

TAX MATTERS

STRATEGIC VALUE THROUGH PRACTICAL BUSINESS SOLUTIONS

9th Annual Tax Conference



11-14 June 2025



Elephant Hills Resort, Victoria Falls

"Navigating the Evolving Tax Landscape"



Tax Liability: A Case of
Substance over Form

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Mental Health Awareness

At WTS Tax Matrix, we recognise the importance of creating awareness. We are committed to supporting and promoting healthier approaches to healthy mental well-being.



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"By bridging the gap between compliance and tax strategy, businesses unlock opportunities to manage risks and optimise tax positions."



Between Compliance and Strategy: From CEO's Desk

As we gather for the 2025 Annual Tax Conference, the theme "Navigating the Evolving Tax Landscape", speaks to the rapidly changing tax environment, shaped by legislative reforms, administrative shifts, court decisions, technological advancement and broader socioeconomic dynamics. This environment demands more than just compliance, it requires a forward-looking approach that integrates compliance with strategic foresight.

At WTS Tax Matrix Academy, we are at the forefront of this change, offering comprehensive solutions that go beyond meeting tax obligations. We help professionals bridge the gap between tax compliance and tax strategy. Over the past decade, we have worked closely with businesses, professionals and institutions to equip them with the tools, knowledge and insights needed to not just comply with tax laws, but to actively use this knowledge to make strategic, business-aligned decisions.

As a member firm of WTS Global, accredited by the South African Institute of Taxation (SAIT) and registered with the Ministry of Higher and Tertiary Education, the Academy has established strong partnerships with the Institute of Chartered Accountants Zimbabwe (ICAZ) and Zimbabwe Open University (ZOU). Our programmes, ranging from professional tuition to executive seminars, certificate courses and policy briefings, are designed to close real-world knowledge gaps while supporting national capacity building.

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Chief Executive Officer
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10

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A Snapshot of 2025 Key Tax Reforms

Zimbabwe's tax system continues to evolve through legislative amendments, digital transformation, compliance enforcement and strategic policy adjustments. Key fiscal changes for 2025 include:

Measure	Description
Remittance of local VAT	Due by the 15th of the month following the end of the tax period (revised from the 25th).
Remittance of VAT on imported services	Within 15 days of invoice date, payment of non-resident person or services rendition whichever is the earliest
Currency of VAT on unbeneficiated products	Export VAT on unbeneficiated platinum, uncut and cut dimensional stone deemed to be paid in foreign currency
Punters Tax	10% of the gross wining of betting punters
Fast Food Tax	1% of fast-food sales value inclusive of VAT
Plastic Bag Tax	20% of sales value of locally manufactured or cost, insurance and freight value of plastic bags imported for commercial use
VAT Deferment on Capital Equipment	Extended to the energy sector, effective 1 January 2025
Tender Returns	Submission of a return of tenders (of goods or services procured through tenders) to the CG by the 10th day after every month
Supplies by non-registered VAT persons	Supplies by non-registered of more than VAT registration threshold to be deemed VAT inclusive
Currency of Trade Enforcement	QPDs to be remitted 50:50 in local and foreign currency when foreign currency income is at least 50% of total trading income.
Rental expenses Deductibility	Deduction allowed only where identity and address of the property owner or beneficial owner is declared.
Intellectual Property Royalty Deduction Limit	Deductible up to 1.5% of turnover or arm's length value; excess treated as dividend (subject to 15% WHT). The transaction must be between related parties.
Recyclable Plastic Suppliers	Exempt from 30% withholding tax on contracts on payment not exceeding US\$5000 per annum
Cattle Suppliers to Abattoirs	Exempt from 30% withholding tax on contracts on payment not exceeding US\$5000 per annum
CGWT on Listed Securities	Capital Gains Withholding Tax on listed marketable securities revised from 2% to 1%.
Special Capital Gains on Mine Titles	Effective date of 20% Special Capital Gains on Transfer of Mining Title revised to 31 December 2023 from 1 January 2014
Coal Royalties	Increased to 2%.
Mineral Royalty Harmonisation	Now administered under the Income Tax Act (objections, assessments, appeals).
Registration and transfer of mine titles	Registration and transfer of mine titles to be sanctioned only for compliant taxpayers as evidence of certificate from ZIMRA for taxpayer registration and payment of relevant taxes.
Interest benefit on employee loans	Secured Overnight Financing Rate (SOFR) plus 5%
Credit Facility by Financial Institutions	Financial institutions prohibited from granting loans exceeding USD20,000 (or local currency equivalent) in an uninterrupted 12 month in the absence of borrower's tax clearance.
Mandatory POS	Enforcement of POS machines for small traders.
Civil penalty for late return	Standardisation across all Revenue Acts of a USD30 civil penalty per day, up to 91 days for a late submitted return.
TaRMs single account	Establishment of TaRMS single account where taxes are to be paid into, automatic refund and off setting of tax liabilities

