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 30 September - 03 October 2026

 Troutbeck Resort, Nyanga



VAT Hygiene in the Digital Era:
Habits That Prevent Penalties

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From the CEO's Desk: Technical Knowledge vs Practical Application: The New Standard for Proper Tax Management



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whether it is VAT data matching, interest deductibility rules, capital gains tax on securities, exchange differences, withholding taxes, or documentation insufficiency, the common challenge remains the same, taxpayers must not only understand the law, but must also operationalise it correctly within day-to-day business activities. Recent court decisions and audit trends continue to reinforce the principle that strict compliance prevails. In many cases, otherwise legitimate tax positions fail because of procedural defects, weak evidence, delayed corrective action, or inadequate record management. It is for this reason that capacity building remains essential.

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VAT Hygiene in the Digital Era: Habits That Prevent Penalties

The transition by ZIMRA to TaRMS and FDMS marks a noteworthy shift toward automated tax compliance. At the heart of this change is the Invoice Management Module, which automatically pulls tax invoices, credit notes, and debit notes into TaRMS to streamline input tax claims. However, because system logic can clash with legislative rights, an invoice that fails to synchronize digitally will block a manual claim, even if it is legally valid.

Fiscalisation Compliance Check: Valid Fiscal Tax Invoices must originate from an Electronic Fiscal Device (EFD) integrated with ZIMRA's FDMS. A non-compliant invoice blocks VAT input tax claim and income tax deductions. To remain compliant, operators must look beyond their own systems and actively verify supplier devices. Technical lags, data transmission errors, or obsolete supplier devices can prevent valid transactions from pulling into your TaRMS portal, leaving your claims exposed. Taxpayers must also maintain continuous connectivity by keeping all points of sale (POS) connected to the FDMS at all times, which includes implementing robust backup power solutions to prevent system disconnections during power outages.

Invoice Scanning & Data Matching: Taxpayers should ensure all taxable transactions are properly fiscalised and accurately transmitted. This requires a habit of strict pre-filing verification to ensure invoices appear without errors in the Invoice Management Module. Taxpayers must carefully check for data rejections, as minor technical errors like incorrect VAT amounts, wrong tax rates, or incorrect currency codes will cause FDMS rejection and block input tax claims. Additionally, businesses must enforce credit note compliance by ensuring that every credit note explicitly states the reason for issuance and references the original invoice. If an error occurs, prompt reporting is critical.

Financial Records Reconciliation:

Taxpayers must maintain strict turnover alignment by conducting monthly reconciliations between turnover declared for VAT and income tax, keeping sufficient documentation on hand to explain all variances. This review extends to fringe benefits reconciliation, where variable employee benefits must be matched monthly against the payroll ledger to ensure output tax is fully captured. Furthermore, businesses must track aging payables under the 1-year creditor rule, which requires taxpayers to reverse previously claimed input tax on any creditor balances that remain unpaid for over a year. Finally, a dedicated process must be in place for bad debts recovery, ensuring that any previously written-off debt that is wholly or partly recovered is declared as output tax during that specific tax period.

Returns Compliance & Remittance:

TaRMS functionalities automate input tax schedules, but compliance remains an active human duty. Taxpayers must still manually log in to select pre-populated invoices for each tax period, apply apportionment where necessary, and complete manual return fields. When dealing with mixed supplies, businesses must defend their apportionment ratios. It is also vital to isolate non-FDMS claims, as input tax claims for customs bills of entry and VAT on imported services do not automatically fiscalise on the FDMS and must be tracked and captured manually into TaRMS. Lastly, VAT on advance income or deposits should be accounted for upfront and unless the funds are held in a separate trust account.

Currency Compliance & Reverse Charge Mechanism:

Ensure strict observation of exchange rate caps, as any input tax incurred on transactions in ZWG at a rate exceeding the official exchange rate will be disallowed. Multi-currency compliance also requires ensuring that suppliers utilize the correct currency codes on their

fiscal devices to prevent system rejection during data transmission. On the cross-border side, businesses must properly execute reverse charges, if you consume services from a non-resident supplier, you are liable to pay VAT directly to ZIMRA as if you were the supplier. To safeguard the business, you must verify imported service inputs, as this VAT can only be claimed back as input tax if the imported service directly supports the production of taxable supplies, and keep both the invoice and proof of payment.

Time and Value of Supply Rules

Compliance: Apply proper value of supply rules, which require accounting for VAT on the earliest of invoice issuance, payment receipt, removal of goods, service performance or property occupation. For connected persons, tax is triggered when goods are made available or services are performed, regardless of invoice or payment. Instalment credit agreements require full VAT accounting upfront upon delivery, whereas rental agreements trigger VAT progressively as each rental period becomes due or is paid. If transacting with connected parties for less than open market value, the value must be adjusted to market rate, unless the recipient is entitled to a full input tax claim.



Why Does This Matter?

Daily digital hygiene is now mandatory because digital compliance is no longer a period-end activity, it requires real-time oversight, invoice scanning, and system tracking to ensure transactions successfully synchronize between FDMS and TaRMS.



Key Takeaway

VAT Hygiene is an essential requirement to protect business against ZIMRA enforcement measures and business reputation.

