that the recently enacted CCR levy contradicts the original intention of the legislator, which was to exempt resident Limited Partnerships from income tax. We hope that the discrepancy between these two sections of the legislation will be addressed to the satisfaction of the relevant stakeholders soon.

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Nonetheless, it is highlighted that, since the CCR Levy falls under the definition of income tax, where a Limited Partnership has suffered withholding tax or foreign tax on its taxable income streams, such taxes may be claimed as credit by the Limited Partnership against the CCR Levy.

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Nigeria



Navigating the Future: Key Tax Reforms in Nigeria for 2024 and Beyond

In our 2024 Outlook, we noted that Nigeria was overhauling its tax laws and processes pursuant to the establishment of the Presidential Committee on Fiscal Policy and Tax Reforms (the Committee). In furtherance of the Reforms, the Committee has proposed four (4) bills – the Nigeria Tax Bill (NTB), Nigeria Tax Administration Bill, Nigeria Revenue Service Establishment Bill (NRSEB), and the Joint Revenue Board Establishment Bill (JRBE) – for the overhaul of Nigeria's tax system. In this update we highlight crucial changes that would arise from these reforms.

Companies Income Tax (CIT)

The NTB is expected to unify all Nigerian taxes and proposes a reduction in income tax (CIT) rate from 30% to 25% over the next 2 years as well as the exemption of small companies, which has now been reclassified as companies with an annual revenue threshold of N50,000,000.00, from CIT. It also proposes the elimination of minimum tax on loss-making companies and those with low profit margins. The NTB also proposes the introduction of a new Development Levy of 4% which will be gradually reduced to 2% over the next five years for the funding of infrastructure and developmental projects across Nigeria.

Value Added Tax (VAT)

The NTB proposes to introduce a phased increment of Nigeria's VAT rate with a view to achieving a new VAT rate of 12.5% in 2026 and 15% in 2030, thereby aligning Nigeria's VAT rate with the ECOWAS standard by 2030. The NTB also introduces a streamlined VAT refund process, ensuring refunds are issued within 30 days of application without requiring an audit. It also proposes VAT reliefs for small companies to reduce their tax burdens. Notably, the NTB revise the VAT Revenue sharing formular by ensuring that sub-national units are fairly treated and rewarded for their economic contributions.

Personal Income Tax (PIT)

The NTB also seeks to reform Nigeria's PIT regime by, primarily redesigning the PIT brackets and rates based on income levels. The NTB also aims to encourage remote work and digital nomads by making provisions to the effect that income earned by non-resident persons, from employment in Nigeria will only be taxed if the services are physically rendered within Nigeria.

Other notable changes include:

- › Change of the name and organizational structure of the Federal Inland Revenue Service to the Nigerian Revenue Service (NRS) to make the NRS the sole collector of revenue for Nigeria pursuant to the NRSEB.
- › The JRBEB introduces the Tax Ombudsman to advocate for an improved tax system and protect vulnerable taxpayers.

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Overall, it is clear that the proposed reforms aim to improve Nigeria's competitiveness while aligning Nigeria with global standards in taxation. These reforms are expected to create a more business-friendly environment in Nigeria, while ensuring that the country's tax system remains equitable and efficient, fostering economic growth and improving tax compliance.

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Senegal



The specificities of VAT on digital services in Senegal

Senegal's economy is undergoing a digital transformation, necessitating an updated VAT framework for digital services. To regulate the VAT on digital services, Senegal has aligned itself with OECD VAT/GST guidelines and the BEPS Action 1 report. This reform introduces the principle of destination, enabling the taxation of services and intangible goods consumed in Senegal, regardless of the supplier's location.

To implement this, Senegal adopted Order No. 6775 MFB/DGID on May 21, 2024, replacing the initial framework established in November 2023. VAT on digital services became effective on July 1, 2024, as outlined in the tax authority's communiqué of June 24, 2024. This article outlines the key features of the VAT regime on digital services.

› **Territorial scope and VAT collection**

Digital services are taxable in Senegal if consumed locally or the recipient resides there, determined through billing addresses or IP locations. VAT collection responsibilities fall on intermediaries (e.g., digital platforms) or foreign providers. If neither fulfils this obligation, the transaction recipient becomes liable if it is a legal entity subject to and registered for VAT in Senegal. This diverges from the traditional rule requiring local tax representatives to declare VAT.

› **Simplified registration for foreign suppliers**

Foreign digital service providers can register remotely through electronic forms without becoming Senegalese tax residents or incurring liabilities for additional taxes. This approach simplifies compliance for non-residents engaging in Senegal's digital economy.

› **Lightened declaration and payment modalities**

Unlike traditional VAT, which follows monthly reporting, VAT on digital services is reported quarterly via the tax administration's online portal by the 15th of January, April, July, and October.

› **Specific invoicing and record-keeping rules**

Registered foreign providers must include their identity, address, and Senegalese taxpayer number (NINEA) on invoices, along with customer details. They are not required to maintain traditional accounting records in French but must keep electronic copies for audit purposes.

