

LAW N° 2023 / 019 OF 19 DEC 2023

**FINANCE LAW OF THE REPUBLIC OF CAMEROON
FOR THE 2024 FINANCIAL YEAR**

The Parliament deliberated and adopted, the President of the Republic hereby enacts the law set out below:

PART ONE

GENERAL CONDITIONS FOR BUDGETARY AND FINANCIAL EQUILIBRIUM

I - GENERAL PROVISIONS

SECTION ONE: The purpose of this law is to determine Government revenue and expenditure, lay down the conditions of budgetary and financial balance and establish the State budget for 2024.

SECTION TWO: State revenue and expenditure shall include budgetary revenue and expenditure as well as cash and financing resources and expenses.

1. The State budget shall determine the nature, amount and allocation of revenue and expenditure, the resulting budgetary balance as well as the terms of financing.
2. The State budget shall comprise the general budget and Special Appropriation Accounts.

SECTION THREE: This part provides for and authorizes State resources, fixes the ceilings for State expenses and establishes the resulting budgetary and financial balance.

II - PROVISIONS RELATING TO RESOURCES

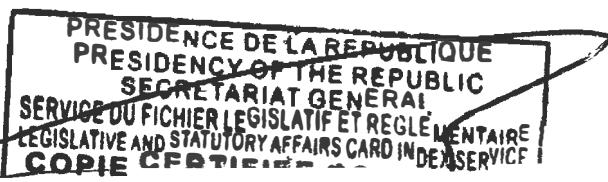
SECTION FOUR: The taxes, duties, levies, contributions, royalties, other proceeds and public revenue of the Republic of Cameroon shall continue to be collected in accordance with the instruments in force, subject to the provisions of this law.

CHAPTER ONE

PROVISIONS RELATING TO CUSTOMS DUTIES AND TAXES

SECTION FIVE: Support to the drinking water, renewable energy, health, livestock and fisheries priority sectors.

1. Equipment and materials intended for drinking water, biomass and solar and wind energy production shall be exempted from import duties and taxes for a period of 24 (twenty-four) months, from 1 January 2024.
2. Medical equipment and appliances, including their accessories, shall be exempted from customs import duties and taxes for a period of 24 (twenty-four) months, from 1 January 2024.
3. Equipment and materials intended for livestock, fisheries and the development of fish farming shall be exempted from customs import duties and taxes for a period of 24 (twenty-four) months, from 1 January 2024.



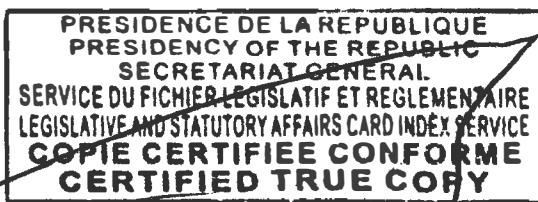
4. The lists of goods referred to in paragraphs 1, 2 and 3 above, excluding those manufactured locally, shall be established by an instrument of the Minister of Finance, after consultation with the relevant ministries and stakeholders in the sectors concerned.
5. Where the equipment and materials referred to in paragraph 1 above are intended for commercial resale by the importer, he/she latter shall be required, in accordance with the provisions of Article 333 of the CEMAC Customs Code, to sign an agreement with the Customs Administration, through which he undertakes to reflect such exemption in the final selling price of the energy or such goods to the consumer.
6. Re-exportation of the goods referred to in paragraphs 1 and 2 above shall remain subject to prior payment of customs duties and taxes not paid on entry into the national territory.

SECTION SIX: Support to the automobile industry

1. Vehicle parts and components imported by car manufacturing and assembly companies shall be granted a 50% reduction in their taxable import value for a period of 10 (ten) years, from 1 January 2024.
2. The reduction referred to in Section Six (1) shall be reserved for vehicle manufacturing and assembly companies that have signed an agreement with the Customs Administration whereby they undertake to transfer the effects of such facility to consumers, and to comply with the commitments arising from their investment project.

SECTION SEVEN: Payment of the ad valorem excise duty on some imported goods

The undermentioned imported goods shall be subject to ad valorem excise duty as follows:



Description	Custom Tarif	Rate
Cereal-based products (e.g. corn flakes) and food preparations obtained from cereal flakes	1904.10.00.000 and 1904.20.00.000	5 %
Refined vegetable oils	1507.90.00.000 1508.90.00.000 1509. 1510.90.00.000 1511.90.00.000 1512.19.00.000 1512.29.00.000 1513.19.00.000 1513.29.00.000 1514.19.00.000 1514.99.00.000 1515.19.00.000 1515.29.00.000 1515.30.00.000 1515.50.00.000 1515.90.00.000 1516.20.00.000	12.5 %
Industrial sausage excluding giblets, which are already subject to excise duty	1602.20.10.000	12.5 %
Cocoa beans, including those intended for use as raw materials	1801.	12.5 %
Dog or cat food	2309.10.00.000	12.5%
Charcoal	4402.	12.5%
Wooden coffins and other wood products	4421.20.00.000 and 4421.99.00.900	25 %
Metal furniture and fittings used in offices	9403.10.00.000	25%

SECTION EIGHT: Gradual increase in taxation on certain goods as part of import substitution

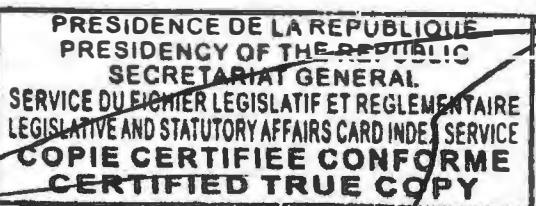
With the exception of rice for general consumption under tariff subheadings 1006.10.10.000 to 1006.40.00.000, which shall remain subject to customs import duty at the reduced rate of 5% provided for in Article 2 of the Finance Law for the 2017 financial year, rice known as "parboiled rice" and "perfumed rice", which shall be classified under specific tariff subheadings 1006.30.90.200 and 1006.30.90.300, shall be subject to the standard rate of the Common External Tariff provided for in the Customs Tariff as from 1 January 2024.