Source: Finance Act no 7 of 2024

The Role of ZIMRA and the Position of Public Notices

The Zimbabwe Revenue Authority (ZIMRA) has, in recent years, been using public notices, many of which carry profound implications for taxpayer compliance. Although such notices are ostensibly intended to guide the public on administrative interpretations, a disconcerting trend has emerged: they are being operationalised as though they possess the force of law. This practice has raised fundamental concerns regarding the limits of ZIMRA's statutory mandate and whether the authority is encroaching upon legislative functions. The matter reached a critical point in the Delta case, which highlighted the tension between administrative guidance and binding legal obligation. At the heart of the dispute lies the question of whether public notices may lawfully be used in its operations.

Founded under the Revenue Authority Act [Chapter 23:11], ZIMRA acts as the primary instrument of revenue assessment and collection for the government. It is further mandated with the roles of advising the government on fiscal policy, promoting legal commerce and travel, safeguarding the public from illegal goods and crime, helping to reduce corruption, and offering taxpayer education. Operating within a legal framework, ZIMRA follows laws and standards of transparency, legality, and accountability.

In the country, the legislature, comprised of the House of Assembly, the Senate and the President is the primary law-making body. To facilitate this process, the Minister of Finance compiles the national budget. As the budget goes through both Houses of Parliament and develops into a Finance Bill, the suggestions are discussed and further polished throughout the legislative process. After the President signs the Finance bill it is published as the Finance Act. This process suggests a policy of parliamentary design where taxes are imposed by an Act of Parliament. This process guarantees that tax law is important in a democratic and constitutional way once it is adopted; this too has effects on legal certainty for taxpayers and their compliance.

The legislative framework also permits the issuance of delegated legislation, typically in the form of statutory instruments. These instruments, promulgated by the Minister under enabling provisions of the principal Acts, are intended to address technical or operational details that may not warrant full parliamentary debate. Nevertheless, statutory instruments cannot exceed the scope of authority conferred by the parent statute. Any attempt to introduce new tax obligations or alter substantive rights through subordinate legislation risks being struck down by the courts for being *ultra vires*. Delegated legislation must therefore remain within its prescribed limits and serve only to give effect to laws properly enacted by Parliament.

The judiciary plays a critical role in enforcing tax laws, interpreting legislative provisions, and resolving disputes between taxpayers and ZIMRA. The courts give legal interpretations of legislative provisions and settle taxpayer/revenue body conflicts. Precedent doctrine guarantees uniformity in tax laws, decision-making and guards against administrative

overreach. Particularly by the Supreme Court, which is the highest court for all tax appeals, the court decisions not only settle particular instances but also exonerate laws for the public at large for the future. This vital oversight responsibility of the judiciary is especially important in both constitutional democracy and the principle that, under clear legislative authority, rather than just an administrative order, taxpayers can only be required to pay taxes.

