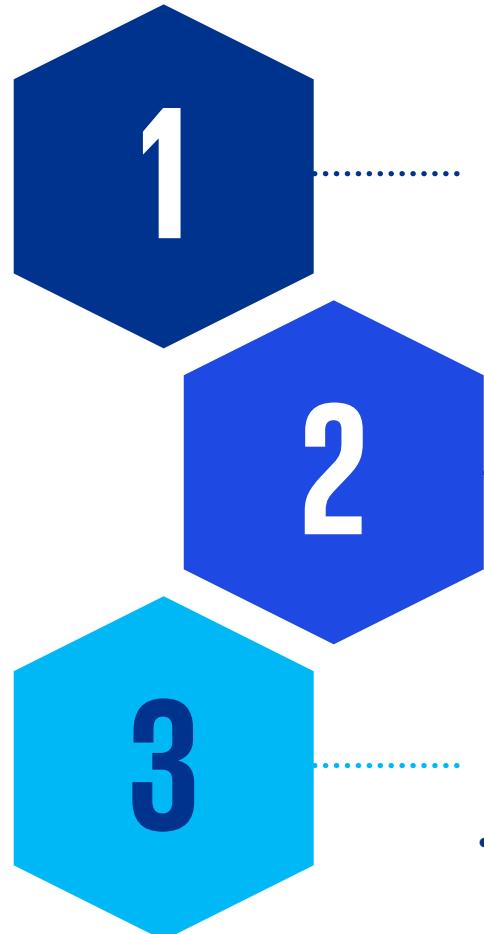




Inside Africa's Tax Landscape – North Africa/Francophone West/Central Africa

2025 KPMG Africa Tax Summit

Key legislative changes – Direct taxes (Cameroon)



Capital Gains Tax (CGT)

- Prior to 2025, dividends distributed were subject to the CGT at the standard rate of 15% (ACT excluded), regardless of the size of the distributing company (SME or large company). This rate is reduced to 10% (ACT excluded), for dividends regularly distributed by companies whose turnover are lower than or equal to three (3) billion CFA francs (SME)

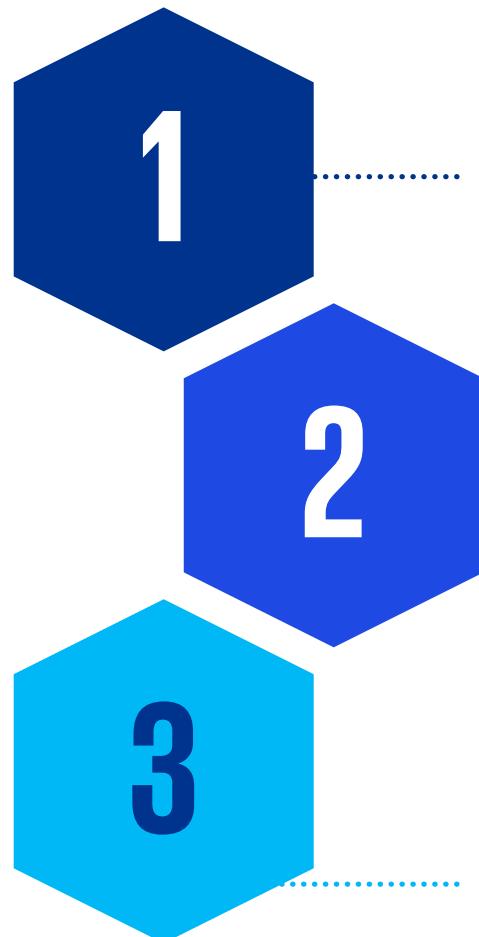
Company Income Tax (CIT)

- Rejection of the deductibility of accounting and tax assistance costs paid outside CEMAC. Sums paid to such service providers (beneficiaries) located outside CEMAC who participate or not in the management or capital of the Cameroonian company are treated as nondeductible expenses as compared to last year.

