Zimbabwe

RISK & COMPLIANCE REPORT

DATE: March 2018

Executive Summary - Zimbabwe	
Sanctions:	EU & US Financial and Arms embargo
FAFT list of AML Deficient Countries	No
Higher Risk Areas:	Supporter of / Safe Haven for International Terrorism Not on EU White list equivalent jurisdictions Corruption Index (Transparency International & W.G.I.)) World Governance Indicators (Average Score) Failed States Index (Political Issues)(Average Score)
Medium Risk Areas:	US Dept of State Money Laundering assessment Weakness in Government Legislation to combat Money Laundering Compliance with FATF 40 + 9 Recommendations

Major Investment Areas:

Agriculture - products:

corn, cotton, tobacco, wheat, coffee, sugarcane, peanuts; sheep, goats, pigs

Industries:

mining (coal, gold, platinum, copper, nickel, tin, diamonds, clay, numerous metallic and nonmetallic ores), steel; wood products, cement, chemicals, fertilizer, clothing and footwear, foodstuffs, beverages

Exports - commodities:

platinum, cotton, tobacco, gold, ferroalloys, textiles/clothing

Exports - partners:

China 21.1%, South Africa 15.1%, Democratic Republic of the Congo 12.1%, Botswana 10.8%, Italy 4.6% (2012)

Imports - commodities:

machinery and transport equipment, other manufactures, chemicals, fuels, food products

Imports - partners:

South Africa 51.9%, China 10% (2012)

Investment Restrictions:

The government's priority sectors for foreign investment are manufacturing, mining, and infrastructure development. In 2008, the government introduced the Indigenization Act, which requires that "indigenous Zimbabweans" own at least 51 percent of all enterprises. In March 2010, the government issued regulations to implement the Indigenization Act.

The government reserves several sectors for local investors. Under current laws, foreign investors wishing to participate in these sectors may only do so by entering into joint-venture arrangements with local partners. Foreign investors may not own more than 35 percent of the operation. These rules apply to the following industries:

Agriculture

- Primary production of food and cash crops
- Primary horticulture
- Game, wildlife ranching, and livestock
- Forestry
- Fishing and fish farming
- Poultry farming
- Grain milling
- Sugar refining

Transportation

- Road haulage
- Passenger bus, taxi, and car hire services
- Tourist transportation
- Rail operations

Retail and wholesale trade, including distribution

- Barber shops, hairdressing, and beauty salons
- Commercial photography
- Employment agencies
- Estate agencies
- Valet services
- Manufacturing, marketing, and distribution of armaments
- Water provision for domestic and industrial purposes
- Bakery and confectionary
- Tobacco packaging and grading post auction
- Cigarette manufacturing

. In 2008, the government amended the Mines and Minerals Act, outlining indigenization requirements for mining. For strategic energy minerals (coal, methane, uranium), the legislation would require mining companies engaged in extraction or exploitation to transfer ownership to the state of 51 percent of the shares; 25 percent would be without compensation. For precious metals and precious stones, 25 percent of the shares must be transferred to the state without compensation and a further 26 percent is required to be owned by the state or by indigenous Zimbabweans. The government is still deliberating amendments to the Mines and Minerals Act, which may include a “use it or lose it” provision for unexploited mining concessions, and new “indigenous” ownership requirements in the sector in line with the Indigenization Act. In addition, the government intends to amend the Precious Stones Trade Act to focus on diamonds in order to enforce, among other things, the 100 percent government ownership of diamonds, immediate separation of diamond mining and marketing activities and the promotion of value addition through the prohibition of exports of unpolished diamonds.

Contents

Section 1 - Background **5**

Section 2 - Anti – Money Laundering / Terrorist Financing **6**

FATF status 6

Compliance with FATF Recommendations 6

Key Findings from latest Mutual Evaluation Report (2007): 6

US Department of State Money Laundering assessment (INCSR) 9

Reports 12

International Sanctions 14

Bribery & Corruption 16

Corruption and Government Transparency - US State Department 16

Section 3 - Economy **17**

Banking 18

Stock Exchange 18

Section 4 - Investment Climate **19**

Section 5 - Government **33**

Section 6 - Tax **34**

Methodology and Sources **35**

Section 1 - Background

The UK annexed Southern Rhodesia from the [British] South Africa Company in 1923. A 1961 constitution was formulated that favored whites in power. In 1965 the government unilaterally declared its independence, but the UK did not recognize the act and demanded more complete voting rights for the black African majority in the country (then called Rhodesia). UN sanctions and a guerrilla uprising finally led to free elections in 1979 and independence (as Zimbabwe) in 1980. Robert MUGABE, the nation's first prime minister, has been the country's only ruler (as president since 1987) and has dominated the country's political system since independence. His chaotic land redistribution campaign, which began in 2000, caused an exodus of white farmers, crippled the economy, and ushered in widespread shortages of basic commodities. Ignoring international condemnation, MUGABE rigged the 2002 presidential election to ensure his reelection. In April 2005, the capital city of Harare embarked on Operation Restore Order, ostensibly an urban rationalization program, which resulted in the destruction of the homes or businesses of 700,000 mostly poor supporters of the opposition. President MUGABE in June 2007 instituted price controls on all basic commodities causing panic buying and leaving store shelves empty for months. General elections held in March 2008 contained irregularities but still amounted to a censure of the ZANU-PF-led government with the opposition winning a majority of seats in parliament. MDC opposition leader Morgan TSVANGIRAI won the most votes in the presidential polls, but not enough to win outright. In the lead up to a run-off election in late June 2008, considerable violence enacted against opposition party members led to the withdrawal of TSVANGIRAI from the ballot. Extensive evidence of violence and intimidation resulted in international condemnation of the process. Difficult negotiations over a power-sharing government, in which MUGABE remained president and TSVANGIRAI became prime minister, were finally settled in February 2009, although the leaders failed to agree upon many key outstanding governmental issues. MUGABE was reelected president in June 2013 in balloting that was severely flawed and internationally condemned.

Section 2 - Anti – Money Laundering / Terrorist Financing

FATF status

Zimbabwe is no longer on the FATF List of Countries that have been identified as having strategic AML deficiencies

Latest FATF Statement - 25 February 2015

Since June 2011, when Zimbabwe made a high-level political commitment to work with the FATF and ESAAMLG to address its strategic AML/CFT deficiencies, Zimbabwe has made significant progress to improve its AML/CFT regime. Zimbabwe has substantially addressed its action plan at a technical level, including by: adequately criminalising money laundering and terrorist financing; establishing adequate procedures to identify and freeze terrorist assets; establishing a financial intelligence unit; ensuring financial institutions are aware of and comply with their obligations to file suspicious transaction reports in relation to ML and FT; and ratifying the Terrorist Financing Convention. The FATF will conduct an on-site visit to confirm that the process of implementing the required reforms and actions is underway to address deficiencies previously identified by the FATF.

Compliance with FATF Recommendations

The last Mutual Evaluation Report relating to the implementation of anti-money laundering and counter-terrorist financing standards in Zimbabwe was undertaken by the Financial Action Task Force (FATF) in 2016. According to that Evaluation, Zimbabwe was deemed Compliant for 11 and Largely Compliant for 9 of the FATF 40 Recommendations.

Key Findings from latest Mutual Evaluation Report (2016):

Zimbabwe has a relatively new AML/CFT regime following the recent comprehensive review of its legal and institutional framework. Implementation of the new measures is emerging.

Zimbabwe has assessed and identified ML/TF risks in the NRA report which was released a few weeks before the on-site visit, and therefore too soon to impact on understanding of risks. Generally, the understanding of the risks is generic and fragmented. While the FIs particularly large banks and FIs with affiliation to international financial groups have a better understanding and modest mitigation controls, the other FIs and DNFBPs showed little or no understanding of ML/TF risks.

Zimbabwean laws do not require FIs and DNFBPs nor the company's registry to establish and verify the identity of a beneficial owner except in circumstances where a customer carries out a transaction classified as prescribed transaction. The FIs and, to a limited extent, the DNFBPs apply general basic CDD requirements but have limited understanding of the beneficial ownership requirements. In general, some FIs and the rest of the DNFBPs are yet to appreciate the concept of verification of the identity of a customer using independent, reliable sources of information.

Overall, Zimbabwe has a cross-cutting issue of low resources capacity, which has negatively affected the implementation of the AML/CFT measures by competent authorities.

Competent authorities have demonstrated a good national cooperation and coordination in the preparation of the NRA and the AML/CFT Strategy. There is however limited information on practical implementation of the coordination and cooperation measures against ML.

The quality and use of financial intelligence is less developed largely due to expertise and resources constraints to conduct, (i) proper analysis of reports by the BUPSML Unit and, (ii) parallel financial investigations to identify potential ML/TF cases by the Police and other LEAs.

There are no feedback mechanisms from the BUPSML Unit to reporting institutions on the reports filed, on the one hand, and on the Police and other LEAs' use of financial intelligence or other relevant information from the BUPSML Unit to initiate or support ML/TF cases, on the other hand.

There is little evidence on the use of financial intelligence from the BUPSML Unit to carry out ML investigations and prosecution.

Zimbabwe has not yet prioritised application of seizure and confiscation measures on property involving illegal proceeds as policy at national level. As a result, there is insignificant cases of seizure and confiscation of property related to ML and TF.

Zimbabwe regards TF as low risk and has demonstrated a good understanding of TF risks in the country.

The authorities demonstrated a good national cooperation and coordination when they investigated a suspected financing of terrorism case in which financial intelligence was prioritised to identify the movements of funds involved and successfully complete the investigation.

