

## GOVERNMENT OF ZAMBIA

STATUTORY INSTRUMENT NO. 107 OF 2021

**The Income Tax Act**  
(Laws, Volume 19, Cap 323)**The Income Tax (Transfer Pricing) (Amendment) Regulations, 2021**

IN EXERCISE of the powers contained in sections 97C and 97D of the Income Tax Act, the following Regulations are made:

1. (1) These Regulations may be cited as the Income Tax (Transfer Pricing) (Amendment) Regulations, 2021, and shall be read as one with the Income Tax (Transfer Pricing) Regulations, 2000, in these Regulations referred to as the principal Regulations. Title and commencement  
S.I. No. 20 of 2000
- (2) These Regulations shall come into operation on 1st January, 2022, and shall have effect in relation to the charge of tax for the charge year ending on 31st December, 2022, and to each subsequent charge year.
2. Regulation 10 of the principal Regulations is amended by the deletion of the words "section 97A (2)" and the substitution therefor of the words "section 97A (1)". Amendment of Regulation 10
3. Regulation 11 of the principal Regulations is amended by the deletion of the words "section 97A (2)" and the substitution therefor of the words "section 97A (1)". Amendment of Regulation 11
4. Regulation 22A of the principal Regulations is amended—  
(a) in sub-regulation (1) by the deletion of the definition of "excluded multi-national enterprise group" and the substitution therefor of the following: Amendment of Regulation 22A

“excluded multi-national enterprise group” means, with respect to an accounting year of the group, a group having a total consolidated group revenue of less than four thousand seven hundred and ninety-five million Kwacha during the accounting year immediately preceding the reporting accounting year as reflected in the group’s consolidated financial statements for the preceding accounting year;

(b) by the deletion of subregulation (4) and the substitution therefor of the following:

(4) The standard template of a country-by-country report shall be

(a) in the Form set out in the Schedule; and

(b) submitted manually or electronically.

(c) in subregulation (7) by the deletion of paragraph (d) and the substitution therefor of the following:

(d) the State of tax residence of the surrogate parent entity is notified in accordance with this subregulation by the constituent entity resident tax purposes in its jurisdiction, that it is the surrogate parent entity; and

(d) by the deletion of the word “system” wherever the word appears and the substitution therefor with the word “systemic”.

Amendment  
to the  
Schedule

5. The principal Regulations are amended by the deletion of the Schedule to the Regulations and the substitution therefor of the Schedule set out in the Appendix.





PART II – Additional Information

<p><b>Name of the Multi-National Enterprise Group:</b> í í í í í í í í í í í í í í í í</p> <p><b>Fiscal year concerned:</b> í í í í í í í í í í í í í í í í</p>
<p><i>Please include any further brief information or explanation you consider necessary or that would facilitate the understanding of the compulsory information provided in the Country-by-Country Report</i></p>

DR S. MUSOKOTWANE,  
*Minister of Finance and National Planning*

Lusaka  
30th December, 2021  
[MFB/64/9/4c]

