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PRIVATE AND CONFIDENTIAL

Baker Tilly Hem LLP

Uganda Budget Review

& Tax Amendments (2022 / 23)

Now, for tomorrow

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Uganda Budget Review 2022 / 23

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Economic Performance Review

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Budget Theme for Financial Year 2022 / 2023

Full Monetisation of Uganda's Economy through:

- Commercial Agriculture
- Industrialisation
- Expanding and Broadening Services,
- Digital Transformation and
- Market Access

Theme in line with East African Community (EAC) which is

accelerating economic recovery and enhancing productive sectors for improved livelihood

Introduction

Resolved to pursue following goals

#	Goals Description
1	Kick-start the process of getting the households still engaged in subsistence into the money economy
2	Support businesses and the overall economy to recover from the impact of the COVID-19 pandemic and restore the lost jobs and livelihoods
3	Protect households from the rising prices of food, fuel, and other essential commodities using prudent economic policies

Introduction

Strategic Actions to achieve Goals

#	Key Strategic Actions
1	Maintain peace, security and stability
2	Full implementation of the Parish Development Model (PDM)
3	Step up implementation of the relief and recovery funds
4	Implement appropriate fiscal and monetary policies
5	Enhance investment in infrastructure

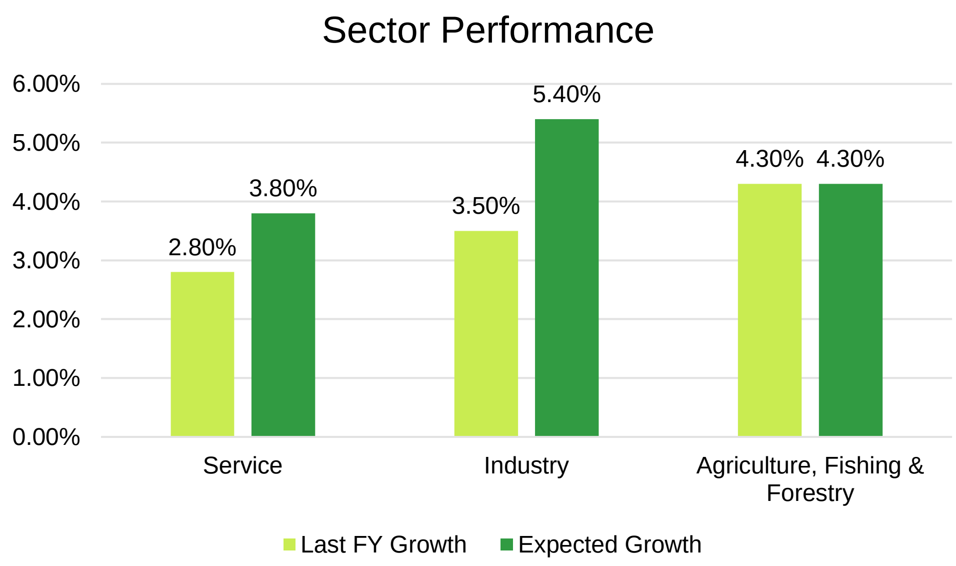
Economic Performance for the Fiscal Year 2021 / 2022

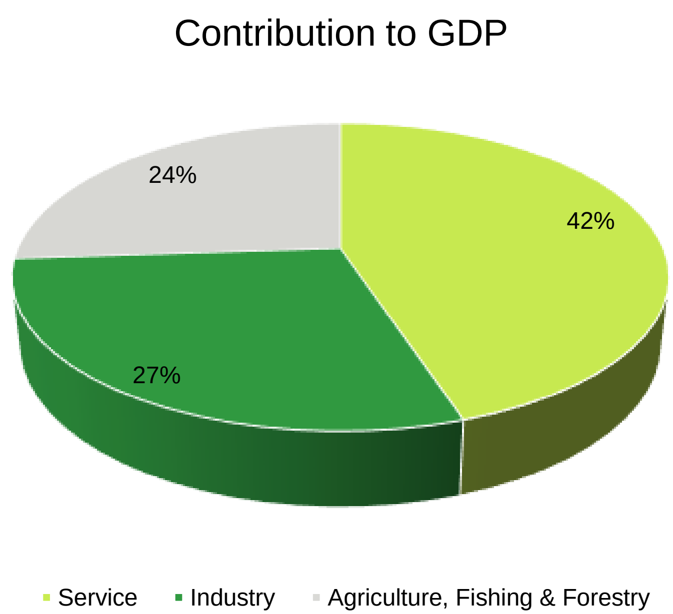
#	Performance Indicators	Value
1	Economy size projected to expand for FY ending 30th June 2022	UGX 162.1 Trillion *(USD 45.7 Billion)*
2	Growth Rate of economic activity (3.5% in previous year)	4.6%
3	Uganda's GDP per capita (Per Person Per Year)	UGX 3.7 Million *(USD 1,046)*

Economy is on a path to full recovery from the COVID-19 disruptions

Sector Performance

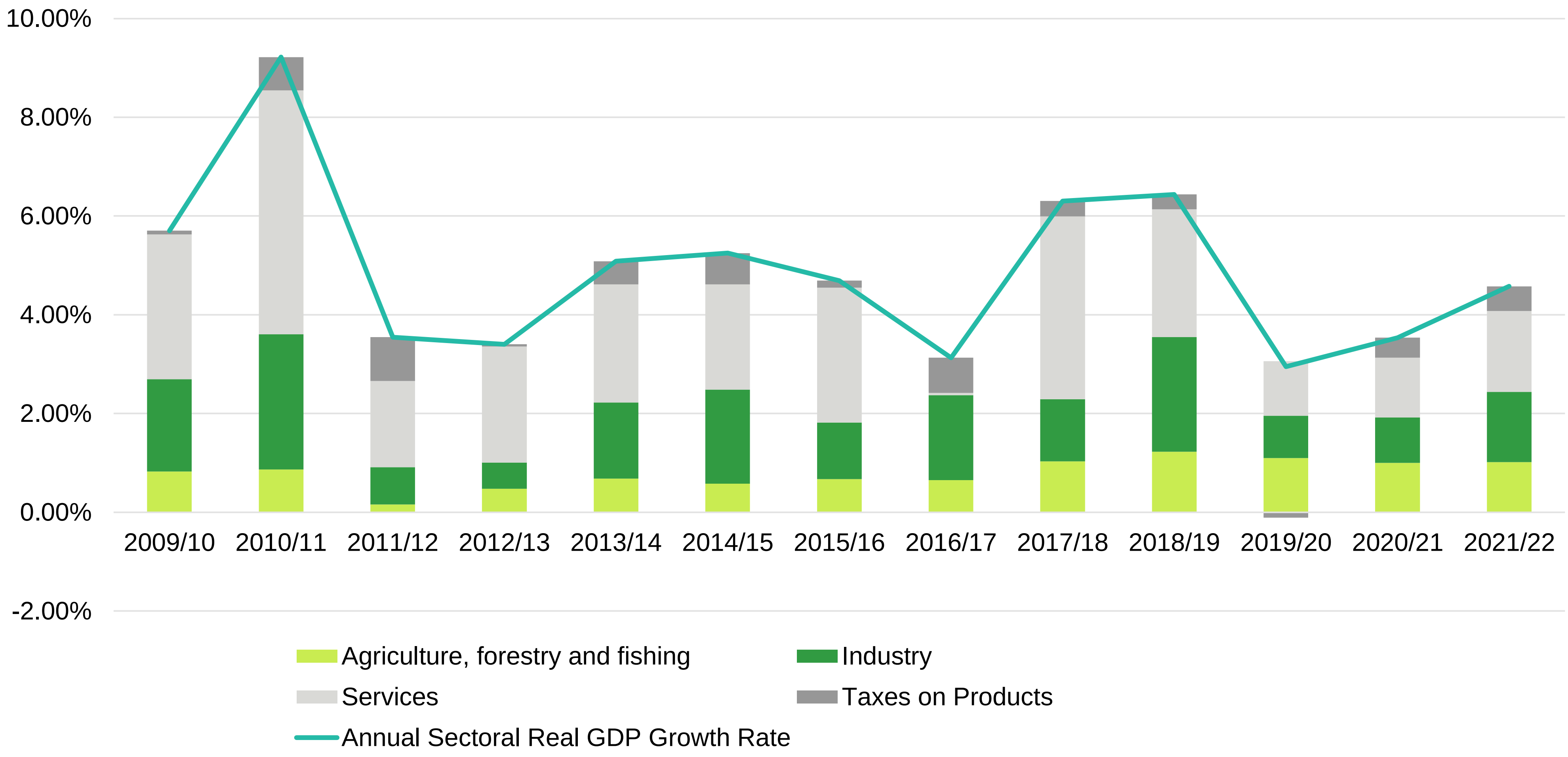
#	Sector	Last FY Growth (2021-22)	Expected Growth (2022-23)	Contribution to GDP
1	Service	**2.8%**	**3.8%**	**41.5%**
2	Industry	**3.5%**	**5.4%**	**26.8%**
3	Agriculture, Fishing & Forestry	**4.3%**	**4.3%**	**24.1%**



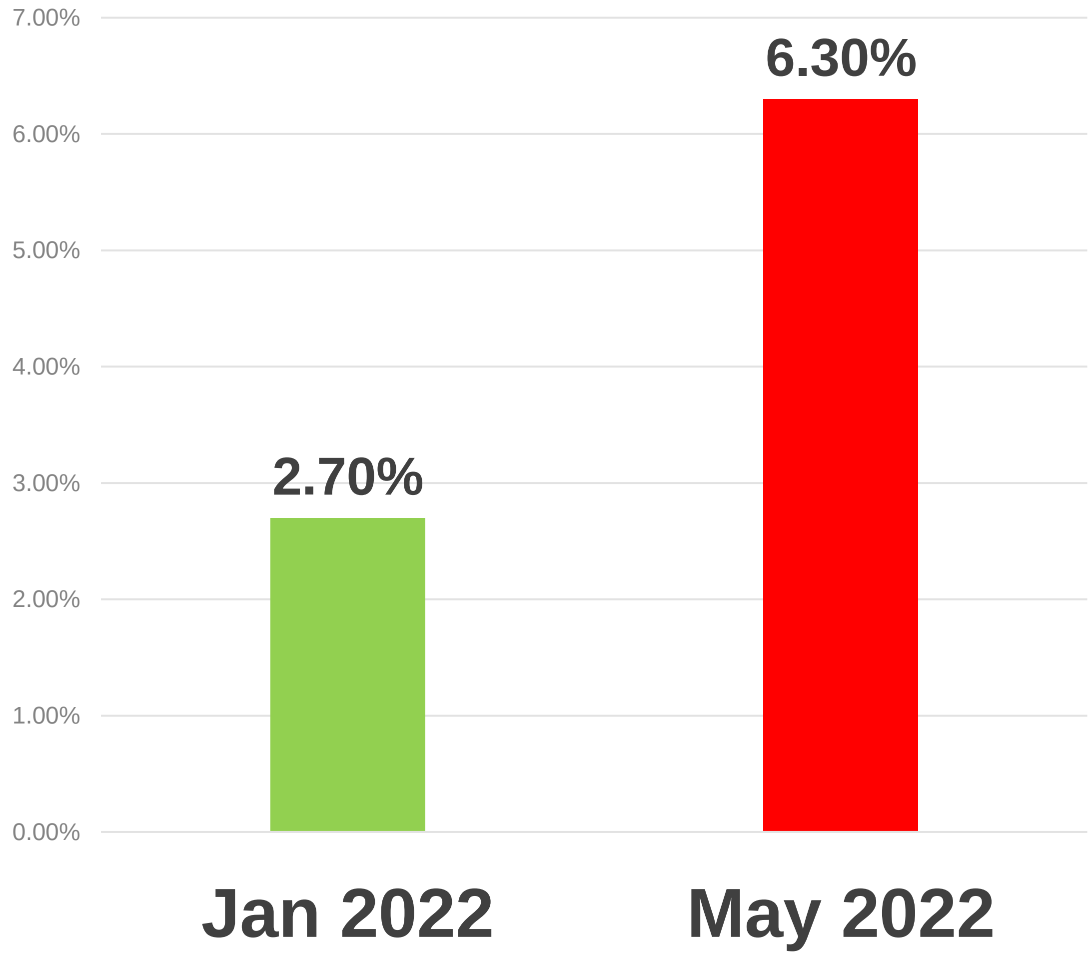


Sector Performance

Annual sectoral real GDP growth rates



Inflation



Significant Price increase in:

