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African Footprint

Technical Newsletter of the Crowe Global African firms

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Audit / Tax / Advisory

Smart decisions. Lasting value.

Crowe Zimbabwe and Zambia – Harnessing and Growing Great Talent

Crowe Zimbabwe, with its subsidiary in Crowe Zambia, is a public accounting, consulting, and technology firm that combine deep industry and specialised expertise with innovation. It is led by well-known resourceful personalities in Zimbabwe and Zambia. Crowe Zimbabwe is registered under registration number Z10009 and Crowe Zambia under registration number FR0149/17. The firm has a total of 8 Partners and Directors and employs a total of 35 full-time employees of whom 27 are technical staff qualified in accounting, auditing, tax and advisory and 8 are support staff.

Our areas of focus are Audit, Tax and Advisory with each department employing critical skills to cover the different special needs clients may have. Crowe Zimbabwe and Zambia, being a member firm of Crowe Global, has introduced a new service provision - Digitalisation. We offer to our valued clients the support and skills they need in digital transformation as dictated by the global trends. This will assist clients in ensuring that they are abreast of the new trends in terms of technology which will help them in their business processes, strategy achievement and vision.

Crowe Zimbabwe and Crowe Zambia operate under the leadership of Dr Oliver Mtasa as the Lead Partner and supported by an experienced and qualified team of Partners and Directors.



Our Management Team

Yande Mwenye
Raymond Sibanda

- Managing Partner, Crowe Zambia
- Business Development and International Liaison Partner

Dereck Chirengwa
Albert Tirivangani
Jabulani Mavimba
Sabina Sibanda
Connie Mutunhu

- Advisory Partner
- Audit Partner
- Partner
- Director
- Tax Director

Over the past six months the team has grown both at management level as well as technical staff. In both offices, our drive has been to engage and employ young graduates as trainees and interns promoting some into supervisory and management roles. We have improved the selection criteria and process in order to attract great talent from the different educational institutions in both countries. We believe that hands-on training that takes place within real work environments can support the development of strong skills in young people as such experience will help students to identify their intended career paths earlier in life. This process can be daunting and confusing while trying to keep up with classes in colleges and universities.

The Crowe Internship and Development Programme is an initiative aimed at identifying talent amongst high school and recent university graduates. This for us is an effective way for older generations of employees to transfer their knowledge down to the next generation so as to influence the future quality of work.

At Crowe Zimbabwe, we endeavour to be an employer of choice. We understand that employers of choice seek employees that match up to the standards expected. We are a training institution that works to give back to the community to help mould sought after employees. We train them from ground zero until they finish their articles.

Ruth Dengwani
Crowe Zimbabwe and Crowe Zambia

South Africa Covid-19 Relief Measures

In terms of a Media Statement issued by National Treasury on 1 May 2020, the following tax measures were announced.

PAYE Deferral

The purpose of this relief is to assist the cash flow of small to medium sized businesses (i.e. a business (including a partnership) with an annual turnover not exceeding R100 million) which have employees in respect of whom PAYE is payable.

The business must have been registered for PAYE on 1 March 2020 and its gross income for the current year of assessment must not include more than 20% consisting of gross interest, dividends, foreign dividends, royalties, annuities, gross rental from the letting of fixed property (except where the letting of fixed property is the main trading activity of the business) and any remuneration from an employer.

In respect of the PAYE liabilities for the months of April to July 2020 –

- Only 65% of the total amount of PAYE payable must be paid on time i.e. by the 7th of the following month. 35% is deferred without penalty or interest.
- The total amount deferred in respect of these 4 months must be paid to SARS in 6 equal monthly instalments. The first amount is payable on 7 September 2020 and the same amount in the following 5 months.



This relief is not available to those employers (or representative employers of non-resident businesses) if the employer –

- has failed to submit any return to SARS (not only in respect of PAYE) in the prescribed form and manner and by the due date;
- has any outstanding tax debt in excess of R100 (unless an instalment agreement with SARS is in place).