To improve legal certainty in the application of tax law, section 34D of the Revenue Authority Act introduces a statutory framework for advance tax rulings. This provision allows the Commissioner-General to render binding rulings on his own accord, or upon application by a taxpayer, as to the meaning of any tax law administered by ZIMRA. The rulings must be compliant with the requirements of the Fourth Schedule and are intended to provide authoritative guidance in respect of specific transactions. These rulings are articulated and procedurally safeguarded; they do not reflect informal or unilateral administrative interpretations and are firmly established in law.

The extent of ZIMRA's authority to issue public notices that have same impact as primary legislation was a key consideration in the case of *Delta Corporation Limited v ZIMRA* (2024 ZWSC 62). In that case, ZIMRA issued additional assessments supported by a turnover apportionment formula set out in Public Notice No. 26 of 2019, even though the formula was not even enshrined in the Income Tax Act or any statutory instrument. The taxpayer filed a challenge to the assessments on the basis that the public notice was an invalid use of legislative power. The challenge was upheld by the Supreme Court which held that public notices are "administrative advisories" and cannot trump or add to statutory tax law. Public notices "do not have the force of law and cannot be used to create enforceable obligations" and it characterised Public Notice No. 26 as "an attempt to legislate" - a role ZIMRA is not empowered to take under the Constitution. To the taxpayer's clear benefit, ZIMRA received clear guidance on its limits. Nevertheless, since that matter, ZIMRA has persistently issued public notices to amend compliance obligations despite the lack of legislative change or legal authority.

This practice raises a fundamental question: what is the legal status of public notices within Zimbabwe's tax framework? If they are considered informal precedent, they still lack the procedural rigor and binding authority of determinations issued under Section 34D of the Revenue Authority Act. If not, then at best they serve as explanatory tools, and at worst, they blur the lines between administration and legislation. Either way, their role must be clearly delineated. Legal certainty, consistency, and transparency are essential elements of a fair tax system. The continued reliance on public notices to shape taxpayer obligations, in the absence of statutory backing, risks undermining those principles and invites constitutional concerns around separation of powers.

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Foreign Exchange Differences: The Audit Pitfalls Hiding in Plain Sight

Foreign exchange differences are a frequent source of tax adjustments during audits, particularly where taxpayers fail to align accounting treatment with tax rules. The volatility of Zimbabwe's multicurrency framework requires careful treatment of foreign currency movements to mitigate exposure to audit adjustments and penalties. In terms of the Income Tax Act, foreign exchange gains form part of taxable income when realised, while realised foreign exchange losses are tax deductible. Improper treatment of foreign exchange differences continues to trigger heightened scrutiny, with common pitfalls often leading to audit disputes, penalties and disallowed deductions.

Common Tax Pitfalls

Offsetting Foreign Exchange Gains and Losses: Section 37AA of the ITA mandates taxpayers trading in both local and foreign currencies to file a separate foreign currency income tax return. This necessitates the determination of income ratios for apportioning expenditure and allowances between the returns. The ratio is based on accounting turnover adjusted for specific gross income items as per s8 of the ITA, less exemptions. Foreign exchange gain is one of the specific gross income items. Therefore, offsetting foreign exchange gains and losses distorts this ratio.

Recognition of Notional or Translation Differences: Unrealised foreign exchange differences arising from the revaluation or translation of foreign currency at year-end are not recognised for tax purposes. These differences typically result from translating balances for reporting purposes, such as restating cash held in a foreign currency safe box or bank account. Since no actual transaction has occurred, these gains or losses remain notional. Only realised gains or losses resulting from actual settlement, qualify for inclusion in taxable income or deductions.

Tax Reporting of Gains and Losses when Transaction Occur in Same Currency: Because of differences between functional and presentation currencies, businesses may account for exchange differences, even when no actual transaction has occurred, and trade has only been conducted in one currency. Even though accounting records may reflect exchange differences due to currency conversion of balances for reporting purposes, these differences are not recognised for tax purposes. Only exchange differences arising from variation in exchange rate between local currency and foreign currency form part of the tax base.