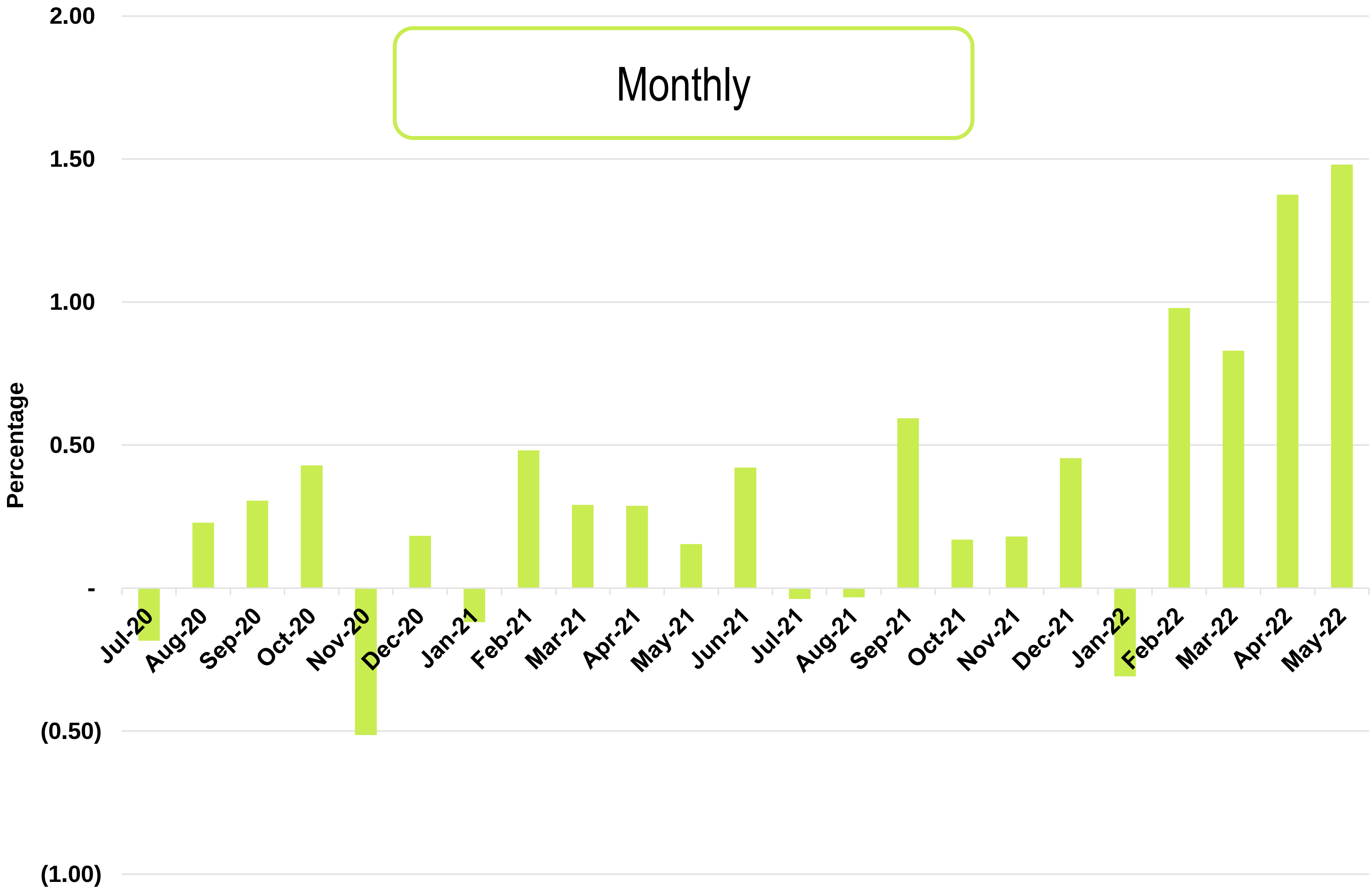
- Laundry bar soap
- Petrol
- Diesel
- Cooking oil
- Wheat
- Sugar
- Potatoes
- Onions
- Education services
- Cement
- Steel

Inflation

Events causing price increase

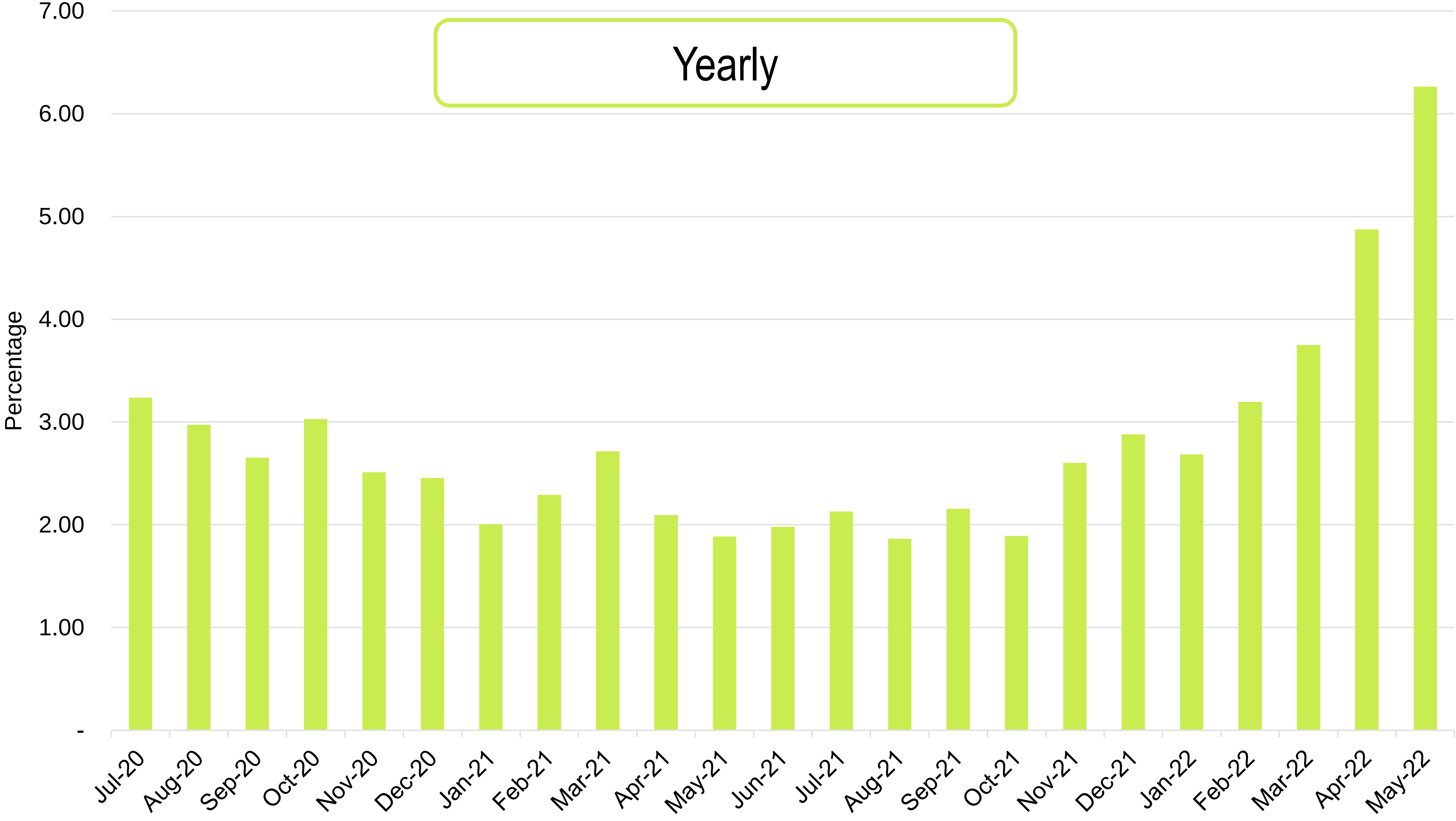
#	Events causing price increase
1	**The effect of COVID-19 restrictions across the world**, which disrupted supply-chains, which has consequently caused a shortage of intermediate raw materials used to produce some essential commodities
2	In the recent past, **the global economy has faced high shipping costs** arising from limited availability of containers, and higher fuel prices; all together leading to supply shortages globally
3	The **full opening of economies globally following relative containment during the COVID-19 pandemic lockdowns** has led to a rapid rise in aggregate demand for a number of fast-moving-goods beginning with oil, yet production levels have been constrained by Covid-19 restrictions
4	The situation has been worsened by **the Russia-Ukraine conflict**, which has further disrupted supply of oil, cereals such as wheat, maize, and sunflower oil, as well as essential metals like aluminum and nickel. The two countries are major producers and exporters of these commodities

Inflation



Monthly
2.00
1.50
1.00
0.50
-
(0.50)
(1.00)
Percentage
Jul-20
Aug-20
Sep-20
Oct-20
Nov-20
Dec-20
Jan-21
Feb-21
Mar-21
Apr-21
May-21
Jun-21
Jul-21
Aug-21
Sep-21
Oct-21
Nov-21
Dec-21
Jan-22
Feb-22
Mar-22
Apr-22
May-22

Inflation


Yearly
Percentage
7.00
6.00
5.00
4.00
3.00
2.00
1.00
-
Jul-20
Aug-20
Sep-20
Oct-20
Nov-20
Dec-20
Jan-21
Feb-21
Mar-21
Apr-21
May-21
Jun-21
Jul-21
Aug-21
Sep-21
Oct-21
Nov-21
Dec-21
Jan-22
Feb-22
Mar-22
Apr-22
May-22

