# PwC Energy & Utilities Contacts

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#### Lazhar Sahbani

#### Partner

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Key country contacts and their credentials

Lazhar is the Partner leading our Tax and Legal practice in Algeria. He is a lawyer specialized in business law and international tax services.

He has more than twenty years of experience working with tax and business law professionals, international consulting firms and multinationals. His experience covers areas such as dealing with complex global tax challenges, risk management, minimizing the global effective tax rates of businesses and streamlining of their cash flow.

Through his previous experience, Lazhar has developed an extensive knowledge skill set in International Tax Structuring, Corporate Income Tax and providing assistance in tax optimization and corporation reorganization services for global companies operating in Africa with large activities in Algeria. He has developed strong technical guidance for corporate transactions, specifically with regards to Algerian tax & legal requirements. Throughout his career, Lazhar has provided key solutions to Oilfield service companies, pharmaceutical and manufacturing companies based on his strong understanding and knowledge of client business and industry challenges.

Lazhar holds Bachelors in Business Studies from IHEC- Tunis Carthage, a Tax Inspector Diploma from Ecole Nationale des Impôts— Clermond Ferrand (France), and Masters in Taxation from Université de Paris IX — Dauphine.

He is also a professor of taxation and business law at the Management and Business School of Algiers "MDI".



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#### Rosa Areias

#### **Partner**

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# Angola



Key country contacts and their credentials

Rosa Areias is Partner of PwC Portugal and leader of its Tax Department, with responsibility also for Angola and Cape Verde.

Rosa has a degree in Economics from Faculdade de Economia da Universidade do Porto. As well as a degree in Law from Universidade Lusófona, and a MBA in Finance from Faculdade de Economia da Universidade do Porto.

Further, she has a Bachelor's degree in Accounting and Administration from Porto's Instituto Superior de Contabilidade e Administração, as well as a postgraduate degree in Management and Taxation by IESF. Additionally, Rosa has a attended an Advanced Management Programme in partnership between Católica Lisbon School of Business and Economics and the Kellogg School of Management of the Northwestern University. And is currently in a Post-graduation program in Business Intelligence and Analytics by Porto Business School (ongoing).

Rosa has a wide experience in tax management and international projects with national and multinational groups.

She is also responsible for PwC Portugal's Knowledge Management area in tax. Rosa has participated as a keynote speaker, in teaching courses, seminars and conferences related to taxation and is also a guest lecturer in some education institutions. She regularly collaborates with the social media, having been co-author of the book "IRC – Notas Práticas".

She is a licensed Arbitrator at the Portuguese Court of Tax Arbitration (CAAD).



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#### Cristina Teixeira

#### **Partner**

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# Angola



Key country contacts and their credentials

Cristina is a Partner with PricewaterhouseCoopers (PwC) Angola in the Tax and Regulatory Services line of business.

Before now, she worked within the tax unit of another Big 4 accounting firm, where she dealt with the tax compliance and consultancy matters as well as support to the statutory audits, mainly on the financial sector.

She is an expert on petroleum income tax, direct tax consultancy and compliance, tax audits and personal income tax.

Cristina joined PwC Angola Tax department in 2010 and she has been providing tax assistance to local and multinational companies in the Oil & Gas sector. She is currently the Tax Director for Oil & Gas – Tax department.

Cristina has been providing continuous tax assistance to local and multinational companies in the oil and gas sector in Angola (Sonangol, Cobalt, ConocoPhillips, Maersk, Halliburton, Transocean, Schlumberger, Nafta Gas, Boskalis, Ensco, Fugro), as well as services providers to the industry on tax compliance (Petroleum Tax returns and Corporate Tax returns) and consultancy assignments, group restructuring, support in tax audits, due diligences for target companies and delivering training on tax and accounting subjects.

Cristina holds a degree in Accounting and Business Administration - Taxation. She is a registered Statutory Accountant in Portugal and is recognized as taxation technician by Association of Taxation Technician in UK.



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#### Susana Claro

#### **Partner**

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Key country contacts and their credentials

Susana is a Partner of the Indirect Taxation (VAT, Excise and Customs) practice of PwC Portugal.

Susana graduated in Business Organization and Management by ISCTE - Instituto Universitário de Lisboa, postgraduate in Advanced Accounting and Taxation by Overgest / ISCTE - ISCTE - Centro de Especialização do ISCTE, in September 2007.

Susana has a curricular competence in the Official Examiners' Association, completed in 2010.

Susana's professional experience in the area of VAT has focused on the implementation of projects for the implementation of tax efficiency structures, namely in the areas of Financial Services, Construction & Real Estate, Hospital & Health Care and Consumer Business; monitoring of clients' current tax issues; and, follow-up of audits, due diligences, revisions of procedures and revisions of internal control processes and revision of tax declarations.

Susana is a certified trainer by the Institute of Employment and Professional Training and trainer in training courses in the area of indirect taxation organized by PwC, as well as postgraduate and Executive Masters. Susana is the author of articles in the area of indirect taxation published in journals and journals of specialty and economic journals.

Susana is also an arbiter at the Administrative Arbitration Center (CAAD).



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Ines Barbosa Cunha

#### Director

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Key country contacts and their credentials

Inês is a Director in the Tax Department. Inês developed her professional experience in tax consultancy projects, tax structuring, tax compliance, taxation of expatriates, financing structuring, audit tax work, due diligence operations, mergers and acquisitions, both in Portugal and Angola.

Between October 2009 and March 2011, Inês took over the Portuguese Tax Desk in PwC's Office in New York, where she participated in projects primarily associated with financial derivatives and investment funds.

Inês took over the coordination of various tax matters in PwC Angola, where she acquired the necessary background to currently support customers with operations in Angola.

She holds a degree in administration and business management, Portuguese Catholic University. She is a member of the Portuguese Accountants Bar and is a certified statutory auditor in Portugal



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Luís Andrade

#### Director

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# Angola



Key country contacts and their credentials

Luís is a Director of the M&A Tax practice in Angola, Cape Verde and Portugal. He is also responsible for the Corporate & Regulatory practice in Angola.

Luis started his career in 2002 at the Tax department of PwC Portugal, where he joined the teams of some of the most important Portuguese Groups.

Luís was on assignment with the International Tax Services Department in PwC Luxembourg between July 2007 and December 2007.

Luís has worked with national and multinational groups in different tax areas, such as setting-up and restructuring international corporate structures and structuring inbound investment in Angola, Cape Verde and Portugal.

As part of the M&A tax team, has been involved in a number of large transactions over the last years in Portugal and Angola, in different activity sectors, including also several privatization processes.







Hugo Maia

#### Director

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### Angola



Key country contacts and their credentials

Hugo is a Director of the Indirect Taxation (VAT, Excise and Customs) practice of PwC (Portugal, Angola and Cape Verde).

Hugo graduated at Law at Universidade Católica do Porto. Postgraduate at Tax Law at Faculdade de Direito da Universidade de Coimbra. Post Graduate at VAT of the European Union at Faculdade de Direito da Universidade de Lisboa. Hugo is a lawyer since 2006.

Hugo is a specialist in VAT, also works with Excise duties and Customs, working with all kind of public and private organizations, with special emphasis to the following areas: compliance analysis and consulting services, particularly in what concerns supply chains, international operations, real estate, VAT recovery and VAT auditing. During the last years Hugo has also been supporting PwC's clients in Angola, with the challenges of the VAT implementation in the country.

He is lecturer at Católica Business School, ISAG and Portuguese Accountants Association.

Hugo is the author of books and articles on Indirect Taxation. Hugo is also an indirect taxation trainer at PwC's Academy.







#### Bernard Noutsawa

#### Director

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### Cameroon



Key country contacts and their credentials

Bernard is a Director in the Energy, Telecoms and Public Orders Business Unit . He is authorised Tax Consultant, CEMAC N° 212.