SECTION NINE: Taxation on rough timber export

As an amendment to the provisions of Section Ten 1 (c) of the Finance Law for the 2023 financial year, the rate of exit duty applicable to rough timber and similar timber is fixed at 75% of the FOB value of the volume of the species. The rate shall remain fixed at 60% at the entry of such timber into industrial free points.

SECTION TEN: Customs limitation periods

1. Pursuant to the provisions of Articles 398 and 399 of the CEMAC Customs Code, the limitation period for declarations of release for consumption as well as for detailed declarations of discharge of direct clearance tenders and suspensive and economic regimes shall be three years.



2. The period referred to in paragraph 1 above shall become thirty years for direct clearance tenders and declarations for the placing of goods under suspensive and economic regimes which have not yet been discharged.
3. The thirty-year limitation period referred to in paragraph 2 above shall apply generally to all customs operations relating to foreign trade where the Customs Administration was not in a position to know of the existence of its claim to customs duties and taxes at the time when the said duties and taxes should have been paid.

SECTION ELEVEN: Information on transport documents

1. Pursuant to the provisions of Section 117, 122 and 124 of the CEMAC Customs Code, shipping companies, consignees, inland carriers and the captains and operators of vessels, aircraft and any other means of transport shall be bound to indicate, on the transport documents they submit to customs offices, the commercial description and the tariff type of the goods they are transporting, as well as the year of first entry into service, in case of vehicles.
2. Any breach of the obligation referred to in paragraph 1 above shall be tantamount to failure to register, deemed to be a second-class offence, and punishable by the penalties set out in Article 465 of the CEMAC Customs Code.

SECTION TWELVE: Conversion rate applicable when discharging direct clearance

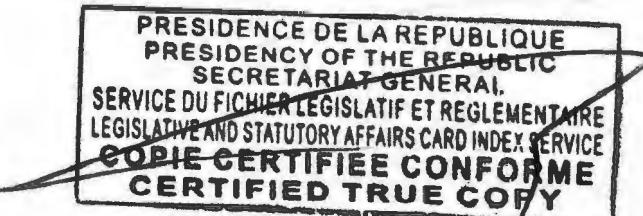
The currency conversion rate applicable for the settling of direct removal submissions through detail declarations of release for consumption shall be that used when the said facility was granted.

SECTION THIRTEEN: Proof of origin of currency and the tax status of holder at border crossings

1. At border crossings, natural persons shall be required to declare to the competent customs services, sums in cash, in both foreign currency and CFA francs, in excess of CFAF five million, in accordance with the provisions of Article 78 of Regulation No. 02/18/CEMEC/UMAC/CM of 21 December 2018 on foreign exchange regulations in the CEMAC. They must also show proof of the lawful origin of the said funds.
2. The documents to be provided to justify the origin of the funds shall be indicated by a separate instrument of the Minister in charge of Finance.
3. In the event of failure to produce the convincing supporting documents referred to in paragraphs 1 and 2 above, the said funds shall be seized by the customs services, in accordance with the seizure report, then confiscated by decision of the Minister in charge of Finance and paid to the Central Bank, after automatic deduction of the fines imposed by the customs authorities.

SECTION FOURTEEN: Organization of mixed controls

1. Where a posteriori customs controls require specific technical skills, the customs authorities shall be authorized to organize joint controls with other government services and public bodies.
2. The procedures for carrying out such controls shall be laid down in separate instruments.



3. Where the said joint controls result in customs fines, the staff of the other government services and entities referred to in paragraph 1 shall also receive remuneration in accordance with the customs regulations in force.

CHAPTER TWO

PROVISIONS RELATING TO THE GENERAL TAX CODE:

SECTION FIFTEEN: The provisions of Articles 7, 8a, 8b, 18, 18b, 18c, 18d, 18e, 18f, 18g, 18h, 18i, 19, 19a, 21 (2), 21 (3), 22 (3), 25, 33, 34, 35, 42a, 44 (6), 53, 56, 65 bis, 70, 85, 87, 88, 90, 92, 92a, 92b (new), 93a A, 93b, 93j, 101, 103, 128 (6), 141a (new), 142, 143, 149, 225, 226, 231, 239b, 470a, 543, 546a, 546b, 546c, 556, 556, 597, 598, 598e, 601, M 1, M 2, M 2a, M 2b, M 3, M 6a, M 8a, M 13, M 19a (new), M 41a, M 53, M 79, M 86, M 94a, M 94b, M 94c, M 104, M 104b, M 104b, M 121 (new), M 125, M 145 of the General Tax Code, are amended and/or supplemented as follows:

BOOK ONE

TAXES AND DUTIES

PART I DIRECT TAXES

CHAPTER I COMPANY TAX

DIVISION III TAXABLE PROFITS

Section 7: Net taxable profit shall be established after deduction of all charges directly entailed by the exercise of activities subject to assessment in Cameroon, in particular:

A – Overhead expenses

All types of overheads, personnel and labour expenses, expenses relating to premises, equipment and furniture, miscellaneous and exceptional costs, insurance premiums, liberalities, donations and subsidies;

However, the following expenses shall be treated as follows:

1- Sundry remuneration and provision of services

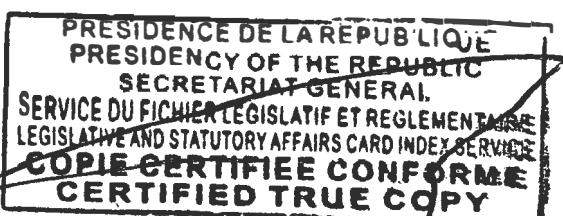
(a)

(b)

(c)

d) Subject to international conventions, the following are recognised as expenses, provided they are not exaggerated:

- Head office overhead expenses for operations carried out in Cameroon and the



remuneration of certain effective services (studics, technical, financial or accounting assistance) provided to Camcroonian firms by foreign or Cameroonian natural or corporate bodies.