Exchange Rates

<table>
<tr><th>Period</th><th>Appreciation</th><th>Reasons</th></tr>
<tr><td>April 2021 to April 2022</td><td>2.3%</td><td>• Higher USD inflows from exports
• Foreign Direct Investments
• Foreigners buying Government treasury bills and bonds</td></tr>
<tr><td>March 2022 to June 2022</td><td>(1.7%) MOM</td><td rowspan="2">• Concerns arising from the Ukraine-Russia conflict
• Related sanctions
• Rising interest rates in advanced economies</td></tr>
<tr><td>June 2021 to June 2022</td><td>(6.7%)</td></tr>
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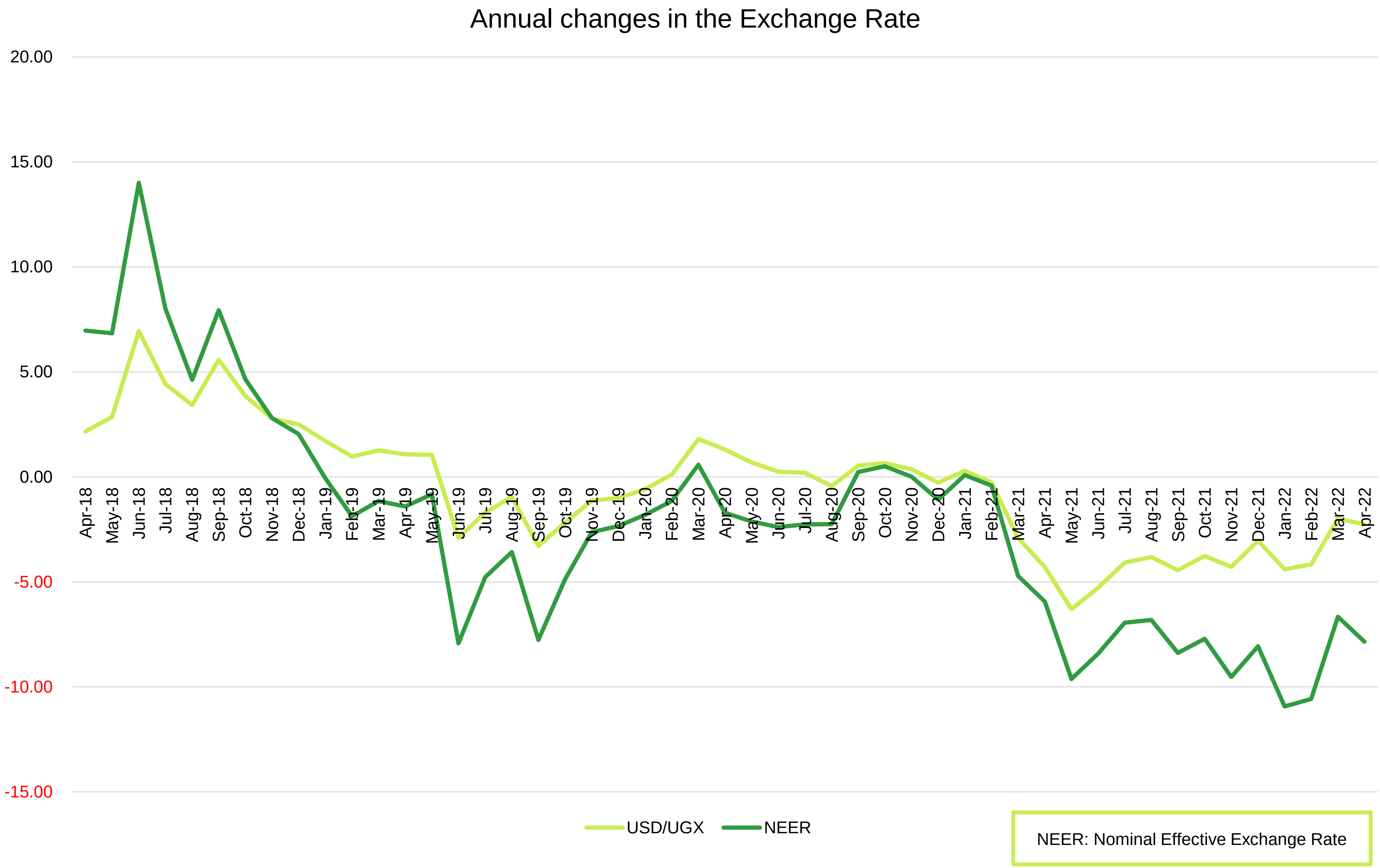
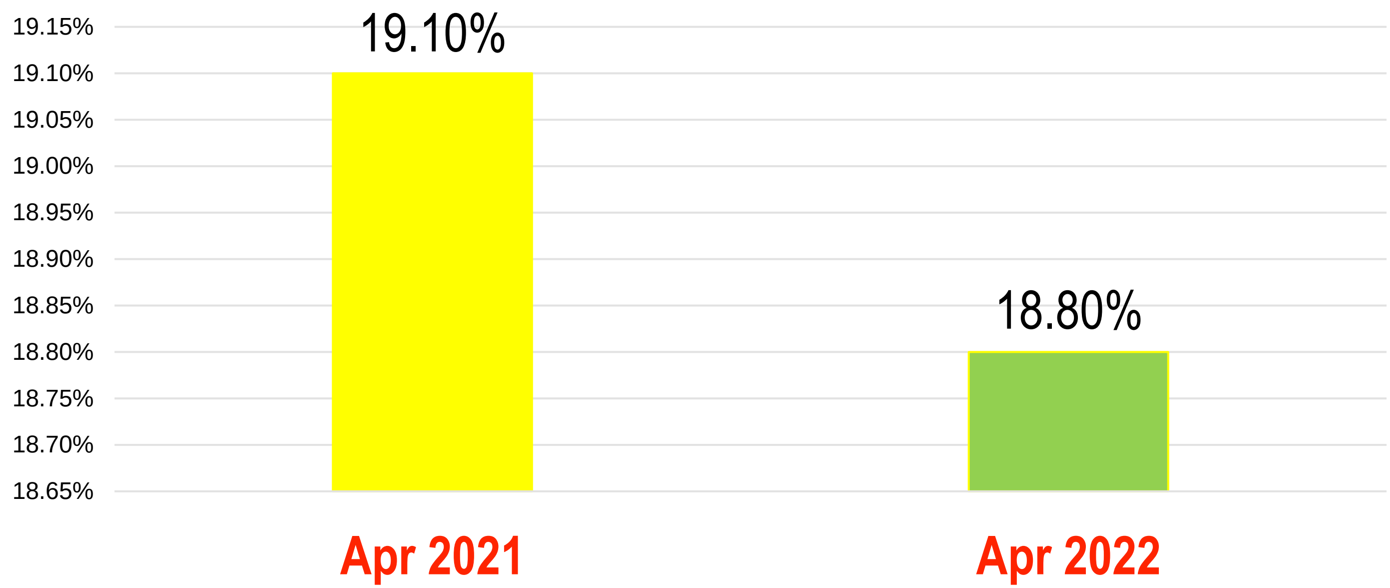
Negative values in red ink denotes depreciation

Exchange Rates



Interest Rates

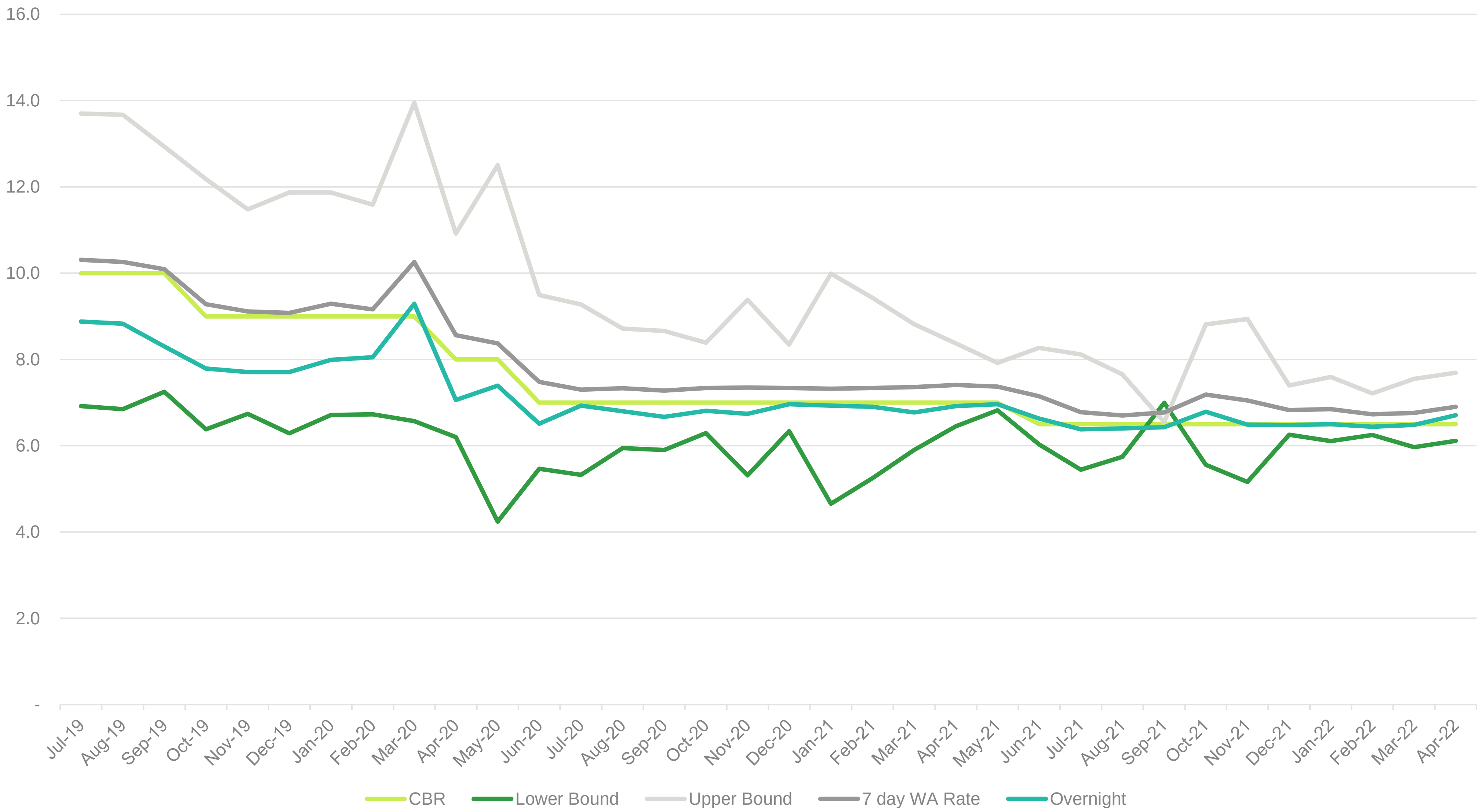


Reduction in lending rates occurred in the following Sectors:

- Transport and communication
- Building
- Mortgages
- Construction and Real Estate
- Personal and Houshold

Interest Rates

CBR and interbank money market rates



External Sector Performance

Sectors (Million USD)	12 months to Apr 2021	12 months to Apr 2022	Change in Value	Change %
Export receipt of goods and services	6,200	5,740	(460)	(7.42%)
Merchandise Exports	4,966	4,108	(858)	(17.28%)
Coffee	531	811	280	52.60%
Private Sector	5,000	6,400	1,400	28.00%
Foreign Direct Investment	**892**	**1,360**	**468**	**52.47%**

This increase in private sector is attributed largely to investments in the oil and gas sector.

Commercialisation of Oil and Gas

- The construction of the **East African Crude Oil Pipeline (EACOP)** is expected to commence in the coming financial year.
- The capacity of the Uganda National Oil Capacity to **invest in oil and gas development** has also been enhanced.
- While there have been **negative campaigns** against the development of the Crude Oil Pipeline, the Government will develop Uganda's oil and gas resources in a responsible and sustainable manner for the benefit of all Ugandans.
- **Shs. 904.1 billion** has been allocated towards the development and commercialization of minerals, oil and gas.

Fiscal Sector Developments

Particulars (Billion USD)	FY 2021 / 22
Revenue Collection Target	22,425
Revised Projection	21,486
Excess / (Shortfall) in Value	(939)
Excess / (Shortfall) in Percentage	(4.19%)

Key Highlights

- Improved domestic revenue collection
- Improved Tax Administration
- Full Reopening of the economy in Jan 2022
- Increased economic activity

Fiscal Sector Developments

- Total Government expenditure excluding domestic debt refinancing, external debt amortisation and appropriation-in-aid is projected to amount to **Shs. 35.027 trillion** this ending financial year.
- This expenditure is equivalent to **21.6 percent of GDP**.
- This is **Shs. 697 billion** higher than the expenditure planned at the time of budgeting
- Mainly due to the need
    - to finance the health requirements associated with the impact of **Covid-19 pandemic**,
    - to address **internal and regional security threats**.
- The fiscal deficit this Financial Year 2021/22 is estimated at **7.3 percent of GDP**
- Fiscal deficit is lower than the **9 percent** fiscal deficit registered in Financial Year 2020/21.
- Government target is to **reduce** the fiscal **deficit to 3 percent** in the medium term

Macroeconomic and Fiscal Policy Framework

To support recovery of the economy Government has provided credit relief to

- Borrowers
- Funding to micro, small and medium enterprises (MSMEs) and
- Funding to corporate/large businesses

Macroeconomic and Fiscal Policy Framework

#	Details of progress Registered
1	Bank of Uganda extended credit relief, Loans totaling Shs 7.2 trillion, representing 40 percent of total loans, were restructured over the period
2	Domestic arrears to private sector suppliers of goods and services to Government totaling Shs. 526 billion were cleared.
3	Court Awards amounting to Ushs 57 billion were settled
4	The Microfinance Support Center (MSC) was funded to support micro-businesses through the Emyooga Fund (Shs. 100 billion) and support to SACCOs (Shs. 27 billion).
5	Consequently, 6,600 SACCOs and 205,000 savings groups have been established across the country. These are operating a total of 4.1 million accounts.