It must be realized therefore that if employers are in default with any returns or payments, this relief is not available and the usual penalties and interest will apply. Furthermore, penalties and interest will apply if PAYE liabilities are understated for any of the 4 months referred to above.

Provisional Tax Deferral

The purpose of this relief is to assist the cash flow of a small to medium sized taxpayers (i.e. an annual turnover not exceeding R100 million) which have a liability to pay provisional tax.

The gross income of the taxpayer for the current year of assessment must not include more than 20% consisting of gross interest, dividends, foreign dividends, royalties, annuities, gross rental from the letting of fixed property (except where the letting of fixed property is the main trading income of the taxpayer) and any remuneration from an employer.

In respect of the provisional tax payments falling due during the period of 12 months from 1 April 2020 to 31 March 2021 –

- Deferral without penalty or interest of a portion of the first and second provisional tax payments due to SARS.
- The first provisional tax payment falling due during the period from 1 April 2020 to 30 September 2020 is to be 15% of the estimated total tax liability (without this concession, 50% would be payable).

- The second provisional tax payment falling due during the period from 1 April 2020 to 31 March 2021 will be 65% of the estimated total tax liability (without this concession, 100% would be payable) less the amount paid as the first provisional tax payment.
- When the third provisional tax payment is due for the company (i.e. 6 months after the company year end (or 7 months for February year end companies)), the deferred amounts (i.e. 35%) must be paid in full.

This relief is not available to a company if such company –

- has failed to submit any return to SARS (not only in respect of provisional tax) in the prescribed form and manner and by the due date;
- has any outstanding tax debt in excess of R100 (unless an instalment agreement with SARS is in place).

It must be realised therefore that, if companies are in default with any return or payments, this relief is not available and the usual penalties and interest will apply.

Employment Tax Incentive (ETI) Relief

The ETI programme was instituted to promote employment, particularly of young workers (i.e. between the ages of 18 and 29).

This wage subsidy relief is administered through the PAYE system and is applicable in respect of a qualifying employee between the ages of 18 and 29 who has a monthly remuneration of less than R6 500. The maximum monthly ETI claimable per qualifying employee is limited to R1 000 in the first year of employment and R500 in the second year of employment. The monthly ETI can only be claimed for the first 24 months of the qualifying employee's employment. For the limited period of 4 months from 1 April 2020 to 31 July 2020, so as to minimize job losses, the ETI programme is to be expanded as follows –

Relief Measures

- Increasing the maximum amount of ETI claimable during this 4 month period from R1 000 to R1 750 in the first qualifying 12 months and from R500 to R1 250 in the second 12 qualifying months.
- Allowing a monthly ETI claim of R750 during this 4 month period for employees from the ages of –
 - 18 to 29 who are no longer eligible for the ETI as the employer has claimed ETI in respect of those employees for 24 months, and
 - 30 to 65 who are not eligible for the ETI due to their age.
- Accelerating the payment of the ETI reimbursements from twice a year to monthly as a means of getting cash in the hands of tax compliant employers as soon as possible.

This ETI expansion only applies to employees who were registered with SARS as at 1 March 2020.

This ETI relief is not available if such employer –

- has failed to submit any return to SARS in the prescribed form and manner and by the due date;
- has any outstanding tax debt in excess of R100 (unless an instalment agreement with SARS is in place).

Skills Development Levy Holiday

With effect from 1 May 2020, there will be a 4 months holiday for skills development levies of 1% of remuneration payable by employers.

This means that no SDL levies will be payable for the months of May, June, July and August 2020.

Early VAT Refunds

Smaller VAT vendors file VAT returns every 2 months. This means that, if you are due for a VAT refund, you have to wait until your next 2 months return has been reviewed by SARS. Those in a net VAT refund position will be temporarily permitted to file monthly VAT returns instead of every 2 months. This will allow for VAT refunds earlier than before. SARS hopes to have this system in place in May 2020 (for category A vendors who would otherwise only be able to file in June 2020). It appears that if the vendor is not due for a VAT refund, normal 2 monthly returns can be filed.