On no account shall there be accepted on this basis any sum exceeding 2.5% of the taxable profit before deducting the expenses concerned.

In case of a deficit, this provision shall apply to the results of the last financial year not prescribed. However, for companies in a continuous deficit situation and new companies in a deficit situation, the limitation shall apply to turnover at the rate of 1%. If there is no turnover, the basis for calculating the cap shall be the total amount of annual expenses incurred by the company.

The rest shall remain unchanged.

C- Actual losses

The following shall be deductible from profits:

- duly established actual losses on fixed or realisable assets, with the exception of:

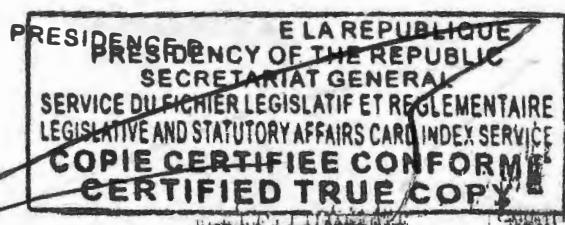
- losses due to misappropriation by a shareholder or a company manager, or where the misappropriation is attributable to negligence on the part of managers;
 - losses due to the transfer of the liabilities of the dissolved company to the acquiring company, in the event of a change of activities following restructuring;
-
- = losses due to damage duly established and validated in the presence of a taxation officer with at least the rank of controller, under the conditions laid down in the Tax Procedures Manual, provided that such losses are not the result of negligence or manifest recklessness on the part of the taxpayer, as established by the competent authorities or bodies.

The rest shall remain unchanged.

Section 8 a: (1) The charges referred to in Section 7 above of a value equal to or above CFAF 100 000 (one hundred thousand) per transaction shall not be deductible when paid in cash.

(2) The following shall also be non-deductible:

- expenses justified by invoices that do not include a Single Identification Number, with the exception of invoices from foreign suppliers;
- expenses justified by invoices issued outside the tax authorities's electronic invoicing monitoring system;
- expenses relating to all types of remuneration paid to self-employed professionals practising in breach of the regulations in force governing their respective professions;



- expenses relating to all types of remuneration paid to taxpayers who, on the date of the transaction, are not on the tax authorities' list of active taxpayers.

Section 8 b (new): (1) Charges and all types of emuneration, recorded by a natural or legal person domiciled or established in Cameroon and relating to transactions with natural or legal persons residing or established in a territory or state considered to be a tax haven, shall not be deductible for the purposes of determining corporate tax or personal income tax in Cameroon.

(2)

(3) A tax haven shall be a State or territory whose income tax rate for individuals or legal entities is below one third of that applied in Cameroon, or a State or territory considered as non-cooperative with respect to transparency and information exchange for tax purposes **by the international bodies responsible for promoting transparency and information exchange for tax purposes.**

DIVISION VII

OBLIGATIONS OF TAXPAYERS

Section 18: (1) Concerning the assessment of this tax, taxpayers are expected to submit a declaration of revenue derived from their business venture during the period serving as tax base no later than:

- 15 March for taxpayers falling under the entity responsible for the management of large-scale enterprises;
- 15 April for taxpayers falling under medium-size taxation centres and specialised tax centres;
- 15 May for taxpayers falling under divisional taxation centres.

The declaration shall be presented in conformity with the OHADA accounting system.

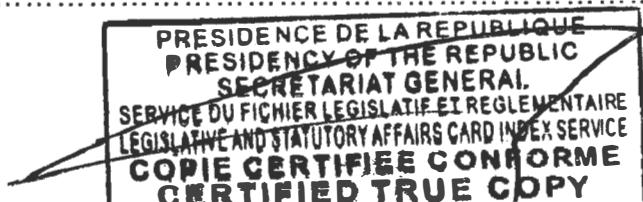
The rest shall remain unchanged.

Section 18 b: (1) Enterprises falling under the entity responsible for the management of large-scale enterprises that are controlled by or which control other enterprises within the meaning of section 19a of this code shall be required to make an annual declaration on transfer pricing by electronic means, in accordance with the model established by the administration, within the period provided for in section 18 of this Code.

(2) The declaration referred to in the preceding subsection shall include notably:

- a. General information on the group of associated enterprises, including:

i.