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Strict Compliance Prevails Even in The Absence of Fiscal Prejudice

The tension between strict statutory adherence and tangible losses to the fiscus frequently arises in tax administration. The disparity raises a fundamental question; can minor technical defects or delayed corrections invalidate an otherwise genuine claim for input tax? The general stance of tax authorities is that statutory frameworks governing tax deductions leave little room for partial compliance. This issue came under judicial scrutiny in *National Foods Limited (NF) v ZIMRA* (Hh159/26), where the court had to determine whether defective documentation could lead to a loss of input tax claims despite no fiscus prejudice to the State.

Case Background:

National Foods Limited (NF), a registered VAT operator in the food sector, claimed input tax deductions for various months in 2023. Upon review, ZIMRA disallowed these claims because the supporting documents contained numerous defects. ZIMRA found that invoices were missing important details, unclear, or duplicated, and some credit notes failed to explain why

reductions were made. Furthermore, NF submitted corrected or replacement invoices after the statutory 30-day deadline.

As a result, ZIMRA refused the input tax claims, reassessed the VAT liability, and imposed a 40% penalty for non-compliance. NF disagreed, arguing the issues were purely technical, there was substantial compliance without fraud or prejudice, and that missing details could be verified elsewhere.

Reasoning and Court Decision:

The High Court evaluated whether ZIMRA was overly restrictive or acting within the bounds of tax legislation. NF argued that section 20(4) of the VAT Act should be interpreted purposively, allowing substantial compliance for rectifiable errors. ZIMRA countered that tax legislation requires strict compliance and does not permit partial adherence, meaning missing, duplicate, or illegible invoices cannot support deductions. In resolving this case, the court quoted with approval: "If the person sought to be taxed comes within the letter of the law he must be taxed, however great the hardship may appear to the

judicial mind to be." Conversely, if the State cannot bring the taxpayer within the letter of the law, the taxpayer is free, regardless of how equitable the case might seem. Applying this principle, the court held that despite NF's non-compliance was technical, the missing information being found elsewhere, returns, or not actual fiscus prejudice being suffered, the law clearly requires tax invoice to be obtained within a 30-day period and mandatory content of tax invoices as per s 20(4).



Key Takeaway

This case confirms that taxpayers must strictly comply with VAT documentation requirements, as defective or late invoices can lead to denial of input tax claims, regardless of the taxpayer's good faith, the absence of prejudice to the State or even where compliance seems unreasonable.

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Immigrant Rebate: Calamities for Returning Residents & Other Immigrants

An immigrant rebate is a concession granted to expatriates and non-residents entering Zimbabwe to take up employment or permanent residence, visitors taking up permanent residents, diplomats, returning residents or any other persons as may be approved by the Commissioner, including spouses of such persons. However, the rebate often ignites disputes between immigrants and ZIMRA, demonstrating that eligibility and compliance requirements are often misunderstood.

The Rebate Framework: The rebate grants immigrants an opportunity to import one motor vehicle for private use plus personal effects free of customs duty and VAT. Eligibility depends on residency status, time of arrival rules, ownership requirements and compliance with post-importation conditions. The danger for non-compliance includes the re-imposition of duty, penalties or seizure of the vehicle.

Time of Arrival Critical: Time of arrival is central to qualifying for the motor vehicle rebate. For returning residents on study programme, it is the first return to Zimbabwe after completing studies; for those on employment contracts, the first return after contract expiry or termination; and for those absent for other reasons, the first return to Zimbabwe. Where a former resident enters as a visitor and later settles permanently, it is the date

the qualifying goods are first imported within three months of obtaining returning resident status. In *Goba v ZIMRA*, the Court held that eligibility depends on the taxpayer's circumstances and intention to settle permanently rather than passport entry dates, and that status in another jurisdiction is irrelevant for rebate purposes.

Qualification criteria: A returning resident must have resided outside Zimbabwe for at least 24 months (48 months subsequent to first 24 months) on an employment contract, a programme of study, medical grounds or other circumstances acceptable to ZIMRA. Supporting evidence is critical in form of employment contracts, residence permits, proof of contract termination, medical reports, proof of completion of studies or other documentation supporting the period of absence. ZIMRA conducts interviews to establish if individual has genuinely returned to Zimbabwe for permanent residence.

Status of goods at time of importation: The motor vehicle should be pre-owned: purchased and used by the person for at least six months before the time of arrival and at the time of importation. However, in terms of SI 36 of 2026 the six-month ownership requirement may be waived for immigrants arriving from countries where driving is on the right-hand

side of the road, upon production of a certificate of ownership that such other motor vehicle was owned at least six months before the time of arrival and at the time of its importation

Post-Importation Conditions: The rebated goods may not be sold, leased, transferred, pledged or otherwise disposed of within 24 months without written approval. Similarly, a returning resident who remains outside Zimbabwe beyond 6 months during the 24-month restriction period must either remove the vehicle or pay the applicable duty. Failure to comply may result in the recovery of suspended duty, penalties and seizure, as demonstrated in *Nyoni v ZIMRA*, where a post-clearance verification led to the re-imposition of duty.



Why Does This Matter?