Other Deferrals

- 1 Carbon Tax.** First returns and payments were due by 31 July 2020. This filing and payment date is to be delayed by 3 months to 31 October 2020.
- 2 Excise taxes on alcohol and tobacco products.** Payments due in May and June 2020 are to be deferred by 90 days to August and September 2020 respectively. This deferral is only available for excise compliant businesses.
- 3 Limiting of interest deductions.** In the Budget Review tabled by the Minister of Finance in February 2020, measures were announced to limit the deduction of interest incurred in the production of income to 30% of earnings. The implementation date has been deferred by 1 year to be effective for years of assessment commencing on or after 1 January 2022.
- 4 Limitation of assessed losses.** In the February 2020 Budget Review, it was announced to limit the deduction of assessed tax losses to 80% of taxable income in the following tax year. The implementation date has been deferred by 1 year to be effective for years of assessment commencing on or after 1 January 2022.

Other Concessions

- 1 **Waiver of SARS penalties for businesses.** Larger businesses (with a gross income of more than R100 million p.a.) which can show that they are incapable of making payment due to the Covid-19 disaster, may apply directly to SARS to defer tax payments without incurring penalties.

Businesses with a gross income of less than R100 million p.a. may also apply for deferral of payment without incurring penalties beyond the deferral relief dealt with earlier in this circular.

This relief does not cover the interest which will be payable.

From a practical point of view, the challenge will be to be able to show to SARS that the business is incapable of making payment due to the Covid-19 disaster. Applications will be dealt with by SARS on a case by case basis.

- 2 **Tax deductible donations.** Currently tax deductible donations are limited to 10% of taxable income for that tax year. The limit will be increased by an additional 10% for donations to the Government sponsored Solidarity Fund during the 2020/2021 tax year.

Generally, if an employer contributes on behalf of employees, for PAYE purposes, employers can take into account as a deduction up to 5% of the employee's monthly salary. An additional percentage up to 33.3% of monthly remuneration for 3 months April to July 2020 **or** 16.66% for 6 months April to September 2020 will be allowed for that limited period for donations to the Solidarity Fund.

- 3 **Access to Living Annuity Funds.** Current legislation allows the recipient of a living annuity to draw as annuity income from their fund from 2.5% to 17.5% of the fund value. Changes within those rates are only allowed once a year on the policy anniversary date. It is announced that, for a temporary period, up to a maximum of 20% (from 17.5%) and a minimum of 0.5% (from 2.5%) will apply. This temporary change will be allowed to take place immediately without the need to wait for the annual anniversary date.

Debt Relief Finance Scheme

This is to be administered by the Department of Small Business Development to benefit businesses negatively affected by COVID-19.

There are numerous qualifying criteria and application forms and full details are available at

https://www.gov.za/sites/default/files/gcis_documents/SMME%20Debt%20Relief%20Scheme.pdf

Other financial support measures have been announced by various banks, financial institutions and other organisations.

Relief Funding

https://www.gov.za/sites/default/files/gcis_document/202005/COVID-19%20Loan%20Guarantee%20Scheme%20Q&A.pdf

Various interim measures were implemented as a safety net in order to help curb the longer-term and immediate effects of the COVID-19 pandemic. The loan guarantee scheme is the latest government funding relief that has begun operating with the intention to fund operational expenses like salaries and rent. Applications for these interim relief measures being implemented by the SA Government and its departments, as well as other initiatives, are readily available on-line. A good place to begin is with your own bank.

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Kent Karro

Non Profits: Managing in Uncertain Times

Charities and other non profit organisations are facing much uncertainty.

This article was first written some years ago by Pesh Framjee when non profit organisations were having to adapt to changes such as economic and political uncertainty arising from the last big economic down turn. In March 2020, this article was updated.