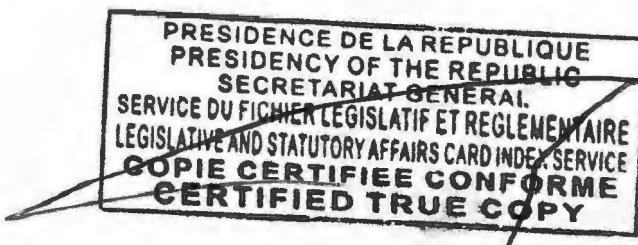


- ii.
- iii.
- iv. . a list of the intangible assets held by the group and used by the reporting enterprise, as well as the corporate name of the company that owns or co-owns the assets and its state or territory of residence for tax purposes;
- v. **the nature of the relationship with the affiliated enterprise.**
 - b. Specific information about the reporting enterprise, including:
 - i. a description of the activity carried out, including the changes made in the course of the financial year;
 - ii. a summary statement of transactions with affiliated enterprises within the meaning of sect 19 a of this code. This statement shall include the nature and the amount of the transactions, the corporate name and state or territory of residence of the affiliated enterprises concerned by the transactions and the beneficial owners of the related payments for tax purposes, the transfer pricing method applied and the changes made in the course of the financial year;
 - iii. a statement of loans and borrowings contracted with affiliated enterprises within the meaning of section 19 a of this code;
 - iv. a summary statement of transactions carried out with affiliated enterprises within the meaning of sect 19a of this code without a counterpart contribution or with a non-monetary counterpart contribution;
 - v. a summary statement of transactions carried out with associated enterprises within the meaning of Article 19 a of this Code, which are the subject of an advance transfer pricing agreement or a tax rescript concluded between the associated enterprise concerned by the transaction and the tax authorities of another State or territory.

(3) Failure to file the annual pricing declaration within the prescribed time limit, or filing an incomplete or non-compliant declaration shall be punished with a fixed fine as provided for in Article M 104 (2) of the Tax Procedures Manual.

Section 18 c: (1) Any enterprise established in Cameroon shall be required to file, within twelve (12) months following the close of the tax year, by electronic means, a country-by-country report, using a format established by the tax authorities, including the country-by-country breakdown of profits of the multinational enterprise group to which it belongs, and tax and accounting data as well as information on the place where the activities of the enterprises in the group are carried out, where:

a. it directly or indirectly owns shares in one or more enterprises such that it is required to prepare consolidated financial statements in accordance with applicable accounting legislation, or would be required to do so if its shares were listed on the Central African Stock Exchange (BVMAC);



b. it has tax-exclusive annual consolidated sales of at least CFAF 492 000 000 000 (four hundred and ninety-two billion) for the financial year preceding that to which the declaration relates;

c. no other enterprise directly or indirectly owns shares in the aforementioned enterprise within the meaning of point (a) of this paragraph.

(2) Any enterprise established in Cameroon meeting one of the conditions below shall also be required to file the report provided for in this Section within the time limit and in accordance with the procedures and format referred to above:

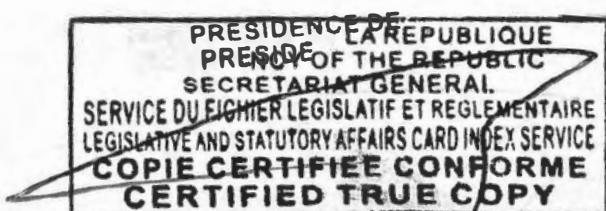
a. it is directly or indirectly owned by an enterprise established in a State which does not require the filing of a country-by-country report, but which would be required to file such a report if it were established in Cameroon; or

b. it is directly or indirectly owned by an enterprise established in a State which is not on the list provided for in paragraph 8 of this Article but with which Cameroon has concluded an agreement for the exchange of information on tax matters.

(3) Any enterprise established in Cameroon directly or indirectly owned by an enterprise established in a State included in the list provided for in Section 18c (8), which is required to file a country-by-country report under the legislation in force in that State or which would be required to file such a report if it were established in Cameroon, shall also be required to file the report provided for in Section 18c where it is informed by the tax authorities of a systemic failure of the State of tax residency of the company which directly or indirectly owns it.

(4) An enterprise established in Cameroon, other than the ultimate parent entity of a multinational enterprise group, shall not be required to file the country-by-country report in respect of a tax year in the event of substitution filing in another jurisdiction by the multinational enterprise group, provided that the following cumulative conditions are met for that tax year:

- the jurisdiction of tax residence of the reporting entity requires the filing of a country-by-country report similar to that provided for in this Section;
- the jurisdiction of tax residence of the reporting entity has concluded an agreement authorizing the automatic exchange of country-by-country reports with Cameroon which is in force on the date on which the country-by-country report is due to be filed;
- the jurisdiction of tax residence of the reporting entity has not informed Cameroon of a systemic failure;
- the country-by-country report is exchanged by the jurisdiction of tax residence of the reporting entity with Cameroon;
- the jurisdiction of tax residence of the reporting entity has been informed by the constituent entity resident for tax purposes in its jurisdiction that the latter has been designated by the multinational enterprise group to file the country-by-country report on its behalf;



- a notification from the constituent entity resident for tax purposes in Cameroon has been received by the tax authorities, indicating the identity and jurisdiction of tax residence of the reporting entity.

(5) Where two or more enterprises established in Cameroon belonging to the same multinational enterprise group meet one or more of the conditions referred to in Section 8c (2) and (3) above, one of them may be designated by the multinational enterprise group to file the country-by-country report provided for in this Section, subject to informing the tax authorities that such filing seeks to fulfil the filing obligation imposed on all the enterprises of this multinational enterprise group established in Cameroon.

(6) The content of the country-by-country report provided for in this article shall be determined by order of the Minister in charge of finance.

(7) The country-by-country report provided for in this Section may be exchanged automatically with States or territories which have concluded an agreement to this effect with Cameroon.

(8) The list of States which have concluded an agreement with Cameroon authorizing the automatic exchange of the country-by-country report provided for in this Section shall be determined by order of the Minister in charge of finance.