The legal and regulatory framework for registration and licensing as well as monitoring of the NPO sector is less developed, owing to a number of deficiencies and resources constraints at the NPO regulator. There has been no outreach to the NPO sector and the regulator has not yet identified the NPOs which pose high TF risk with a view to apply proportionate monitoring controls. Despite this, the national security agencies and specialised terrorism units have demonstrated a good understanding of the vulnerabilities facing the sector and with the cooperation of the NPO regulator have put in place mitigating controls to monitor the NPOs suspected of terrorism-related activities

Zimbabwe has a sound legal and regulatory framework to implement targeted financial sanctions in respect of UNSCRs 1267 and 1373. FIs have a good understanding of the requirements and, as such, have put in place adequate procedures and processes to apply the lists issued by the BUPSML Unit on the customers and transactions. The DNFBP sector showed very little awareness of the UNSCRs requirements.

Zimbabwe has no specific legal or regulatory measures to implement targeted financial sanctions in respect of proliferation financing.

Supervisors are in the process of developing a risk-based approach supervision framework following the recent release of a NRA findings. Generally, AML/CFT supervision of FIs and DNFBPs in Zimbabwe is less developed. Only the BUPSML Unit has carried out supervision of banks and recently started carrying out joint inspections with the non-bank supervisors, as they develop their own capacity. There has been no supervision of DNFBPs as the focus of the authorities was on FIs. No sanctions have been issued by the supervisors for noncompliance with AML/CFT requirements.

There is no adequate legal and regulatory framework to obtain and maintain beneficial ownership information on legal persons and arrangements. No comprehensive and sufficient risk assessment of ML/TF risks has been conducted on companies. The Registrar has no supervisory capacity including ensuring that the information it obtains and keeps, is accurate and up-to-date.

Zimbabwe has a sound framework for provision of MLA and other forms of international cooperation. However, these measures have been applied on predicate offences only and not on ML and TF cases.

Risks and General Situation

Since the last Mutual Evaluation in 2007, Zimbabwe underwent a comprehensive review of its AML/CFT regime. This exercise led to a number of new laws and amendments to the Mutual Evaluation Report of Zimbabwe-September 2016 existing legislations to strengthen the regime. Before this process, the primary legislations underpinning the AML/CFT regime were; Criminal Law (Codification and Reform) Act, 2006, Serious Offences Act, 2001 and the Bank Use Promotion and Suppression of Money Laundering Act, 2002. In 2013, Zimbabwe passed the Money Laundering and Proceeds of Crime Act (MLPC Act) which is a composite legislation criminalising money laundering (ML) and terrorist financing (TF). The Act also provides for provisional and confiscation measures, preventative measures and supervision responsibilities, and sanctions for failure to comply with obligations and commission of ML and TF offences.

Although Zimbabwe has strengthened its AML/CFT legal framework, the country has low institutional capacity to implement the new measures. The majority of the Financial Institutions (FIs), Designated Non-Financial Businesses and Professions (DNFBPs) and the Competent Authorities are still in the early stages of developing and implementing their policies, procedures and processes to take into account the new framework.

Zimbabwe has no measures in place to implement proliferation financing requirements.

Zimbabwe completed a National Risk Assessment (NRA) in July 2015, and has identified five predicate offences generating the most proceeds, as follows: smuggling, illegal dealings in precious stones, corruption, fraud and tax crimes including externalisation of currency (in that order). The NRA showed that 16 predicate crimes contributed about USD 1.8 billion in 2013. This was estimated at 13 percent of Gross Domestic Product (GDP) in 2013. There were some ML cases investigated and prosecuted arising from some of the predicate offences.

The general ML risk situation in Zimbabwe changed during the period of hyperinflation which resulted in structural changes to the economy, as follows:

- Zimbabwe introduced a multi-currency system in 2009 in which nine currencies1 became legal tender in place of the Zimbabwean Dollar (ZWD) which had collapsed. Botswana Pula, the South African Rand (ZAR) and the United States of America Dollar (USD) are widely used. The USD is the settlement currency for international transactions and central securities depository systems. Following the introduction of the multi-currency system, the authorities identified increase in criminal activities with organised cross-border characteristics mainly to conversion of foreign currencies, in particular, transactions involving the ZAR and the USD.

- Zimbabwe experienced significant rise in inflows of remittances mainly from Botswana and South Africa as well as the USA and the United Kingdom due to the substantial increase in emigration. The official estimated figure was 5.9 percent of GDP in 2013.

- The economy has become cash-intensive and informal following the collapse of the ZWD which had eroded public confidence in the formal financial sector. This means that the transactions conducted in cash and outside of the formal sector are not being recorded and therefore difficult to monitor by the authorities.

The NRA identified "externalisation of currency" (i.e. sending currency out of Zimbabwe without formal approval from the Exchange Control Department of the Reserve Bank of Zimbabwe) as a major concern. The main typologies observed were, (i) individuals who physically carried cash across the borders, (ii) and legal entities transferring funds to foreign jurisdictions using personal or non-business accounts to avoid detection.

Among the existing FIs, the NRA has identified the banking sector (based on materiality and links with the global financial sector) as the most exposed to risks of ML and proceeds of associated predicate crimes. The most vulnerable DNFBPs to ML and proceeds associated predicate crimes are precious stones and metals dealers, lawyers and the real estate sectors. Cash couriers largely use informal, unregulated foreign currency changers to convert proceeds. Botswana Pula, South African Rand and the United States of America Dollar are the currencies which are widely used in the illegal transactions.

The legal regime on terrorism and terrorism financing is contained in the Suppression of Foreign and International Terrorism Act and the MLPCA. The NRA concluded that the risk of TF in the country is low considering a number of factors including risk level in the region, understanding of TF threats and risks by relevant competent authorities and FIs' risk assessments and absence of known TF or terrorism cases in the country.

US Department of State Money Laundering assessment (INCSR)

No longer catergorised a Jurisdiction of Primary Concern however the 2017 Report has not yet been published and, therefore, below is the 2016 report.

Zimbabwe was deemed a Jurisdiction of Primary Concern by the US Department of State 2016 International Narcotics Control Strategy Report (INCSR).

Key Findings from the report are as follows: -

Perceived Risks:

Zimbabwe is not a regional financial center, but it does face problems related to money laundering and corruption. Serious financial crime in Zimbabwe generally appears in the form of various violations of exchange control rules; underground banking; cross-border crime; organized syndicates, both domestic and international; non-transparency in diamond production receipts; and increased cooperation among criminal networks and links with legal business activity, resulting in corruption and bribery.

Regulatory and enforcement deficiencies in Zimbabwe's AML/CFT regime expose the country to illicit finance risks, but there are no reliable data as to the actual extent of the problem. Commercial banks, building societies, moneylenders, insurance brokers, realtors, and lawyers in Zimbabwe are all vulnerable to exploitation by money launderers. Nearly all transactions in Zimbabwe are carried out with either the U.S. dollar or the South African rand.

The United States, Canada, Australia, and the EU have imposed targeted financial sanctions and travel restrictions on some political leaders and a limited number of private companies and state-owned enterprises for complicity in human rights abuses or for undermining democratic processes or institutions in Zimbabwe. Effective November 1, 2014, the EU lifted Article 96 restrictions, which previously limited EU development assistance to Zimbabwe. Currently, the EU maintains active restrictions against President Mugabe, Grace Mugabe, and Zimbabwe Defense Industries, and an arms embargo. The EU reviews its restrictions annually. Although the EU delisted the Zimbabwe Mining Development Corporation (ZMDC) and the Minerals Marketing Corporation of Zimbabwe (MMCZ) from its list of sanctioned entities in September 2013, the United States maintains sanctions on the ZMDC and MMCZ.

Do financial institutions engage in currency transactions related to international narcotics trafficking that include significant amounts of US currency; currency derived from illegal sales in the U.S.; or illegal drug sales that otherwise significantly affect the U.S.: NO

Criminalization of money laundering:

"All serious crimes" approach or "list" approach to predicate crimes: All serious crimes

Are legal persons covered: criminally: YES ***civilly:*** YES

Know-your-customer (KYC) rules:

Enhanced due diligence procedures for PEPs: Foreign: YES ***Domestic:*** YES

KYC covered entities: Commercial banks, acceptance houses, discount houses, money transfer agencies, bureaux de change, legal practitioners, accounting firms, pension funds, real estate agents, cash dealers, and finance houses

REPORTING REQUIREMENTS:

Number of STRs received and time frame: 355: January 1 - October 31, 2014

Number of CTRs received and time frame: Not applicable

STR covered entities: Commercial banks, acceptance houses, discount houses, money transfer agencies, bureaux de change, legal practitioners, accounting firms, pension funds, real estate agents, cash dealers, and finance houses

money laundering criminal Prosecutions/convictions:

Prosecutions: Not available

Convictions: Not available

Records exchange mechanism:

With U.S.: MLAT: NO ***Other mechanism:*** NO

With other governments/jurisdictions: YES

Zimbabwe is a member of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), a FATF-style regional body.

Enforcement and implementation issues and comments:

The Government of Zimbabwe sometimes abuses AML legislation for political purposes. Widespread corruption impedes the proper implementation of Zimbabwe's AML/CFT regime. Although several reform-oriented ministers from the opposition party are no longer in the government, Parliament's 20 portfolio committees, including some chaired by opposition members of parliament, continue to offer opportunities for oversight of the executive branch.