Disputes often come from misunderstanding of eligibility and compliance requirements than customs valuation issues. As court decisions indicate, importance is placed on correct determination of returning resident status, time of arrival and post-importation compliance. Taxpayers are encouraged to understand both eligibility and post-importation conditions in order not to miss out on the concession and avoid penalties.

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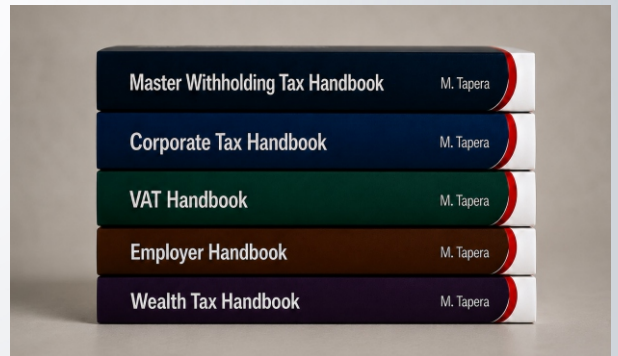


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Interest Deductibility Rules: Why Taxpayers Face Elevated Audit Exposure

Businesses increasingly rely on debt financing as part of their operational expansion strategies, through shareholder loans, intercompany funding arrangements, offshore credit lines or treasury structures. Interest expenses therefore represent a significant cost component of most businesses and can materially affect taxable income. As taxpayers adopt more complex funding structures, interest deductions have become an important focus area for ZIMRA audits.

Understanding the Rules: The key determining factor in the deductibility of borrowing costs is what the funds were used for. Once this purpose test is satisfied, secondary rules such as thin capitalisation and arm's length principles become relevant, particularly in related-party funding arrangements

Purpose of the Funds Test: Deductibility of borrowing costs starts with the purpose for which the funds were used. Where funds are applied toward non-income-producing activities, the purchase or construction of fixed assets, purchase of shares or shareholder purposes, deductibility becomes restricted. Only borrowing costs on debt incurred in the production of income i.e. incurred on revenue nature activities are deductible.

Thin Capitalisation: This is secondary to the purpose of funds test. The implication is that thin capitalisation rule is applied to borrowing costs incurred in the production of income as demonstrated by the funds use test. It is applied on related party and borrowings from non-resident persons. Under the rule, deductible borrowing costs are capped to that applicable on debt not exceeding 3 times company equity. Accordingly interest attributable to debt beyond this threshold becomes non-deductible. It will be recharacterised as a deemed dividend subject to a Shareholders' Tax at 15%.

Arm's Length Principle: The rule is secondary to purpose of the funds test but operates in parallel to thin capitalisation rule on inter-company loans and borrowings from non-resident persons. The borrowings or financing arrangements should reflect terms that independent parties would ordinarily agree to under similar circumstances. Where a local taxpayer receives funding from a parent company or related entity, tax authorities often review pricing of interest rates; loan terms and repayment conditions; supporting agreements; economic substance; and arm's length justification.

Documentation Gaps Create Audit Exposure: The most common audit challenge for taxpayers is not the existence of financing arrangements, but documentation. Interest deductions require taxpayers to demonstrate formal loan agreements; board approvals; repayment schedules; evidence supporting business purpose; transfer pricing documentation; commercial justification etc. Documentation therefore serves as a defence mechanism against possible transaction re-characterization, which could trigger additional tax assessments, penalties and interest.

! Why Does This Matter?

The financial implications of unsuccessful audit outcomes can be substantial. Potential consequences include disallowed deductions; additional tax assessments; penalties and interest; deemed dividend treatment; Shareholders' Tax exposure; and transfer pricing adjustments. These adjustments can significantly change the economics of financing decisions.

✓ Key Takeaway

Key takeaways: Interest deductibility increasingly requires tax, transfer pricing and documentation support. In Zimbabwe's tight tax environment, weak financing structures can convert ordinary interest expenses into costly tax exposures.

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When Write-Offs Raise ZIMRA Eyebrows

Taxpayers frequently seek to align commercial losses with tax deductions by writing off bad debts, impairing stock, or making provisions for pilferages among others. However, the Income Tax Act draws a sharp distinction between what is commercially prudent and what is statutorily deductible. Zimra's audit focus on write-offs has intensified, as many claims fail because taxpayers mistake some of these write offs for realised losses.

Understanding the Rules

Bad debts – To qualify for deduction, debts: (a) must be due and payable to the taxpayer, (b) have been included in taxpayer's taxable income and (c) be proven to the satisfaction of the Commissioner to be irrecoverable. The taxpayer should own the debt and is disqualified if he had sold the debt by the time they become bad. Further, the debts should emanate from a sale made by the taxpayer and recovery measures should have been exhausted. The implication is that bad debts arising from loans and advances are disallowed because these were never part of the taxpayer's income. The onus is on the taxpayer to demonstrate irrecoverability by providing evidence of inability to pay such as the debtor being declared insolvent, liquidated or deceased without sufficient assets from which the debt can be recovered. In *MBCA Bank v ZIMRA* (SC 140-2021), the Supreme Court dismissed the bank's appeal because it had not exhausted its rights against sureties, and borrowers were still making payments during litigation. It further ruled that a company in liquidation can be sued only with court permission, and if guarantors (sureties) have not been sued, the debt cannot be treated as bad. In

practice ZIMRA requires supporting documentation including debtor details, reminders, litigation papers, and proof of insolvency.