Uncertainty is ever present and its management sometimes becomes routine. At other times uncertainty creates a real crisis that requires immediate attention. Threats can be existential and circumstances are unprecedented and the scale and impact of risks and challenges make them different to routine challenges. The speed at which events unfold, change and impact does not allow time to interpret them using the usual approaches.

Nonetheless many of the usual approaches for managing uncertainty can be useful in times of crisis except that there has to recognition that responses and actions cannot be based only on predefined response plans that were drawn up before the crisis.

Strategy and scenario planning

It is important to recognise that rigour in decision making is not the same as ponderous and charities need to be nimble and agile in their decision making. Care needs to be taken to examine some of the projects and programmes that have been planned.

Risk Management

Unprecedented events require a new awareness of the importance of remote events that can have a significant impact; this casts some question marks over the way organisations have traditionally identified and scored risks and adopted procedures to manage them.



Reserve and liquidity

As income levels are threatened, cash flow and reserves management inevitably demand more attention. Charities should reassess their reserves policy and ensure it meets operational needs. Unfortunately, many reserves policies are often created to justify the existing level of reserves rather than what is realistic and operationally necessary.

Working it through

Charities need to avoid knee jerk reactions whilst recognising that change is inevitable. There are a number of steps before launching into responses to matters such as Brexit, new fundraising requirements or any of the many drivers of change that the sector will be facing.

Some key messages

- Strategies have to become more dynamic and focused on the short-term.
- Monitoring and measurement of progress against the strategy is more frequent.
- Strategies and tactics have to be developed on the premise that several different outcomes are possible.
- Scenario planning is valuable in helping cope with the uncertain environment and can help identify the drivers of change.

- There is a need to put values and analysis on different scenarios and this requires out of the box thinking from different perspectives. Horizon scanning is important.
- Scenarios are often wrongly treated as forecasts and the range of scenarios is too simplistic.
- Charities should develop action plans for different scenarios by setting and monitoring trigger points along with trend analyses.
- Look beyond the obvious - consider both direct and indirect drivers and short and long term implications.
- Be aware of the importance of remote events that together can have a significant impact.
- Probability has less value for risks that occur outside the norm and the past is not the best indicator of the future.
- Lower significance risks can escalate to a very high impact risk because of risk interactions.
- It is important to understand the core processes and sub-processes and their role in achieving strategy.
- Governance structures, board and management competencies and frameworks for decision making may need to be revisited.
- The reserves policy should link with the risk management and forecasting process.
- Understand what the reserves represent and look at the ease with which they can be made available in times of need.
- The continued uncertainty and volatility of income has dramatically increased the exposure to liquidity risk.

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Pesh Framjee

Will Accounting and Auditing Standards Pass the Pandemic Test?

Everywhere you turn or go, COVID 19 is written all over. Be it in your house, on the tram, on the bus, on your television, in the office, on your mobile phone, on the street, you name it. What about in our profession? The accounting standards have not been spared the knock-on-the-door by the COVID 19 pandemic. Many in the profession including stakeholders have run back to their bookshelves and other file storage media to be sure that the effects of COVID 19 pandemic on business operations and reporting is not lost to the attention of the standards. The standard bodies have had to put in an extra shift to look at how the standards are doing in light of the pandemic.

At Crowe Global, in the last months since the pandemic, Crowe channels have remained a buzz with updates, guidelines and other communications for its members and customers on how to ensure we remain alert to issues of the pandemic in so far as the standards are concerned.

Crowe Global has gone ahead and put up a dedicated website to help businesses and individuals navigate the uncertainty associated with COVID-19. It has also been running various webinars on the International Financial Reporting Standards (IFRS) and International Standards on Auditing (ISA) implications of the Covid-19 situation through which the various guidelines and experiences have been shared. The Crowe Global Technical Advisor & Quality Controller (David Chitty) with his team have been ensuring the message on the standards and COVID 19 is disseminated across the Crowe network.