Macroeconomic and Fiscal Policy Framework

#	Details of progress Registered
6	As a result, savings worth Shs. 63 billion as at the end of April 2022 among the lowest earners of this country have been realized
7	For small businesses that do not fall under Emyooga and at the same time do not qualify for the UDB funding, the Shs. 200 billion Small Business Recovery Fund has been established at a subsidised interest rate of 10% percent per year
8	To support the recovery of medium and large-scale businesses, Uganda Development Bank (UDB) was capitalized to the tune of Shs. 636 billion
9	Above fund was fully disbursed by May 2022 at an interest rate of 12 percent per annum. In addition, UDB plans to disburse a further Shs. 351 billion by December this year
10	For private sector enterprises such as agro-processing, manufacturing, and minerals beneficiation, the Uganda Development Corporation (UDC) received Shs. 160.7 billion this financial year to make equity joint venture investments

Macroeconomic and Fiscal Policy Framework

#	Details of progress Registered
11	Government has also disbursed the Shs. 20 billion to Teachers' SACCO to support them to recover from the pandemic
12	in the Financial Year 2021/2022, the Agricultural Credit Facility disbursed a total of Shs. 67.42 billion to 1,057 borrowers as at June 2022. Cumulatively, the fund has financed a total of 3,120 farmers across the country to a tune of Shs. 737.30 billion
13	Following amendment of the National Social Security Fund (NSSF) Act to allow mid-term access for qualifying members, a total of Shs. 420 billion has so far been paid out to about 21,500 beneficiaries
14	For women entrepreneurs, received a US Dollar 217 million grant from the World Bank to provide funding in the coming financial year to middle level businesses managed by women to support their growth and create jobs

Macroeconomic Projections for the fiscal year and the Medium Term

Future prospects for our economy are positive, with medium term growth projected at 6.5 percent per annum.

#	The positive economic outlook is dependant on the following
1	The full reopening of the economy
2	The increase in global demand for some commodities we produce and export, such as coffee, livestock, tea, and other food products
3	Commercialisation of oil and gas following the announcement of the Final Investment Decision (FID) in February this year
4	Active import substitution for goods that Uganda can produce and export competitively, such as pharmaceuticals
5	Support to private sector industries particularly in agro-industry, light manufacturing and value-addition to our minerals
6	Improved access to affordable credit for micro, small and medium enterprises to enable their businesses revive and create jobs
7	Fast tracking the implementation of the Parish Development Model which targets increased production of strategic commodities for domestic consumption and export
8	Digitisation of the economy to realise efficiency gains in business and government

Resource Envelope for Fiscal Year 2022 / 2023

The resource envelope for Financial Year 2022/23 amounts to Shs. 48,130.7 billion

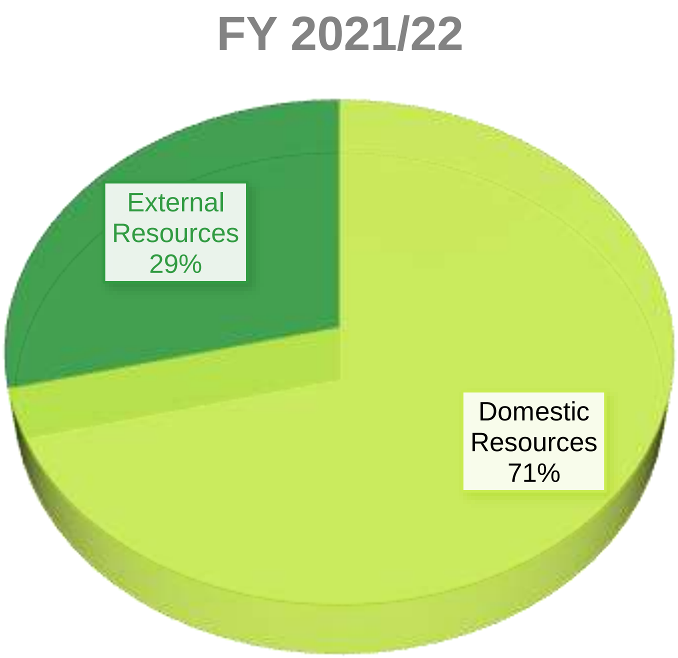
#	Topics
1	Revenue Collection
2	Strategic Sector Priorities allocation for Fiscal Year 2022 / 2023

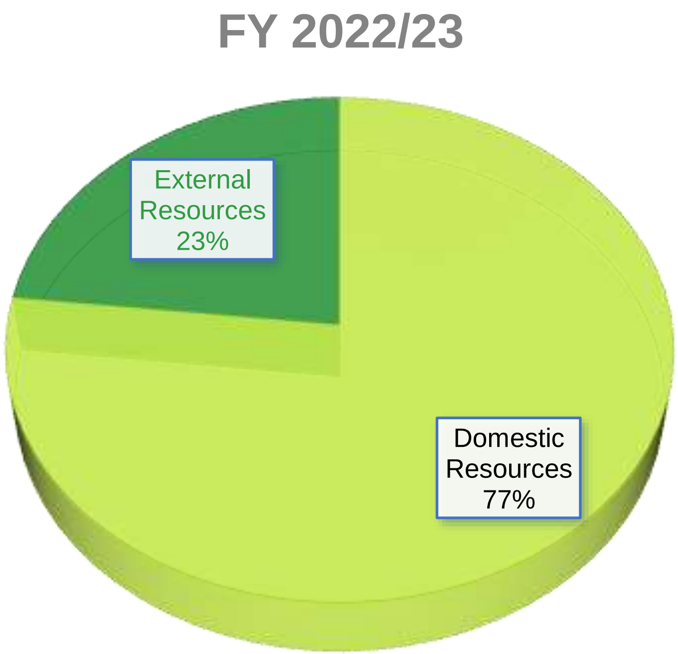
Revenue Collection

	FY 2021/22		FY 2022/23	
Budget	Billion UGX	% to Total	Billion UGX2	% to Total
(1) Domestic Resources	**25,780.40**	**71.15%**	**30,797.27**	**76.76%**
URA Tax Revenue	20,836.95	57.51%	23,754.95	59.21%
Non Tax Revenue	1,588.42	4.38%	1,795.89	4.48%
Petroleum Fund	200.00	0.55%	-	0%
Domestic Financing	2,942.63	8.12%	5,007.93	12.48%
AIA/Local Revenue	212.40	0.59%	238.50	0.59%
(2) External Resources	**10,451.45**	**28.85%**	**9,325.41**	**23.20%**
Budget Support	3,583.20	9.89%	2,609.24	6.50%
Grants	74.94	0.21%	78.05	0.20%
Loans	3,508.26	9.68%	2,531.19	6.30%
Project Support	6,868.25	18.96%	6,716.17	16.70%
Grants	1,349.43	3.72%	2,090.46	5.20%
Loans	5,518.82	15.23%	4,625.71	11.50%
Total Resources (1+2)	**36,231.85**	**100%**	**40,122.68**	**100%**
Domestic Debt Re-financing	8,547.00		8,008.00	
Total Resource Envelope	**44,778.85**		**48,130.68**	

Resource Envelope for Fiscal Year 2022 / 2023

Revenue Collection

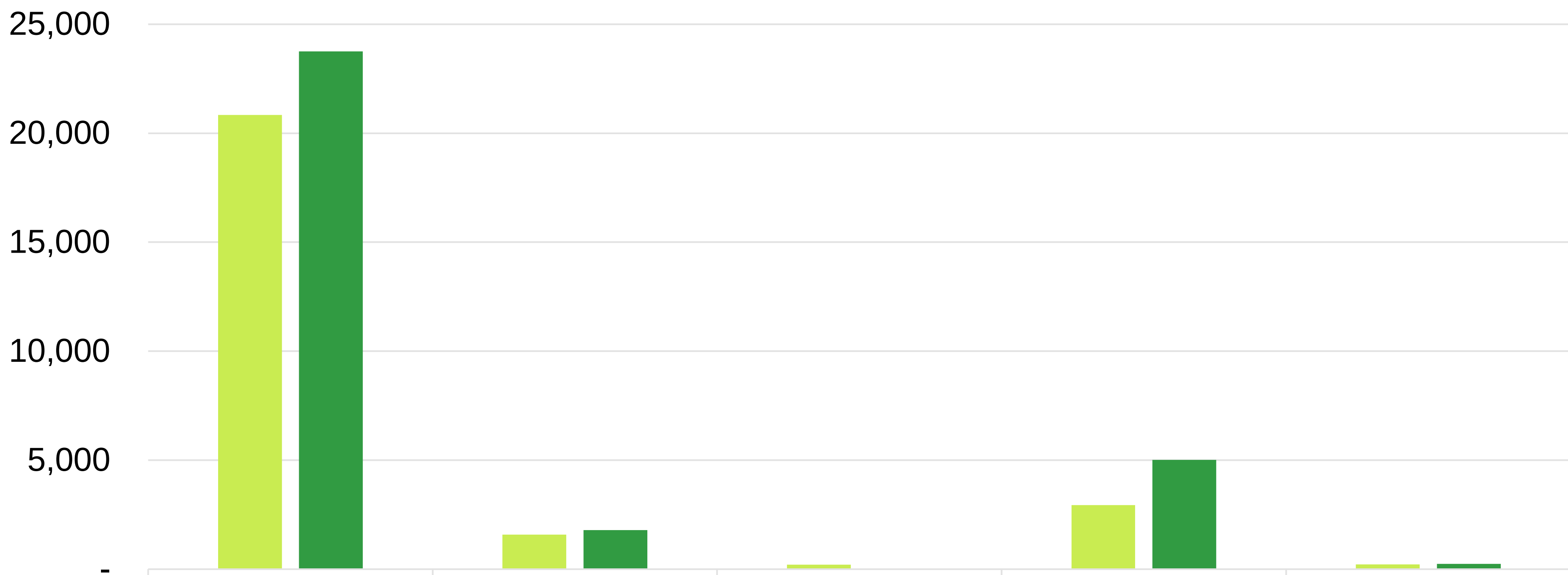




Buget (Bn UGX)	FY 2021/22	FY 2022/23
Domestic Resources	25,780.40	30,797.27
External Resources	10,451.45	9,325.41

Revenue Collection

Domestic Resources Budget

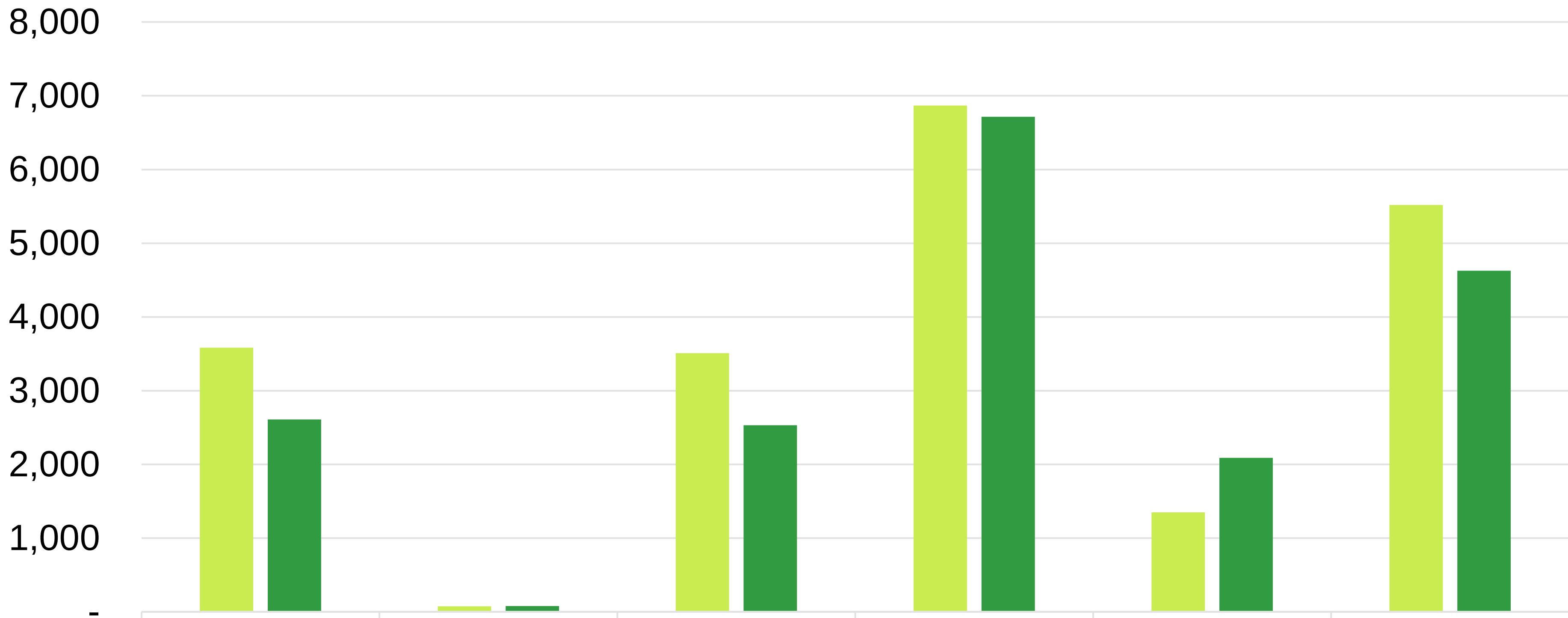


	URA Tax Revenue	Non Tax Revenue	Petroleum Fund	Domestic Financing	AIA/Local Revenue
FY 2021/22	20,837	1,588	200	2,943	212
FY 2022/23	23,755	1,796	-	5,008	239