- Bernard is a more than 15 years experienced tax and legal consultant with strong knowledge of sub-Saharan Africa countries in various field of activities.
- Bernard is the coordinator of the oil and gas business unit at PwC Tax & Legal Cameroon. He is involved in strategic engagements requiring in-depth acquaintance of regulations and practice. He advises multinational companies in their strategy to structure their investments in Cameroon.
- He is specialized in Energy, Public Orders (EPC and PPP projects) and has accomplished, managed and led several assignments in many sectors for the major actors of the energy industry. He has a good working knowledge of all tax requirements relating to the energy and PPP sector.
- Bernard is currently assisting major companies operating in Cameroon for their compliance, tax and legal and investment matters.
- Bernard is proficient in English and French.



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#### **Magloire Tchande**

#### **Partner**

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### Chad & Cameroon



Key country contacts and their credentials

Magloire is the Partner of PricewaterhouseCoopers Cameroon and Chad. He is Authorized Tax Consultant, CEMAC.

Magloire developed her professional experience in Tax Audit, Transfer Pricing, Tax planning, tax consultancy projects, tax structuring and tax compliance.

- Magloire is a highly skilled investment analyst with more than 15 years experienced in the counselling of multinational companies in Cameroon, Chad and Central Africa Republic.
- Magloire's field of competencies includes tax audit, business restructuring, due diligence and transfer pricing engagements in sub-Saharan Africa countries. Magloire is involved in the health check audit of major local and international companies operating in different sectors such as energy sector.
- Since 7 years Magloire is leading projects relating to tax compliance, tax health check audits, and disputes resolution for Cameroon's companies in many industries.
- Magloire has been involved in several business restructuring for multinational companies operating in various field of activity.
- · Magloire is proficient in English and French.







Beaudry Katchi

#### Director

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### Chad



Key country contacts and their credentials

Beaudry is Director in charge of PwC Chad. He is Authorized Tax Consultant, CEMAC.

Beaudry developed her professional experience in Tax Audit, Transfer Pricing, Tax planning, tax consultancy projects, tax structuring and tax compliance.

- Beaudry is a highly skilled investment analyst with more than 10 years experienced in the counselling of multinational companies in Congo and in Chad.
- Beaudry's field of competences includes tax audit, business restructuring, due diligence and transfer pricing engagements in sub-Saharan Africa countries. Magloire is involved in the health check audit of major local and international companies operating in different sectors such as energy sector.
- Since 10 years Beaudry is leading projects relating to tax compliance, tax health check audits, and disputes resolution for companies in many industries.
- Beaudry has been involved in several business restructuring for multinational companies operating in various field of activity.







#### Noussaina N'Diekhor

#### Manager

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Key country contacts and their credentials

Noussaina is a Manager in Tax & Legal arm of PwC Chad. He has more than three years professional experience.

His area of specialization include corporate tax, tax of restructuring operations, petroleum and mining tax, personal income tax, banking law, corporate law and transfer pricing.

Noussaina has taken part in many missions, particularly in legal and tax matters. These missions have allowed him to work for multinational companies established in Chad and in other countries operating in oil and mining sectors (GE Oil & GAS, General Electric International Inc., etc.).

He is also in charge of the PwC's monthly legal and tax newsletter

Noussaina holds a Master's degree in Tax Law and a Master's degree in Management of Humans and Organizations obtained from University Paris 1 Pantheon-Sorbone and Special Military School of Saint-Cyr (France).







Heladoum Abdallah Ngarbaye

#### Senior Associate

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Key country contacts and their credentials

Heladoum is a Senior Associate in the tax and legal team at PwC Chad office. He has more than three years experience as a professional.

His area of specialization include Corporate Law, Business Law, Legal Secretary, Drafting of Deeds, tax payroll, Social Law, banking Law, and Arbitration.

Heladoum has participated to several advisory assignments which allow him to work for several oil companies established in Chad (Petrochad Mangara, General Electric International Inc, Baker Hughes, SNF, GE OIL & GAS, etc.)

He holds a Master Degree in Litigation and Arbitration of Business from Catholic Central Africa University (Cameroon).







Jean Claude Gnamien

#### Director

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Key country contacts and their credentials

Jean-Claude is in charge of PwC Ivory Coast Côte d'Ivoire tax and legal services to the Energy & Utility industry, including the Electricity sector, the mining and the oil and gas industries.

He has over 15 years of experience within the Tax and legal services of PwC Côte d'Ivoire, with a special focus on Energy clients. He has been providing tax consulting, tax compliance, tax health checks services and assistance for government tax audits to energy clients.

He also has a long experience of transaction services to the Energy industry, including legal and tax due diligence, advice for restructuring.

He works closely with Dominique Taty Tax & Legal leader of PwC Côte d'Ivoire, especially on tax services assignments for Côte d'Ivoire clients as well as clients in Burkina Faso, Benin, Mali, Niger and Togo.

He has provided tax advice to several multinational Energy (oil and gas), Utilities and Mining companies clients during start-up operations, acquisition of other companies and reorganizations; and also carried out due diligence and tax structuring advisory work for companies in the oil & gas industry in Ivory Coast and in Sub Saharan Francophone African Region.

He has completed a 2.5 years secondment in the Houston office of PwC United States, within the Federal tax team, where he assisted with tax services to US Energy clients.

Jean-Claude graduated from Abidjan University School of Law in Cote d'Ivoire (2002), and joined the tax and legal department of PwC Tax & legal in Abidjan in 2005.

Jean Claude is a Registered Legal and Tax Advisor in Ivory Coast.



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Sherif Shawki

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# Egypt



Key country contacts and their credentials

Sherif has over 23 years of experience in corporate tax services in Egypt and Kuwait, working with several multinational and national clients. With over 7 years of practicing in Egypt, Sherif has gained a considerable amount of experience and knowledge about Corporate Tax, International Tax and Indirect Tax.

Sherif has participated in various tax planning, valuation and due diligence assignments. He has participated in several areas such as: tax dispute resolutions with tax authorities, tax structuring for large multinational clients involved in construction and infrastructure projects, and also tax planning for large multinational clients involved in strategic investment projects and defence contracts.

Sherif invested lots of time working in advising of entry level strategies for foreign multinationals wishing to do business in Kuwait. He has been involved in several consulting assignments including application of double tax treaties. He also has extensive experience in a wide variety of taxation issues and accounting outsourcing in various industries, including financial services, oil and gas, telecommunication, retail, trading, manufacturing, construction, and pharmaceutical industries. He also helped in the processes of tax planning, valuation and compliance for multinational clients. Sherif participated with the Institute of Tax Development and Researchers of Egypt for Development programs and multiple trainings for VAT and Sales Tax as well.

Sherif is also a member of the Egyptian Society of Tax in Egypt ("MST"). He worked in the beginning of his career to promote advances in the legislation and application of tax in Egypt economically and financially, as well as socially. He also initiated with the MoF in Kuwait for the implementation of the new regulations and legislations including FATCA, CRS, executive rulings and circulars. He is also working closely with their VAT committee in preparation for the initiatives of VAT in Kuwait. He has also contributed to VAT projects and advised on the implications and impact of VAT for entities in Kuwait, such as their transactions, compliance requirements, while also leading discussions with clients on approaches going forward.

Sherif holds a B.A. in Accounting from Ain Shams University. He his a Certified Public Accountant and a member of the California Board of Accountancy, a member of the Egyptian Society for Auditors and Taxation.

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#### **Laurent Pommera**

#### **Partner**

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### **Equatorial Guinea**



Key country contacts and their credentials

Laurent is the PwC Tax & Legal Leader for the Sub-Saharan Francophone Africa region and the Country Tax Leader for Equatorial Guinea.

Laurent is a former French Attorney at law from the Paris Bar with 20 years experience and high profile experience in the mining and upstream oil sector and a wide experience in oil contract terms analysis and oil contract structuring and negotiations.

He has notably:

Advised on Licensing round process and round bid

Advised major companies in legal and tax regulations

Advised on tax issues, including the validity and enforceability of fiscal stabilisation provisions, and cross-border tax issues;

Advised on environmental compliance.

Laurent holds a post-graduate diploma in Tax and Business Law and a Company tax and legal Advisor diploma (DESS-DJCE) from the University of Rennes (France) as well as a post-graduate diploma (DEA) in Private international conflicts of law and international business law from the Sorbonne University in Paris (France). He also holds a diploma in international business legal studies from the University of Exeter (UK).

He held a Thesis at "la Sorbonne" University in International tax law: "Tax Aspects of Petroleum State Agreements: Conciliation and Protection of Departing Interests between States and Petroleum Companies".