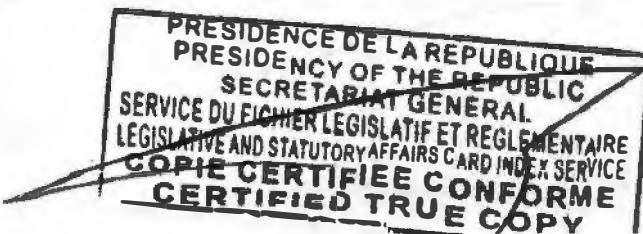
(9) Failure to file, or incomplete or inaccurate filing of the country-by-country report within the stipulated period shall be punished with a fixed fine as provided for in Section M 104 (2) of the MTP.

Section 18 d: (1) Financial institutions and similar bodies, including banks and financial establishments, as well as insurance and reinsurance companies, shall be required to identify the tax residence of all financial account holders. They must also identify, in the required manner, the tax residence of the natural persons who control these accounts, where applicable.

(2) Financial institutions and similar bodies shall disclose to the tax authorities, by means of a report that conforms to the model prescribed by the tax authorities, all the information required for the implementation of conventions concluded by Cameroon allowing automatic exchange of information on financial accounts for tax purposes. They must also report any lack of information.

The report shall contain, in particular, information relating to the identification of the holders of financial accounts and, where applicable, that of the individuals who control them, as well as financial information relating to these accounts, including income from movable capital, account balances, the surrender value of insurance and annuity contracts, capitalisation bonds or contracts and similar investments, and the proceeds of sales or redemptions of financial assets.

(3) Financial institutions shall be required to keep records of actions taken to meet the obligations referred to in this Section, as well as the supporting documents, self-certifications and other evidence used for this purpose, for a period of 5 (five) years following the end of the period during which they must provide the information required.



Section 18 e: As from 1 January 2025, natural persons or entities opening financial accounts with financial institutions shall be required to submit a self-certification establishing their tax residence and, where applicable, the tax residence of the natural persons controlling them.

Section 18 f: (1) Where a person establishes a mechanism or engages in a practice the main purpose or one of the main purposes of which may reasonably be considered to be to evade an obligation imposed by the provisions of Sections 18e and 18g above or their implementing instruments, such provisions shall apply as if the person had not established the mechanism or engaged in the practice.

(2) The notion of "mechanism" is defined as any arrangement, contract, practice, transaction or series of transactions, in whatever form, having one or more principal objectives, one or more of which is to avoid one of the obligations imposed by the provisions of Sections 18f and 18g above or their implementing instruments.

Section 18 g: (1) Information collected by the tax authorities from the bodies referred to in Section 18 d above may be disclosed to the tax authorities of countries that have concluded agreements with Cameroon allowing automatic exchange of information on financial accounts for tax purposes.

(2) Information shall be disclosed in accordance with the conditions laid down in the agreements concluded with the countries concerned.

Section 18 h: (1) Failure to comply with the identification and reporting obligations set out in Sections 18 d and 18 e shall be punishable by a fine of FCFA 5 million per account. Such penalty shall also apply to late, incomplete, insufficient or erroneous reporting.

(2) Natural persons or entities who fail to provide financial institutions with the self-certification provided for in Section 18e shall be liable to a fine of FCFA 1 million per account holder. The deliberate self-certification of erroneous information by an account holder or a natural person controlling the account holder constitutes forgery, be punishable by the penalties provided for in the Criminal Code.

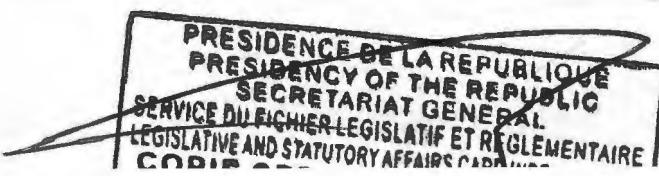
(3) Failure to keep the information and documents provided for in Article 18d shall be punishable by a fine of FCFA 1 million per year and per account subject to reporting. Failure to comply with the retention period provided for in Section 18 d shall be tantamount to failure to keep records.

Section 18 i: The procedures for implementing the automatic exchange of information provided for in Sections 18 d et seq. of this Code shall be laid down by regulation.

DIVISION VIII

ASSESSMENT

Section 19: (1) For the assessment of the company tax payable by companies which are controlled by, or which control an undertaking established in or outside Cameroon within the meaning of Section 19 a of this code, the profits indirectly transferred to the latter by increasing or reducing the purchase or selling price, or by any other means,



shall be incorporated in the results of such enterprises. The profits indirectly transferred shall be assessed by comparison with those that would have been realised in the absence of dependency or control.

(2) The condition of dependency or control referred to in Section 19(1) shall not be required when the transfer takes place with enterprises:

- established or resident in a State or territory considered as a tax haven within the meaning of Section 8 b (new) of this Code;
- or subject to a preferential tax regime.

Enterprises shall be considered to be subject to a preferential tax regime in a State or territory if they are not taxable therein, or if their income tax is less than half that which they would have paid in Cameroon they were domiciled or established there.

(3) The provisions of section 19 (1) above shall also apply to transactions with affiliated enterprises within the meaning of section 19a below, established in Cameroon, particularly where the latter are beneficiaries of a derogatory tax regime..... (deleted).

Section 19 a: Dependency or control relationships shall be deemed to exist between two enterprises:

- I. where one holds directly or by proxy 25% of the share capital of the other or actually exercises decision-making powers in the other; or
- II. where both are placed, under the conditions defined in point (a) above, under the control of the same enterprise or person.

DIVISION IX

PAYMENT

Section 21: (1) The company tax shall be paid on the initiative of the taxpayer not later than the 15th of the following month, in accordance with the terms below:

The rest shall remain unchanged.