Stock Write-Offs, Impairments and Pilferages

- All provisions, including impairment reserves, revaluations, and stock write-downs for obsolescence are disallowed. Actual losses should be demonstrated. Write-downs for obsolescence or other losses should be supported with evidence of physical or actual loss, backed by stock count sheets, police report/loss incident report for stock theft, disposal order or board minutes for obsolescence stock and senior management approvals for other stock losses. For destroyed stock, insurance claims and scrapping records are necessary. However, if recovery is made under an insurance contract the losses will be disallowed.

Fraud, theft or embezzlements

- These are tax deductible if they are incurred in the production of income. There must be a connection between the loss and production of income or exist an inherent risk of the loss occurring. For losses occasioned by acts of shareholders, proprietors, partners, managers and supervisors the risk is deemed remote and therefore are disallowed. ZIMRA also disallows losses which they allege due care has not been exercised and capital losses. Meanwhile, losses arising from fraud or theft should be ascertained, not estimated, supported by police or incident report, disciplinary minutes and dismissal records.

Foreign Exchange Differences-Only exchange loses of a revenue nature that has been realised are tax deductible. These are losses arising from variation in exchange rates

between transaction date and settlement date. Technically, ruling out deduction of exchange losses incurred on capital transactions, upon translation of balances i.e. mere conversion of one currency into another and on transactions yet to be settled or concluded.



Why Does This Matter?

As ZIMRA intensifies its audits, write-offs have become a primary focal point for severe revenue adjustments and retroactive penalties. In the current economic landscape, misinterpreting a practical balance-sheet deduction as being statutory creates an unnecessary and costly exposure to cash flow blockages and prolonged litigation. Businesses that proactively align their accounting adjustments with the boundaries of the Income Tax Act ensure they do not trap vital working capital in compliance disputes.



Key Takeaway

To withstand ZIMRA scrutiny, businesses must shift from an accounting-driven mindset to a strict, evidence-first compliance approach before filing their returns. This requires moving beyond board approvals or estimated provisions by ensuring that every bad debt claim represents a completely exhausted legal avenue where even third-party guarantors have been pursued.



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Securities Trading in Zimbabwe: The CGT Compliance Dilemma

Capital Gains Tax is chargeable on the disposal of specified assets, which comprise immovable properties, marketable securities, and certain registrable rights or interests in intangible properties. While this appears straightforward, marketable securities transactions involve a multitude of rules and complications that must be navigated, particularly for asset managers, custodians, stockbrokers, and taxpayers operating through omnibus or nominee structures where weak tracking systems can result in incorrect tax outcomes and create significant audit exposure.

The Key Risks and Traps Upon Disposal of Securities: Securities trading requires integrated tax, compliance and transaction-record management systems. Weak controls over securities transactions can convert ordinary investment activity into significant tax and regulatory exposure. To navigate this landscape, taxpayers must understand the primary risks and traps:

Classification Risk: There is a fundamental risk in incorrectly classifying what constitutes a security under the law. Marketable securities include any bond capable of being sold in a share market or exchange, any debenture, share, or stock, whether or not such instruments are capable of being sold in a share market or exchange. It also extends to any right possessed by reason of a person's participation in any unit trust, collective investments, and government bonds/treasury instruments.

Source Risks: Unlike immovable property, which is easily defined by the physical location of the

property, defining the source of marketable securities is difficult. Generally, the source for marketable securities is where the investor carries on investment activities. This implies that shares not registered in a company in Zimbabwe, or not traded in Zimbabwe, are considered not to be from a source within Zimbabwe and their disposal has no CGT implications in Zimbabwe.

Valuation Risks: For private entity (unlisted) shares, it is always difficult to ascertain the true value of the shares because they are not freely traded, raising regulatory concern regarding the valuation provided by directors. To address this trap, section 14 of the Capital Gains Tax Act requires an independent valuation.

Compliance Risks on Past Transactions: Because there is no rigid form of registration by authorities for private shares, CGT can easily be avoided upon the exchange of private shares. However, this creates a major trap, presenting a severe challenge and tax exposure on the next sale. In contrast, immovable property requires registration in the Deeds Office, which can only be sanctioned after successfully getting a CGT clearance certificate from ZIMRA.

Ascertaining the Cost Base: When computing a capital gain, the cost base is comprised of the acquisition cost plus incidental acquisition costs, property improvement cost, inflation allowance on acquisition and improvement costs, incidental disposal costs (such as brokerage fees), and capital losses. However, the cost of shares will often carry its nominal value, which might be very small. Taxpayers may not be aware

that the cost of immovable property (to which the shares are attached to) represents the cost base when computing CGT on a share disposal. These represent improvements whose cost and inflation allowance should be computed effective the date the improvements were effected.

Share Disposal Risk: While it is quite clear that immovable property is deemed disposed of when there is a physical change of title, the disposal of marketable securities can carry a variety of forms and triggered by several complex corporate actions or events. Taxpayers risk missing a CGT trigger, as a disposal can be forced or executed through share consolidations, share buy-backs, compromises, swaps, and exchanges, repurchases, liquidations, demergers and unbundling, share splits, foreclosures/expropriations, cessations, trust transfers, death/transmission and gifts/donations.