Laurent is fluent in French and English







Sinforiano Ngomi Elomba

#### **Partner**

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### **Equatorial Guinea**



Key country contacts and their credentials

Sinforiano is a Partner in PwC Tax & Legal Department Equatorial Guinea (EG), with more than 14 years professional experience.

Sinforiano has participated in several tax, legal and business assignments for local and multinational companies as well as public institutions located in Equatorial Guinea and outside the CEMAC Area. He also proficient in Tax and legal advise within the oil & gas, restructuring of companies and negotiation of contracts.

Some of the assignments he has worked on include assisting companies in tax, legal and customs compliance in Equatorial Guinea, Legal and tax audit realized for many public institutions, Trainings and tax advices to many financial institutions (banks and insurance company) in EG, Immigration formalities and trainings to many companies operating in the oil & gas sector and other sectors in Equatorial Guinea.

Sinforiano is also a lawyer registered at the Equatorial Guinea Bar Association and totally fluent in French, English and Spanish.

He holds postgraduate diploma in Tax Law – University of Douala (Cameroon) and Master Degree in Business Law – University of Douala (Cameroon). He is a CEMAC registered Tax Advisor.

Sinforiano is fluent in Spanish, French and English







Jose Mbara

#### Manager

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### **Equatorial Guinea**



Key country contacts and their credentials

José is a Senior Associate in the Tax & Legal team at PwC and has more than 5 years professional experience.

José assists Oil & Gas companies and other sectors working in Equatorial Guinea on a whole range of issues such as company law (analysis of legal structure, setting up, incorporation, etc...) as well as tax law and social law.

His areas of industry specialization are Tax and legal advise, Social Audits, Resolution of Conflicts etc

Some notable services he has provided to clients include Identification of taxes and risks related to Corporate Income Tax, Withholding Tax, Personal Income Tax, Value Added Tax and any other specific taxes in Equatorial Guinea, compliance with Hydrocarbons' Law, Company Law, Tax Law, Trade Law, Labour Law, Customs' Law, Contract Law and Administrative Law.

José holds a Law Degree obtained at the University of Sophia Antipolis (France) .





Zenika Sanogho

#### Manager

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# **Equatorial Guinea**



Zénika is Senior Associate in the tax & legal team at PwC and has more than 4 years professional experience.

Zénika works on clients in the Oil & Gas and other sectors on a whole range of issues that relate to Company law (analysis of the legal structure, setting up, incorporation, etc) Tax Law and social Law.

Some notable assignments she has worked on include Identification of taxes and risks related to Corporate Income Tax, Withholding Tax, Personal Income Tax, Value Added Tax and any other specific taxes in Equatorial Guinea, compliance with Hydrocarbons' Law, Company Law, Tax Law, Trade Law, Labour Law, Customs' Law, Contract Law and Administrative Law

She has also participated in general tax work such as assisting clients in tax inspections /tax audits. constitution and registration of companies, redundancy procedures providing advice for legal restructuring of companies or groups of companies, computation and payment of taxes.

Zénika holds a Double Degree in Spanish and French Law at the Universities of Complutense (Spain) and Paris I, Pantheon Sorbonne (France). She also obtained a specialized diploma in Business Law at the University of Versailles Saint Quentin en Yvelines (France).







Inès VAZ

#### **Partner**

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### Gabon



Key country contacts and their credentials

Inès is Partner at PwC Tax & Legal Gabon.

She has joined the Tax and Legal team of PwC Gabon 15 years ago.

She serves a large number of subsidiaries of international corporations and many multinationals in Gabon in the Oil &Gas sector.

Inès assists clients in the context of continuous tax assistance to oil & Gas local and multinational companies. She notably provides services to consultancy assignments, group restructuring as well as support in tax audits and tax litigation and on the performance of tax review and tax due diligences for target companies.

Inès holds a post-graduate diploma in Tax and Business Law (DESS) from the University of Paris VIII (France).

Inès is fluent in French and English





Rose-Monde ZANG NDONG

#### Manager

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### Gabon



Key country contacts and their credentials

Rose-Monde has joined the PwC Gabon Tax and Legal practice three years ago.

She provides tax and legal assistance in various matters to domestic and multinational clients.

She is a Manager involved in several assignments consisting notably in the provision of tax and legal advice in the scope of consultations, audits and performance of reviews

As a tax and legal adviser within the firm, she has intervened in several tax and legal due diligence assignments in various sectors of the economy in Gabon including Oil & Gas.

Rose-Monde holds a PhD in Economics law from the University of Lille II (France) and the certificate of lawyer profession from the Paris Bar School.

Rose-Monde is fluent in French and English.





#### Ayesha Bedwei Ibe

#### **Partner**

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### Ghana



Key country contacts and their credentials

Ayesha is currently a Tax Partner overseeing a portfolio of clients including companies operating the Energy, Utilities and Resources industry. She leads the Ghana tax practice (with oversight on Sierra Leone). She serves as PwC's Africa Diversity and Inclusion leader and the West Market Corporate Responsibility Leader for Ghana, Nigeria, Liberia and Sierra Leone.

Ayesha has over 22 years professional accounting experience with over 15 years covering the provision of tax compliance and tax advisory services as well as experience on various lobbying and negotiation assignments with the revenue and regulatory authorities in Ghana on behalf of clients. Among such tax advisory services include reviewing clients' proposed business models in order to advise them on the tax implications of their business models recommending tax efficient structuring options available under the Ghanaian tax laws. Ayesha has also participated in and led teams on various tax due diligence projects and tax health checks for multinational clients.

Ayesha's focus has mainly been in the mining and oil and gas industries and the majority of operators, contractors, and subcontractors operating in the industry in Ghana are her clients. Ayesha is currently the President of American Chamber of Commerce, Ghana and also a Corporate Membership Director for the Ghana Oil Club, a nonprofit friendly organization for the Energy industry in Ghana.

She is a Fellow of Chartered Institute of Taxation, Ghana (CITG), a Fellow with the Association of Chartered Certified Accountants (FCCA), UK, a Member of the Institute of Chartered Accountants (Ghana) (ICAG) and holds a BSc. Business Economics from the University of East London.







Abeku Gyan-Quansah

#### Partner |

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Key country contacts and their credentials

Abeku is a Partner in PwC Ghana and leads PwC's Indirect Tax Practice in the West Market Area. He has over 15 years working experience in the provision of professional tax services.

His experience includes providing tax advisory and compliance services to clients in the energy, utilities and resources, telecommunications, financial services and consumer and industrial products sectors. These clients have local and/or international presence with interests in Ghana, Liberia, Sierra Leone and The Gambia.

Abeku has project-managed several assignments including providing tax advice on inbound investments, mergers and acquisitions and restructuring as well as conducted due diligence assignments. He has been involved in negotiating assessments with regulatory authorities and lobbied for various tax reforms in Ghana.

He also provides tax support such as responding to queries from the Ghana Revenue Authority ("GRA") and liaising with the GRA through meetings and/or written request to resolve outstanding issues during tax audits. He also provides training to companies in the energy industry on various complex topics through PwC Ghana's Business School, which he has been leading over the years.

Abeku holds an LLB from the University of London and a Bachelor of Arts degree in Economics and Statistics from the University of Ghana. He holds a Certificate in Mining Taxation from the University of South Africa and an Advanced Diploma in International Taxation from the Chartered Institute of Taxation UK. He is a fellow of the Association of Chartered Certified Accountants (UK), the Chartered Institute of Taxation Ghana (CITG), and the Institute of Chartered Accountants Ghana (ICAG). He is the Vice Dean of ICAG's Taxation and Fiscal Policy Faculty, and he served on the Technical Committees of CITG and ICAG.







Foster Okyere Duodu

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Key country contacts and their credentials

Foster is a manager in PwC's tax line of service with over 7 years experience in providing tax compliance and advisory services to clients across various sectors. Part of Foster's professional experience includes a three and half year secondment to PwC Tanzania where he worked as a Assistant Manager and later a Manager specialising in direct taxes.

Over the years, Foster has worked on a number of tax advisory and compliance assignments for clients in various industries including oil and gas, mining, financial services, telecommunication, real estates, mining, manufacturing and service companies.