Due primarily to production in the Marange diamond fields, Zimbabwe is the world's sixth largest producer of diamonds by volume. Yet Zimbabwe's diamond revenue is non-transparent. There have been reports of collusion between some mining companies and members of the military and secret police. In a form of trade and service-based laundering, management of the mining companies also presented grossly inflated procurement receipts for mining equipment and other materials and, according to government reports, pocketed the difference. The Ministry of Finance has promised to tighten controls in future legislation and to enhance the revenue authority's oversight of the production and sale of diamonds. Ultimate responsibility for this legislation lies with the Ministry of Mines and Mining Development. The ministry has not yet produced a draft act, but the Minister of this department has promised to improve accountability within the diamond mining sector.

Regulation and enforcement in the financial sector is weak, mainly due to a lack of trained regulators and financial crimes investigators. Regulatory and law enforcement agencies lack the resources and capacity to effectively combat money laundering. Many financial institutions are unaware of – or simply fail to comply with – their obligations to file STRs. During the period under review, Zimbabwe's Financial Intelligence Unit (FIU) noted improved cooperation between itself and the law enforcement agencies.

Zimbabwe's framework to freeze terrorist assets has yet to be proven effective. Financial institutions typically receive information related to UN designations from private sources or companies rather than from the government.

Between January and October 2015, the FIU referred eight cases to relevant law enforcement agencies for further investigation. The outcomes of 2013, 2014, and 2015 investigations and prosecutions are still pending.

The Money Laundering and Proceeds of Crime Act (MLPCA) of 2013 brought amendments to the Bank Use Promotions and Suppressing of Money Laundering Act, Building Societies Act, Criminal Matters (Mutual Assistance) Act and the Asset Management Act.

The MLPCA widens the applicability of the Criminal Matters Act (CMA), which deals with mutual legal assistance and appears to assist the investigation and prosecution of terrorist financing. However, this has not yet been demonstrated. While the MLPCA removes key legal impediments to mutual legal assistance, only effective implementation of the CMA will demonstrate its effectiveness. The MLPCA also bars citizens from dealing with shell banks.

Zimbabwe has made some progress in improving its AML/CFT regime. The FIU is fully operational and there have been political commitments to continue the development of anti-money laundering countermeasures. Zimbabwe should ensure that implementation of the MLPCA is underway, combat widespread corruption that permeates government and commerce, and take steps to investigate and prosecute money launderers.

Current Weaknesses in Government Legislation (INCRS Comparative Tables):

According to the US State Department, Zimbabwe does not conform with regard to the following government legislation: -

Report Large Transactions - By law or regulation, banks and/or other covered entities are required to report large transactions in currency or other monetary instruments to designated authorities.

Ability to freeze assets without delay - The government has an independent national system and mechanism for freezing terrorist assets in a timely manner (including but not limited to bank accounts, other financial assets, airplanes, autos, residences, and/or other property belonging to terrorists or terrorist organizations)

EU White list of Equivalent Jurisdictions

Zimbabwe is not currently on the EU White list of Equivalent Jurisdictions

World Governance indicators

To view historic Governance Indicators Ctrl + Click here and then select country

Failed States Index

To view Failed States Index Ctrl + Click here

Offshore Financial Centre

Zimbabwe is not considered to be an Offshore Financial Centre

Reports

US State Dept Narcotics Report:

No report available

US State Dept Trafficking in Persons Report 2016 (introduction):

Zimbabwe is classified a Tier 3 Country. This is a country whose governments does not fully comply with the TVPA's minimum standards, and: a) the absolute number of victims of severe forms of trafficking is very significant or is significantly increasing; b) there is a failure to provide evidence of increasing efforts to combat severe forms of trafficking in persons from the previous year; or, c) the determination that a country is making significant efforts to bring themselves into compliance with minimum standards was based on commitments by the country to take additional future steps over the next year

Zimbabwe is a source, transit, and destination country for men, women, and children subjected to sex trafficking and forced labor. Women and girls from Zimbabwean towns bordering South Africa, Mozambique, and Zambia are subjected to forced labor, including domestic servitude, and sex trafficking in brothels catering to long-distance truck drivers on both sides of the borders. There are continuous reports of Zimbabwean women lured to China and the Middle East for work where they are vulnerable to trafficking. Zimbabwean men, women, and children are subjected to forced labor in agriculture and domestic service in the country's rural areas, as well as domestic servitude and sex trafficking in cities and surrounding towns. Family members recruit children and other relatives from rural areas for work in cities where they are often subjected to domestic servitude or other forms of forced labor; some children, particularly orphans, are lured with promises of education or adoption. Reports indicate that adults have recruited girls for child sex trafficking in Victoria Falls.

Children are subjected to forced labor in the agricultural and mining sectors and are forced to carry out illegal activities, including drug smuggling. There were increased reports of children from Mozambique being subjected to forced labor in street vending in Zimbabwe, including in Mbare. Additionally, the practice of ngozi, giving a family member to another family to avenge the spirits of a murdered relative, creates a vulnerability to trafficking. Zimbabwean women and men are lured into exploitative labor situations in agriculture, construction, information technology, and hospitality largely in neighboring countries; some subsequently become victims of forced labor, and some women become victims of forced prostitution. Many Zimbabwean adult and child migrants in South Africa often enter with the assistance of taxi drivers who transport them to the border at Beitbridge or nearby unofficial crossing locations and are subject to labor and sex trafficking. Some of the migrants are transferred to criminal gangs that subject them to abuse, including forced prostitution in Musina, Pretoria, Johannesburg, or Durban. Some Zimbabwean men, women, and children in South Africa are subjected to months of forced labor without pay, on farms, at construction sites, in factories, mines, and other business. Men, women, and children, predominantly from East Africa, are transported through Zimbabwe en route to South Africa; some of these migrants are trafficking victims. Refugees from Somalia and Democratic Republic of the Congo reportedly travel from Zimbabwe's Tongogara Refugee Camp to Harare, where they are exploited and, in some cases, forced into prostitution. Chinese nationals are reportedly forced to labor in restaurants in Zimbabwe. Chinese construction and mining companies reportedly employ practices indicative of forced labor, including verbal, physical, and sexual abuse, and various means of coercion to induce work in unsafe or otherwise undesirable conditions.

The Government of Zimbabwe does not fully meet the minimum standards for the elimination of trafficking and is not making significant efforts to do so. Official complicity in trafficking crimes remained a concern. The government made minimal efforts to protect trafficking victims, instead relying on NGOs to identify and assist victims. The government made limited efforts to collaborate with NGOs on the issue of trafficking. The government began investigation into the trafficking of 200 women to Kuwait during the reporting period; however it did not prosecute or convict any trafficking offenders during the reporting period. The government appointed the permanent secretary of home affairs to chair the Anti-Trafficking Inter-Ministerial Committee (ATIMC) in December 2015. It developed its first national action plan in September 2015, which remained pending cabinet approval at the end of the reporting period.

Latest US State Dept Terrorism Report

Zimbabwean government agencies routinely provided assistance by conducting investigative inquiries, traces, and border checks of individuals thought to be threats to U.S. government facilities or personnel. Zimbabwe's continued economic decline, however, has had a detrimental impact on local law enforcement and national security elements responsible for implementing and coordinating counterterrorism efforts. The Suppression of Foreign and International Terrorism Bill, enacted in August 2007 to combat terrorism and mercenary activities in Zimbabwe, was redirected to suppress opponents of Zimbabwe's political leaders and policies. Although generally cooperative, Zimbabwean law enforcement officials have been reluctant to take or recommend actions that would be seen as pro-American. This has undermined efforts to foster greater cooperation.

International Sanctions

EU legislation

Arms

The main EU legislation regarding Zimbabwe is Council Regulation (EC) No 310/2002. It has been in force since 18 February 2002.

The Regulation provides for an arms embargo and ban on export of equipment for internal repression, as well as a number of other sanctions. In February 2004, the embargo was renewed by Common Position 2004/161/CFSP and modified by Council Regulation (EC) No 314/2004. This regulation introduced prohibitions on the granting, selling, supply or transfer of technical assistance related to military equipment.

Financial

In 2002 the European Union imposed restrictive measures, including among other matters, a freeze on the assets of selective members of the Government of Zimbabwe and individuals associated with them.

Current EU regulations

- 27.03.2013 – Council Regulation (EU) No 298/2013
- 21.02.2012 – Commission Implementing Regulation (EU) No 151/2012 Amended Annex III to Council Regulation (EC) No 314/2004
- 23.02.2011 Commission Regulation (EU) No 174/2011 Amended Annex III to Council Regulation (EC) No 314/2004
- 25.02.2010 Commission Regulation (EU) No 173/2010 Amended Council Regulation (EC) No 314/2004 concerning certain restrictive measures in respect of Zimbabwe
- 21.03.2009 Corrigendum to Commission Regulation (EC) No 77/2009 Amended Annex III to Council Regulation (EC) No 314/2004
- 17.02.2009 Corrigendum to Commission Regulation (EC) No 77/2009 Amended Annex III to Council Regulation (EC) No 314/2004
- 26.01.2009 Commission Regulation (EC) No 77/2009 Amended Annex III to Council Regulation (EC) No 314/2004
- 08.12.2008 Commission Regulation (EC) No 1226/2008 Amended Annex III to Council Regulation (EC) No 314/2004

- 23.07.2008 Commission Regulation (EC) No 702/2008 Amended Annex III to Council Regulation (EC) No 314/2004
- 02.07.2007 Commission Regulation (EC) No 777/2007 Amended Annex III to Council Regulation (EC) No 314/2004
- 16.04.2007 Commission Regulation (EC) No 412/2007 Amended Annex III to Council Regulation (EC) No 314/2004.
- 02.03.2007 Commission Regulation (EC) No 236/2007 Amended Annex III to Council Regulation (EC) No 314/2004.
- 01.08.2005 Commission Regulation (EC) No 1272/2005 Amended Annex III to Council Regulation (EC) No 314/2004.
- 15.06.2005 Commission Regulation (EC) No 898/2005 Amended Annex III to Council Regulation (EC) No 314/2004.
- 19.02.2004 Council Regulation (EC) No 314/2004 Replaced Council Regulation (EC) No 310/2002. The measures included a ban on technical assistance, financing and financial assistance related to military activities, a ban on the export of equipment which might be used for internal repression, and the freezing of funds and economic resources of members of the Government of Zimbabwe and of any natural or legal persons, entities or bodies associated with them.
- 18.02.2002 Council Common Position 2002/145/CFSP (PDF 98KB) Concerning restrictive measures including a visa ban on certain individual members of the Government of Zimbabwe and persons associated with them, and an asset freeze.