! Why Does This Matter?

Ignoring these actions directly leads to the incorrect assessment of CGT, alongside severe penalties and interest for late remittance. It further results in the denial of legitimate tax exemptions and costly disputes with ZIMRA over beneficial ownership and the validity of historical compliance.

✓ Key Take Away

Capital gains taxation should never be treated as a post-trade administrative exercise, it requires integrated, pre-transaction planning to ensure that beneficial ownership is undisputed and transaction records can withstand ZIMRA scrutiny.



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The Statutory Exception to the 60-Day Notice in ZIMRA Litigation

The intersection of administrative justice and statutory procedural rules frequently creates friction in tax and customs disputes. While statutes often impose strict notice periods before a taxpayer can institute civil proceedings against revenue authorities, a critical question arises when the taxpayer seeks to review an administrative decision rather than claim monetary damages. Does a review application, which challenges the legality or procedural fairness of an authority's action, automatically require the same statutory notice as an ordinary civil claim? Generally, the purpose of a notice requirement is to afford the authority time to investigate and potentially settle a claim. However, in review proceedings, the authority has already made its decision, rendering such notice arguably redundant. This procedural distinction came under judicial scrutiny in *Tsitsi Nyoni (Nyoni) v ZIMRA (HH319/26)*, where the court had to determine whether a failure to provide a 60-day notice could invalidate an application for review.

Case Background:

In December 2022, Tsitsi Nyoni imported a Mercedes Benz into Zimbabwe utilizing a returning resident rebate, which suspended the payment of customs duty. Subsequently, Nyoni travelled to South Africa to care for her ailing sister, but fell ill herself, resulting in her staying outside Zimbabwe for

more than six months without obtaining the necessary written authority. Upon her return, she discovered that ZIMRA had flagged her vehicle during a post-clearance verification exercise. After unsuccessful attempts to contact her, ZIMRA seized the vehicle on the grounds that she had violated the rebate conditions by remaining outside the country for over six months during the restricted period without permission. ZIMRA then demanded payment of duty, penalties, interest, and storage charges. In response, Nyoni filed a review application before the High Court in Harare to challenge the seizure and related decisions, arguing she was not given a hearing, and her prolonged absence was unintentional due to illness. ZIMRA raised a preliminary objection, arguing that Nyoni's application was defective and liable to dismissal because she failed to give the mandatory 60-day notice required by section 196 of the Customs and Excise Act before instituting civil proceedings.

Court's Reasoning and Decision:

The High Court dismissed ZIMRA's preliminary objection with costs, allowing the review application to proceed. The court analysed the nature of the proceedings, noting that the primary purpose of the 60-day notice requirement is to provide ZIMRA with sufficient time to investigate complaints and decide whether to settle or defend

claims. While acknowledging that review applications can be broadly classified as civil proceedings, the judge emphasized that they possess unique characteristics that distinguish them from ordinary civil claims. Relying on the precedent set in *Quest Manufacturing (Pvt) Ltd v ZIMRA & Ors SC51-24*, the court reasoned that section 196 does not mandate a 60-day notice in absolutely every proceeding brought under the Customs and Excise Act. Crucially, the court highlighted that in review proceedings, ZIMRA is already fully aware of the dispute and the decision being challenged, having already had ample opportunity to consider and defend its position before the application is filed. Therefore, the statutory 60-day notice was not required for review proceedings against ZIMRA.



Key Take Away

The decision clarified that review applications against ZIMRA are not automatically subject to the 60-day statutory notice requirement. The case also highlights the importance of procedural rules in tax disputes, as compliance with or interpretation of procedural requirements can determine whether a matter is heard on its merits at all.

DURABILITY

WAICA Re Zimbabwe Achieves National Scale AAA(ZW) Financial Strength Rating | Stable Outlook

WAICA Reinsurance Zimbabwe (Pvt) Limited has been assigned a National Scale Financial Strength Rating of AAA(ZW) with a Stable Outlook by GCR Ratings.

🏆 AAA(ZW) represents the highest national scale financial strength rating, reflecting exceptional capacity to meet policyholder obligations in Zimbabwe and beyond.

This milestone demonstrates:

- Robust Capitalisation – Statutory solvency at 136% (above regulatory minimum)
- Strong Liquidity Position – 91% of investments held in cash and foreign currency placements

- Disciplined Underwriting – Combined ratio of 86.9% in 2025

- Sustained Profitability – Double-digit return on revenue

- Pan-African Group Support – Strategic and operational integration within WAICA Reinsurance Corporation Plc

The Stable Outlook reflects expectations of:

- Sustained adequate capitalisation
- Healthy liquidity buffers
- Continued earnings resilience
- Strategic growth across Southern Africa

We remain dedicated to strengthening reinsurance capacity across Southern Africa while delivering security, stability, and long-term value to our cedants and stakeholders