Foster's experience also includes assistance to clients in responding to tax audit issues and dispute resolution with both the Ghana Revenue Authority for clients in Ghana and the Tanzania Revenue Authority for clients in Tanzania on various taxes.

His experience also includes preparation of proposal documents to the Government on tax issues and adoption of best tax practices, leading tax due diligence assignments and tax health check reviews for various clients to ensure compliance with the tax laws.

Foster holds a BSc. in Business Administration (Accounting option) from the Kwame Nkrumah University of Science & Technology, Kumasi and also a member of the Institute of Chartered Accountants, Ghana.







#### Steve Okello

#### Partner |

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Key country contacts and their credentials

Steve is a tax partner and Head of Tax in Kenya and East Market Area Tax leader. He has many years of tax experience working for PwC Kenya and PwC Nigeria.

Steve holds a Bachelor degree in BSc (Mathematics and Applied Chemistry) from the University of Nairobi and is a member of the Institute of Certified Public Accountants of Kenya (ICPAK).

He has extensive experience in the tax law and practice including leading high profile engagements in the oil and gas sector in Nigeria and Kenya. Steve has provided advice to national and international oil companies involved in exploration and production operations and in particular market entry advice, farm-in/farm-out transaction advice. He has also led teams involved in providing technical arguments for presenting to the Kenyan and Nigerian Government's proposals for changes in tax legislation. His vast experience includes providing tax advice to petroleum services subcontractors, mining companies as well as companies involved in distribution and retailing of petroleum products.

Some of his clients include: Tullow Oil, Eni Energy Company, Anardako Petroleum Corporation, Africa Oil Corp, Total S.A, GE Oil & Gas Company, CNOOC, Expro-Gulf, Base Titanium.







Osborne Wanyoike

#### **Associate Director**

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### Kenya



Key country contacts and their credentials

Osborne is a tax director with PwC Kenya and is the Head of the Horn of Africa ("HoA") tax desk based in Nairobi. His vast experience in tax law and practice in Kenya as well as Uganda spanning a broad range of sectors and clients.

Osborne holds two degrees from the University of Nairobi namely Master in Business Administration in strategic management and Bachelor of Arts in economics and political science. He successfully completed a two year Income Tax Assessor postgraduate training from Kenya School of Revenue Administration. He is a Member of Institute of Certified Public Accountants of Kenya since 1996.

His work experience covers three countries, namely Kenya, Tanzania and Uganda and two employers, Kenya Revenue Authority and PwC. In his role of Head of HoA tax desk, he provides market entry tax and business advice to investors assessing regional markets namely Ethiopia, Eritrea, Djibouti, Somalia, South Sudan and Sudan.

Osborne provides wholistic tax advice to local, regional and multinational investors while focusing on the extractive sector as well as the electricity and telecommunications sectors. More specifically he has provided advice in the area of market-entry advice, farm-in/farm-out, tax analysis of Production Sharing Contracts, defending clients before the tax authorities, lobbying for tax legislative changes.

Some of the clients Osborne has been engagement leader include Africa Oil, CNOOC, Anadarko Kenya, ENI, Expro-Gulf, Flow Energy, Acacia Mining, Kenya Electricity Generation Co., Poly GSL.





#### Edna Gitachu

#### **Director**

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### Kenya



Key country contacts and their credentials

Edna is a director in the PwC Kenya Tax Practice with over 15 years' experience in the field of tax in Kenya.

Edna holds a Master in Business Administration (Strategic Management) degree and a Bachelor of Commerce (Finance) degree both from the University of Nairobi. She is a Member of the Institute of Certified Public Accountants of Kenya where she serves as the co-convenor of the Public Finance and Tax Committee. She was part of the team that drafted the Kenyan draft income tax policy.

She has represented both the Power and the Oil and Gas Sectors in discussions with the Kenyan Government on various tax legislations. She has been successful in seeing amendments made to the Kenya Income Tax Act, Value Added Tax Act and the Tax Procedures Act.

Edna has provided tax advice to various clients in the energy sector who are at various stages in the power sector project cycle i.e. inception, financial close, construction and operations. The assignments involved advising on the tax implications of capital raising, optimal structures and exit considerations of various partners.

Edna has successfully assisted with tax dispute resolution for various clients within both the Oil and Gas and Power Sectors. Some of her clients include Tullow Kenya BV, Kenya Oil and Gas Association, Vivo Energy Kenya Ltd, Kenya Power and Lighting Company, Kipeto Energy Plc, OrPower 4 Inc, Rabai Power Limited, amongst others.

Prior to joining PwC, Edna served for five years as a Tax manager at Kenya Electricity Generating Company (KenGen), the leading electric power producer in Kenya.







Amos Adjei

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### Liberia



Key country contacts and their credentials

Amos is Senior Manager with the tax line of service of PwC Liberia and has over seven years professional experience in providing tax and regulatory compliance services to clients across different industries.

Since joining the tax line of service, Amos has been involved in a number of tax and legal/regulatory advisory and compliance assignments covering company registrations, corporate statutory filings, inward investor/pathfinder services, corporate tax, transfer pricing, indirect taxes, employment taxes, withholding taxes, and tax dispute resolution for entities across various industries in Ghana, Liberia and Sierra Leone.

Amos has also worked on many International Tax related assignments and Mergers & Acquisitions for clients in both Ghana, Liberia and Sierra Leone. These assignments involved advising clients on the tax and legal/regulatory implications of inbound investments, structuring options, tax planning considerations, tax implications of financial models and conducted tax due diligence assignments and tax health check reviews.

Amos has been involved in many thought leadership activities for the firm. He has been involved in writing a number of publications including newspaper articles, annual tax facts and figures, tax calendars and On-Point publications. He has also facilitated a number of external trainings under the PwC Business School programme

He is a member of the Association of Chartered and Certified Accountants (ACCA), Institute of Chartered Accountants (ICA) Ghana, and the Liberian Institute of Certified Public Accountants.





Andriamisa Ravelomanana

#### **Partner**

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# Madagascar



Key country contacts and their credentials

Andriamisa is a Partner in charge of PwC Madagascar and Partner of PricewaterhouseCoopers Tax & Legal. He has over 25 years of experience in tax and business law

His scope of intervention includes, inter alia, organizational, legal, financial and tax advices. He has provided technical, administrative and legal set-up of various projects affecting in particular the water and electricity sector, energy (hydrocarbons) and mines.

He has been acting as advisor in the context of number of acquisitions in a variety of industry sectors mainly mining sector, leading legal due diligence work in coordination with other PwC foreign offices such as PwC Finance (France). PwC South Africa, PwC Kenya, PwC China and PwC Australia, PwC England

He has gained ample experience working on projects like the takeover of the management of a HFO Power Plant Station in Madagascar by Symbion Power, AKUO's Implementation of Photovoltaic Panel, Implementation of various hydropower generators by VIMA, GC Solar sales and Installations of solar panel generator, assisting the Ministry of Energy in drafting the main decrees implementing the new electricity law, implementation of hydropower generators by FILATEX and tax and custom consultations focused on renewable energy.

Andriamisa is a member of the Madagascar Institute of Chartered Accountants, a member of Groupement des Entreprises de Madagascar and a member of France-Madagascar Chamber of Commerce and Industry.

He is also part of the World Bank Doing Business local correspondents regarding mainly starting business and paying tax indicators.







#### Lanto Ralison

#### **Director**

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# Madagascar



Key country contacts and their credentials

Lanto is Director of PwC Tax and legal Madagascar with more than 20 years of experience in Malagasy business law. Lanto has wide experience in corporate law, mergers and acquisitions, tax, legal and social due diligence, and regulatory issues in Madagascar.

Her intervention covers domestic and foreign companies. She has a good practice in implementation of foreign investments in Madagascar for having participated to multiple assistances to various foreign companies: French, Mauritius, Switzerland, Dutch, Asian, Australian, U.S and others. Those assistances include advice or opinion in relation to tax, foreign exchange control and other areas, including studies, analysis, due diligence regarding business acquisition or restructuration in various sectors such as trade, insurance, mining and petroleum activities.