As a sign of resilience of the current accounting and auditing standards, to the date of this report, there has been no significant communication of changes to standards on the basis of the effects of the COVID 19 pandemic on reporting. The only change in standards that has been proposed due to the pandemic is the amendment of IFRS 16, Leases – The issues of rent concessions from lessors as a COVID 19 effect may lead to changes in lease terms. The IASB has issued an amendment to IFRS 16 to make it easier for lessees to account for Covid-19 related rent concessions. The amendment takes effect on 1 June 2020, but lessees can apply the amendment immediately in any financial statements (interim or annual) not yet authorized for issue.

On the rest of the standards, the IASB has issued on its website various guidelines and bulletins on how to navigate the effects of the pandemic - <https://www.iasb.org/focus-areas/guidance-auditors-during-coronavirus-pandemic>

Guidelines have been issued by IFAC on the application of key standards - <https://www.ifac.org/knowledge-gateway/supporting-international-standards/discussion/summary-covid-19-financial-reporting-considerations>

- i) IAS 1, **Presentation of Financial Statements** - Requires management to assess and disclose company's ability to continue as a going concern during this uncertainty.
- ii) IAS 10, **Events After the Reporting Period** – Affects entities mainly with year ends of 31 December 2019 and after and determining of adjusting or non-adjusting events.
- iii) IFRS 13, **Fair Value Measurement** – Especially for financial instruments and investment property which will have to be reviewed in the face of the pandemic and volatility in the markets.
- iv) IAS 36, **Impairment of Assets** – There is need to assess whether the impact of Covid-19 has potentially led to an asset impairment.
- v) IFRS 7, **Financial Instruments: Disclosures** – Affects mainly hedge accounting where the pandemic may affect the probability of a hedged forecast transaction occurring or affect its timing.
- vi) IFRS 9, **Financial Instruments** - The Covid-19 impact on credit risk will be more severe and immediate in various sectors of the economy and businesses. Determination of provisions related to these effects and the required modification of the design and calibration of ECL models is a headache that management will have to address.
- vii) IAS 2, **Inventories** - In the current environment, the NRV calculation will likely require more detailed methods or assumptions (e.g. companies may need to write-down stock due to less sales). Interim inventory impairment losses will need to be reflected in the interim period in which they occur, with subsequent recoveries recognized as gains in future periods.

- viii) IFRS 15, **Revenue from Contracts with Customers** - Covid-19 could affect the assumptions made by management in measuring the revenue from goods or services already delivered, particularly for variable consideration and for the anticipated outcome of contracts extending over multiple reporting periods.
- ix) IAS 12, **Income Taxes** – The issue of judgement of future taxable profits comes into play. There may be uncertainties at the year-end in estimating whether there will be sufficient future taxable profits against which to utilize the previous tax losses when calculating deferred tax asset balances.
- x) IAS 20, **Accounting for Government Grants and Disclosure of Government Assistance** – Treatment variations may arise in accounting treatments due to COVID related government funding depending on whether it is received through a tax concession or a government grant.

The Ethical standards have not been spared the attention after COVID 19. The IESBA has issued a Question & Answer publication highlighting aspects of the Code of Ethics that can be relevant in navigating ethics and independence challenges and risks that result from the Covid-19 situation.

On the other hand, Auditing standards (ISA) have not changed. However guidelines on Auditing in the face of the pandemic have been issued including the need to adapt to the changing environment due to restrictions related to COVID which have affected auditors in implementing their work in light of the standards. Key standards that have received closer attention due to the pandemic include:

- i) ISA 500, **Audit Evidence** (due to the uncertainties in obtaining audit evidence in the current environment).
- ii) ISA 560, **Auditor's responsibilities** relating to subsequent events and ISA 570 – the auditor's responsibility to obtain sufficient appropriate audit evidence regarding going concern.
- iii) ISA 501, **Audit Evidence-Specific Considerations for Selected Items**, comes into focus due to items such as physical inventory counting attendance, not practical during the pandemic restriction period.
- iv) ISA 600, **Special Considerations-Audits of Group Financial Statements** (Including the Work of Component Auditors) where group auditors may not be able to visit components.