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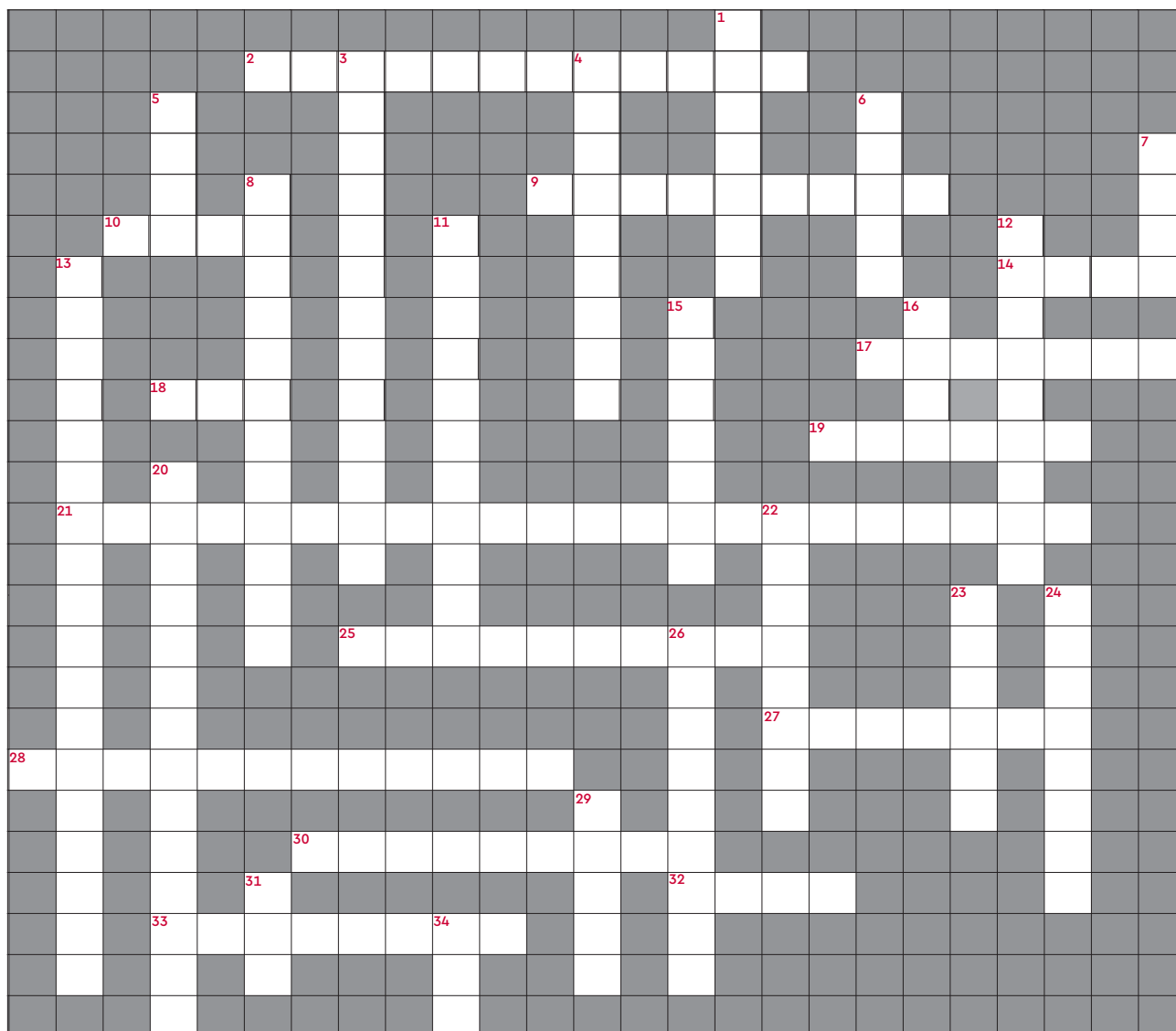


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Know Your Tax Cross Word Puzzle



Across

2. An adjustment reducing value of assets over time but must be added back to accounting profit on the tax computation because it is legally replaced by capital allowances.
21. A fixed place of business through which a non-resident wholly or partly conducts operations.
25. The only document recognised by ZIMRA for altering the consideration of a previous supply.

Tax Hub (Chitubu) Webinar



Every Thursday (10am - 12:30pm)

- Tax Updates
- Compliance Insights
- ZIMRA Developments
- Emerging Tax Trends
- Live Q&A Session

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9. — are subject to a 15% final withholding tax if emanating from unlisted companies, or a reduced 10% rate if from a company listed on the ZSE.

14. The recoupment of capital allowances can never exceed the original — of the asset.

17. A payment for the use of intellectual property that is subject to both VATIS and non-resident withholding tax when paid to a non-resident person.

18. Acronym for an agreement preventing double taxation between countries.

19. A dividend distributed by a local company chargeable to income tax, on its profits to another local company is — from income tax.

27. Tax — is the unlawful non-payment or underpayment of taxes.

28. A — is deductible against future taxable income up to maximum of 6 years and indefinitely by mining operations.

30. A — of trade is an amount paid to restrict a person from trading freely and is not a recognisable expense for income tax purposes.

32. Acronym for a tax on transfers of money electronically and is levied at the rate of 2% for USD transactions and 1.5% for ZWG transactions.