OFAC (US) Sanctions

On March 7, 2003, as a result of actions and policies by certain members of the government of Zimbabwe, and its supporters to undermine democratic institutions and processes in Zimbabwe, President Bush issued Executive Order 13288 imposing sanctions against specifically identified individuals and entities in Zimbabwe. On November 23, 2005, the President issued a new Executive Order superseding E.O. 13288. The new Executive Order (E.O. 13391) expands the list of sanctions targets to include immediate family members of any designated individual of the Zimbabwe sanctions, as well as those persons providing assistance to any sanctions target. Providing statutory authority for these sanctions is the International Emergency Economic Powers Act ("IEEPA"), the National Emergencies Act and sections 301 of title 3 of the United States Code.

This fact sheet provides general information about the Zimbabwe sanctions program imposed by the new Executive Order and administered by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC").

PROHIBITED TRANSACTIONS - Executive Order 13391 prohibits U.S. persons, wherever located, or anyone in the United States from engaging in any transactions with any person, entity or organization found to: 1.) be undermining democratic institutions and processes in Zimbabwe; 2.) have materially assisted, sponsored, or provided financial, material, or technological support to these entities; 3.) be or have been an immediate family member of a sanctions target; or 4.) be owned, controlled or acting on behalf of a sanctions target.

Persons, entities and organizations referenced in Annex A of the Executive Order are all incorporated into OFAC's list of Specially Designated Nationals (SDNs). Prohibited transactions include, but are not limited to, exports (direct and indirect), imports (direct and indirect), trade brokering, financing and facilitation, as well as most financial transactions.

Attempts to evade or avoid these sanctions are also prohibited. These prohibitions also extend to any person, organization or entity found to be owned, controlled or acting on behalf of any Zimbabwe entity included on the SDN list.

Under the Executive Order, U.S. persons are also required to block any property of any Zimbabwe Specially Designated Nationals that is in the United States, that comes into the United States, or that comes under the control of a U.S. person wherever located. The term property includes, but is not limited to, money, checks, drafts, bank accounts, securities and other financial instruments, letters of credit, bills of sales, bills of lading and other evidences of title, wire transfers, merchandise and goods. Blockable property also includes any property in which there is any interest of a Zimbabwe SDN, including direct, indirect, future or contingent, and tangible or intangible interests.

Foreign branches and representative offices of U.S. companies, as well as U.S. branches and representative offices of foreign companies are considered U.S. persons for purposes of these prohibitions.

Transactions that do not involve any of the Zimbabwe SDNs, or any person or entity believed to be owned, controlled or acting on behalf of a Zimbabwe SDN are not prohibited by the new Executive Order.

Bribery & Corruption

Index	**Rating (100-Good / 0-Bad)**
Transparency International Corruption Index	22
World Governance Indicator – Control of Corruption	9

Across all sectors, corruption is a very high risk for companies operating in Zimbabwe. Investors face both high-level corruption in the form of nepotism, patronage and abuse of power, as well as petty bribery and extortion. The Prevention of Corruption Act prohibits active and passive bribery, gifts and facilitation payments in the public and private sectors, but such practices are common. Companies can be held criminally liable. The maximum punishment for corruption offenses is 20 years' imprisonment, fines, or both, but the government enforces the law selectively, targeting mostly political opponents. **Information provided by GAN Integrity.**

Corruption and Government Transparency - US State Department

In 2005, the government enacted an Anti-Corruption Act that established a government-appointed Anti-Corruption Commission (ACC) to investigate corruption. However, the ACC did not include any members from civil society or the private sector. The government of national unity (GNU) enhanced the institutional capacity of the ACC with members appointed from civil society and the private sector. However, when the ACC's term of office expired, the new ACC did not include civil society and private sector representatives. The government prosecutes individuals selectively, focusing on those who have fallen out of favor with ZANU-PF and ignoring transgressions by members of the favored elite. Accusations of corruption are used a political tool but seldom result in formal charges and convictions.

The government also created a policy to improve accountability in the use of state resources through the introduction of the Public Finance Management Act in March 2010. In spite of this, corruption is still endemic, especially within the diamond sector where production and export figures are largely unreliable. In this respect, the government has introduced a Diamond Policy that focuses on ensuring the 100 percent government ownership of all alluvial diamonds in the ground and the involvement of the Zimbabwe Revenue Authority (ZIMRA) in the entire value chain of diamond production. The government has also considered implementing the World Bank's Extractive Industries Transparency Initiative (EITI) principles in order to strengthen accountability, good governance, and transparency in the mining sector. However it has yet to launch an EITI program in Zimbabwe.

Section 3 - Economy

Zimbabwe's economy depends heavily on its mining and agriculture sectors. Following a decade of contraction from 1998 to 2008, the economy recorded real growth of more than 10% per year in the period 2010-13, before slowing to roughly 3% in 2014 due to poor harvests, low diamond revenues, and decreased investment. Lower mineral prices, infrastructure and regulatory deficiencies, a poor investment climate, a large public and external debt burden, and extremely high government wage expenses impede the country's economic performance.

Until early 2009, the Reserve Bank of Zimbabwe (RBZ) routinely printed money to fund the budget deficit, causing hyperinflation. Dollarization in early 2009 - which allowed currencies such as the Botswana pula, the South Africa rand, and the US dollar to be used locally - ended hyperinflation and reduced inflation below 10% per year. The RBZ introduced bond coins denominated in 1, 5, 10, and 25 cent increments on a par with the US dollar in December 2014, more than five years after the Zimbabwe dollar was taken out of circulation. In January 2015, as part of the government's effort to boost trade and attract foreign investment, the RBZ announced that the Chinese renmimbi, Indian rupee, Australian dollar, and Japanese yen would be accepted as legal tender in Zimbabwe.

Zimbabwe's government entered a second Staff Monitored Program with the IMF in 2014 and undertook other measures to reengage with international financial institutions. Foreign and domestic investment continues to be hindered by the lack of clarity regarding the government's Indigenization and Economic Empowerment Act. In 2015 the depreciation of the South African rand against the US dollar has led to deflation in Zimbabwe as prices for South African imports decline while the costs of domestic production in US dollars remains stable.

Agriculture - products:

tobacco, corn, cotton, wheat, coffee, sugarcane, peanuts; sheep, goats, pigs

Industries:

mining (coal, gold, platinum, copper, nickel, tin, diamonds, clay, numerous metallic and nonmetallic ores), steel; wood products, cement, chemicals, fertilizer, clothing and footwear, foodstuffs, beverages

Exports - commodities:

platinum, cotton, tobacco, gold, ferroalloys, textiles/clothing

Exports - partners:

China 27.8%, Democratic Republic of the Congo 14%, Botswana 12.5%, South Africa 7.6% (2015)

Imports - commodities:

machinery and transport equipment, other manufactures, chemicals, fuels, food products

Imports - partners:

South Africa 48.1%, China 12.1%, India 5.2%, Zambia 4.6% (2015)

Banking

Zimbabwe's banking system is surprisingly functional considering the economic crisis that has enveloped the country over the last few years. But its fragility ha been exposed by the bankruptcy of several banks during the last years and the country's dependence on the willingness of foreign banks to maintain their branches in Zimbabwe.

Stock Exchange

The first stock exchange in Zimbabwe opened in Bulawayo in 1896. The present exchange, The Zimbabwe Stock Exchange only opened up to foreign investment in 1993.

Section 4 - Investment Climate

Executive Summary

While the government of Zimbabwe has implemented a number of measures since 2009 designed to attract foreign direct investment (FDI), many of its macroeconomic policies, such as the indigenization and economic empowerment laws, are significant deterrents. The country's commitment to the use of the multicurrency monetary regime, under which the U.S. dollar dominates most transactions, continues to stabilize and restore business confidence in the economy as it removes the exchange-rate risk associated with the use of domestic currencies.

In addition, Zimbabwe's successful completion of the International Monetary Fund (IMF) fifteen-month Staff-Monitored Program (SMP) acted as a useful anchor for implementation of more sound macroeconomic policies. Zimbabwe also has a number of incentives designed to attract FDI, including tax breaks for new investment by foreign and domestic companies and allowing capital expenditures on new factories, machinery, and improvements to be fully tax deductible. The government also waives import taxes and surtaxes on capital equipment.

In spite of these positive developments, the country still needs to implement a comprehensive economic reform program designed to address the debt burden and attract foreign financial inflows at concessionary rates. In addition, corruption is rife and there is little protection of property rights, particularly with respect to agricultural land. The government routinely expropriates land without compensation. Moreover, the inconsistent application of "indigenization" regulations, which sets minimum ownership levels by black Zimbabweans of enterprises valued over $500,000 at 51 percent in most economic sectors, continues to discourage investment.