FY 2021/22 FY 2022/23

Revenue Collection

External Resources Budget

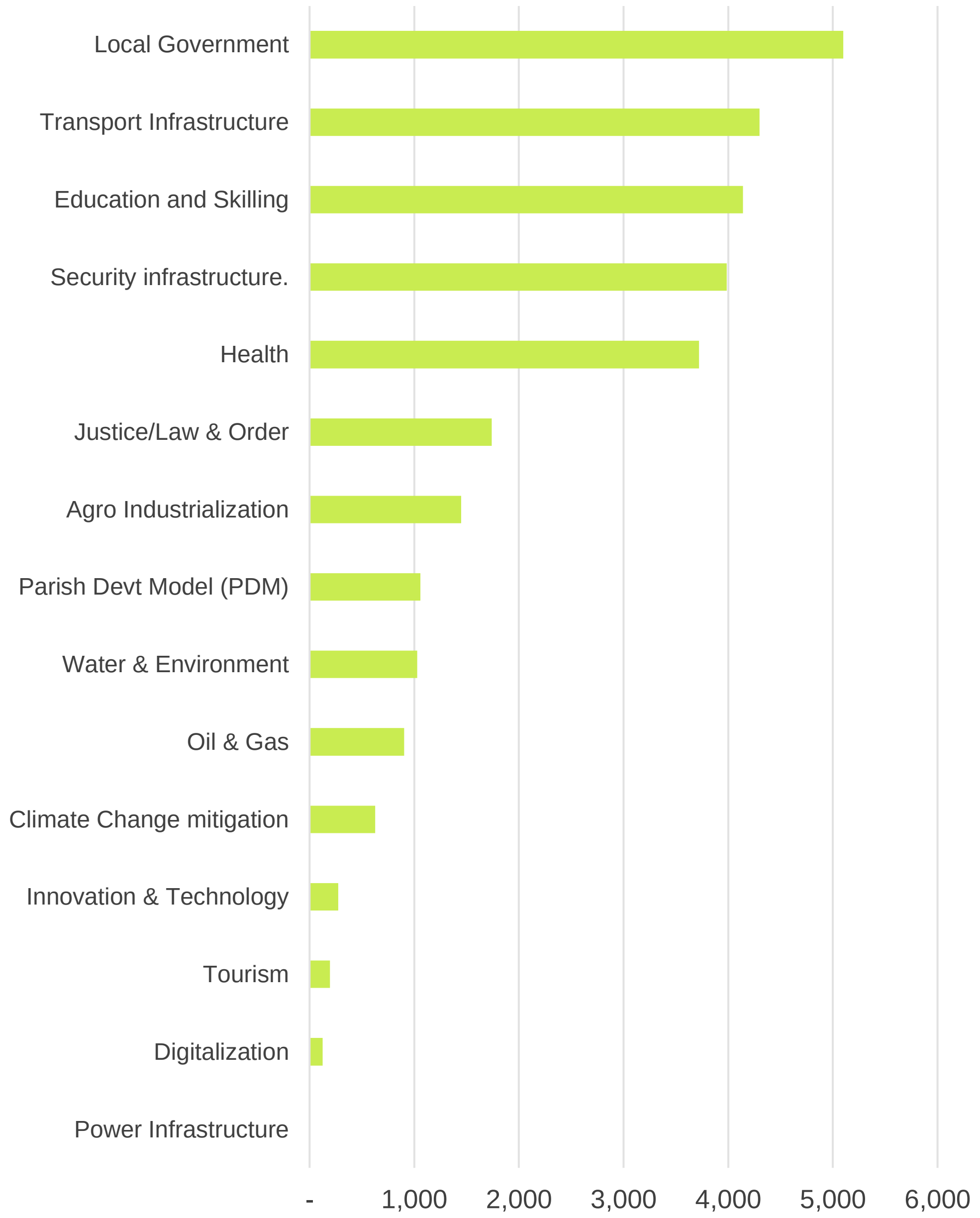


	Budget Support	Grants	Loans	Project Support	Grants	Loans
FY 2021/22	3,583	75	3,508	6,868	1,349	5,519
FY 2022/23	2,609	78	2,531	6,716	2,090	4,626

FY 2021/22 FY 2022/23

Strategic Sector Priorities allocation for fiscal year 2022/23

Priority Sector	UGX Billions
Local Government	5,100
Transport Infrastructure	4,300
Education and Skilling	4,140
Security infrastructure.	3,987
Health	3,722
Justice/Law & Order	1,741
Agro Industrialization	1,449
Parish Devt Model (PDM)	1,059
Water & Environment	1,027
Oil & Gas	904
Climate Change mitigation	628
Innovation & Technology	274
Tourism	195
Digitalization	124
Power Infrastructure	2
Total	28,652



Review of Tax Amendments

Contents

Introduction

Introduction

The Ministry of Finance, Planning and Economic Development (MoFPED) on behalf of Government published and presented the 2022/2023 tax bills to parliament in April 2022. The bills were discussed by the Parliament Committee on Finance after public hearing and subsequently passed by parliament and assented to by HE The President in accordance with the Public Finance Management Act. They are now **Acts of Parliament**. The Acts do not seem to introduce new tax measures but rather appear to be a cleaning act to clarify or correct ineffective or poorly drafted provisions for efficient tax collection.

The tax measures are also coming on the heels of a promise by government that post covid, no new tax measures (at least for revenue enhancement) would be introduced.

As part of the cleaning up exercise, Government has repealed a number of provisions under various Finance Acts. However, the TPCA is penalty heavy because of the operationalisation of EFRIS and expansion of the list of products on which affixation of tax stamps is required.

The Acts shall become effective **1st July 2022**.

Income Tax (Amendment) Act, 2022

Income Tax (Amendment) Act, 2022

Income Tax (Amendment) Act, 2022

1. Amendment in Section 2

(a) By substituting for the definition of "beneficial owner" the following

(ea) *"**Beneficial owner**" means - natural person who ultimately owns or controls a customer or the natural person on whose behalf a transaction is conducted, including a person who exercises ultimate control over a legal person or arrangement*

Implications:

- **This is the second time in a row that the definition of beneficial owner is changed. Notable changes are the use of the word 'customer' and the extension of the definition to "an arrangement" other than a legal person. Whereas this definition aligns to the International Exchange of Information provision on Beneficial ownership, a customer or arrangement have not been defined. This may create further complexity is applying the rules. The definition further elaborates the effect it had on various kinds of persons.**
- **This is part of Uganda's commitment to the Automatic Global Exchange of information of the OECD**

Income Tax (Amendment) Act, 2022

1. Amendment in Section 2

*(a) in relation to **legal person** includes—*

i. the natural person who either directly or indirectly holds at least ten percent shares or voting rights;

ii. the natural person exercising control of the legal person through other means including personal or financial superiority; or

iii. the natural person who has power to make or influence a decision of the legal person.

Implications:

- **Introduces a threshold of 10% shareholders in the definition. This means that a holder of less than 10% shares of a legal person shall not, for purposes of the Act be a beneficial owner**;
- **Further introduces a test of 'personal' or 'financial superiority'. Unfortunately, these terms have not been defined by the Act. They will remain subjective in implementation. (Poor legislation in my view);**
- **Also introduces another tier of test – 'power to make or Influence 'a decision of a legal person. This is also difficult to determine. Hopefully further guidance shall be provided in Practice Notes.**

Income Tax (Amendment) Act, 2022

2. In relation to Trusts

b) *in **relation to trusts** includes-the settlor; the trustee; the protector; the beneficiaries or the individual benefiting from the trust who is yet to be determined; and any other natural person exercising control of the trust;*

c) *in **relation to other legal arrangements** similar to trusts, the natural person holding equivalent positions referred to in subparagraph (b);"*

Implications:

- **Some few changes made in respect of trusts by introducing an undetermined beneficiary and a controller.**
- **The above definition of "beneficial owner" is largely relevant for purposes of benefits derived from the Double Taxation Agreements (DTAs) and the attendant Limitation of Benefits (LOB) clauses in domestic legislation (Section 88(5) ITA);**
- **It will become difficult day by day to access benefits under DTA if the individuals (natural persons) owning offshores companies are not residents of the respective countries.**
- **Note that the DTAs do not define "Beneficial owner" and reliance has in the past been placed on case law;**
- **It is also always a clause in the DTAs that any changes in domestic legislation affecting the agreed terms of the DTAs be communicated to the counterparts for agreement or comment before enactment;**
- **It remains to be seen how LOB clauses in domestic legislation paly out since they are clearly treaty overrides. Some jurisprudence is need in this area.**

Income Tax (Amendment) Act, 2022

Amendment to section 2 (bb)(B)

(b) in section 2 (bb) by substituting for paragraph (B) the following—

"(B) a religious, charitable, educational institution or research institution whose object is not for profit;"

Implications:

- **This is the second time in a row that this provision is substituted. What has changed from last year (2021 amendment) is only the inclusion or addition of research institution.**

Income Tax (Amendment) Act, 2022

3. Amendment of section 5 of the principal Act

Section 5 of the principal Act is amended in subsection (3) -

(a) by repealing paragraph (b);

(b) by substituting for paragraph (c) the following—

"(c) expenditures and loses incurred by a person, other than an individual or partnership, in the production of rent shall be allowed as a deduction for any year of income only as provided for in section 22 (1) (c);

(c) by repealing paragraph (d);

(d) by inserting immediately after paragraph (d) the following—

"(e) the expenditures incurred or gross rent derived by a partnership shall be allocated to the partners in accordance with section 67 (5) and (7) of this Act."

Income Tax (Amendment) Act, 2022

3. Amendment of section 5 of the principal Act

Implications:

- **Section 5(3)(b) of the Act being repealed provided that expenditures and losses incurred by the individual in the production of the rent shall be allowed as a deduction under the Act for any year of Income only as provided for in Section 22(1)(c). The repeal means that no deductions shall be allowed for a resident individual deriving rental income. This means that in accordance with Section 6 of the Act, a specific percentage (12%) of tax shall be applied on the gross rent; A threshold of 2,820,000 shall be allowed.**
- **The substitution of Section 5(3) (c) provides for a new formula of computing allowable deductions for rental income for persons other than individuals or partnerships under Section 22(1) (c);**
- **Section 5(3)(d) of the Act, now proposed to be repealed is respect of expenditures and losses for partnerships deriving rental income. The same treatment that applies to individuals shall apply to partnerships;**
- **The new provision Section 5(3)(e) by reference to Sections 67(5) and 67(7) of the Act merely clarifies the pass-through nature of rent income accruing to partnerships. In other words, rental income accruing to partnerships shall accrue to individual partners in their respective sharing ratios whereupon the partners shall be taxed as individuals.**

Income Tax (Amendment) Act, 2022

4. Amendment of section 21 of the principal Act

*(**This Section deals with Income Exempt from Tax**)*

Section 21 of the principal Act is amended in subsection (1)-

(a) in subsection (1) (ac) by substituting for the word "2022" the word "2023"

Implications:

- **Section 21(1)(ac) has extended the exemption status of Bujagali Hydro power project by one (1) year up to 30th June 2023. This exemption to the Bujagali project was due to expire on the 30th June 2022;**
- **The extension might be against the background of reducing the electricity tariff for consumers in the wake of the Bujagali sell by the previous shareholders and the consequent re-financing.**

Income Tax (Amendment) Act, 2022

5. Amendment of section 22 of the principal Act

Section 22 of the principal Act is amended in subsection (1) by substituting for paragraph (c) the following-

"(c) in case of rental income, the expenditure and losses incurred by a person other than an individual or partnership in the production of such income subject to subsection (1a)."