Accounting for Foreign Exchange Movements between the Years: Foreign exchange differences are period-specific and must be taxed or deducted in the year they are realised. The practice of subtracting the opening balance and adding back the closing balance of foreign exchange differences in the tax computation is therefore incorrect. Only foreign exchange gains or losses realised from actual transactions in the current year should be included in the tax computation.

Retained earnings are a balance sheet item, not a basis for determining the taxable foreign exchange differences of the current year.

Misclassification between Revenue and Capital Nature: Only revenue nature exchange differences form part of the tax base. Revenue nature foreign exchange differences arise from the sale of goods or services in the course of trade or on working capital items, i.e., settlement by trade debtors or of creditors etc. Capital nature foreign exchange differences are not part of tax base and can only be offset against the cost of the asset when realised. These are often linked to the acquisition or disposal of fixed assets, long-term loans and equity accounts.

Failure to Provide Analysis of the Ledger: No supporting tax schedules showing how balances disallowed, deducted, taxed, or excluded have been determined. In the absence of a clear breakdown linked to transactional records or settlement confirmations, these entries are rejected during audit.

Why This Matters

Businesses need to be prudent in the approach to taxing or deducting foreign exchange differences because the tax risks have heightened the level of scrutiny from ZIMRA. The integrity of foreign currency tax schedules, ledger evidence and classification of items must be maintained to ensure compliance and manage audit risk.



A background image for the header showing two business people shaking hands in front of a city skyline at night. Overlaid on the image is a glowing blue line graph and a bar chart. The text 'BUSINESS SERVICES' is written in large, white, bold, sans-serif capital letters.

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Tax Liability: A Case of Substance over Form

The principle of **substance over form** remains central to determining tax liability, particularly where contractual terms diverge from actual conduct. As economic models, digital transactions and hybrid payment structures continue to evolve, there is often a mismatch between the legal form of agreements and how they are executed in practice. This disparity raises a fundamental question: should tax liability follow the contract, or the conduct? The principle holds that the true nature of a transaction is determined by its implementation and not merely its documentation. This issue came under judicial scrutiny in *Contitouch Technologies (Pvt) Ltd v ZIMRA (HH 57-25)*, where the court had to determine whether an unenforced contract could give rise to a tax obligation.

Case Background:

In 2017, Contitouch Technologies (Pvt) Ltd entered into a formal contract with a company called Africa Gaming which entitled Contitouch to receive US\$80,000 monthly. In response, ZIMRA deemed this as revenue of the company and demanded payment of taxes in foreign currency, arguing that the company was trading in foreign currency. According to Contitouch, the contract was never enforced. Instead, it traded in local currency. It further insisted that the contract was merely an administrative arrangement, allowing Africa Gaming to use Contitouch's banking system to facilitate offshore software payments. The company's bank statements confirmed that no such income was ever received. Nonetheless, ZIMRA insisted that the written contract formed the basis of its assessments.

Court's Reasoning and Decision:

The court came to the rescue of the company. Drawing on established legal doctrine, the judge reiterated that the validity and enforceability of a contract depend not merely on its terms, but on the intention of the parties and their conduct. A putative contract which is one signed without the intention to create legal obligations, cannot be the basis of tax liability. Citing *Joubert v Enslin* and affirming that intention governs interpretation, the court found that the contract had no substance and had not been implemented in practice. The company also gained favour from the fact that that same contract was technically converted into local currency through operation of law. In terms of SI 33 of 2019, all assets and liabilities held prior to 22 February 2019 were converted to RTGS on a 1:1 basis. The court held that while ZIMRA has a legitimate mandate to enforce tax laws and collect tax, this must be done within the context of commercial reality and statutory reforms.

Decision Impact:

The judgement reaffirms a key principle at law that while legal form provides a framework, it is the actual conduct that dictates the tax implications. This principle is practised in many tax jurisdictions especially in areas of transfer pricing and the taxpayer community should heed the call.