Zimbabwe's arrears in payments to international financial institutions and high external debt overhang of over $10.7 billion complicate the situation by limiting the country's ability to access official development assistance at concessional rates. Additionally, the country's banks do not offer financing for periods longer than two years, with most financing available for 180 days or less. As a result of these negative factors, Zimbabwe generally ranks poorly in global comparisons of economic competitiveness.

Table 1

Measure	Year	Index or Rank	Website Address
TI Corruption Perceptions index	2015	150 of 175	transparency.org/cpi2015/results
World Bank's Doing Business Report "Ease of Doing Business"	2015	155 of 189	doingbusiness.org/rankings
Global Innovation Index	2015	133 of 143	globalinnovationindex.org/content/page/data-analysis
U.S. FDI in partner country ($M USD, stock positions)	N/A	N/A	N/A
World Bank GNI per capita	2014	USD 680	data.worldbank.org/indicator/NY.GNP.PCAP.CD

Millennium Challenge Corporation Country Scorecard

The Millennium Challenge Corporation, a U.S. Government entity charged with delivering development grants to countries that have demonstrated a commitment to reform, produced scorecards for countries with a per capita gross national income (GNI) of $4,125 or less. The most recent scorecard for Sri Lanka is available here: http://www.mcc.gov/pages/selection/scorecards. Details on each of the MCC's indicators and a guide to reading the scorecards are available here: http://www.mcc.gov/pages/docs/doc/report-guide-to-the-indicators-and-the-selection-process-fy-2015.

1. Openness To, and Restrictions Upon, Foreign Investment

Attitude toward Foreign Direct Investment

The government's policies reflect the need to attract greater FDI in order to improve the country's competitiveness, even if those policies are not fully supported in practice. The government encourages public-private partnerships in order to enhance technological development, while also emphasizing the need to improve the investment climate by restoring the rule of law and sanctity of contracts. The statements and actions of many senior government officials, however, are inconsistent with the desire to attract FDI and undermine investor confidence.

Despite extremely difficult economic conditions over the past decade, some U.S. companies have maintained subsidiaries in Zimbabwe. Other U.S. companies prefer to sell their products locally through certified dealers. Following commitment to implement limited economic reforms under the International Monetary Fund's (IMF) staff monitored programs (SMP) between 2013 and 2015, Zimbabwe witnessed a progressive increase in net FDI from $373 million in 2013 to $473 million in 2014, a figure which falls well short of its neighbors in the region.

In 2007, the government passed the Indigenization and Economic Empowerment Act, which requires that "indigenous Zimbabweans" (i.e. black Zimbabweans) own at least 51 percent of all enterprises valued over $500,000. In certain sectors, such as primary agriculture, transport services, and retail and wholesale trade including distribution, foreign investors may not own more than 35 percent equity. Application of the Indigenization Act is inconsistent, resulting in many questions regarding compliance with the Act.

Other Investment Policy Reviews

In the past three years, the government has not conducted an investment policy review through the Organization for Economic Cooperation and Development (OECD), the World Trade Organization (WTO) or the United Nations Conference on Trade and Development (UNCTAD).

Laws/Regulations on Foreign Direct Investment

As noted above, the Indigenization and Economic Empowerment Act requires that "indigenous Zimbabweans" (black Zimbabweans) own at least 51 percent of all enterprises valued over $500,000. In certain sectors, such as primary agriculture, transport services, and retail and wholesale trade including distribution, foreign investors may not own more than 35 percent equity. Application of the Indigenization Act is inconsistent, resulting in many questions regarding compliance with the Act. Moreover, there has been repeated executive interference in cases that have political overtones in.

Business Registration

Zimbabwe does not have an online registration process. The Zimbabwe Investment Authority (ZIA) is the country's investment promotion body set up to facilitate both foreign direct investment and local investment. ZIA's website is http://www.investzim.com/. The country encourages companies to register with ZIA and the process currently takes 90 days.

The country defines micro, small and medium-sized enterprises (MSMEs) as businesses with turnover ranging from one dollar to $999,999. As a special tax incentive, MSMEs may be eligible for 100 percent special initial allowance (SIA) on qualifying capital assets over a period of four years at 25% per year.

Industrial Promotion

The government, through ZIA, encourages investment in a number of sectors including agribusiness, energy and mining, food processing and packaging, health technologies, industrial equipment and supplies, manufacturing industries, textiles, apparel and sporting goods. The information is available on ZIA's website at: http://www.investzim.com/

Limits on Foreign Control and Right to Private Ownership and Establishment

While there is a right for foreign and domestic private entities to establish and own business enterprises and engage in all forms of remunerative activity, foreign ownership of businesses is limited to 49 percent (or less in certain sectors), as outlined above..

Zimbabwean law guarantees the right to private ownership although the government has increasingly ignored this right in practice. Since 2000, the government has seized thousands of private farms and conservancies, including those belonging to Americans and other foreign investors, without due process or compensation. Most of these property owners held ZIA investment certificates and purchased their land for fair market value after Zimbabwe's independence in 1980. Despite repeated U.S. advocacy, the government has not addressed the expropriation of property belonging to U.S. citizens.

Privatization Program

Since the start of the privatization program of its 76 state-owned enterprises (SOEs) in the 1990s, the government has only successfully privatized two parastatals. The government established a ministry responsible for state-owned enterprises in 2009 but disbanded it in 2013. Inter-SOE debts of nearly $1 billion pose challenges for privatization plans because they further weaken the entities' balance sheets. In addition, lack of political will and the enterprises' operational inefficiencies make it unlikely that privatization will accelerate in the near term.

Screening of FDI

The country screens FDI through the Zimbabwe Investment Authority (ZIA) in liaison with line ministries to confirm compliance with the country's investment and indigenization regulations. Once ZIA criteria are met, it issues the company or entity with an investment certificate.

A foreign investor wishing to establish a business in Zimbabwe requires an investment license issued by the Zimbabwe Investment Authority (ZIA) as defined by the ZIA Act and must obtain operating permits from relevant government agencies. In addition, the foreign investor must satisfy the previously described sector-based indigenization requirements. This is the only formal screening of FDI. Investment into an existing company requires the approval of the Exchange Control Authority of the Reserve Bank of Zimbabwe (RBZ). The government's priority sectors for foreign investment are agriculture, construction, building and heavy equipment, automotive and ground transportation, chemicals, petrochemicals, plastics and composites, energy and mining, industrial equipment and supplies, metal manufacturing, and products and textiles, apparel and sporting goods.

Competition Law

The government's official policy is to encourage competition within the private sector with the enactment of the Zimbabwe Competition Act. The Act provided for the formation of the Tariff and Competition Commission charged with investigating restrictive practices, mergers, and monopolies in the country.

2. Conversion and Transfer Policies

Foreign Exchange

Until the end of 2008, Zimbabwe's exchange-rate policies made it difficult for firms to obtain foreign currency, and this in turn resulted in shortages of fuel, electric power, and other imported goods. Other consequences included defaults on public- and private-sector debt and a sharp decline in industrial, agricultural, and mining operations. In 2009, the government lifted exchange controls and demonetized the Zimbabwe dollar. The RBZ now permits bank accounts and transactions in the following currencies: Euro, Botswana pula, South African rand, British pound, U.S. dollar, Chinese yuan, Australian dollar, Indian rupee, and Japanese yen, with most business conducted in U.S. dollars. Zimbabwe's export performance is recovering slowly, but the government's arrears on over $10 billion in external debt block access to multilateral financing. These conditions severely constrain external financing for the economy. The RBZ has not restored foreign currency accounts it confiscated from bank depositors prior to official dollarization in 2009.

Remittance Policies

In line with recommendations from the Southern African Development Community (SADC) and the IMF, the government revised the Foreign Exchange Control Act, which regulated currency conversions and transfers. With these changes and the liberalization of most current account transactions, exporters now retain 100 percent of their foreign currency receipts for their own use. In addition, foreigners can remit capital appreciation, dividend income and after tax profits without exchange control approval.

Zimbabwe is a member of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG). The country still awaits the results of the 2014 Financial Action Task Force (FATF) assessment of Zimbabwe's compliance with the international standards on money laundering and terrorism financing, and the authorities believe that the results will be positive.

3. Expropriation and Compensation

Despite provisions in Zimbabwe's previous constitution that prohibit the acquisition of private property without compensation, in 2000 the government began to sanction uncompensated seizures of privately owned agricultural land, serially amending the constitution to grant the government increasingly broad authorities to do so after the fact. The authorities subsequently transferred many of the farms seized to government officials and other regime supporters. In April 2000, the government amended the constitution to authorize the compulsory acquisition of privately owned commercial farms with compensation limited to the improvements made on the land. In September 2005, the government amended the constitution again to transfer ownership of all expropriated land to the government. Since the passage of this amendment, top government officials, supporters of President Mugabe's Zimbabwe African National Union – Patriotic Front (ZANU-PF) party, and members of the security forces have continued to disrupt production on commercial farms, including those owned by foreign investors and those covered by bilateral investment agreements. Similarly, government officials have sought to impose politically-connected individuals as indigenous partners on privately and foreign-owned wildlife conservancies.

In 2006, the government began to issue 99-year leases for land seized from commercial farms. These leases, however, are not readily transferable. The government retains the right to withdraw the lease at any time for any reason. The government's program to seize commercial farms without compensating the titleholders, who have no recourse to the courts, has raised serious questions about respect for property rights and the rule of law in Zimbabwe. As a result, Zimbabwe ranked 87 out of 189 countries considered with respect to the country's ability to protect minority investors in the World Bank's 2015 Doing Business report.