33. An amount charged for borrowing money and whose tax deductibility depends on how the money is used by the borrower.

Down

1. The person who creates a trust, ZIMRA can attribute trust income back to this person if they retain the power to revoke the trust.

3. The term for a person appointed by a company to represent it for all tax matters, who must be a resident.

4. Tax — is legally avoiding tax through permissible arrangements.

5. Acronym for the system where the employer's tax calculation is final and requires no further assessment.

6. The process of examining taxpayer records to verify compliance.

7. The acronym for the minimum effective tax of 15% introduced for large multinational groups.

8. A tax charged on profits from disposal of specified assets such as immovable property or marketable securities like shares.

11. Tax charged to informal traders carrying on business in Zimbabwe.

12. The — allowance is claimable on assets that are sold, damaged, or destroyed and is meant to be a relief measure to taxpayers.

13. The rule used to disallow interest deductions based on a debt-to-equity ratio of 3:1.

15. An amount owed to the taxpayer but unlikely to be recovered.

16. A Special Economic — is a designated geographical area that grants corporate operators specialized tax incentives.

20. Non-cash benefits provided to employees like airtime, personal use of company vehicles etc.

22. An amount charged for borrowing money.

23. The principle that tax is charged according to a person's ability to pay.

24. Tax — is the practice of using tax laws to reduce tax liability legally.

26. A challenge lodged against a tax assessment if a taxpayer is not in agreement with ZIMRA audit findings.

29. Acronym for the authority tasked with tax revenue collection in Zimbabwe.

31. Abbreviation for Double Tax Agreement.

34. The maximum number of years an assessed loss can typically be carried forward, excluding mining operations.

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ZIMRA



BELINA

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Conference Only: USD920

Package Deadline: 31 August 2026

Activities

- Mutarazi Falls (Skywalk & Zipline)
- World's View
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- Nyangombe Falls
- Boat Cruise
- Volleyball
- Canoeing



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PROGRAMME

Day 1

Time	Topic/Facilitator
15:00 - 15:10	Welcome Remarks Simelinkosi Mangena Assistant Manager WTS Tax Matrix Academy
15:10 - 15:20	Opening Remarks Marvellous Tapera Chief Executive Officer WTS Tax Matrix Academy
15:20 - 17:00	Breakaway Session: Taxpayer Clinic (PAYE, Income Tax, VAT & Withholding Tax)
17:00 - 18:00	Health Break
18:00 - 20:00	Dinner

Day 2

Time	Topic/Facilitator
08:10 - 10:00	2026 Tax, Legal & Financial Reporting Updates: Key Changes, Compliance Risks & Implications Focus 1: Tax Compliance: New Rules, TaRMS, ZIMRA Audit Focus Areas & Emerging Risk Triggers Simon Gwenzi Director-VAT Crowe, Zimbabwe ZIMRA Representative Focus 2: Updates on Legal & Regulatory Shifts Affecting Business Operations Tafadzwa Mhonde Tax Director WTS Tax Matrix Focus 3: 2026 Accounting Standards & Reporting Changes- Tinashe Murerekwa Tinashe Murerekwa Partner Kreston, Zimbabwe
10:00 - 10:30	Tea Break
10:30 - 11:45	Income Tax in Practice: Practical Guidance on Computation, Declaration & Filing Focus 1: Multicurrency Tax Computation: Framework, Conversion Rules & Practical Application Focus 2: Tax Computation: Allowable & Disallowable Expenses, Rules, Key Risk Areas & Audit Exposure Marvellous Tapera Chief Executive Officer WTS Tax Matrix Academy Focus 3: Defensible Tax Returns: Declaration, Return Filing & Defensible Documentation Requirements
11:45 - 13:00	Value Added Tax: Practical Guidance, Compliance Risks, Common Pitfalls, Audit Risk Areas & Audit Survival Focus 1: Digital Compliance in Practice: TaRMS. Fiscalisation & Data Matching ZIMRA Representative Focus 2: VAT Compliance Essentials: Classification, Supply Rules, Prohibited Claims, Compliance Risks & Return Filing Simon Gwenzi Director-VAT Crowe, Zimbabwe Focus 3: Surviving VAT Audits: ZIMRA Focus Areas, Risk Triggers & Dispute Resolution Tafadzwa Mhonde Tax Director WTS Tax Matrix
13:00 - 14:00	Lunch
14:00 - 17:00	Professional Networking - High Energy/Delegate Engagement Option 1: Nyangombe Falls Option 2: Volleyball Competition + Prizes Option 3: Hotel Activities- Boating & Fishing and Hiking Viewpoints etc
17:00 - 18:00	Health Break
18:00 - 19:00	Dinner
19:00 - 21:00	Taxpayer Clinic - Feedback Session & Prize Giveaway

