

TIWB Programme N° L2015-0003

Host Administration:
Botswana Unified Revenue Service (BURS)

Expert source:
**Organisation for Economic Co-operation and Development (OECD) /
African Tax Administration Forum (ATAF) / World Bank Group (WBG)**

Programme Dates:
February 2015 – April 2017

BURS requested audit assistance in transfer pricing (TP) and international tax issues, including in the diamond cutting and polishing sector, in 2015. Together with the WBG, the OECD and ATAF deployed experts over four missions from February 2015 to April 2017. TIWB-style assistance was provided on TP issues in anonymised cases. Main tax issues included intra-group services and financial transactions, intangibles, and comparability adjustments.

Impact of the practical audit assistance programme

The TP assistance programme helped Botswana achieve the following results:

- **Human Resource development – Skill and knowledge transfer:** In total, 20 BURS tax auditors were trained in TP issues relating to comparability, business restructuring, intra-group services, financial transactions, and intangibles. The workshops conducted received very positive feedback particularly on the usefulness of working on case studies and anonymised audit cases.
- **Institutional Development – Legislative changes, tools, processes, and procedures:** The support from the experts helped BURS draft TP legislation and regulations, including permanent establishment and interest deductibility rules. The drafts, approved by the BURS Commissioner-General and Ministry of Finance and Development Planning (MoFDP), were submitted to the Cabinet and have been enacted. Benefits of joining the Inclusive Framework on BEPS were considered during this programme.
- **Other Outcomes:** This programme led to an assistance request for a new TIWB programme supported by the Kenya Revenue Authority.