(b) by repealing paragraph (ca);

(c) by inserting immediately after subsection (1) the following—

"(1a) Where the expenditure and losses incurred by a person other than an individual or partnership in the production of rental income, exceeds fifty percent of the rental income, the allowable deduction shall be fifty percent of the rental income for that year of income.

Income Tax (Amendment) Act, 2022

5. Amendment of section 22 of the principal Act

Implications:

- **Last year 2021, the deductions allowed for rental income for all persons was to be 75% of the rental income. This has caused a lot of confusion in two (2) ways:**
  - **Section 5(3)(b) of the Act had not been repealed (now proposed to be repealed);**
  - **Section 22(1)(ca) in respect of mortgage interest deduction remained; Now being repealed.**
  - **Whether 75% was an absolute deduction or was subject to verification.**
- **This provision now applies to persons other than individuals or partnerships, eg. Companies, trusts etc.**
- **Note that the provision limits the rental deductions for each year of income to 50% of the gross rental income. The rate of tax remains 30%, giving a constant effective tax rate of 15%;**
- **Further to note is that the law as proposed is not clear as to what happens when the expenses incurred by the company are less than 50%. This needs to be clarified.**

Income Tax (Amendment) Act, 2022

6. Amendment of section 85 of the principal Act

Section 85 of the principal Act is amended by inserting immediately after subsection (4) the following—

"(5) For avoidance of doubt income derived from the carriage of passengers who do not embark or cargo or mail which is not embarked in Uganda is not income derived from a Ugandan-source service contract."

Implications:

- **There has been a lot controversy about URA attempts to collect WHT on inbound transport charges. TAT in Roche Transporters V. URA ruled controversially in favour of URA that the tax was collectable;**
- **This arose out of the interpretation of Section 79(c) of the Act (since 2015) and how the source rule interplays with Section 85(Ugandan sourced services contract) and the specificity of Section 86(1), the charging provision for carriage of cargo;**
- **This provision is aimed at clarifying the position that no WHT is chargeable on international transport of cargo embarking outside Uganda as it ought to be.**
- **When Cargo is embarked from Uganda the tax is 2% under section 86**

7. Amendment of section 89QA of the principal Act

Section 89QA of the principal Act is amended by substituting for subsection (1) the following—

"(1) Notwithstanding the provisions of sections 48 and 49A of the Tax Procedure Code Act, 2014 a licensee who fails to furnish a return or provide any other document within the time prescribed by this Act is liable to a penalty of not less than fifty thousand United States Dollars and not exceeding five hundred thousand United States Dollars."

Implications:

- **This provision is similar to the existing provision in terms of offence and penalty. The difference is the cross reference to the TPCA, Sections 48 & 49A thereof, which provide for different penalties for the same offences (2% & 50 million respectively);**
- **The intention is to make the provision which is specific to mining and petroleum, conflict free with other laws;**
- **However, it is still bad legislation because administrative penalties (without court process) should not be discretionary. For example, who and how is the penalty determined to be $50,000 or $500,000?**

8. Amendment of First Schedule to principal Act

The First Schedule to the principal Act is amended—

(a) by inserting the following in alphabetical order— "International Development Law Organisation (IDLO)."

(b) by substituting for the words "Department for International Development (DFID)" the words "Foreign, Commonwealth and Development Office (FCDO)"

Implications:

- **This is a Schedule for Listed Institutions. These institutions are exempt from tax by virtue of Section 21(1)(a) of the ITA.**
- **FCDO Replaces DFID.**

9. Amendment of Third Schedule to principal Act

The Third Schedule to the principal Act is amended by substituting for Part VI the following—

Rate of Rental Tax applicable to an individual	
Gross Rental Income	**Rate of Tax**
Not exceeding Ushs. 2,820,000 per annum (235,000 per month)	Nil
Exceeding Ushs. 2,820,000	12%

Implications:

- **The rate of rental tax for individuals and partnerships(partners) is 12% of the gross income;**
- **As discussed above, the repeal of the various provisions under Section 5, and Section 22;**
- **Whereas this is simpler to compute and fairer because it places resident individuals at an advantage in terms of effective rate of tax as compared to non-residents.**
- **A tax free threshold of 2,820,000 has been introduced. Persons with annual rental income not exceeding 2, 820,000 shall not pay rental tax.**

Value Added Tax (Amendment) Act, 2022

Value Added Tax (Amendment) Act, 2022

An Act to amend the Value Added Tax Act, Cap. 349; to provide for value added tax on imported services used by business in making exempt supplies; to provide for the repeal of the exemption on cotton seed cake; to exempt assistive devices for persons with disabilities; to provide for an exemption for supply of airport user services charge by the Civil Aviation Authority; to provide for equal treatment of supplies of educational materials from the East Africa Community Partner States and to provide for related matters.

Value Added Tax (Amendment) Act, 2022

1. Amendment to Section 20

The Value Added Tax Act Cap. 349, in this Act referred to as the principal Act is amended in section 20 (2) by repealing the words "or would be used in the provision of an exempt supply"

Implications:

- **This is a provision which last year 2021, exempted imported services used to make exempt supplies such as financial services from import VAT;**
- **With the repeal, imported services by persons engaged is provision of exempt supplies shall account for VAT on the said imported services;**
- **This must be purely from a revenue enhancement standpoint.**

2. Amendment to Section 26

Section 26 of the of the principle Act is amended by substituting for subsection(1), the following –

"(1) This Section applies to –

(a) a taxable person , the annual value of whose taxable supplies does not exceed five hundred million shillings; or

(b) a supplier who supplies goods or services to government."

Implications:

- **This means that VAT on taxable supplies made to government or government departments shall be accounted for only when government agencies pay for the supplies;**
- **This is an interesting development since it relieves taxpayers the burden of accounting for VAT on invoice basis when government takes a long time to pay for the supplies. Most taxpayers have had to borrow or have their cash flows constrained in order to meet the previous requirements of time of supply under Section 14 of the Act.**

3. Amendment of the First Schedule to the principal Act

The First Schedule to the principal Act is amended by inserting the following in the alphabetical order-

“International Development Law Organisation (IDLO);”

(b) by substituting the words “Department for International Development (DFID)” with the words “Foreign, Commonwealth and Development Office (FCDO)”.

Implications:

- **Under the VAT Act, this Schedule contains Listed Institutions entitled to some VAT relief. They usually claim refunds of all VAT paid in the course of their official duties in Uganda;**
- **FCDO replaced DFID.**

Value Added Tax (Amendment) Act, 2022

3. Amendment of the Second Schedule to the principal Act

The Second Schedule to the principal Act is amended in paragraph 1-

(a) in paragraph (1) (q) by substituting item (xvi) the following—

"(xvi) oxygen cylinder or oxygen for medical use;"

Implications:

- **This is an addition of the words "oxygen for medical use" under what constitutes medical goods. The supply of both oxygen cylinders and oxygen for medical use shall be exempt from VAT.**

(b) in paragraph 1 by repealing subparagraph (sd);

Implications:

- **The supply of menstrual cups hitherto exempt shall no longer be exempt from VAT. Note that instead this supply shall be zero rated.**

(c) in paragraph 1(rr) by repealing the words "at the level of a national referral hospital";

Implications:

- **The words repealed to ease access to exemption from VAT on the various goods and services to a developer of a hospital facility, even when the facility does not attain a level of national referral.**

Value Added Tax (Amendment) Act, 2022

3. Amendment of the Second Schedule to the principal Act

(d) by inserting immediately after paragraph 1(ooo) the following—

"(ppp) the supply of assistive devices for persons with disability;

Implications:

- **This is a new provision exempting all assistive devices for persons with disabilities, for example, canes for the blind, clutches, etc.**

(qqq) the supply of airport user services charge by Civil Aviation Authority"

Implications:

- **This is a new provision exempting airport user services charges from VAT. These may include entrance fees charged to each passenger as part of the tickets, airport ingress fees for motor vehicles, rent, etc;**
- **Clarification may be required by way of Practice Notes.**

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4. Amendment of Third Schedule to the principal Act

The Third Schedule to the principal Act is amended –

(a) by substituting for subparagraph (d), the following—

"(d) the supply of educational materials including educational materials manufactured in a Partner State of the East African Community;

Implications:

- **Previously, the zero- rate applied to only educational materials manufactured in Uganda. This is in line with the non-discrimination principle under the EAC protocols.**

(b) in paragraph 1 by substituting for subparagraph (j) the following—

"(j) the supply of sanitary towels, menstrual cups, tampons and inputs for their manufacture;

Implications:

- **Basically, an addition of menstrual cups under this head of sanitary towels. Zero rate makes them cheaper because incidental input tax related to their supply is claimable or creditable.**

Excise Duty (Amendment) Bill, 2022

Excise Duty (Amendment) Bill, 2022

The object of this Bill is to amend the Excise Duty Act, 2014, to provide for the definition of “fruit juice”, “un-denatured spirits” and “vegetable juice”; to provide for the amendment of Schedule 2 to the Act and to provide for related matters.

NOTE:
1. The Excise Duty Bill, 2022 has not yet been assented to by the President
2. We shall be in position to explain it once the Bill becomes Law.
3. However, the following were proposed in the Bill:

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1. Amendment of the Excise Duty Act, 2014

The Excise Duty Act, in this Act referred to as the principal Act, is amended in section 2 ---

(a) by inserting immediately after the definition of "export" the following—

*"**Fruit juice**" means unfermented liquid extracted from the edible part of a fresh fruit whether the extracted liquid is diluted or not;"*

Implications:

- **Previously, the Excise Duty Act had not defined fruit juice. This will attempt to create more clarity other than reliance on customs nomenclature.**

(b) by inserting immediately after the definition of "tribunal" the following—

*"**un-denatured spirits**" means spirits, that are not mixed with any substance to render the spirit unfit for human consumption or capable of being rendered unfit for human consumption, including neutral spirits or alcoholic beverages made from neutral spirits that are fit for human consumption.*

Implications:

- **Not defined before under the Act. Attempt to define to avoid ambiguity for this highly tradable commodity; Basically, the key word is unfit for human consumption.**

Excise Duty (Amendment) Bill, 2022

1. Amendment of the Excise Duty Act, 2014

(c) by inserting immediately after the definition of "value added tax" the following—

*"**vegetable juice**" means unfermented liquid extracted from the edible part of a vegetable whether the extracted liquid is diluted or not;"*

Implications:

- **Defined for the first time to distinguish it from fruit juice.**

Excise Duty (Amendment) Bill, 2022

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2. Amendment of Schedule 2 to the principal Act
Part 1 of the Second Schedule

Item No.	Product or service	Old rate	New rate	Comments
2(d)	Opaque Beer	20% or Shs. 230 per litre whichever is higher.	**12% or 150/= per litre whichever is higher.”**	• Encourage manufacture of more hygienic beer; • Further enhance the consumption of hygienic alcohol by making it cheaper.
3(a)	Un-denatured spirits of alcoholic strength by volume of 80% or more made from locally produced raw materials;	60% or Shs. 1500 per litre, whichever is higher.	**60% or Shs. 1500 per litre whichever is higher;**	• Whereas the rate has remained the same, there is proposed to vary the drinks by percentage of alcohol content. This rate is for 80% or more.
3(b)	Un-denatured spirits of alcoholic strength by volume of 80% or more made from imported raw materials;	100% or Shs. 2500/= per litre, whichever is higher;	**100% or Shs. 2500/= per litre, whichever is higher;**	• Same rate, specification of percentage of alcohol content, 80%.

2. Amendment of Schedule 2 to the principal Act
Part 1 of the Second Schedule

Item No.	Product or service	Old rate	New rate	Comments
3(c)	any other un-denatured spirits— (i) that is locally produced of alcoholic strength by volume of less than 80%; or	80% or Shs. 1700/= per litre whichever is higher;	**80% or Shs. 1700/= per litre whichever is higher;**	• Same rate; distinction made specific for spirits ready to drink made from locally.
	(ii) that is imported of alcoholic strength by volume of less than 80%.	None	**100% or Shs. 2500/= per litre whichever is higher;**	• For ready to drink imported spirits. This is a new distinction.
3(d)	Un-denatured spirits made from locally produced raw materials that is used in the production of disinfectants and sanitizers for the prevention of the spread of COVID-19 of alcoholic content by volume not less than 70%.	None	**NIL**	• New provision as covid -19 response for manufacture of sanitizers. Guidelines may be needed to operationalise.