President Mugabe and other politicians have in the past threatened to target the mining and manufacturing sectors for similar forced indigenization. In 2008, the government amended the Mines and Minerals Act, outlining indigenization requirements for mining. For strategic energy minerals (coal, methane, uranium), the legislation required mining companies engaged in extraction or exploitation to transfer ownership to the state of 51 percent of the shares; 25 percent would be without compensation. The 2008 legislation directs a transfer of 25 percent of the shares in precious metals and precious stones to the state without compensation and a further 26 percent to the state or to indigenous Zimbabweans. The government is still deliberating amendments to the Mines and Minerals Act, which may include a “use it or lose it” provision for unexploited mining concessions and new “indigenous” ownership requirements in the sector in line with the Indigenization Act. In addition, the government intends to amend the provisions of the Precious Stones Trade Act relevant to diamonds to enforce, among other things, 100 percent government ownership of all alluvial diamonds in the ground, immediate separation of diamond mining and marketing activities, and the promotion of value addition through the prohibition of exports of unpolished diamonds.

4. Dispute Settlement

Legal System, Specialized Courts, Judicial Independence, Judgments of Foreign Courts

According to law, Zimbabwe has an independent judicial system whose decisions are binding on the other branches of government. There are no specialized commercial courts in the country. Administration of justice in commercial cases that lack political overtones is still generally impartial. As government revenue declined, however, court resources have dwindled and dockets have become backlogged. In practice, the executive threatens judicial independence in cases that have political overtones through continuous interference in the decisions of the local courts. Politicians sometimes interfere in decisions of foreign courts that are considered unfavorable to Zimbabwe's interests. For example, senior politicians declined to support enforcement of a 2008 SADC Tribunal decision ordering Zimbabwe to return expropriated commercial farms to the original owners. Once an investor has exhausted the administrative and judicial remedies available locally, the government of Zimbabwe agrees, in theory, to submit matters for settlement by arbitration according to the rules and procedures promulgated by the United Nations Commission on International Trade Law. However, this has not occurred in practice.

Zimbabwe acceded to the 1965 convention on the settlement of investment disputes between states and nationals of other states and to the 1958 New York convention on the recognition and enforcement of foreign arbitral awards in 1994. However, the government does not always accept binding international arbitration of investment disputes between foreign investors and the state. Most disputes take months if not years to resolve.

Bankruptcy

In the event of insolvency or bankruptcy, Zimbabwe applies the Insolvency Act. All creditors have equal rights against an insolvent estate. In terms of resolving insolvency, Zimbabwe ranks 148 out of 189 economies in the World Bank's 2015 Doing Business Report.

Investment Disputes

A group of Dutch farmers who lost their land under the "fast track land reform" program of the 2000s took their case to the International Centre for the Settlement of Investment Disputes in April 2005 demanding that Zimbabwe honor its investment agreement with the Netherlands. At a hearing in Paris in November 2007, the tribunal issued a verdict favorable to the farmers. Although the Zimbabwean government acknowledged the debt owed to the farmers with respect to payment of compensation for the expropriated land, it disputed the amount the farmers claimed in damages.

In 2008, a three-judge panel of the SADC Tribunal in Namibia ruled that Zimbabwe's violent land reform exercise discriminated against a group of white farmers who filed an application challenging the seizure of their farms. The government refused to recognize the ruling and in September 2009 said Zimbabwe had withdrawn from the jurisdiction of the SADC Tribunal.

This appeared to be a bid to stop the effect of adverse judgments against it by the Windhoek-based court. The Zimbabwean government argued that it had not ratified the protocol establishing the Tribunal. The SADC Summit meeting of August 2010 endorsed this position and dissolved the Tribunal in early 2012.

In 2010, a South African High Court attached a Zimbabwe government-owned property in Cape Town to satisfy the Tribunal's order, but the Zimbabwean government appealed to the South African Supreme Court. On September 20, 2012, however, the South African Supreme Court ruled in favor of granting the sale proceeds of the government of Zimbabwe's seized property to the Zimbabwean farmer as compensation for seizure of his farm.

International Arbitration

The United States does not have a bilateral investment treaty with Zimbabwe. The United States does have a Trade and Investment Framework Agreement (TIFA) with the Common Market for Eastern and Southern Africa (COMESA), of which Zimbabwe is a member. This TIFA provides a mechanism to talk about disputes, although the protection offered by the TIFA is much more limited than the protection typically provided by a bilateral investment treaty.

ICSID Convention and New York Convention

Zimbabwe acceded to the 1965 Convention on the Settlement of Investment Disputes between States and Nationals of Other States and to the 1958 New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards in 1994. However, the government does not always accept binding international arbitration of investment disputes between foreign investors and the state.

Duration of Dispute Resolution – Local Courts

Most disputes take years to resolve. Local courts lack funding and other resources necessary to hear cases in a timely manner.

5. Performance Requirements and Investment Incentives

WTO/TRIMS

Zimbabwe has been a member of the World Trade Organization (WTO) since March 5, 1995. A 2011 report by the WTO on the country's trade policies and practices concluded that Zimbabwe needed to improve its business environment. The WTO cited governance issues and recommended further liberalization of the Zimbabwean trade regime with a view to attracting foreign investment. The review also noted that enhancement of and full compliance with multilateral commitments would increase the credibility of the regime and make it more predictable.

Investment Incentives

There are a number of incentives depending on the form of investment and the sectors. For investment designed to develop industrial parks and investment in tourism development zones and joint ventures in the form of the build, own, operate and transfer (BOOT) and build operate and transfer (BOT), the investors do not pay tax in the first five years after which they pay tax at the rate of 25 percent compared to the normal tax rate of 35 percent. For joint ventures in the form of the build, own, operate and transfer (BOOT) and build operate and transfer (BOT), investors do not pay tax for the first five years after which they pay tax at the rate of 15 percent per annum. Investors within the mining sector exporting 50 percent of output have reduced corporation tax of 20 percent and receive import duty exemption on imported capital goods.

Research and Development

Due to financial constraints, the government does not subsidize research and development programs on a national level.

Performance Requirements

There are no general performance requirements for businesses located outside Export Processing Zones. Government policy, however, encourages investment in enterprises that contribute to rural development, job creation, exports, the addition of domestic value to primary products, use of local materials, and the transfer of appropriate technologies.

Although there are no discriminatory import or export policies affecting foreign firms, the government's approval criteria heavily favor export-oriented projects. Import duties and related taxes range as high as 110 percent. Export Processing Zone-designated companies must export at least 80 percent of output.

Government participation is required for new investments in strategic industries such as energy, public water provision, and railways. The terms of government participation are determined on a case-by-case basis during license approval. The few foreign investors (for example, from China, Russia, and Iran) in reserved strategic industries have either purchased existing companies or have supplied equipment and spares on credit.

Data Storage

The government does not require foreign IT providers to turn over source code and/or provide access to surveillance. Only banks are required to maintain all their data in the country through the escrow agreement.

The government encourages foreign investors to make maximum use of Zimbabwean management and technical personnel, and any investment proposal that involves the employment of foreigners must present a strong case in order to obtain work and residence permits. Normally, the maximum contract period for a foreigner is three years but with possible extension to five years for individuals with highly specialized skills.

6. Protection of Property Rights

Real Property

The government enforces interests in residential and commercial properties in cities although this is not the case with agricultural land. Mortgages and liens do exist for urban properties although liquidity constraints have led to a fall in the number of mortgage loans. According to the World Bank's 2015 Doing Business Report, Zimbabwe is ranked 94 out of 189 countries in terms of registering property. The recording of mortgages is generally reliable. With regard to agricultural land, the government provides and protects use rights of indigenous people and it is currently in the process of developing new 99-year leases that will guarantee use, with the government retaining ownership of all agricultural land.

Intellectual Property Rights

Zimbabwe applies international patent and trademark conventions, and it is a member of the World Intellectual Property Organization. Generally, the government seeks to honor intellectual property ownership and rights, although a lack of expertise and manpower and rampant corruption limit its ability to enforce these obligations. Pirating of videos, music, and computer software is common.

It does not appear that the government enacted new IP related laws or regulations over the past year. The country does not publish information on the seizures of counterfeit goods.

For additional information about treaty obligations and points of contact at local IP offices, please see WIPO's country profiles at http://www.wipo.int/directory/en/.

Resources for Rights Holders

Contact at U.S. Embassy Harare

- Name: Christopher Corkey
- Title: Economic and Commercial Officer
- Telephone Number: +263-4-250-593
- Email Address: CorkeyCT@state.gov

7. Transparency of the Regulatory System

The government's official policy is to encourage competition within the private sector, but the bureaucracy within regulatory agencies lacks transparency, and corruption within the regulatory system is believed to be rampant.

The adoption of the multi-currency system in 2009 stabilized prices and removed the need for price controls. Consequently, the government no longer controls prices of goods and services. Nevertheless, the National Incomes and Prices Commission (NIPC) still monitors trends in domestic prices relative to those in the region. The NIPC raised concerns over the decision by private schools to raise fees for 2012 without clearance from the government.

The government introduces import taxes arbitrarily to support certain inefficient producers who continue to lobby for protection against more competitive imports. In late 2012, the Ministry of Finance announced a 25 percent surtax on selected imported products including soaps, meat products, beverages, dairy products, and cooking oil starting January 1, 2013 as well as other import taxes on beer, cigarettes, and chickens brought in from outside the Southern African Development Community (SADC) and the Common Market for Eastern and Southern African regions (COMESA).

It is not apparent that nongovernmental organizations or private sector associations manage informal regulatory processes.

8. Efficient Capital Markets and Portfolio Investment

Zimbabwe's stock market currently has 58 publicly-listed companies, but just 17 of them account for over 80 percent of total market capitalization, which stood at $2.8 billion on March 8, 2016. In September 1996, the government opened the stock and money markets to limited foreign portfolio investment. Since then, a maximum of 49 percent of any locally-listed company can be foreign-owned in line with the indigenization policy framework, with any single investor allowed to acquire up to 15 percent of the outstanding shares.