Lanto experience conducted her to be part of World Bank Doing Business local correspondent regarding mainly starting business and paying tax indicators, acquisition of land regulation, foreign exchanges regulation.







Sylviane Rakotomanana

#### Manager

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# Madagascar



Key country contacts and their credentials

Sylviane is Manager of PwC Tax and legal Madagascar with ten years of experience in Malagasy business law. She has experience in the general practice in corporate law including assistance of local companies and her area of expertise covers in particular:

- Legal diagnosis of the project: elaboration of legal, tax and technical pre-feasibility studies review of compliance
- Tax and legal compliance work: assistance in case of legal audit, due diligence, drafting of tax memo, follow-up the application and obtention of various mandatory permit / visa / approval, incorporation of business and regularization of dormant activities, memos on overall legal and administrative procedures in relation to heavy operations (e.g. oil exploration or mining sector), Tax & legal aspects of company transactions: business sales; asset and share sales...
- Company secretarial services: preparation of draft acts formalizing the decisions of the corporate bodies, preparation of draft acts in the field of mergers and acquisitions

Sylviane assists clients focused in oil and gas activities in Madagascar and in Comoros. Her main clients are BP, TULLOW and MADAGASCAR OIL. She also assisted the public organization OMNIS for the change of its Articles of association which must be through a presidential decree. OMNIS is the technical body, representative of the State, whose mission is to ensure the management, development and promotion of the national hydrocarbon mining domain by implementing the national policy on the exploration and exploitation of national petroleum and mining resources.







Moussa Awe

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### Mauritania



Key country contacts and their credentials

Moussa brings his 10+ years of experience in Tax & Legal services in Mauritania and Senegal for client service to his role as Manager to PwC's Tax & Legal in Mauritania.

He has tax experience ranging from tax controversy and dispute resolution, mergers and acquisitions, structure advice, tax compliance reviews and tax policy initiatives.

His clients include multinational companies of all sizes and in varying industries including: exploration and production, drilling, oilfield services, manufacturing, financial services, and non-profit organizations, including EXXONMOBIL, TULLOW OIL, TOTAL E&P, SCHLUMBERGER, WARTSILA, VINCI, BOUYGUES, INEO, OCEANEERING, POLARCUS, BAKER HUGHES, QNB, HELICONIA, PETRONAS, AIRSWIFT, ...

Moussa holds a Tax law Degree from Lyon University and an Economic & Affairs Degree from Gaston Berger University

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#### Mahi Kane

#### **Partner**

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Key country contacts and their credentials

Mahi has been working in PricewaterhouseCoopers Tax & Legal for more than 15 years based in Dakar after a couple of months based in Paris. Before then, Mahi had worked in the tax department of Louis Vuitton Moet Hennessy Holding in Paris for 18 months.

He assists companies operating in various sectors such as Power plant, Oil & Gas, Telecom, Shipping, food industry, etc. He has good knowledge of the tax legislation pertaining to Oil & Gas operations, food industry, etc. Mahi has a significant experience in assisting companies in tax litigations. The main clients he assists on daily basis are Total Senegal, General Electric, Total, Baker Hugues, British Petroleum, Teranga Gold, ConocoPhillips, Air Liquide, Soboa (Castel), Woodside, Oceaneering, Weatherford, Kosmos.

Mahi daily assists world-class Oil & Gas businesses by tax and legal assistance, including:

- structuring legal and tax aspects of new investors' projects;
- negotiation and interpretation of conventions of establishment or large projects' special regimes schemes;
- · tax optimization;
- tax dispute;
- corporate negotiation and restructuring.

Main clients in oil & gas sector are:

Total Sénégal, British Petroleum, Kosmos, Boart Longyear Sénégal, Woodside, Oceaneering, Weatherford, Conocophillips, Schlumberger, Total E&P, etc.

Mahi holds a Master in tax and business law from the INSEEC Paris Business School. He is a Senegalese Chartered Tax Expert and registered as such with the National Association of Chartered Tax Experts





Noureddine Marzouk

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### Morocco



Key country contacts and their credentials

Noureddine is a Director in PwC Morocco's Tax team and has over 15 years of experience in local and international taxation.

He joined PwC in 2010. Since then, he has worked on tax planning, structuring and consultancy projects for a wide variety of multinational and local companies operating in Morocco.

Noureddine has developed recognized knowledge and expertise in different industries. He has led and supervised many tax structuring assignments in Oil Industry.

He holds an MBA degree from Al Akhawayn University in Morocco and has a Bachelors degree from the International Institute for Higher Education in Morocco







#### Ahmad Essak

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# Mozambique



Key country contacts and their credentials

Ahmad is the leader of the Tax & Legal Business Unit of PwC Mozambique. He is a lawyer registered with the Mozambican Bar Association (*Ordem dos Advogados de Mocambique*). Ahmad has over 17 years of experience in providing tax advice to clients in structuring and implementing their business in Mozambique and on M&A transactions, focusing on corporate and international tax.

Ahmad joined the firm in 2006. Since then, he has been engaged in providing tax assistance to numerous clients (most of them highly reputable multinationals), comprising, *inter alia*, of performance of tax due diligences, drafting tax reports on the tax framework for investors in Mozambique and in general, advising on the tax implications arising from specific transactions.

He has been deeply involved in six of the seven major transactions involving oil and gas participating interests in Mozambique by providing advice on the tax planning of the deals. This allowed him to build and leverage on the relationship with the country's main public stakeholders.







#### **Driaan Rupping**

#### **Partner**

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# Mozambique



Key country contacts and their credentials

Driaan is Partner in the Tax Business Unit of PwC Mozambique. He has over 10 years of experience in providing corporate and international tax advice to clients from both a South African and Mozambican perspective.

Seconded to the Mozambican firm in early 2013, for the past 7 years, Driaan has been involved in providing tax advice to local and international clients in structuring and implementing their businesses in Mozambique and on M&A transactions, focusing on corporate and international tax.

He is also engaged in providing tax assistance to numerous clients, (most of them highly reputable multinationals), comprising, *inter alia*, performance of tax due diligences and drafting tax reports on the tax implications arising from specific transactions in general.

His portfolio of clients covers a large number of subsidiaries and permanent establishments of multinational corporations in various sectors within Mozambique, including *inter alia*, the mining, oil and gas, financial, construction, manufacturing, retail, agriculture, tourism and services sectors.

Driaan holds a Masters degree in Tax Law (Macc Tax) from the University of Stellenbosch. He is a member of the South African Institute of Chartered Accountants.



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## **Imad Karrit**

#### **Senior Associate**

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Key country contacts and their credentials

Imad is currently a Tax Senior Associate in the area of Corporate and International Tax, having joined the firm in 2016.

Imad has over 4 years of experience in providing tax advice to clients in structuring and implementing their business in Mozambique, focusing on Corporate and International Tax.

He holds a Bcom in Law (Bcom Law) and a Law Degree (LLB) from the University of Pretoria. Imad also holds a Masters degree in International Trade and Investment Law (LLM) from the University of Pretoria.







Chantell Husselmann

### **Country Senior Partner**

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# Namibia



Key country contacts and their credentials

Chantell is the Country Senior Partner of PwC Namibia. She also serves as a Tax Partner with specialty in Indirect Taxation with over 15 years experience in the field of indirect taxes.

In addition to Chantell's role as Country Senior Partner, she also serves as the Tax Leader for PwC Namibia. As Tax Leader she leads the Tax department with a staff compliment in excess of 30 employees.

She has serviced a client portfolio from a broad range of industries. She has experience on facilitating consultations between large international groups small and medium enterprise industry, in particular retail, agricultural, construction, energy and utility, mining and tourism sectors.

Chantell further assists in the provision of tax clearance on the audits of clients from various industries, including financial service providers, medical service industries and large cross border retail groups.

Chantell she has gained extensive experience across a broad range of industries and clientele

Chantell is a retired president of the Institute of Chartered Accountants of Namibia (ICAN), she is currently a member of the Public Accounting and Auditors Board (PAAB), and a retired board member of PAAB. Chantell serves on the ICAN Tax Committee and is a Qualified Chartered Accountant, being a member of the Institute of Chartered Accountants of Namibia (ICAN) and South African Institute of Chartered Accountants (SAICA).