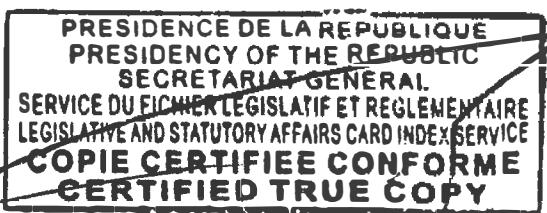
(2) The installment referred to in Section 21 (1) above shall be deducted at source by the public accountants and persons of equivalent status during the settlement of bills paid by the budget of the State, regional and local authorities, public administrative establishments, public or semi-public corporations, **non-profit organizations** as well as private sector enterprises, the list of which shall be established by regulation.

The rest shall remain unchanged.

(3) The following shall be subject to a withholding tax:

- ;

- ;



The following shall not be subject to a withholding tax:

- purchases made by registered industrialists subject to actual earnings System for exploitations

(deleted);

The rest shall remain unchanged.

DIVISION X
TAX PAYER OBLIGATIONS

Section 22: (1) For the payment of the taxes collected, industrialists, importers, wholesalers, semi-wholesalers and forestry companies must:

The rest shall remain unchanged.

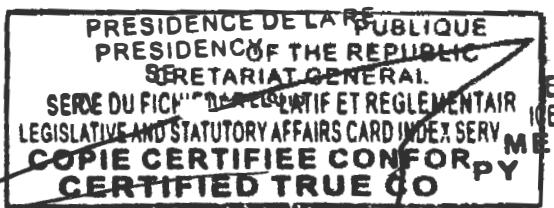
(3) Any withholding tax deducted in respect of income tax or withholding tax on purchases shall give rise to the issue of a withholding tax certificate. Such certificate must be generated from the tax authorities' computer system.

CHAPTER II
PERSONAL INCOME TAX

DIVISION I:
GENERAL PROVISIONS
SUB-DIVISION I
TAXABLE PERSONS

Section 25: Subject to the provisions of international conventions and those of Section 27 below, the Personal Income Tax shall be payable by any natural persons whose tax residence is in Cameroon on account of all their global income

The rest shall remain unchanged.



DIVISION II
BASIS OF ASSESSMENT
OF THE PERSONAL INCOME TAX

SUB-DIVISION I

SALARIES, WAGES, PENSIONS AND LIFE ANNUITIES

II - DETERMINATION OF THE TAX BASE

Section 33: (1) Benefits in kind shall be valued according to the following scale, applicable to the gross taxable wage:

- ;

- ;

- ;

- ;

- ;

- ;

- telephone 5 %;

- fuel... 10 %;

- security guard 5 %;

- internet5 %.

Benefits in kind not listed in paragraph 1 above shall be valued at their actual cost.

(2) Any cash allowance representing benefits in kind shall be included in the basis of assessment for **its actual amount**, unless they are specifically exempted by a contrary provision.

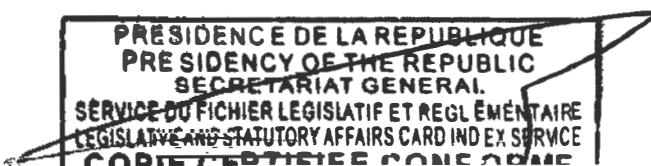
Section 34: (1) The net taxable income shall be determined by deducting from the gross amount paid and the benefits in kind or cash granted, the business expenses calculated at a fixed rate of 30%, as well as contributions paid to the State and the National Social Insurance Fund (NSIF) for compulsory retirement.

(2) The amount resulting from the application of the fixed rate provided for in paragraph 1 above shall be capped at FCFA 4 800 000 (four million eight hundred thousand) per year.

SUB-DIVISION II
INCOME FROM STOCKS AND SHARES

I – TAXABLE INCOME

Section 35: The following capital shall be taxed as income from stocks and shares



- (1507) proceeds from shares, stocks and similar income;
- (b) income from bonds;
- (c) income from assets, deposits, surety bonds and current accounts;
- (1507) profits from the transfer of shares, bonds and other kinds of shares
- (1507) (e)income from digital assets.

A- Proceeds from stocks and shares income considered as such

The rest shall remain unchanged.

E. Income from digital assets.

Section 42-a: The methods of taxation of income from digital assets shall be laid down by a separate instrument by the Minister in charge of finance.

III. ASCERTAINMENT OF TAXABLE BASIS

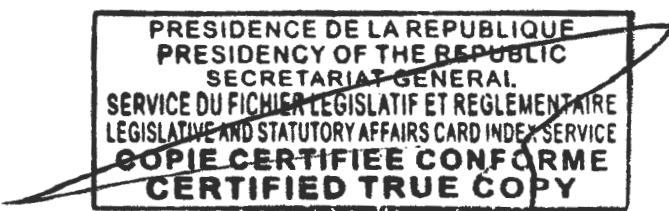
Section 44: Taxable income shall be assessed in respect of

- 1)
- 2)
- 3)
- 4)
- 5)

(6) Income from the indirect transfers referred to in Section 42 above, through the capital gain obtained from the transfer of the shares of the foreign entity to the Cameroonian company's capital.

Recorded gains or losses for each transfer operation done during the financial year shall be assessed by the **differential between the transfer price** of the securities concerned and their purchase price or their grant value, in case of acquisition of such securities during the incorporation of a company or when increasing the company's capital. **The amount to be taken into account as transfer price in order to determine the gain or less shall, under no circumstance, be below the value of the values transferred.**

In the event of net overall losses recorded in a financial year, such losses shall be offset by any net overall profits recorded in the next four financial years.



SUB-DIVISION V
PROFITS FROM AGRICULTURE

I- TAXABLE INCOME

Section 53: Income earned by farmers, share-croppers, smallholders, (deleted) or by the actual owners of agricultural undertakings shall be deemed to be profits from agriculture for the assessment of personal income tax.