Key Points

What is the Tax Issue?

The principle of substance over form dictates tax liability where transactions are complex or multi-layered.

How Does it Affect You?

ZIMRA and the courts will examine the actual conduct of the transaction not merely their contractual terms to establish the true tax position.

What is the Key Takeaway?

Ensure that contractual documentation reflects the true operational conduct to avoid tax exposure and disputes.

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Insurance Premiums to Non-Residents: Are They Subject to NRTF?

Non-Resident Tax on Fees (NRTF) is levied in terms of s30 as read with the 17th schedule to the ITA on fees paid from a Zimbabwean source to a non-resident person. The 17th schedule defines fees as amounts payable in respect of managerial, consultative, administrative, or technical services. These terms are not defined in the Act and as per the established legal position in Zimbabwe in absence of legislative definition, the ordinary, literal, and grammatical meaning of words would be adopted. In *M Coy v ZIMRA*, the court held that few payments to non-residents would fall outside the scope of "fees," given the breadth of the four qualifying terms. However, it remains a requirement that the payment be made in respect of services rendered to attract NRTF. This raises the question of whether premiums paid to offshore insurers fall within the charge.

Insurance premiums paid to offshore insurers are not by their nature, consideration for such services. Under ,

the Insurance Act [Chapter 24:07], an insurance contract is a financial agreement in which the insurer undertakes to indemnify the insured against defined risks. The premium is paid in exchange for this indemnity, not for a service rendered to the insured.

While insurers may conduct underwriting, claims processing and other internal functions, these activities are integral to the provision of the insurance product itself. They are not separately provided or billed services. Unless the premium is expressly unbundled to include charges for technical or advisory services, whether by the insurer or an affiliate. The total payment remains consideration for a financial product, not a service. Therefore, insurance premiums paid to non-resident insurers do not fall within the ambit of non-resident tax on fees, unless distinct and separately charged services are present.

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No Shelter in Courts: Objection Not a Shield Against Enforcement

The recent High Court decision in *Omnia Fertilizer Zimbabwe (Pvt) Ltd v ZIMRA & Others* [2024] ZWHHC 174 reaffirms the limits of judicial intervention in the face of ZIMRA's statutory tax collection powers. The ruling reinforces the applicability of the "pay now, argue later" doctrine and provides clarity on when taxpayers may seek urgent court relief against garnishee orders issued before an objection is finalised.

Case Background:

Between 2020 and 2022, Omnia submitted tax returns and remitted its tax payments in Zimbabwean dollars despite part of its trade taking place in foreign currency. ZIMRA disputed this and insisted that the company pays part of its tax in foreign currency. Despite Omnia's objection to the assessments and request for suspension of collection under s69 of the Income Tax Act, ZIMRA rejected and proceeded with garnishee orders to several of Omnia's banks to recover US\$3.9 million. In response the company approached the High Court on an urgent basis, seeking to block ZIMRA from proceeding with collections while the matter was still under review.

Court's Reasoning and Decision:

The Court held that, lodging of an objection or initiation of legal proceedings does not, in itself, suspend an assessed tax liability. In terms of section 69(1) of the ITA, an assessment remains enforceable unless the Commissioner issues a directive to suspend collection and none was issued in this instance. Accordingly, the garnishee orders were held to be a lawful and procedurally valid exercise of powers under section 58. The Court found no requirement for prior judicial approval before ZIMRA enforces payment, noting that garnishee action in the presence of an undisputed debt is a legitimate tool of revenue collection. It further held that any challenge to the legal foundation of the assessments must follow statutory procedures, including objection and appeal to the Fiscal Appeals Court. An application for urgent interdictory relief was deemed an improper substitute for these internal remedies. The application was struck off the roll.