A Sign of Resilience

- v) ISA 540 (Revised), **Auditing Accounting Estimates and Related Disclosures** – The pandemic will have a significant impact on management decisions on making of judgements and estimates.
- vi) ISA 230, **Audit Documentation** - The auditor is required to prepare documentation that provides a sufficient and appropriate record of the basis for the auditor's report and evidence that the audit was planned and performed in accordance with ISAs. Restrictions may limit the obtaining and documentation of evidence, among other standards.

In light of the foregoing, Auditors have had to review their audit approaches in relation to risk assessment, the need for offsite audit including application of online tools and how to apply aspects of physical reviews, planning and communication, direction, supervision

and review of audits. Another key area of attention due to the increased adoption of IT in audit, has been security of data and the need for audit approach flexibility that calls for creativity and innovativeness in audit processes.

I conclude that though there are challenges in the profession on how to navigate the application of accounting and auditing standards during and after the pandemic, the standards seem to have stood the preliminary test. However, things may change when the real impact of the effects of the pandemic has been felt and assessed.

Francis Ugango
Crowe Erastus & Company
Kenya

Francis Ugango



Message for our African Network

Since we last met in Tunis for the Middle East and Africa Meeting, the entire World has changed, at least for a period of time, as a result of the health crisis generated by the Covid 19. Predictions are that it will be followed by a financial crisis, whose impact is still unknown.

It is a good illustration of what, apparently, Bob Dylan said that 'there is nothing so stable as change'.

However, and since the beginning of the crisis, our network of firms in Africa has fared very well. We have been in contact with most firms, if not all, to make sure that you were coping as well as possible. Mark Watson has initiated daily emails sent by a different person for quite a while and they are read very carefully by all of us and have contributed to maintaining a very good spirit. The monthly African conference calls have never been so well attended and efficient. We even have new expressions of interest for joining the network from Ethiopia and Togo.

It probably shows the resilience of Africa and Africans in time of crisis. Of course not everything is rosy, we know that you are going through difficult times, but we will all end in better shape once it is all over.

Because of the crisis, we had to re-engineer the transition period between the two of us. We should have travelled to Kenya, Tanzania, Uganda and Egypt : obviously those trips have been cancelled. But we have established a daily connection between us and we have become experts in terms of Go to Meeting, Microsoft Teams and any kind of webinars. We know that many of you attended the EMEA one and listened to the two of us. Thank you to David and Lynda and we hope that it has been useful for all.

We are both convinced that Kamel is as much prepared as was possible under these circumstances, to take on the role of EMEA Regional Director as of 1 July, and Bernard is obviously committed to help whenever requested.

Africa has a great level of recognition within the network and we are both proud of what you have achieved so far and your commitment for the future.

Best wishes to all of you!

Kamel Abouchacra and
Bernard Delomenie
Crowe Global



Kamel Abouchacra



Bernard Delomenie

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About Crowe Global

Ranked eighth largest accounting network in the world, Crowe Global has over 200 independent accounting and advisory firms in 130 countries.

For almost 100 years, Crowe has made smart decisions for multinational clients working across borders.

Our leaders work with governments, regulatory bodies and industry groups to shape the future of the profession worldwide. Their exceptional knowledge of business, local laws and customs provide lasting value to clients undertaking international projects.

Crowe's leaders work with governments, regulatory bodies and industry groups to shape the future of the profession worldwide. Their exceptional knowledge of business, local laws and customs provide lasting value to clients undertaking international projects.

Crowe provides global reach on a personal scale. Crowe firms focus on the future, the client experience and working with clients to build something valuable, substantial, and enduring. Close working relationships are at the heart of our effective service delivery.

At Crowe, our professionals all share one commitment, to deliver excellence.