Excise Duty (Amendment) Bill, 2022

2. Amendment of Schedule 2 to the principal Act
Part 1 of the Second Schedule

Item No.	Product or service	Old rate	New rate	Comments
5(b)	fruit juice and vegetable juice, except juice made from at least 30% pulp or at least 30% juice by weight or volume of the total composition of the drink from fruits and vegetables locally grown.	12% or shs. 250 per litre, whichever is higher.	**12% or Shs. 250 per litre whichever is higher**	• No change. Only change in description of item by introducing the percentage by weight of volume of total composition. • Previously, there has been confusion as to what the 30% entails.
5(d)	any other non-alcoholic beverage locally produced other than the beverage referred to in paragraph (a) made out of fermented sugary tea solution with a combination of yeast and bacteria.	12% or 150/= per litre whichever is higher”	**12% or 150/= per litre whichever is higher”**	• No change

Excise Duty (Amendment) Bill, 2022

2. Amendment of Schedule 2 to the principal Act
Part 1 of the Second Schedule

Item No.	Product or service	Old rate	New rate	Comments
11	Sacks and bags of polymers of ethylene and other plastics under HS codes 3923.21.00 and 3923.29.00 except vacuum packaging bags for food, juices, tea and coffee sacks and bags for direct use in the manufacture of sanitary pads;	2.5% or USD 70 per ton, whichever is higher	**40% or 4000/= per kilogram whichever is higher;”**	• Changes in description of the product(s); • More specific than the general description hitherto; • Previous description had no exclusions.
13(g)	in item 13 (g), by inserting the words “United Republic of Tanzania” immediately after the word “Kenya”;	None	**None**	• To include Republic of Tanzania in the list of countries, where inbound international calls are exempt from duty; • Spirit of EAC. • Duty for other incoming international calls is USD 0.09 per minute.

2. Amendment of Schedule 2 to the principal Act

Part 1 of the Second Schedule

Item No.	Product or service	Old rate	New rate	Comments
25(b)	any other fermented beverages including cider, perry, mead or near beer produced from locally grown or produced raw materials;	30% or Shs. 550 per litre whichever is higher	**30% or Shs. 550 per litre whichever is higher**	• Change in description to the effect that all from locally grown of produced raw materials.
26	construction materials of a manufacturer, other than a manufacturer referred to in item 21, whose investment capital is, at least thirty-five million United States Dollars in case of a foreigner or five million United States Dollars in the case of a citizen;	NIL	**NIL**	• Modification of threshold from USD 50 Million to USD 35 Million; • Providing for citizen investors threshold of USD 5 million.

Tax Procedures Code (Amendment) Act, 2022

Tax Procedures Code (Amendment) Act, 2022

An Act to amend the Tax Procedures Code Act, 2014, Act, 14 of 2014 to provide for the time frame for registration of tax agent; to provide for temporary closure of business until compliance with the requirements of electronic receipting and invoicing or tax stamps; to provide for disclosure of information on contracted services; to provide for penalties for failure to affix or activate a tax stamps, printing over or defacing of a tax stamps, forgery of tax stamp, failure to use an electronic receipting or invoicing, forgery of electronic receipt or invoice interfering with the electronic fiscal device or electronic dispensing control device, payment of informers and related matters.

Tax Procedures Code (Amendment) Act, 2022

1. Amendment of Tax Procedures Code Act, 2014

The Tax Procedures Code Act, 2014 in this Act referred to as the principal Act is amended in section 9, by substituting for subsection (4) the following—

"(4) The registration of a tax agent shall remain in force from the date of issue of the certificate of registration to 31st December every calendar year."

Implications:

- **To provide that for tax agents, irrespective of issue of a certificate of registration, the certificate shall lapse every 31st December. The previous provision provided for 12 months from the date of registration;**
- **Probably to ease administration of registration of tax agents.**

2. Amendment of section 19B of the principal Act.

Section 19B of the principal Act is amended in subsection (1) by inserting immediately after the word "affix" the words "or activate"

Implications:

- **This relates to activation of tax stamps through the electronic system. Failure to activate the tax stamp shall attract the same penalty as failure to affix.**

3. Amendment of section 33 of the principal Act

Section 33 of the principal Act is amended—

(a) in subsection (1) by inserting immediately after the word "payable" the words " or for failure to comply with the requirements of electronic receipting and invoicing or tax stamps within fifteen(15) days from the date of notice."

Implications:

- **This provision is about notice to close business premises for failure to comply with EFRIS or tax stamps within 15 days' of notice. The notice has been extended from 7 days to 15 days.**

(b) in subsection (2) by substituting for subsection 2 , the following " (2) where the taxpayer does not pay the tax due or fails to comply with the requirements of electronic receipting and invoicing or tax stamps after service of a notice under subsection(1), the Commissioner or authorised officer may issue an order to close down part or the whole of the business premises of the taxpayer for a period not exceeding 15 days";

Implications:

- **Failure to comply with subsection 1 above, An order to close premises for a period not exceeding 15 days may be issued for none compliance with EFRIS and tax stamps.**

3. Amendment of section 33 of the principal Act

Section 33 of the principal Act is amended—

(c) by substituting for subsection (5) the following—

"(5) if the taxpayer complies with the tax obligations under subsection (1) during the period of closure, the Commissioner shall immediately remove the notice referred to in subsection (4).

Implications:

- **Removal of Notice after payment of tax due, complying with EFRIS and complying with tax stamps.**

4. Amendment of section 42 of the principal Act

Section 42 of the principal Act is amended by inserting immediately after subsection (4) the following—

"(5) Notwithstanding the provisions of subsection (1), a person engaged in the construction or extractive industry shall disclose to the Commissioner the names of persons contracted in the course of performance of their duties or business within seven days from the date of signing the contract.

(6) A person who fails to comply with the provisions of subsection (5), is liable to pay a penalty of one thousand currency points.

Implications:

- **These are new provisions for persons engaged in construction or extractive industry (mining, oil & gas) to disclose to the commissioner names of contracted persons within 7 days of signing respective contracts;**
- **This provision is ambiguous because it does not specify whether these are employers (eg. UNRA or any person building) or the construction firms or both;**
- **The penalty for non- compliance is UGX. 20,000,000.**

5. Amendment of section 58 of the principal Act

Section 58 of the principal Act is amended by substituting the words "two hundred" with the words "five thousand five hundred";

Implications:

- **This provision enhances the penalty for making false pr misleading statements from two hundred currency points (UGX 4 million) to five thousand five hundred currency points (UGX. 110 million);**
- **This is a prosecutorial offence and the penalty is payable upon conviction. The offence may also carry a prison term of 10 years or both the penalty and custodial sentence.**

6. Insertion of new sections 62B, 62C, 62D to principal Act.

The principal Act is amended by inserting immediately after section 62A the following---

"62B Failure to affix or activate a tax stamps

A tax payer who fails to affix or activate a tax stamp on goods prescribed under section 19A (3) commits an offence and is liable on conviction to a fine not exceeding one thousand five hundred currency points or imprisonment not exceeding ten years or both.

62C. Prints over or defacing of a tax stamps

A person who prints over or defaces a tax stamp affixed on goods prescribed under section 19A (3) commits an offence and is liable on conviction to a fine not exceeding one thousand five hundred currency points or imprisonment not exceeding ten years or both.

62D. Forgery of tax stamp

A person who forges or found in possession of a forged tax stamp commits an offence and is liable on conviction to a fine not exceeding one thousand five hundred currency points or imprisonment not exceeding ten years or both.

6. Insertion of new sections 62B, 62C, 62D, 62E, 62F, 62G and 62H to principal Act.

Implications:

- **These are new prosecutorial penalties in respect of offences related to tax stamps;**
- **Failure to affix or activate, defacing or forgery of tax stamps, upon conviction, maximum UGX. 30 million or maximum 10 years in prison or both;**
- **Note that these are very stringent penalties and URA is planning to prosecute persons who are in default. Clients should be extra conscious.**

6. Insertion of new sections 62E, 62F, 62G to principal Act.

62E. Failure to use an electronic receipting or invoicing

A taxpayer specified under section 73A (2) who does not issue an e-invoice, issue an e-receipt or employ an electronic fiscal device in accordance with section 73A, commits an offence and is liable on conviction to a fine not exceeding one thousand five hundred currency points or imprisonment not exceeding ten years or both.

62F. Forgery of electronic receipt or invoice

A person who forges or found in possession of a forged electronic receipt or invoice commits an offence and is liable on conviction to a fine not exceeding one thousand five hundred currency points or imprisonment not exceeding ten years or both.

62G. Interfering with the electronic fiscal device or electronic dispensing control device

A person who makes un authorised interference with the software or hardware of an electronic fiscal device or electronic dispensing control device commits an offence and is liable on conviction to a fine not exceeding one thousand five hundred currency points or imprisonment not exceeding ten years or both.

6. Insertion of new sections 62E, 62F, 62G and 62H to principal Act.

Implications:

- **These are new prosecutorial penalties in respect of offences related to use of EFRIS;**
- **Failure to use electronic receipting or invoicing, forgery of electronic receipt or invoice, or interfering with electronic fiscal device or electronic dispensing control device, upon conviction, maximum UGX. 30 million or maximum 10 years in prison or both;**
- **These offences and penalties, unlike stamps, may affect a bigger number of taxpayers especially those registered for VAT. Extra care should be taken in this regard.**

6. Insertion of new sections 62H to principal Act.

62H. Offences relating to automatic exchange of information

A person who—

(a) fails to file an information return for purposes of automatic exchange of information commits an offence and is liable on conviction to a fine not exceeding two thousand five hundred currency points for each day of default or to imprisonment for the term not exceeding ten years or both;

(b) fails to maintain records for purposes of automatic exchange of information commits an offence and is liable on conviction to a fine not exceeding two thousand five hundred currency points for each day of default or to imprisonment for a term not exceeding ten years or both;

(c) makes a false or misleading statement in the information return commits an offence and is liable on conviction to a fine not exceeding two thousand five hundred currency points for each day of default or to imprisonment for a term not exceeding ten years or both; or

(d) omits from a statement made in the information return commits an offence and is liable on conviction to a fine not exceeding two thousand five hundred currency points for each day of default or to imprisonment for a term not exceeding ten years or both.

6. Insertion of new section 62H to principal Act.

Implications:

- **These are new prosecutorial offences and penalties related automatic exchange of information (AEOI);**
- **Failure to file an information return, maintain records, makes a false or misleading statement, or omits from a statement made, for purposes of automatic exchange of information, commits an offence and is liable on conviction to a fine not exceeding UGX. 50 million for each day of default or to imprisonment for a term not exceeding 10 years or both;**
- **Moreover, there is no law at present obliging any person to automatically share information. Reliance maybe placed on Section 88(3a) and 88(3b) of the ITA for the Minister to make Regulations for this purpose. However, the provisions of Section 88 ITA are in the realm of international tax and actually imposes obligations on the Commissioner General than the tax paying public;**
- **Passing such provisions into law would be poor legislation because of want of enabling law**

Tax Procedures Code (Amendment) Act, 2022

7. Amendment of Section 74 A of principal Act

The principal Act is amended by substituting for section 74A the following—

"74A. Payment of informers

(1) The Commissioner shall pay to a person who provides information leading to—

(a) identification of un assessed tax or duty one percent of the tax or duty assessed or fifteen million shillings, whichever is less; or

(b) recovery of un assessed tax or duty five percent of the tax or duty recovered or one hundred million shillings whichever is less.

(2) Subsection (1) shall not apply to a staff of the Authority.