There is a 1.48 percent withholding tax on the sale of marketable securities, while the tax on purchasing stands at 1.73 percent. Totaling 3.21 percent, the rates are comparable with the average of 3.5 percent for the region. As a way of raising funds for the state, the government mandated that insurance companies and pension funds invest between 25 and 35 percent of their portfolios in prescribed government bonds. Zimbabwe's hyperinflation, which came to an end with the 2009 dollarization, wiped out the value of domestic debt instruments, and the government has only recently restarted issuing Treasury Bills.

According to the World Investment Report compiled by the United Nations Conference on Trade and Development (UNCTAD), Zimbabwe's net foreign direct investment (FDI) rose slightly from $373 million in 2013 to $473 million in 2014. This resulted from implementation of positive reforms under the IMF’s SMP between 2013 and 2015.

Three major international commercial banks and a number of regional and domestic banks operate in Zimbabwe, with a total of over 200 branches. Following the well-publicized failure of a number of financial institutions in 2003, primarily due to fraud and inept management, the RZB tightened regulations. Nonetheless, financial institutions have an uncertain future due to the reluctance of citizens to trust their deposits to banks and an increase in bad loans on bank balance sheets. During the beginning of 2015, two local institutions surrendered their banking licenses to the RBZ while a third was placed under curatorship by the central bank. The central bank cancelled the banking license of fourth locally-owned bank in 2013. During the last quarter of 2015, the Reserve Bank licensed four financial institutions and two of these started operating in January 2016. As a result of Zimbabwe's dollarized economy and the effects of hyperinflation, the RBZ did not have the resources to act as lender of last resort for the banking system between 2009 and 2013. In early 2014, however, the central bank received a $200 million injection from the African Export Import Bank (Afrexim Bank) to revitalize Zimbabwe’s inter-bank lending market under the Afreximbank Trade Debt Backed Securities (AFTRADES). The facility supported banks to the tune of $178.8 million as at the end of December 2015.

Money and Banking System, Hostile Takeovers

The Reserve Bank of Zimbabwe (RBZ) believes that the banking sector is generally stable in spite of a harsh operating environment characterized by high credit risk and liquidity constraints. As of December 2015, the sector had 18 operating institutions, comprising 13 commercial banks, one merchant bank, three building societies and one savings bank. All operating banking institutions except the merchant bank complied with the prescribed minimum core capital requirements. The level of non-performing loans improved somewhat from just over 20 percent in September 2014 to 10.87 percent by December 2015 largely due to a general improvement in credit management and the selling of qualifying bad assets to the Zimbabwe Asset Management Company, set up to cleanse banks' balance sheets through acquisition and restructuring of non-performing loans.

According to the central bank, the total deposits (excluding interbank deposits), rose from $4.4 billion in December 2014 to $5.6 billion by December 2015. Demand deposits accounted for 46.2 percent of the total while time deposits accounted for 33.8 percent.

The central bank received a $200 million injection from the African Export Import Bank (Afrexim Bank) to revitalize Zimbabwe's inter-bank lending market which started operating on March 23, 2015 (see above).

9. Competition from State-Owned Enterprises

Zimbabwe has 76 state-owned enterprises (SOEs), defined as companies wholly-owned by the state. Many SOEs support vital infrastructure, including energy, mining, and agribusiness. As a result, competition within the sectors where SOEs operate tends to be limited. However, the government of Zimbabwe (GOZ) invites private investors to participate in infrastructure projects through public-private partnerships (PPPs). Most SOEs have public function mandates, although in more recent years, they perform hybrid activities of satisfying their public functions while making profits.

Zimbabwe does not appear to subscribe to the Organization for Economic Cooperation and Development (OECD) guidelines on corporate governance of SOEs. SOEs operate under the same taxes and same value added tax rebate policies as private sector companies. The SOEs face a number of challenges that include persistent power outages, mismanagement, lack of maintenance, inadequate investment, a lack of liquidity and access to credit, and debt overhangs. As a result, the SOEs have performed poorly in recent years. Few SOEs produce publicly available financial data and ever fewer audited financial data. This has imposed significant costs on the rest of the economy.

OECD Guidelines on Corporate Governance of SOEs

The government wholly owns the SOEs and they report through the responsible line ministers. Until February 2009, most SOEs operated without boards of directors. Poor management and the GOZ's failure to privatize SOEs rendered them almost entirely dependent on subsidies. Following the inclusive government in 2009, each SOE has had an independent board of directors. Normally, responsible line ministers appointment the boards on the basis of political considerations. Currently, there is no existing corporate governance code to guide the operations of these companies, giving rise to cases of abuses and malpractices at a number of these entities. The corporate governance challenges prevalent in Zimbabwe are on disclosure, ethical conduct, remuneration practices, conflict of interest, shadow directors and multi/cross directorships.

Sovereign Wealth Funds

Zimbabwe does not have a sovereign wealth fund (SWF). The government set aside US$1 million toward administrative costs related to the setting up of the Sovereign Wealth Fund in its 2016 Budget. The government proposes to capitalize the SWF through a charge of up to 25% on royalty collections on mineral sales, as well as on special dividend on the sale of diamond, gas, granite and other minerals.

10. Responsible Business Conduct

Following dollarization in 2009, there is increased awareness of standards for responsible business conduct (RBC), driven by the private sector through the Standards Association of Zimbabwe. The private sector developed the National Corporate Governance Code of Zimbabwe (ZimCode), which is a framework designed to guide Zimbabwean companies on RBC. An industrial advocacy group, the Confederation of Zimbabwe Industries, has a standing committee on business ethics and standards which drive ethical conduct within the Zimbabwean private sector. The organization has developed its own charter according to OECD guidelines, highlighting good corporate governance and ethical behavior. The Zimbabwean government has not taken any measures to encourage RBC and it does not take RBC policies or practices into its procurement decisions.

Firms that demonstrate corporate social responsibility do not automatically garner favorable treatment from consumers, employees, and government. With regard to indigenization, foreign companies receive formal indigenization credits of up to 31 percent for conducting CSR determined by the extent to which the activity achieves the government's socio-economic objectives.

Although the Zimbabwean government has considered implementing the World Bank's Extractive Industries Transparency Initiative (EITI) principles in order to strengthen accountability, good governance, and transparency in the mining sector, it has yet to launch an EITI program. However, the government has stated its intention to adopt a domestic initiative called the Zimbabwe Mining Revenue Transparency Initiative (ZMRTI) but it has made little progress in implementing the initiative.

11. Political Violence

Political parties and civil-society groups that oppose ZANU-PF and President Mugabe routinely encounter state-sponsored intimidation and repression from government security forces and ZANU-PF-linked activists. This environment persisted even during the period of the coalition government when the main opposition parties, the Movement for Democratic Change-Tsvangirai (MDC-T) and the Movement for Democratic Change-Ncube (MDC-N), joined ZANU-PF in a Government of National Unity (GNU) from February 2009 to June 2013. Individuals and companies out of favor with ZANU-PF routinely suffer harassment and bureaucratic obstacles in their business dealings.

Despite perceived widespread dissatisfaction with government policy, there have not been large-scale demonstrations since the July 2013 general elections. Disagreements between and within political parties occasionally resulted in violence targeting political party members. In December 2013, customers broke the windows at a bank branch which had run out of funds to distribute to depositors. Such violence is sporadic.

12. Corruption

In 2005, the government enacted an Anti-Corruption Act that established a government-appointed Anti-Corruption Commission (ACC) to investigate corruption. However, the ACC did not include any members from civil society or the private sector. The government of national unity (GNU) enhanced the institutional capacity of the ACC with members appointed from civil society and the private sector. However, when the ACC's term of office expired, the new ACC did not include civil society and private sector representatives. The government prosecutes individuals selectively, focusing on those who have fallen out of favor with ZANU-PF and ignoring transgressions by members of the favored elite. Accusations of corruption are used a political tool but seldom result in formal charges and convictions.

While the laws to combat corruption exist, enforcement of the laws is weak as the law enforcement agencies lack the political will and resources to do their job effectively. As a result, Transparency International ranked Zimbabwe 150 out of 175 countries and territories surveyed in 2015.

Existing rules on the Zimbabwe Stock Exchange compel listed companies to disclose, through annual reports, minimum disclosure requirements.

The government also created a policy to improve accountability in the use of state resources through the introduction of the Public Finance Management Act in March 2010. In spite of this, corruption is still endemic, especially within the diamond sector where production and export figures are largely unreliable. In this respect, the government has introduced a Diamond Policy that focuses on ensuring the 100 percent government ownership of all alluvial diamonds in the ground and the involvement of the Zimbabwe Revenue Authority (ZIMRA) in the entire value chain of diamond production.

UN Anticorruption Convention, OECD Convention on Combatting Bribery

While Zimbabwe signed the United Nations Convention against Corruption on February 20, 2004 and ratified the treaty on February 20, 2007, it is not party to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

Resources to Report Corruption

Although Zimbabwe's Constitution allows for the establishment of the Zimbabwe Ant-Corruption Commission, it is currently not constituted.