Miscellaneous taxes and duties – Special Tax on Petroleum Products (STPP)

- Reduction in the rate of the Special Tax on Petroleum Products (STPP) applicable to gas for industrial use to XAF 50 per cubic meter as compared to XAF 60 per cubic meter for last year.

Key legislative changes – Direct and indirect taxes (Côte d'Ivoire)



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Payroll taxes (PT)

The Finance Acts for 2024 and 2025 have fundamentally reformed the taxation applicable to salaries. Previously, the employee portion included the salary tax, the national contribution, and the personal income tax. These three levies have now been merged into a single tax, which the employer is required to withhold at source according to a progressive scale with a marginal rate of 32%. Furthermore, the rates applicable to employer contributions now correspond to the former standard rates applied to the gross salary after a 20% deduction.

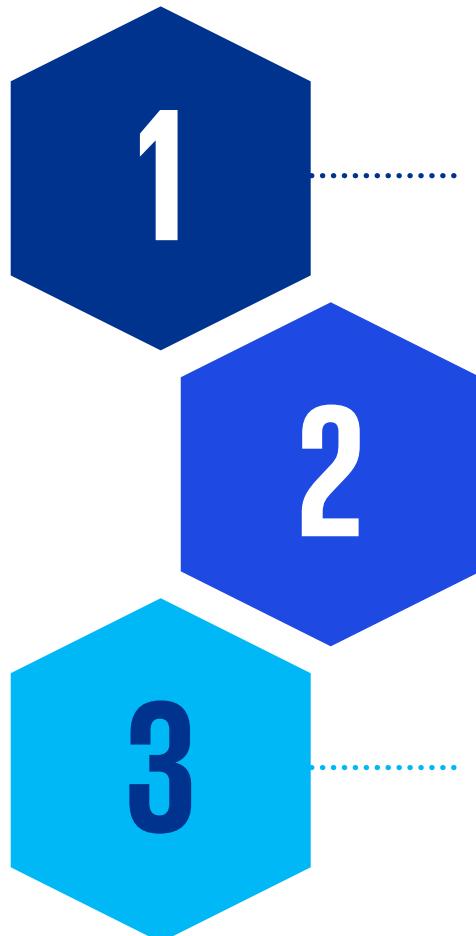
VAT and customs duties (CIT)

Prior to the 2025 Finance Act, certain investors could benefit from VAT and customs duties exemption, as stipulated in specific agreements concluded with the State of Côte d'Ivoire for the implementation of their projects. Henceforth, agreements entered into after the effective date of the 2025 Finance Act may no longer provide for such exemptions. This benefit has been replaced by a temporary suspension of the payment of VAT and customs duties during the investment phase, with such taxes becoming payable during the operational phase.

Transfer tax (TT)

Prior to the 2024 Finance Act, a 1% stamp duty was jointly payable by both the parent company and its subsidiary on intercompany loans where either party was a tax resident in Côte d'Ivoire. The 2024 Finance Act broadened the scope of this duty to encompass all funds advanced to a resident entity by related parties, irrespective of whether the lender is resident or non-resident. The stamp duty base is defined as the principal amount of the cash advance, excluding interest. The 2025 Finance Act further clarified that the duty must be paid within 30 days following the disbursement of the cash advance.

Key legislative changes – Direct taxes (DRC)



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Tax clearance certificate

- The scope of the tax clearance certificate (certifying that the applicant is in order regarding the declaration and payment of their taxes on the date of issue) has been significantly expanded.
- It is now required before the payment of any debt between businesses and professionals, before the granting of credit by financial institutions, before the opening of bank accounts for non-residents, and for the subscription of professional licenses.

Company Income Tax (CIT)

- Incomes from investments made abroad by commercial banks and microfinance companies institutions established in the DRC are included in profits subject to Corporate Income Tax.