Implications:

- **This is an attempt to limited the quantum of rewards payable to informers whose information leads to assessment and/or recovery of tax;**
- **A distinction is being made between information leading to an assessment and information leading to recovery of tax;**
- **A cap of UGX. 15 million has been placed as a maximum payable to a person giving information leading to an assessment or 1% whichever is less;**
- **A cap of UGX .100 million has been placed as a maximum payable to a person giving information leading to a recovery of tax or 5% whichever is less;**
- **The current reward is 5% of the tax recovered.**

The Stamp Duty (Amendment) Act, 2022

The Stamp Duty (Amendment) Act, 2022

An Act to amend the Stamp Duty Act, 2014, to provide for the amendment of the stamp duty rate for agreement relating to deposit of title, deeds, pawn pledge of the total value; to provide for the amendment of the stamp duty rate for security bond or mortgage deed executed by way of security for the due execution of an office, or to account for money or other property received by virtue of security bond or mortgage deed executed by surety to secure a loan or credit facility of entry total value; to provide for the amendment of the stamp duty rate for trust concerning any property made by any writing including a transfer from a holder of letters of administration or probate orders to a beneficiary and to provide for related matters.

The Stamp Duty (Amendment) Act, 2022

Item	Amendment	New Duty	Comments
6	AGREEMENT relating to deposit of title- deeds, pawn pledge – of the total value	NIL	• **Current duty is 1%;** • **To harmonise all duty in respect of borrowing to NIL.**
48	Agricultural Insurance Policy	NIL	• **To Promote agriculture sector**
56	SECURITY BOND OR MORTGAGE DEED- executed by way of security for the due execution of an office, or to account for money or other property received by virtue of security bond or mortgage deed executed by surety to secure a loan or credit facility– of entry total value	NIL	• **Current duty 1%;** • **To harmonise all duty in respect of borrowing including equitable mortgages to NIL.**

The Stamp Duty (Amendment) Act, 2022

Item		New Duty	
63	TRUST- concerning any property made by any writing including a transfer from a holder of letters of administration or Probate orders to a beneficiary	**15,000**	• **Current duty of 15,000 excluded transfer of property by will;** • **This means that duty applicable on transfer by will(probate) or letters of administration was 1.5%;** • **Nominal fee shall now be paid upon transfer of property by holders of letters of administration.**
60A	by substituting for the word “fifty” the word “thirty-five” in item 60A (f)		• **To harmonise the threshold of USD 35 million with other proposals in other Bills.**

The Tax Appeals Tribunal (Amendment) Act, 2022

The Tax Appeals Tribunal (Amendment) Act, 2022

An Act to amend the Tax Appeals Tribunal Act, Cap. 345 to provide for the increase in the number of members of the tribunal.

1. Amendment of Cap 345

The Tax Appeals Tribunal Act, Cap. 345 in this Act referred to as the principal Act is amended in section 2 by substituting for the word "four" the word "eight".

(b) By inserting immediately after subsection (2), the following "(3) At least forty percent of the members of the tribunal shall be women"

Implications:

- **The increase in the number of members means that more than one set of the Tribunal may sit at any time;**
- **This increases turnaround time for determining cases and from the administration point of view potentially unlocks tax tied up in litigation quicker.**
- **The Act has created gender parity to command the composition of the Tribunal to be 40% women.**

About Us

About BAKER TILLY HEM LLP

- Baker Tilly Hem LLP is established by its managing partner Mr. Manjit Kothari.
- He is a member of Certified Public Accountants of Uganda, Institute of Chartered Accountants of India and Institute of Cost and Management Accountants of India.
- He has over twenty years of experience in the field of Audit & Accountancy, out of which over 18 years of post qualification experience in Uganda
- Baker Tilly Hem LLP is a full service firm for Assurance, Taxation, Company secretary, Project Finance, Start-up ventures, Backoffice accounting support, Human Resource consulting services with over 20 years of experience in servicing clients (Individuals and Corporates) in Uganda
- We are convinced that the economic development of the African continent requires cooperation and partnership actions between professionals that lead to the birth of African champions.
- These strategic and technical groupings make it possible to reinforce and widen the offers of services through the combination of efforts, competences, and pooling of resources for a better customer satisfaction.

250+ Clients

1 Partner

15+ Professionals

35+ Support staff

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Our Journey

Mr. Manjit Kothari came to Kampala
- November 2001

Formation of HEM Associates
- November 2005

Alliance with MGI (Firm name changed to MGI HEM Associates)
- October 2018

Entered into Partnership with A. H. Thakkar & Sons (Firm name changed to MGI HEM & Thakkar LLP)
- April 2019

Alliance with Baker Tilly (Firm name changed to Baker Tilly Hem LLP)
- September 2021

Vision & Mission

Vision

Our vision is to effectively contribute to the development of the Uganda and African economic fabric by offering personalized services to organizations that wish to ensure their development while strengthening their governance. All this, of course, based on a relationship of trust.

Mission

For us each customer is special. We take the time to listen to them, to understand their business, to grasp their challenges, their functioning and their values.

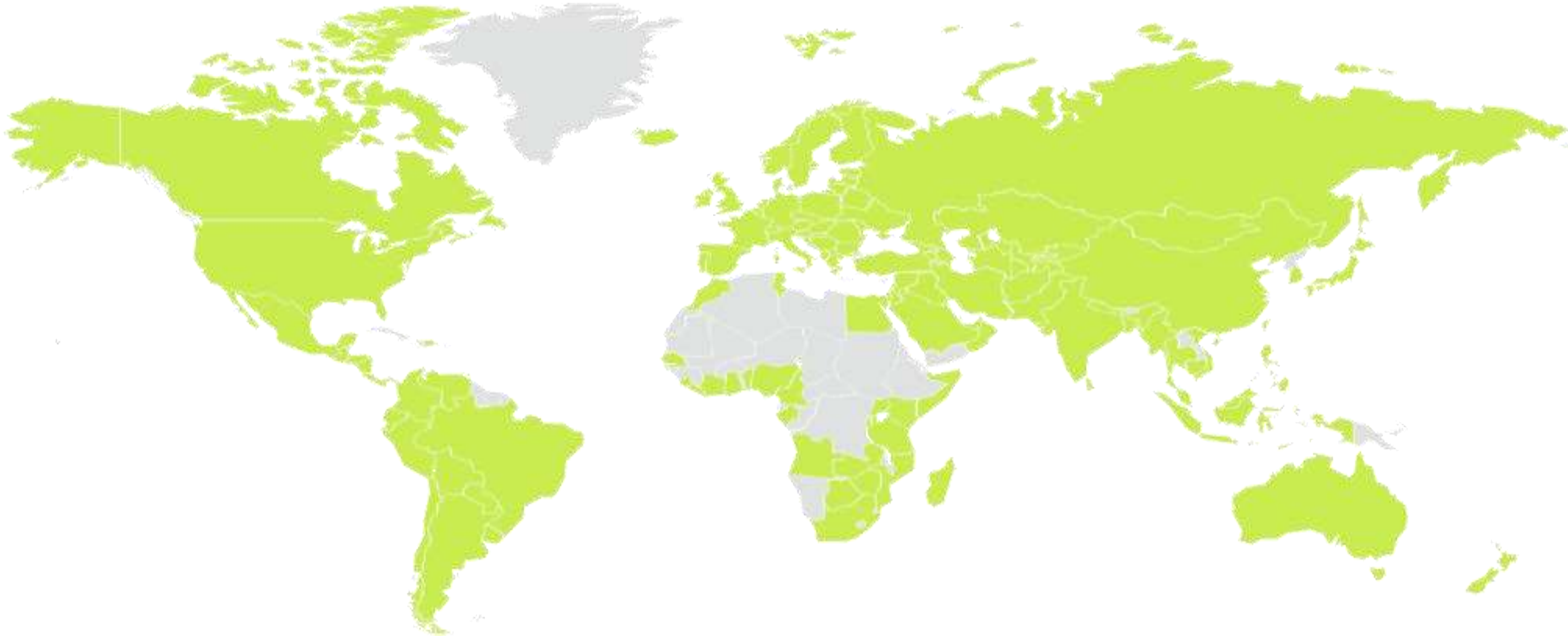
Our mission is to create value for our clients by offering them customised services that are perfectly adapted to their needs and by solving their problems in a structured and methodical manner.

Values

Although success is not measured by numbers alone, our performance serves as an indicator of how far we've come – we know a thing or two about what it takes to be successful.

Lead by example	Delivery of quality services with emphasis on integrity	Open and honest in all communicatio ns	Foster teamwork and collaboration with each other	Act ethically	Maintain supportive environment in which our individuals can flourish

Baker Tilly Networks



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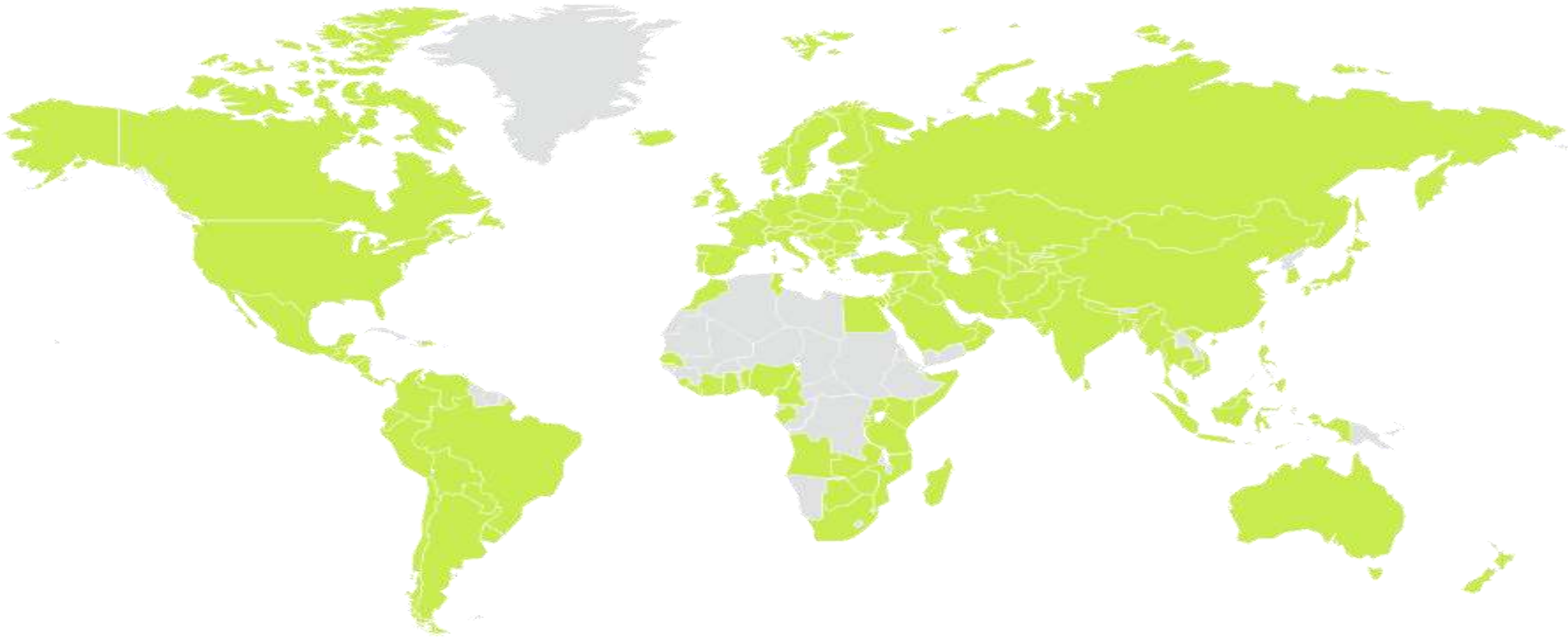
The international network gives us significant global reach in addition to our substantial national presence. We collaborate to leverage our skills, resources and local expertise to help our clients grow locally, nationally and globally.

740 OFFICES	148 TERRITORIES	37,000 PROFESSIONALS	US$4.04bn COMBINED GLOBAL REVENUE

Baker Tilly Networks



NORTH AMERICA	LATIN AMERICA	MIDDLE EAST & AFRICA	ASIA PACIFIC	EUROPE
US$1,866m	US$102m	US$105m	US$835m	US$1,135m
2 TERRITORIES	31 TERRITORIES	36 TERRITORIES	24 TERRITORIES	55 TERRITORIES
10 FIRMS	28 FIRMS	24 FIRMS	20 FIRMS	41 FIRMS

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Audit & Assurance	Taxation	Business Advisory	Transaction Advisory	Accounting and Business Support
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Contact Us

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