Decision Impact:

Taxpayers remain obligated to pay assessed amounts unless the Commissioner General grants a suspension under section 62 or a formal payment plan is approved. ZIMRA has unrestricted powers to demand payment once a valid assessment has been issued, even where an objection or appeal is pending. The High Court will not entertain premature challenges unless it is shown that ZIMRA acted irrationally or unfairly, exceeded its powers, committed an error of law or a breach of natural justice when exercising its collection powers. With ZIMRA's current aggressive enforcement, assessments once raised are being immediately enforced, with a minimum of 30% demanded upfront and an increase in garnishee orders. Payment plans are increasingly being rejected. Where a case of genuine financial constraint exists, early engagement with ZIMRA is critical.

Key Points

What is the Tax Issue?

Objections under the Income Tax Act offer no protection from ZIMRA's powers to enforce tax collection.

How Does It Affect You?

ZIMRA may proceed with immediate enforcement measures, including garnishee orders, even while an objection or appeal is pending.

What is the Key Takeaway?

Proactively engage with ZIMRA, either securing a suspension or agreeing on a formal payment plan. Courts will not intervene unless there's evidence of irrational or unfair action by ZIMRA.



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Fast Food Tax: A Compliance Dilemma

Zimbabwe introduced a fast-foods tax of 1% of the sale value inclusive of VAT on certain fast-food items sold by restaurants, take-aways, supermarkets, retail outlets, hotels, or lodges. The specified products include pizza, burgers, hotdogs, shawarma, chicken, French fries, tacos, doughnuts, or similar items, whether sold pre-packaged or consumed on the premises.

Businesses are required to calculate and remit the tax to ZIMRA by the 10th of the month following the month of sale. The obligation extends to composite foods such as bundled meals. This introduces compliance complexities for small and medium-sized

operators, particularly those with limited pricing and systems capacity. Businesses should review their product classifications and ensure that point-of-sale systems can isolate applicable items.

For businesses facing operational challenges, particularly in distinguishing taxable items from exempt ones in mixed menus, there is need to adjust pricing structures and reconfigure point-of-sale systems to comply. Ongoing compliance will depend on accurate classification, internal controls and continued engagement with ZIMRA to resolve interpretation issues related to composite products and varying business models.

Tax Policy Manual

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9TH ANNUAL TAX CONFERENCE

"Navigating the Evolving Tax Landscape"



11-14 June 2025



Elephant Hills Resort, Victoria Falls



Speakers



Misheck Gova
Commissioner: Domestic Taxes
Zimbabwe Revenue Authority



Marvellous Tapera
Managing Partner
WTS Tax Matrix
Zimbabwe



Simon Gwenzi
Managing Director
Platinum Tax Consultancy
Zimbabwe



Lucia Chipungu
Lead Advisor
Old Mutual Africa Regions
Tax Reporting, Zimbabwe



Patrick Mawire
Principal
Hepta Advisory Services
Zambia



Keitumetse Sesana
Strategic Lead for Stakeholder
Engagement & Legislation
SAIT, South Africa



Solomon Choge
Transfer Pricing Expert
Royalty Range
United Kingdom



Tendero Makanga
Partner
DMH Legal Practitioners,
Zimbabwe



Godfrey Williams
Tax Technology Specialist
South Africa



Leonora Mawire
Managing Consultant
Leonora & Associates Consulting
Zimbabwe



Simelinkosi Mangena
Assistant Manager
WTS Tax Matrix Academy
Zimbabwe



Tinashe Murerekwa
Partner
Kreston
Zimbabwe



Hope Vengesa
Senior Manager: Transfer Pricing
BDO
Zambia



Lorean Magaramombe
Assistant Manager: Transfer Pricing
WTS Tax Matrix
Zimbabwe



Tafadzwa Mhonde
Tax Director
WTS Tax Matrix
Zimbabwe



Fadzana Chigeregomo
Regulatory Reporting & Tax Manager
Stanbic Bank
Zimbabwe



Minati Ndala
Senior Partner
MNK Chartered Accountants
Zimbabwe



Conference Fees Per Person (USD)

	Full Package	Own Transport	Conference Only	Deadline
Standard	2,260	1,950	1,460	23/05/25
Late	2,430	2,100	1,550	06/06/25