Telecommunication companies

- The sale of airtime credits constitutes revenue acquired and must be taken into account in determining taxable profit, even if said credits have not yet been used by the purchasers.
- This revenue is converted into income after a period of one month from the closing date of the accounting year.

Morocco

Key legislative changes in 2025 – Morocco

- 1
- 2
- 3

Personal Income Tax

Changes have been introduced to improve individual taxpayers' income including increasing the exempt annual income, reducing the upper tax rate to 37% and increasing the tax reduction per dependent. Other changes are introduced to encourage youth employment including exemption during 12 months for internship payment and 24 months for salary payment when there is employment of the intern.

New category of income in the PIT scope

Any income not falling in the existing 5 categories of income falls into the new category. e.g. digital gambling from foreign source: the local banks or entities involved in the payment should withhold 30% PIT.

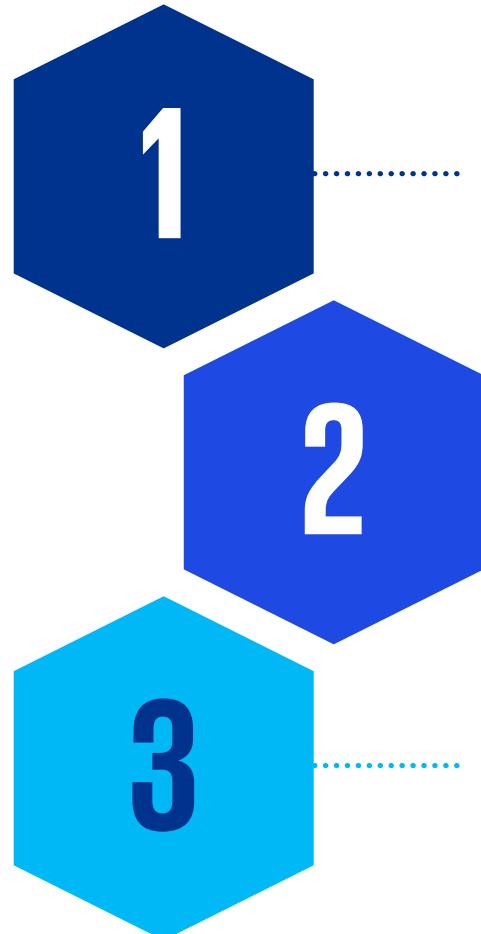
Amicable settlement procedure

Introduction of a clear legal framework for the conclusion of amicable settlements between the tax administration and taxpayers during tax proceedings.

Key legislative changes in 2024 – Morocco

- 1 **VAT rates and Withholding of VAT on some domestic transactions**
Changes has been introduced to VAT rates to keep two rates 20% and 10% on 2026. Withholding of VAT by private businesses applies on i) professional services, rental, installation and maintenance work provided by individuals and on ii) provision of equipment and works performed by suppliers not providing a valid tax compliance certificate.
- 2 **VAT on digital services provided by non-resident**
Digital services rendered to customer established/domiciled in Morocco irrespective of where the services are used are subject to Moroccan VAT. Territoriality rules have been updated, registration, filing and payment requirements have also been introduced.
- 3 **Self amended returns**
New tax framework to amend tax returns based on self amendment process for tax returns.
Taxpayers can request from the tax authorities their list of irregularities identified. They should amend the relating tax returns within 60 days.

Key legislative changes in 2023 – Morocco



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CIT and Withholding Tax on dividends

- Changes has been introduced to CIT rates. The new rates will be 20%, 35% and 40% on 2026.
- Withholding tax rate on dividends is also to be reduced to 10%.

Withholding Tax on some domestic transactions

- 10% withholding tax applies on fees, commissions and other remunerations paid to individuals registered as businesses.
- 5% withholding tax is applied by state entities on similar remunerations

Minimum Levy

- Minimum levy rates have been reduced by 50% to become 0.25% on revenues and 0.15% on revenues from gas, water and electricity



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