SUB-DIVISION VI
PROFITS FROM NON-COMMERCIAL ACTIVITIES

I – TAXABLE INCOME

Section 56: (1) Earnings from liberal professions, public offices and trusts held by persons without commercial status, from non-salaried income of sportsmen and artists, and from all operations, gainful activities and sources of gain unconnected with any other category of profit or income shall be deemed to be non-commercial earnings or earnings considered as such.

(2) Profits shall notably comprise:

(a) income from stock-exchange operations performed by individuals;

(b)..... ;

(h) income generated on digital platforms by individuals who sell goods, provide services or exchange or share goods on such platforms.

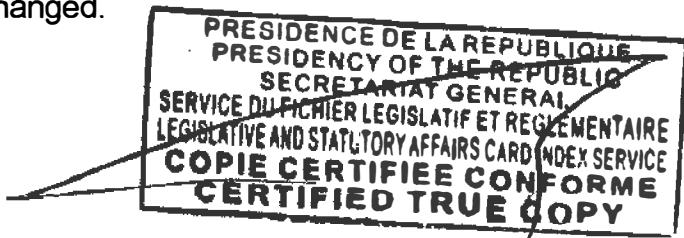
SUB-DIVISION VII
PROVISIONS COMMON TO HANDICRAFT, INDUSTRIAL, COMMERCIAL,
AGRICULTURAL AND NON-COMMERCIAL PROFITS

II – CALCULATION OF PROFITS OF TAXPAYERS ASSESSED
UNDER THE ACTUAL EARNINGS SYSTEM

Section 65 a: Where, in the course of a financial year, a taxpayer realized an income which, by its nature, may not be made available to him annually and where the amount of such special income exceeds the average net incomes on the basis of which the taxpayer was liable to the Personal Income Tax for the previous three years, the tax payable by the person concerned shall be calculated by adding one quarter of the net special income to his net taxable income and multiplying the additional tax thus obtained by four..

Where the amount of exceptional income is above the income threshold subject to the marginal rate of personal income tax, the tax payable by the taxpayer shall be calculated on the basis of the overall net taxable income, plus the net exceptional income after a 25% reduction.

The rest shall remain unchanged.



DIVISION III TAX CALCULATION

Section 70: (1) In the specific case of income on stocks and shares, a 15% flat rate shall be applicable to taxable income.

(2) However, this rate shall be fixed at 10 % for the non-commercial income and profits referred to in Section 56 (2) d, e and f. **It shall be reduced to 5% for the income referred to in Section 56 (2) h.**

DIVISION VI PAYMENT OF TAXES SUB-DIVISION II INCOME FROM SECURITIES

Section 85: (1) Personal income tax levied on capital gains from securities calculated in accordance with Section 69 of this Code shall be deducted at source by the person paying the proceeds mentioned in Sections 35 et seq of this Code. **The deduction thus made shall give rise to the issue of a certificate of deduction at source which must be generated from the tax authorities's computer system.**

The rest shall remain unchanged.

SUB-DIVISION III: REAL ESTATE INCOME

Section 87: A 15% deduction at source shall be levied on gross real estate income calculated in compliance with the provisions of section 48 of this Code.

The deduction at source shall be made exclusively by government services and public establishments, corporate bodies and sole-proprietor business assessed under the actual earnings system, simplified system **or the non-profit organization (NPO) system.**

Rents paid to enterprises assessed on the basis of actual earnings and depending solely on the specialized management units shall be exempt from the deduction.

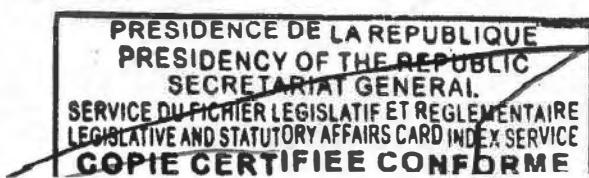
The withholding tax is levied exclusively by public administrations and establishments, legal entities and sole proprietorships subject to the real income tax regime, the simplified tax regime or the regime for non-profit-making organisations (NPOs).

Section 88: The deduction shall be made by the person paying the rents who shall be responsible for payment of the said amount to his/her Taxation Centre, not later than the 15th of the month following the actual payment of the rents.

The withholding tax on rent shall give rise to the issue of a withholding tax certificate which must be generated from the tax authorities's computer system.

Section 90: The capital gains referred to in section 46 (2) shall be subject to a 5% flat rate deducted by the notary for the vendor. **The rate shall be increased to 10% where the transaction is made in cash.**

However, the buyer may also pay the capital gains tax on behalf of the seller.



SUB-DIVISION IV:

HANDICRAFT, INDUSTRIAL, COMMERCIAL, AGRICULTURAL AND NON-COMMERCIAL PROFITS

Section 92: The installments referred to in Section 91 above shall be deducted at source by public accountants and persons of equivalent status during the settlement of bills paid from the budget of the State, regional and local authorities, public administrative establishments, public or semi-public corporations as well as **non-profit organizations** and private sector enterprises, the lists of which shall be established by regulation.

The rest shall remain unchanged.

Section 92 a: A 5% installment shall be deducted at source by the State, regional and local authorities, administrative public establishments, public or semi-public companies, private enterprises and **non-profit organizations** (NPOs) on the fees, commissions and emoluments paid to members of liberal professions, irrespective of their legal form or tax system.

The rest shall remain unchanged

Section 92 b (new). The tax due pursuant to the provisions of Section 56 (2) d, e, f shall be deducted at source by the entity that makes the payment **or the operator of the digital platform.**

The amount deducted shall be paid not later than the 15th of the following month to the taxation office with jurisdiction.