Contact at watchdog organization:

- Name: Transparency International Zimbabwe
- Address: 96 Central Avenue
- PO Box CY 434, Causeway
- Harare
- Telephone Number: +263-4-793 247/77
- Email Address: nfo@tizim.org

13. Bilateral Investment Agreements

Bilateral Taxation Treaties

The United States has no bilateral investment or trade treaty with Zimbabwe. Zimbabwe has investment treaties with 17 countries but ratified only seven of these treaties (with the Netherlands, Denmark, Germany, South Korea, South Africa, Botswana, and Switzerland). Three other investment agreements with Russia, India, and Iran are awaiting ratification before they go into effect. In spite of these agreements, the government has failed to protect investments undertaken by nationals from these countries, particularly with regard to land. In 2009, for example, an army officer seized a farm belonging to a German national but the government did not intervene, despite its assurance that Zimbabwe would honor all obligations and commitments to international investors.

The United States does have a Trade and Investment Framework Agreement (TIFA) with the Common Market for Eastern and Southern Africa (COMESA), of which Zimbabwe is a member. This TIFA provides a mechanism to talk about disputes, although the protection offered by the TIFA is much more limited than protection typically provided by a bilateral investment treaty.

14. Foreign Trade Zones/Free Ports/Trade Facilitation

The government promulgated legislation creating Export Processing Zones (EPZs) in 1996. Zimbabwe now has approximately 183 EPZ-designated companies. Benefits include a five-year tax holiday, duty-free importation of raw materials and capital equipment for use in the EPZ, and no tax liability from capital gains arising from the sale of property forming part of the investment in EPZs. Since January 2004, the government has generally required that foreign capital comprise a majority of the investment. The requirement on EPZ-designated companies to export at least 80 percent of output has constrained foreign investment in the zones. The merger between the Zimbabwe Investment Centre and the Zimbabwe Export Processing Zones Authority, which began in 2006, has been completed and the new institution—ZIA—now serves as a one-stop shop for both local and foreign investors. Zimbabwe is currently in the process of amending the Zimbabwe Investment Authority Act to include Special Economic Zones. However, to date, activities in special economic zones overall have not been meaningful.

15. Foreign Direct Investment and Foreign Portfolio Investment Statistics

Table 2: Key Macroeconomic Data, U.S. FDI in Host Country/Economy

	Host Country Statistical source*		USG or international statistical source		USG or International Source of Data: BEA; IMF; Eurostat; UNCTAD, Other
Economic Data	Year	Amount	Year	Amount	
Host Country Gross Domestic Product (GDP) ($M USD)	2014	$14,171	2014	$14,196	www.worldbank.org/en/country

Foreign Direct Investment	Host Country Statistical source*		USG or international statistical source		USG or international Source of data: BEA; IMF; Eurostat; UNCTAD, Other
U.S. FDI in partner country ($M USD, stock positions)	2013	N/A	2013	(D)	http://bea.gov/international/direct_investment_ multinational_companies_comprehensive_data.htm
Host country's FDI in the United States ($M USD, stock positions)	2013	N/A	2013	N/A	http://bea.gov/international/direct_investment_ multinational_companies_comprehensive_data.htm
Total inbound stock of FDI as % host GDP	2014	N/A	2014	3.8	N/A

* Zimbabwe National Statistical Agency

Table 3: Sources and Destination of FDI

Data not available for Zimbabwe.

Table 4: Sources of Portfolio Investment

Data not available for Zimbabwe.

Section 5 - Government

Chiefs of State and Cabinet Members:

For the current list of Chief of State and Cabinet Members, please access the following - Central Intelligence Agency online directory of Chiefs of State and Cabinet Members of Foreign Governments

Legal system:

Mixed legal system of English common law, Roman-Dutch civil law, and customary law

International organization participation:

ACP, AfDB, AU, COMESA, FAO, G-15, G-77, IAEA, IBRD, ICAO, ICRM, IDA, IFAD, IFC, IFRCS, ILO, IMF, IMO, Interpol, IOC, IOM, IPU, ISO, ITSO, ITU, ITUC (NGOs), MIGA, NAM, OPCW, PCA, SADC, UN, UNAMID, UNCTAD, UNESCO, UNIDO, UNISFA, UNMIL, UNMISS, UNOCI, UNWTO, UPU, WCO, WFTU (NGOs), WHO, WIPO, WMO, WTO

Section 6 - Tax

Exchange control

Subject to certain limited exclusions, Zimbabwean residents are subject to exchange controls. However, currently (since the beginning of the dollarization period) the exchange controls are relaxed to the extent that one can export dividends and profits without a hiccup. Non-residents are excluded from the ambit of exchange controls except when it comes to investing in securities listed on the Zim Stock Exchange.

The Zimbabwean Authorities are in the process of introducing controls over ownership of companies in almost every sector. The target is that each local company should be owned 51% by indigenous persons and foreigners can only own up to 49%. The major thrust has been in the mining sector where large resources of precious minerals like diamonds and gold have been discovered. Investors can negotiate their way through the Zimbabwe Investment Authority and the Ministry of Youth Empowerment and Indigenisation.

Treaty and non-treaty withholding tax rates

The Income Tax Act subjects a number of payments to withholding tax at source. These are as follows:

	Normal Rate of tax %	**Double Taxation Agreements**				**Notes**
		UK %	**Germany %**	**Netherlands %**	**Sweden %**	**1**
Non-Resident Tax on Dividends (NRST)						
Companies listed on the Zimbabwe Stock Exchange	10	5	10	10	15	2,5
Other companies	15	5	10	10	15	2,5
Non-Resident's Tax on Interest (NRTI) (Repealed with effect from 30 September 2009)						
Non-Resident's Tax on Fees (NRTF) Includes director's fees accruing to non-residents	15	10	7,5	10	10	5
Non-Resident's Tax on Remittances (NRTR) This applies to branch operations only and applies to expenses	15	20	20	20	20	6

	Normal Rate of tax %	Double Taxation Agreements				Notes
		UK %	Germany %	Netherlands %	Sweden %	1
allocable to the Zimbabwe operation						
Non-Resident's Tax on Royalties **(NRTRoy)**	15	10	7,5	10	10	5

Notes

1) Other existing Double Taxation Agreements include Norway, South Africa, Bulgaria, Mauritius, Canada, Poland, France and Malaysia.

2) Payable by all non-resident persons, including companies. For the lower rate to apply, the non-resident shareholder must hold a minimum of 25% of the Zimbabwe Company's shares.

3) This tax is final.

4) Taxpayers who are over the age of 55 years are exempt on the first USD 250 per month.

5) Due date is within 10 days after the date of payment or accrual, whichever is earlier.

6) Due date is within 10 days of the remittance of the allocable expenditure.

7) Due date is within 10 days of the end of the month following the month of payment.

Methodology and Sources

Section 1 - General Background Report and Map

(Source: CIA World Factbook)

Section 2 - Anti – Money Laundering / Terrorist Financing

	Lower Risk	Medium Risk	Higher Risk
FATF List of Countries identified with strategic AML deficiencies	Not Listed	AML Deficient but Committed	High Risk

Compliance with FATF 40 + 9 recommendations	>69% Compliant or Fully Compliant	35 – 69% Compliant or Fully Compliant	<35% Compliant or Fully Compliant
US Dept of State Money Laundering assessment (INCSR)	Monitored	Concern	Primary Concern
INCSR - Weakness in Government Legislation	<2	2-4	5-20
US Sec of State supporter of / Safe Haven for International Terrorism	No	Safe Haven for Terrorism	State Supporter of Terrorism
EU White list equivalent jurisdictions	Yes		No
International Sanctions UN Sanctions / US Sanctions / EU Sanctions	None	Arab League / Other	UN , EU or US
Corruption Index (Transparency International) Control of corruption (WGI) Global Advice Network	>69%	35 – 69%	<35%
World government Indicators (Average)	>69%	35 – 69%	<35%
Failed States Index (Average)	>69%	35 – 69%	<35%
Offshore Finance Centre	No		Yes

Section 3 - Economy

General Information on the current economic climate in the country and information on imports, exports, main industries and trading partners.

(Source: CIA World Factbook)

Section 4 - Foreign Investment

Information on the openness of foreign investment into the country and the foreign investment markets.

(Source: US State Department)

Section 5 - Government

Names of Government Ministers and general information on political matters.

(Source: CIA World Factbook / https://www.cia.gov/library/publications/world-leaders-1/index.html)

Section 6 - Tax

Information on Tax Information Exchange Agreements entered into, Double Tax Agreements and Exchange Controls.

(Sources: OECD Global Forum on Transparency and Exchange of Information for Tax Purposes PKF International)

DISCLAIMER

Part of this report contains material sourced from third party websites. This material could include technical inaccuracies or typographical errors. The materials in this report are provided "as is" and without warranties of any kind either expressed or implied, to the fullest extent permissible pursuant to applicable law. Neither are any warranties or representations made regarding the use of or the result of the use of the material in the report in terms of their correctness, accuracy, reliability, or otherwise. Materials in this report do not constitute financial or other professional advice.

We disclaim any responsibility for the content available on any other site reached by links to or from the website.

RESTRICTION OF LIABILITY

Although full endeavours are made to ensure that the material in this report is correct, no liability will be accepted for any damages or injury caused by, including but not limited to, inaccuracies or typographical errors within the material, Neither will liability be accepted for any damages or injury, including but not limited to, special or consequential damages that result from the use of, or the inability to use, the materials in this report. Total liability to you for all losses, damages, and causes of action (in contract, tort (including without limitation, negligence), or otherwise) will not be greater than the amount you paid for the report.

RESTRICTIONS ON USE

All Country Reports accessed and/or downloaded and/or printed from the website may not be distributed, republished, uploaded, posted, or transmitted in any way outside of your organization, without our prior consent. Restrictions in force by the websites of source information will also apply.

We prohibit caching and the framing of any Content available on the website without prior written consent.

Any questions or queries should be addressed to: -

Gary Youinou

Via our Contact Page at KnowYourCountry.com