*Full Package includes conference fee, travel costs, accommodation, meals and activities

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9th Annual Tax Conference Programme

Wednesday, 11 June 2025

TIME	TOPIC & FACILITATORS
09:00 -12:00	Arrival & Check-In
12:00 - 13:30	Lunch
13:30 -15:30	Victoria Falls Tour (Optional)
15:30 -15:40	Welcome Remarks Simelinkosi Mangena - Assistant Manager: Tax Faculty; WTS Tax Matrix Academy
15:40 -15:50	Opening Remarks Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe
15:50 -17:15	Focus Groups: In Connect with Tax Experts & Thought Leaders (Interactive Session & Drinks) Cluster One: Financial Services & Telecoms - Marvellous Tapera & Fadzana Chigeregomo Cluster Two: Mining, Construction & Energy: Tafadzwa Mhonde & Patrick Mawire Cluster Three: Agro Based, Retail & Manufacturing : Leonora Mawire and Simelinkosi Magena Cluster Four: Hospitality, Public Sector & Other Services : Tendero Makanga & Lorean Magaramombe
17:15 - 18:00	Refreshing
18:00 Till Late	Chipala Bush Dinner

Thursday, 12 June 2025

TIME	TOPIC & FACILITATORS
08:00 - 09:00	2025 Tax & Accounting Updates: Developments & Policy Insights (Presentations) Leonora Mawire - Managing Consultant; Leonora & Associates Consulting Services, Zimbabwe Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe Minati Ndala - Senior Partner; MNK Chartered Accountants, Zimbabwe Zimbabwe Revenue Authority Representative Moderator: Patrick Mawire - Principal; Hepta Advisory Services, Zambia
09:00 - 09:10	Commercial & Health Break
09:10 - 09:55	Cross Border Operations: Managing Tax and Legal Risks in Cross Border Transactions (Panel Discussion) Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe Tendero Makanga - Tax Partner, Dube Manikai & Hwacha Legal Practitioners, Zimbabwe Patrick Mawire - Principal; Hepta Advisory Services, Zambia Fadzana Chigeregomo - Regulatory Reporting & Tax Manager; Stanbic Bank, Zimbabwe Moderator: Simelinkosi Mangena - Assistant Manager: WTS Tax Matrix Academy, Zimbabwe
09:55 - 10:00	Commercial & Health Break
10:00 - 10:30	Tea Break
10:30 - 11:25	Transfer Pricing Risk Management: A Revenue Authority Perspective (Panel Discussion) Solomon Choge - Transfer Pricing Expert; Royalty Range, United Kingdom Hope Vengesa - Senior Tax Manager: Transfer Pricing; BDO, Zambia Lorean Magaramombe - Assistant Manager: Transfer Pricing; WTS Tax Matrix, Zimbabwe Moderator: Leonora Mawire - Managing Consultant; Leonora & Associates Consulting Services, Zimbabwe
11:25 - 11:35	Commercial & Health Break
11:35 - 12:45	Taxpayer Compliance Toolkit: Staying Ahead of Shifting Audit Expectations (Panel Discussion) Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe Patrick Mawire - Principal; Hepta Advisory Services, Zambia Fadzana Chigeregomo - Regulatory Reporting & Tax Manager; Stanbic Bank, Zimbabwe Keitumetse Sesana - Strategic Lead for Stakeholder; Engagement & Legislation, SAIT Moderator: Tendero Makanga - Tax Partner, Dube Manikai & Hwacha Legal Practitioners, Zimbabwe
12:45 - 12:55	Commercial & Health Break
12:55 - 14:00	Lunch Break
14:00 - 15:00	From Documentation to Courtroom: Building Defensible Tax Positions (Panel Discussion) Tendero Makanga - Tax Partner, Dube Manikai & Hwacha Legal Practitioners, Zimbabwe Lucia Chipungu - Lead Advisor; Old Mutual Africa Regions Tax Reporting, Zimbabwe Keitumetse Sesana - Strategic Lead for Stakeholder; Engagement & Legislation, SAIT Simelinkosi Mangena - Assistant Manager: WTS Tax Matrix Academy, Zimbabwe Moderator: Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe
15:00 - 15:10	Commercial & Health Break
15:10 - 16:00	Defining Taxpayer-Authority Relationships: A Look at Taxpayer Rights and Responsibilities (Panel Discussion) Lucia Chipungu - Lead Advisor; Old Mutual Africa Regions Tax Reporting, Zimbabwe Simelinkosi Mangena - Assistant Manager: WTS Tax Matrix Academy, Zimbabwe Moderator: Leonora Mawire - Managing Consultant; Leonora & Associates Consulting Services, Zimbabwe
16:00 - 18:30	Refreshing Break
18:30 Till Late	Boma Dinner