Day 3

Time	Topic/Facilitator
08:30 - 09:05	Capital Gains Tax: Transactions, Practical Guidance & Risk Areas Focus 1: Practical Guidance: Transactions, Valuations, Calculation, Exemptions, Reliefs & Supporting Documentation Focus 2: Common Capital Gains Tax Errors, ZIMRA Risk Areas & Defensible Audit Documentation
09:05 - 09:45	Cross-Border VAT & Withholding Taxes: Practical Compliance, Pitfalls & Audit Risk Areas Focus 1: Practical Guidance: Transaction Type, Tax Treatment, Source Rules & Practical Application Simelinkosi Mangena Assistant Manager WTS Tax Matrix Academy Focus 2: Withholding Taxes, Double Taxation Agreements & Supporting Documentation Focus 3: Cross-Border Compliance Risks: VAT, Permanent Establishment, Audit Exposure & ZIMRA Focus Areas Marvellous Tapera Chief Executive Officer WTS Tax Matrix Academy
09:45 - 10:00	Tea Break
15:20 - 17:00	Professional Networking & Fun Experience Activities Option 1: Golf Event Competition + Prizes Option 2: Mutarazi Falls Skywalk & Skyline
17:00 - 18:00	Health Break
18:00 Till Late	Dinner, Awards Ceremony & Professional Networking

Day 4

Time	Topic/Facilitator
08:00 - 10:00	Checkout



Answers to Crossword Puzzle

Across

2. Depreciation.
9. Dividends
10. NSSA.
14. Cost.
17. Royalty.
18. DTA.
19. Exempt.
21. Permanent Establishment.

25. Credit Note.
27. Evasion.
28. Assessed Loss.
30. Restraint.
32. IMTT.
33. Interest

Down

1. Founder.
3. Public Officer.
4. Avoidance.
5. FDMS.
6. Audit.
7. DMTT.
8. Capital Gains.
11. Presumptive.
12. Scrapping.
13. Thin Capitalisation.

15. Bad debt.
16. Note.
20. Fringe Benefits.
22. Interest.
23. Equity.
24. Planning.
26. Objection.
29. ZIMRA.
31. DTA.
34. Six

Behind every successful business is a sound tax strategy

At WTS Tax Matrix, we help businesses turn tax challenges into opportunities. Whether you are expanding into new markets, navigating regulatory change, responding to a tax audit or managing cross border transactions, our specialists deliver practical solutions that protect value and create certainty.

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- » Build tax efficient business structures.
- » Manage cross border transactions seamlessly.
- » Meet statutory obligations accurately and on time.
- » Make informed business decisions backed by trusted tax expertise
- » Assess tax risks through proactive tax health checks.
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Tax Training Calendar

1 July to 31 December 2026

A: Certified Tax Professional Programme

Course	Start Date	End Date	Duration	Price	Venue
Master Tax Audits & Disputes	24-Jul-26	21-Aug-26	4 Weeks	USD200	Online
Master Capital Gains Tax & Estate Planning	10-Aug-26	07-Sep-26	4 Weeks	USD200	Online
Master Preparation of Tax Returns	13-Aug-26	10-Sep-26	4 Weeks	USD200	Online
Master Corporate Income Tax	08-Sep-26	20-Oct-26	6 Weeks	USD230	Online
Master Payroll Tax (MPT)	18-Sep-26	16-Oct-26	4 Weeks	USD200	Online
Master VAT Practice (MVP)	19-Oct-26	29-Nov-26	6 Weeks	USD230	Online
Corporate Tax Structuring - Advanced	11-Sep-26	6-Nov-26	8 Weeks	USD250	Online
Business Tax Strategy- Advanced	11-Sep-26	6-Nov-26	8 Weeks	USD250	Online
International Tax - Advanced	02-Nov-26	28-Dec-26	8 Weeks	USD250	Online
Transfer Pricing - Advanced	02-Nov-26	28-Dec-26	8 Weeks	USD250	Online

B: Sectorial Tax Masterclasses

Course	Start Date	End Date	Duration	Price	Venue
Financial Services Masterclass	12-Aug-26	09-Oct-26	8 Weeks	USD280	Online
Real Estate & Property Masterclass	12-Aug-26	09-Oct-26	8 Weeks	USD280	Online
Insurance & Pension Masterclass	12-Aug-26	09-Oct-26	8 Weeks	USD280	Online
MNOs & ICT Masterclass	12-Aug-26	09-Oct-26	8 Weeks	USD280	Online
Mining & Construction Masterclass	12-Aug-26	09-Oct-26	8 Weeks	USD280	Online
FMCG & Hospitality Masterclass	12-Aug-26	09-Oct-26	8 Weeks	USD280	Online

C: Conferences, Seminars & Indabas

Event	Start Date	End Date	Duration	Price	Venue
Banks, Fintech & Capital Markets Indaba	23-Jul-26	24-Jul-26	2 Days	USD300	Harare
Tax Summer School	30-Sep-26	03-Oct-26	4 Days	USD1440	Nyanga
Managing Tax Compliance Seminar	21-Aug-26	21-Aug-26	Half Day	USD130	Harare
End of Year Income Tax and Budget Seminar	03-Dec-26	03-Dec-26	Half Day	USD130	Harare

D: Practice Management Courses

Event	Start Date	End Date	Duration	Price	Venue
Managing Tax Practice- Basic	03-Aug-26	28-Sep-26	8 Weeks	USD250	Online
Managing Tax Practice- Advanced	30-Aug-26	25-Oct-26	8 Weeks	USD250	Online
Accounting For Tax Financial Statements	26-Oct-26	21-Dec-26	8 Weeks	USD250	Online

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