Johan Nel

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Key country contacts and their credentials

Johan is a Partner responsible for the Corporate and International Tax department at PwC Namibia.

Johan is also responsible for the income tax compliance team that manages Namibian compliance obligations for a top tax compliance portfolio, including local entities and multinational groups.

He has more than 13 years working experience with PwC, which includes preparing and reviewing current and deferred tax calculations, consulting on technical interpretation of the Namibian Income Tax, tax due diligences and health checks, consulting on funding structures and international tax structures, Receiver of Revenue liaison to obtain technical rulings and resolve technical queries, tax compliance, and consulting on employee taxes and related matters.

Johan has experience in consulting clients in various industries on local and cross-border transactions, collaborating with Namibian Regulatory and Tax Authorities, as well as, experts in the PwC global network.

Johan is a Qualified Chartered Accountant and a member of the Institute of Chartered Accountants of Namibia (ICAN) and South African Institute of Chartered Accountants (SAICA). Johan has completed an Advanced Course in Taxation, Advanced Course in VAT and a Course in Taxpayer Rights with the University of South Africa (UNISA).







Audrey van Antwerpen

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Key country contacts and their credentials

Audrey is a Senior Manager in the Indirect Tax department at PwC Namibia.

She started off her career with PwC in 2011 and has gained extensive experience as a trainee accountant and an audit manager on a vast array of clients operating in various industries including financial services, healthcare, construction, retail, fishing, logistics, and transport.

Her exposure includes being the audit manager of various groups, of which some of the groups required interoffice reporting as multinational clients. Audrey became the manager in the Indirect Tax department in our Walvis Bay office in August 2015 and is responsible for the Indirect Tax and Business School portfolios at the coast.

Audrey is a Qualified CA and a member of the Institute of Chartered Accountants of Namibia (ICAN) and South African Institute of Chartered Accountants (SAICA). She is currently busy with her dissertation in UNISA's Advanced Programme in Value-Added Tax.







Chijioke Uwaegbute

#### Partner

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Key country contacts and their credentials

Chijioke is a Partner and the Global Enterprises Tax Solutions (GETS) leader for West and Central Africa. He has 21 years of professional experience across various energy and utilities projects across Africa.

He has the primary responsibility of managing and driving the GE relationship and supporting all GE businesses in East West and Central Africa from a tax and regulatory standpoint.

Prior to joining PwC he was a regional Executive and Tax Director for Sub-Saharan Africa in GE with a responsibility to manage GE tax compliance and provide advice on tax structuring and tax planning for all GE businesses in the sub-region.

He also worked with KPMG, where he led the Gulf of Guinea tax desk – providing compliance and advisory services to companies operating in the GOG region in the areas of Oil and Gas, Power and Mining. He was also a key member of the firms Oil and Gas practice providing tax advisory servicers to companies in the upstream of the oil and gas sector.







Emuesiri Agbeyi

#### **Partner**

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Key country contacts and their credentials

Esiri is a Tax Partner with PwC Nigeria. Prior to this, she worked with the International Tax Services team of PwC New York focused on Africa. She has over 15 years of experience providing international tax services to multinational companies in various industry sectors.

Esiri has worked on a number of tax structuring assignments for multinational investors with interest in sub-Saharan Africa. She has also advised severally on optimal tax structures using tax efficient holding companies and regional hubs including tax efficient finance structures across Africa.

Esiri has led several tax due diligence and structuring assignments on behalf of private equity investor firms, worked as transaction advisor to a Global Brewer in its acquisition of five Breweries in Nigeria amongst others. She is also project manager for several compliance assignments provided to large multinational companies with operations in Nigeria.

She holds a BSc (Hons) in Microbiology, University of Ibadan. She is an Associate member of the Institute of Chartered Accountants of Nigeria (ICAN), and the Chartered Institute of Taxation Nigeria (CITN). She is also a chartered accountant with the Association of Certified Chartered Accountants (ACCA).







Ayo Akinduyite

#### **Associate Director**

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# Nigeria



Key country contacts and their credentials

Ayo Akinduyite has over 20 years work experience with Shell (a global leading International Oil Company) in the petroleum sector of the Nigerian economy with responsibility for tax compliance and assurance, transfer pricing, tax advocacy, tax advisory and planning, mergers and acquisition and dispute resolution.

He is vastly experienced in working with various teams to deliver high quality tax optimal deliverables in support of various projects at various stages of the Oil and Gas lifecycle phase and across different license arrangements both in Nigeria and Internationally, whilst providing a unique insight into the implication, compliance requirement and impact of various law changes. He is a key member of the industry advocacy team playing very important roles in the fiscal space to achieve a relatively balanced Petroleum Industry Act 2021 (PIA). At PwC, Ayo is at the forefront in engaging clients on the impact of the PIA on operations, governance, regulations and compliance processes.

Ayo holds a BSc in Physics and an MBA from the University of Lagos; he is an associate member of the Institute of Chartered Accountants of Nigeria (ICAN) and Chartered Institute of Management Accountant (CIMA).







## Tiwalade Otufale

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Key country contacts and their credentials

Tiwa is an Associate Director with the Transfer Pricing team at PwC Nigeria.

Tiwa has over 10 years experience in the provision of transfer pricing compliance and advisory services to clients in various industries. She has also been involved in providing transfer pricing services to numerous PwC clients in the oil and gas industry.

Specifically, she has worked with several clients and has been involved in preparing transfer pricing documentation, providing advice on the implementation and procedures for avoiding transfer pricing disputes, carrying out benchmarking studies and providing training to stakeholders and the wider audience.

Tiwa is a member of the Chartered Institute of Taxation (CIOT). She possesses an Advanced Diploma in International Taxation and is also a Chartered Tax Advisor.







Babatunde Olaniyi

## Senior Manager

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# Nigeria



Key country contacts and their credentials

Babatunde is a Senior Manager with the Tax and Regulatory Services unit with 8 years taxation and advisory experience with PwC Nigeria and PwC United Kingdom. His experience extends across the energy (oil and gas), utilities, mining, consumer & industrial products & services and financial services sector.

Babatunde has worked on several tax compliance, tax advisory, tax audits and financial reporting engagements involving clients in the oil & gas, financial services, telecommunication, consumer goods and pharmaceutical industries. These clients include some of the big multinationals listed on the London Stock Exchange market, listed indigenous companies, private oil & gas companies, power companies and a leading diversified conglomerate in Nigeria amongst many others.

Babatunde holds a Bachelor of Science degree in Accounting from Covenant University. He is an associate member of the Institute of Chartered Accountants of Nigeria, an associate member of the Chartered Institute of Taxation of Nigeria and an Advanced diploma in International Tax holder awarded by the Chartered Institute of Taxation, United Kingdom.







# Olayemi Williams

### Senior Manager

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# Nigeria



Key country contacts and their credentials

Olayemi is a Senior Manager within the Tax Reporting and Strategy team of Tax. She has over 12 years' experience with PwC Nigeria.

Her experience extends across the oil and gas, utilities and mining, manufacturing and financial services sector. She is an expert in oil and gas taxation having spent many years focused on servicing and providing tax support and advice to a wide range of companies in the sector.

Olayemi has been involved in and led various engagements providing tax advisory support for both multinationals and local companies, company restructuring and strategizing for tax effectiveness, leading tax compliance engagements as well as financial reporting in conjunction with the external audit teams.

Olayemi manages a varied number of oil and gas clients ranging from International oil companies to indigenous oil companies and is an expert on the complexities of their operations in the industry.

Olayemi holds a BA [Hons] Economics and Accounting from Coventry University, UK. She is a fellow of the Association of Chartered Certified Accountants (ACCA), a fellow of the Chartered Institute of Taxation (CITN) and a member of the Institute of Chartered Accountants of Nigeria (ICAN).







### Damilola Ibikunle

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# Nigeria



Key country contacts and their credentials

Damilola is a Senior Associate within the Transfer Pricing team of Tax with 3 years taxation experience with PwC Nigeria.

Damilola has been involved in various engagements providing tax and transfer pricing advisory support for both multinationals and local companies. She has worked on various oil and gas clients ranging from International to indigenous oil companies and has built knowledge on the complexities of their operations in the industry.