› **Penalties for Non-Compliance**

Non-compliance results in penalties under Senegal's General Tax Code, including potential restrictions on access to digital platforms. These measures aim to ensure tax equity and compliance in cross-border digital trade.

In summary, Senegal's VAT regime for digital services addresses the challenges of taxing cross-border transactions while simplifying compliance for non-resident providers, ensuring equitable tax practices in the digital economy.

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South Africa



Unravelling Tax Deductibility: The Transition from PN31 to Section 11G

In terms of either section 11(a) or section 24J of the Income Tax Act 58 of 1962 ('ITA'), interest expenditure is deductible only where a taxpayer derived income from carrying on a trade and such expenditure is incurred in the production of income. Practice Note 31 of 1994 ('PN31'), however, permits a deduction of expenditure where a taxpayer incurs such expenditure in the production of interest income but not in the carrying on of a trade, limited to the amount of interest income.

The South African Revenue Service will soon replace PN31 with section 11G of the ITA, governing deductions for expenses incurred in producing interest income. This will apply to years of assessment starting after 1 January 2025. The final wording of section 11G in the Taxation Laws Amendment Act 17 of 2023 reads as follows:

- › For purposes of this section 'interest' means interest as defined in section 24J.
- › For purposes of determining the taxable income derived by any person, there shall be allowed as a deduction from the income of that person, interest incurred by that person to the extent that the interest –
 - › is incurred in the production of interest that is included in the income of that person; and
 - › is not incurred in carrying on a trade.
- › The amount allowed to be deducted under this section shall not exceed the amount of interest income referred to in subsection (2)(a), that is received by or accrued to a person, during the year of assessment.

There are similarities between PN31 and section 11G. Both apply to all persons, including individuals and trusts, and limit deductible expenditure to related interest income. Both require interest expenditure to be directly linked to interest income for deduction.

Section 11G codifies PN31, allowing deductions even if the trade requirement is not met. It limits deductible interest to the equivalent interest income received, while other expenditures are redirected to section 11(a).

A key difference is that section 11G only allows deduction of 'interest' as defined in section 24J, unlike PN31, which allowed any expenditure incurred in producing interest income. This restricts deductible expenses, affecting taxpayers like holding or treasury companies and private equity firms, who previously deducted administrative fees and other charges not covered under section 24J. For instance, trusts borrowing money to lend to beneficiaries can deduct interest on borrowed funds under section 11G, but cannot deduct other related expenses like accounting fees, which was allowed under PN31.

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While both PN31 and section 11G offer concessions to taxpayers not fulfilling trade requirements under sections 11(a) or 24J, their nuances lead to significant tax differences of which taxpayers must be aware. Understanding section 11G's details and limitations can help optimise tax positions within the new framework.

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Togo



What Future for Togo's Taxation of Foreign-Sourced Service Provision?

The business climate in Togo has experienced significant upheaval in recent months, particularly in terms of tax and customs regulations. These changes, primarily affecting international transactions, warrant the attention of large multinational groups due to the disruptions they are causing.

Background to a Controversial Change in Tax Doctrine

Since the enactment of Law 2012-016 on 14 December 2012, the Togolese tax administration has been consolidated into a single entity, the Togolese Revenue Office (OTR), which replaced and merged the former Directorate General of Taxes and Customs.

Both before and after this reform, the Togolese tax authority has long treated the provision of software and other intangible goods from abroad, along with related services (installation, maintenance, subscription renewals, etc.), as foreign services. These were subject to a 20% withholding tax and VAT payable by the recipient. However, in recent months, the Customs Department of the OTR has begun reassessing businesses by treating software and other intangibles imported from abroad as goods, thereby challenging the previous interpretation of these transactions.

The administration's reversal represents a substantial disruption to Togolese tax practices. Although this new approach is based on legal provisions such as WTO Decision 4.1 of 24 September 1984 and Article 20-f of Togo's National Customs Code, it has drawn significant criticism:

- › **Lack of internal consistency:** As a unified entity, the OTR should adopt a harmonised position for both Tax and Customs departments.
- › **Failure to respect the goods/services distinction:** According to Togo's General Tax Code, services (such as maintenance, royalties, and rights) are difficult to equate with goods.

- › **Retroactivity or questionable new interpretation by the tax authorities:** The reassessments by the Customs Department, which are effectively based on a change in doctrine, are being applied not only prospectively but also retrospectively to previous years that are still open for review. This has disrupted corporate accounting practices, as businesses, relying on the previous doctrine, treated these items as foreign services and paid taxes accordingly. This highlights the urgent need for a clearer distinction between "foreign services" and "imported goods."

Need for Clarification of Tax Treatment for Foreign-Sourced Services

It is essential for taxpayers, especially foreign companies or entities receiving foreign services, to clearly define the concepts of "taxable goods" and "foreign services." The supply component of international contracts is undisputed. However, distinguishing between "pure service provision" (not subject to customs duties) and intangibles or ancillary services requiring customs clearance has become increasingly complex.

A clear directive from the Togolese tax administration is urgently needed to ensure fiscal security in international transactions.

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About WTS Global

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