Friday, 13 June 2025

TIME	TOPIC & FACILITATORS
08:00 - 08:45	Managing VAT Compliance in the Digital Age: Common Pitfalls and Practical Considerations (Panel Discussion) Simon Gwenzi - Managing Director; Platinum Tax Consultancy, Zimbabwe Godfrey Williams - Tax Technology Specialist, South Africa Tafadzwa Mhonde - Tax Director; WTS Tax Matrix, Zimbabwe Zimbabwe Revenue Authority Representative Moderator: Simelinkosi Mangena - Assistant Manager: Tax Faculty; WTS Tax Matrix Academy
08:45 - 09:30	Decluttering Corporate Income Tax: Uncovering the Tax Paradox and Proposals for Tax Reforms (Presentations) Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe Tinashe Murerekwa - Partner; Kreston, Zimbabwe Zimbabwe Revenue Authority Representative Moderator: Lorean Magaramombe - Assistant Manager: Transfer Pricing; WTS Tax Matrix, Zimbabwe
09:30 - 09:35	Commercial & Health Break
09:35 - 10:10	The Role of Automation in Corporate Tax Transparency and Filing (Presentations) Godfrey Williams - Tax Technology Specialist, South Africa Simon Gwenzi - Managing Director; Platinum Tax Consultancy, Zimbabwe Leonora Mawire - Managing Consultant; Leonora & Associates Consulting Services, Zimbabwe Zimbabwe Revenue Authority Representative Moderator: Tafadzwa Mhonde - Tax Director; WTS Tax Matrix, Zimbabwe
10:10 - 10:40	Tea Break
10:40 - 11:10	Zimbabwe Revenue Authority Commissioner General Address Zimbabwe Revenue Authority - Commissioner General
11:10 - 11:40	Key Note Speech and Official Opening : Ministry of Finance and Economic Development Minister of Finance, Investment Promotion and Economic Development
11:40 - 11:50	Commercial & Health Break
11:50 - 12:50	Tax Reforms For Tomorrow: Balancing Policy & Pragmatism (Plenary Session) Minister of Finance, Investment Promotion and Economic Development Zimbabwe Revenue Authority Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe Tinashe Murerekwa - Partner; Kreston, Zimbabwe Simon Gwenzi - Managing Director; Platinum Tax Consultancy, Zimbabwe Leonora Mawire - Managing Consultant; Leonora & Associates Consulting Services, Zimbabwe Moderator: Tafadzwa Mhonde - Tax Director; WTS Tax Matrix, Zimbabwe
12:50 - 13:00	Closing Remarks Marvellous Tapera - Managing Partner; WTS Tax Matrix, Zimbabwe
13:00 - 14:00	Lunch Break
14:00 - 15:30	Refreshing
15:30 - 18:00	Sunset Cruise
18:00 - 18:30	Refreshing
18:30 Till Late	WTS Tax Matrix Dinner- Celebrating 10 Years of Tax Excellence

Saturday, 14 June 2025

TIME	TOPIC & FACILITATORS
08:00 - 10:00	Checkout & Airport Transfers



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