Damilola holds a BAgric [Hons] in Agricultural Economics from Osun State University, Nigeria. She is Associate member of the Institute of Chartered Accountants of Nigeria (ICAN) and an Affiliate member of the Association of Chartered Certified Accountants (ACCA).







## Chidera Ude

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Key country contacts and their credentials

Chidera is a Senior Associate within the Transfer Pricing team of Tax. He has 3 years' experience with PwC Nigeria.

His experience extends across the oil and gas industry, manufacturing and financial services sector. Chidera has been involved in various engagements providing transfer pricing compliance services, tax compliance and advisory support for both multinationals and local companies.

Chidera works on a varied number of oil and gas clients ranging from International oil companies to indigenous oil companies and developed knowledge on the complexities of their operations in the industry.

Chidera holds a BSc (Hons). Economics from Nnamdi Azikiwe University, Awka.







Moïse Kokolo

#### **Country Senior Partner**

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# Republic of Congo



Moise is Partner in Charge at PwC Congo and has over 20 years of professional experience. He is the Human Capital Leader in Francophone Sub-Saharan Africa and in charge of PwC Tax & Legal training. He is also a CEMAC licensed Tax Adviser under number 125.

Moise has extensive experience in international law and tax compliance, performing legal due diligence as well as financing projects, mergers and acquisitions. This includes negotiation of joint venture agreements, performance of acquisition transactions and legal secretary for oil and gas local and foreign companies.

Moïse has also worked on other legal and tax assignments, which allow him to work for several multinationals established in Congo and abroad and operating in various sectors of activity (banking, telecommunications, mining, oil and gas, etc.). As such, he was involved in the financial package for sub-regional projects, covering the countries of the Congo Basin. He was in charge of drafting financial documents relating to the IPO of multinationals with an active presence in the Congo Basin countries.

Moïse is the Leader Partner in charge of the Public Administrations relations. In this respect, he has assisted the Republic of Congo government for the overhaul of its regulatory framework, more specifically with the ministry in charge of the tourism and environment.

This cross-disciplinary experience has enabled him to have a good mastery of the oil and gas industry.

Moise holds a Post graduate diploma in Juriste Conseil d'Entreprise (Toulouse France), a Post graduate diploma in Private Law (DESS) with a major in Business Law (Toulouse - France), a Post graduate diploma of Advanced Studies (DEA) in Business Law (Toulouse - France).



**Emmanuel Le Bras** 

Francophone Africa Energy,

Utilities & Resources Leader.

**Partner** 

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# Republic of Congo



Emmanuel has over 20 years of professional experience, in a wide range of international projects in Africa, Asia, Europe and Middle East, both in enterprises and law firms in Republic of Congo, in DRC, in Senegal and abroad, in advising domestic and multinational companies in national and international tax and legal. Privileged contact for several locally based multinational clients due to his comprehensive knowledge of African countries.

Emmanuel is the PwC Francophone Africa Energy, Utilities & Resources Leader. He is also PwC Congo Tax & Legal Leader.

His portfolio is mainly composed of primarily oil and gas and companies ranging from independents desiring to enter into the international area to integrated majors. In this frame, he advises companies on upstream and midstream oil and gas acquisitions, operations and related activities.

With a concentration on international investments and cross-border transactions, his practice focuses on acquisitions, divestitures, trades, mergers, strategic commercial and business advice; large infrastructures projects; unitization, exploration, development and production operations; negotiations.

Emmanuel leads the Oil and Gas newsletters issued by the firm for the Republic of Congo, including the Newsalerts dedicated to the Congo Hydrocarbons sectors.

He holds a Post Graduate Diploma as Advisor of Enterprises, a Post Graduate Diploma in Business Law and a Masters degree in Civil law from the University of Rennes, France.





Zita Mbuana Makumbu

#### **Partner**

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Key country contacts and their credentials

Zita is Partner in the Tax & Legal team at PwC and has more than 18 years of professional experience. She is a CEMAC Licensed Tax Advisor. She coordinates the PwC OHADA activities in Sub-Saharan Francophone Africa

With a concentration on OHADA business law, Zita has an extensive practice in advising on corporate law compliance and optimization, including drafting deeds as part of the setting up and restructuring of companies and joint-ventures, and governance aspects.

She has wide experience in legal and tax compliance matters, negotiation of joint venture agreements, performance of tax and legal due diligences, financing projects, mergers and acquisitions transactions, incorporation and corporate secretariat covering various sectors (oil & gas sector upstream, mining, forestry sector).

Zita has assisted with multi-territories tax and legal structuring across the Francophone Africa region, notably advising on assets' acquisitions, recapitalizations, mergers and divestitures. She has a strong practice in leading legal due diligences services for foreign investors contemplating to do business in Congo, as well as legal reviews and audits for local companies.

She has a good knowledge of oil taxation regime, as well as of the special taxation regime of subcontractors companies in the oil sector.

Zita has a postgraduate diploma in tax law from the University of Douala (Cameroon) and a Master's degree in Civil law from the University of Brazzaville (Congo).





Benic M. Mbanwie Sarr

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Key country contacts and their credentials

Benic is Senior Manager in the Tax & Legal team at PwC and has more than 12 years of professional experience. She is a CEMAC Licensed Tax Advisor, CF n°143. She coordinates the PwC OHADA activities in Sub-Saharan Francophone Africa

Benic has wide experience in legal and tax compliance, finance projects, merger and acquisitions, corporate structuring, cross border transactions, legal due diligence, reviewing/drafting agreements and corporate governance assistance, tax audits, employment and immigration matters.

With a concentration on international investments and cross-border transactions, her practice focuses on mergers and acquisitions, finance projects. She has a strong practice in leading legal and tax due diligences services for foreign investors contemplating to do business in Congo.

Benic has extensive experience assisting national and multinational companies in diverse sector of activities: mining, oil and gas, telecommunication, in their operations in the Congo.

She has a good knowledge of oil taxation regime, as well as of the special taxation regime of subcontractors companies in the oil sector.

Benic has a postgraduate diploma as a corporate legal adviser from the University of Douala (Cameroon) and a postgraduate diploma in Business law from the University of Yaounde (Cameroon).





William Eastwood

#### **Partner**

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# South Africa



William is an admitted attorney and is a Partner in Corporate & International Tax in the Cape Town office of PwC.

William has over 20 years' experience in advising South African companies and multi-nationals (including oil and gas companies) on a range of corporate and international tax issues, including cross-border transactions, inward and outbound investments, South African exchange controls, implementation of BEE transactions, mergers and acquisitions and general local corporate tax issues. His experience includes facilitating African structuring and compliance advice utilising PwC's network of African firms.

He has also lectured on various topics. William has provided tax services to various oil and gas companies.





## **David Tarimo**

#### Partner |

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# Tanzania



Key country contacts and their credentials

David is a Tax Partner and Country Senior Partner in PwC Tanzania. He joined the Tanzania practice in 1995, and prior to this worked for 10 years in the London office of another big four firm.

His work experience in Tanzania of over 25 years covers tax compliance and advisory work for many of the major companies operating in Tanzania, including most of the listed companies and spanning a broad range of economic sectors (including agriculture, financial services, manufacturing, mining, oil and gas, telecommunications, utilities). The extractive sector (mining, and upstream oil and gas) is an area of particular specilisation.

David has also had significant involvement in national discussions on tax policy matters – including interactions with the Ministry of Finance (for example, participation in the Minister for Finance's Think Tank), Tanzania Revenue Authority ("TRA"), National Board of Accountants and Auditors ("NBAA"), Tanzania Private Sector Foundation ("TPSF") and various private sector bodies (including the Tanzania Chamber if Minerals ("TCM") and the Oil and Gas Association of Tanzania ("OGAT").

Apart from his role as Country Senior Partner (with effect from July 2014) he is also leader of the PwC Tanzania's Energy Utilities and Resources industry group. For many years he was a Tax Leader of the Tanzania tax practice (up to June 2017) and PwC's East Market Area in Africa (up to June 2018) and previously PwC's "Africa Central" region. He has also been Tax Leader for PwC's Africa Region (from July 2018 to June 2019).

#### **Qualifications:**

LLB Honours from Kings college, London University
Fellow of the Institute of Chartered Accountants in England and Wales
Member of the Chartered Institute of Taxation
Member of National Board of Accountants and Auditors of Tanzania (NBAA)
Registered Tax Consultant - Tanzania Revenue Authority







## Rishit Shah

#### **Partner**

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# Tanzania



Key country contacts and their credentials

Rishit is the head of the Tax practice at PwC Tanzania. He has been with PwC Tanzania since 1997 and was admitted as Partner in 2011.

Over the years he has developed extensive direct and indirect tax experience, and has carried out a number of advisory and planning assignments for many of the major companies operating in Tanzania, and across all sectors including many of the listed companies, companies operating in the telecommunications sector, manufacturing, extractive sector as well as major utilities. He has been involved in several assignments in relation to structuring, dispute resolution, health checks. In addition he has worked extensively with many industry and organisations in helping them articulate positions with regard to tax policy matters. He heads the Consumer Industrial Products and Services (CIPS) section of PwC Tanzania.

Indirect tax has been an area of particular specialisation, and in 2007 he was part of the PwC network team advising the Government of UAE on a possible introduction of VAT.

He brings a wealth of Tanzanian taxation experience and over the years have developed strong professional relationships with senior Revenue Authority officials.

#### **Qualifications:**

B.Sc. In Managerial and Administrative Studies, Aston university, Birmingham, UK Fellow of Association of Chartered Certified Accountants UK (ACCA) Member of National Board of Accountants and Auditors of Tanzania (NBAA) Registered Tax Consultant - Tanzania Revenue Authority







# Joseph Lyimo

#### **Partner**

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# Tanzania



Key country contacts and their credentials

Joseph has worked with PwC since 2001 with most of it being with PwC in Tanzania. He has principally specialised in indirect taxes and has spent two years on secondment to PwC New Zealand where he worked with the VAT (GST) practice in Auckland office.

Joseph is currently the Partner/ Director in charge of the Indirect Taxes and Company Administration Services Business Units. He has been very involved in providing indirect tax advice and company secretarial services to several entities in Tanzania and with significant experience in relation to the extractive (oil and gas) industry.

#### Qualifications:

M.A Revenue Law and Administration – University of Dar es Salaam School of Law LLB (Hons) - University of Dar es Salaam Advocate and Commissioner for Oaths - High Court of Tanzania Registered Tax Consultant - Tanzania Revenue Authority







Jonia Kashalaba

### Senior Manager

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# Tanzania



Key country contacts and their credentials

Jonia is a Senior Manager in the tax practice of PwC Tanzania. She has worked with PwC since 2010. She spent 18 months on secondment to PwC Ghana and 1 year on secondment to PwC Dubai.

Her experience includes working on international tax, due diligence, structuring, tax advisory and tax compliance services mainly specialising on direct taxes.

Specifically, she has been involved in preparation of tax structuring reports for multinational companies in various sectors, tax due diligence projects, providing assistance to clients during tax audits and in the dispute resolution process, conducting trainings to clients on various tax topics, assisting clients across various sectors with tax compliance and advising/assisting clients in setting up companies in Tanzania.

Experience in the sector includes: Advising a number of clients in the Oil and Gas sector and in the power and utilities sector and presentation to key players on tax issues specific to the upstream Oil and Gas sector.

#### Qualifications:

Bachelor of Accounting (Business Accounting & Finance)

Fellow of the Association of Chartered Certified Accountants UK (ACCA)

Member of National Board of Accountants and Auditors of Tanzania (NBAA)

Advanced Diploma in International Taxation (ADIT)

Registered Tax Consultant - Tanzania Revenue Authority







Francis Kamulegeya

# **Country Senior Partner**

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Key country contacts and their credentials

Francis is the Country Senior Partner of PwC Uganda. He has been with PwC for over 26 years working in the UK, Kenya and Uganda. Prior to joining PwC in the UK, Francis worked for a UK firm of Chartered Accountants in London for five years. Francis holds a Bachelor of Science degree in Agriculture Economics from Makerere University, Kampala, a member of the UK Chartered Institute of Taxation (CTA), Fellow of the Association of Chartered Certified Accountants (FACCA) as well as a member of the Institute of Certified Public Accountants of Uganda (ICPAU).

Besides advising private sector investors in the oil and gas sector in Uganda, Francis has also provided consultancy and advisory services to the Ministry of Energy and Mineral Development (MEMD) on various issues relating to the sector, including the establishment of the National Oil Company. He has also provided training to the Uganda Revenue Authority (URA) on petroleum fiscal regimes. Francis has been a lead adviser on several M&A transactions in the oil and gas sector, including assisting with due diligence and corporate structuring.

He has also served as a member of the Presidential Investors Round Table (PIRT) Technical Working Group on Oil and Gas in Uganda. He is a regular speaker and writer on oil and gas tax matters, and has presented technical papers at various seminars, workshops and forums in Uganda and at international conferences in London, Aberdeen, Texas, Cape Town and Istanbul amongst others, on investment opportunities, taxation, regulation and governance of the petroleum industry in Uganda. As part of his work he has also written various thought leadership articles for publication in the press and presented at numerous conferences.







## Pamela Natamba

#### **Partner**

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# Uganda



Key country contacts and their credentials

Pamela is a Partner in PwC Uganda. Pamela has worked with PwC for over 16years in tax consulting and advisory services in the UK (working with the energy and utilities team) and in Uganda.

She holds a Bachelor of Commerce degree from Makerere University, Kampala and a Masters Degree in Business Administration from Oxford Brookes University, UK. She is a Fellow of the Chartered Association of Certified Accountants (ACCA) and member of the Institute of Certified Public Accountants of Uganda (ICPAU). She is a councilmember of the Uganda Chamber of Mines and Petroleum.

Pamela is the Partner in charge of the oil and gas practice in Uganda. She has done extensive work with companies in upstream oil and gas. This has included lobbying the Government for amendments to tax laws on petroleum operations on behalf of the various contractors and sub contractors in the oil industry; tax advice to various start-ups in Uganda; was part of the team that delivered the oil and gas training for the Uganda Revenue Authority; has provided support to E&P companies with tax audits as well as tax disputes; has provided other tax advisory services of a varied nature to the international oil companies and their contractors/subcontractors.

Pamela 's experience also covers a broad range of assignments including tax compliance, tax planning and international structuring advice to a number of multi-national companies in a wide range of industries including energy and utilities.







Veronica Magembe

Manager - Tax Services

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Key country contacts and their credentials

Veronica is a Manager in the tax line of service. She has worked with PwC for over 10 years. She was seconded to PwC Ghana for two years during which she predominantly focused on the energy, mining and infrastructure industries. She holds a Bachelor of Statistics Degree from Makerere University, Kampala. She is a member of the Association of Chartered Certified Accountants (ACCA) and has an Advanced Diploma in International Taxation under Chartered Institute of Taxation, UK.

Veronica has been involved in the preparation of various tax consultancy assignments in the oil and gas sector, such as advice on the East African Petroleum Pipeline Project, the oil and gas training for the Uganda Revenue Authority, review of recoverable exploration expenditure incurred by one of the upstream oil companies in respect of one of the exploration blocks in Uganda. She has also been involved in lobbying the Ministry of Finance, Planning and Economic Development for change in tax laws and has provided support during various URA tax audits on E&P companies. She has also been involved in the provision of tax compliance services to a number of clients in the oil and gas sector.







Samson Ssonko

### **Senior Manager**

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Key country contacts and their credentials

Samson is a Senior Manager in the tax line of service. He has worked with PwC for over 14 years. He holds a Bachelor of Statistics Degree from Makerere University, Kampala. He is a Fellow of the Association of Chartered Certified Accountants (FCCA).

Samson has been involved in various tax consultancy projects and assignments in the Energy and Utilities sector together with the Electricity Regulation Authority, Ministry of Finance, Planning and Economic Development and the Uganda Revenue Authority. Some of these projects include tax advice and lobbying regarding the tax treatments of various elements of the different concession agreements that the each of the sector players have with the Government of Uganda.

He has also been involved in providing restructuring, training, health check, URA Audit and regular compliance services and engagements to a number of Energy and Utility clients, both in Uganda and outside Uganda.