The tax due in accordance with the provisions of section 56 (2) d, e, f, h is deducted at source by the entity making the payment.

The sums thus deducted are paid back to the local tax office by the 15th of the following month at the latest.

Section 93a A: The deductions made at source in respect of the income tax instalment provided for in Sections 92, 92a, 92 b (new), 93 and 93a give rise to the issue of a deduction at source certificate which must be generated from the tax authorities's computer system.

CHAPTER III GENERAL AND COMMON PROVI-SIONS ON COMPANY AND PERSONAL INCOME TAX

DIVISION I:

TAXATION SYSTEMS

Section 93 ter: Natural or legal persons shall be assessed according to the following systems, determined on the basis of the turnover realized:



-
-
- Non-professional taxpayers.

Section 93h: (1) Non-professional taxpayers shall be persons who receive only income from salaries, wages, pensions, life annuities and/or income from movable capital and income from property, and in general any passive income.

(2) Subject to the exemptions provided for in this Code, persons under the non-professional taxpayer regime shall be liable to payment of the following taxes for which they are actual or statutory taxpayers:

- in their capacity as actual taxpayer: personal income tax in the categories of salaries and wages and property income, registration fees, tax on landed property and tax on real estate wealth;
- in their capacity as statutory taxpayer: special income tax, salary deductions.

(3) Non-professional taxpayers shall be required to file a summary annual return of their income in accordance with the provisions of Section 74a of this Code.

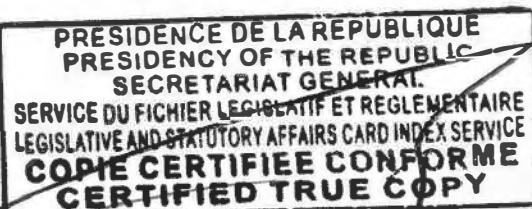
DIVISION IV OBLIGATIONS OF BUSINESS OWNERS

Section 101: Before 15 March each year or one month before departure from Cameroon of his salaried workers, every business owner shall, using the model provided by the tax authority, make an individual return for each worker on the following sums paid during the past financial year:

- a)
- b)
- c) a list of purchases by supplier, showing their single identification number and the amount of purchases for the financial year;
- d) a list of sales by customer, indicating their single identification number and the amount of sales for the financial year.

Section 103: Any infringement of the provisions of Sections 101 and 102 above shall give rise to a fine of 5% of the amount not declared. Such fine shall be recoverable in the same way as the taxes specified in the chapters above.

The rest shall remain unchanged.



PART II
VALUE ADDED TAX AND EXCISE DUTY

CHAPTER I

SCOPE OF APPLICATION

DIVISION III

EXEMPTIONS

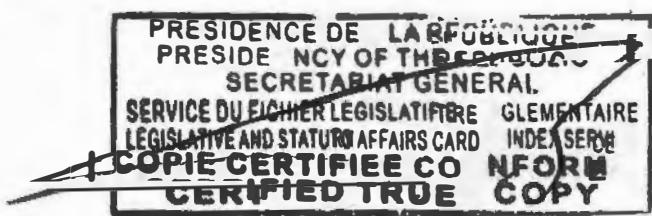
Section 128: The following shall be exempted from Value Added Tax:

(6) a- essential goods listed under Annex 1, notably:

-;
-;
-;
-

b- The exemption provided for in paragraph 6(a) above shall not apply to the following products:

- parboiled rice of tariff subheading 1006.30.90.200;
- perfumed rice of tariff subheading 1006.30.90.300;
- ornamental fish of tariff subheadings 0301.11.00.000, 0301.19.00.000;
- chilled trout of tariff subheading 0302.11.00.000;
- fresh or chilled salmon of tariff subheadings 0302.13.00.000, 0302.14.00.000, 0302.19.00.000;
- livers and roes of fish of tariff subheading 0302.91.00.000;
- frozen salmon of tariff subheadings 0303.11.00.000, 0303.12.00.000 and 0303.13.00.000;
- frozen trout of tariff subheadings 0303.14.00.000 and 0303.19.00.000;
- livers, roes, fins, heads, tails, swim bladders and other offal of edible fish of tariff subheadings 0303.91.00.000, 0303.92.00.000 and 0303.99.00.000;
- livers and roes of fish, dried, smoked, salted or in brine of tariff subheading 0305.20.00.000;
- salmon, dried, salted or in brine of tariff subheading 0305.41.00.000;
- trout, dried, smoked, salted or in brine of tariff subheading 0305.43 .00.000;
- cod of tariff subheading 0305.62.00.000.



CHAPTER II
CALCULATION METHODS

DIVISION III
CALCULATION

A – BASIS OF ASSESSMENT

Section 141a (new): In the specific case of the beverages listed below, the basis of assessment of excise duty shall be determined after application of an abatement of:

- 10% for carbonated beverages;
- 10% for beer with an alcohol content of 5.5 or less
.....(deleted).

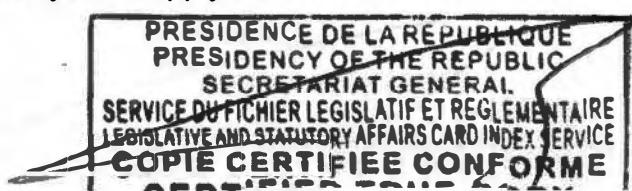
B- RATES

Section 142: (1) ;

(6) (a) The average rate of excise duty shall apply to:

-;
-;
-;
-;
-;
- hair, wigs, wool, beards, eyebrows, eyelashes, locks and other textile materials imported for the manufacture of wigs or similar articles of hair of tariff headings 6703 to 6704;
-;
-;
-;
-;
- refined vegetable oils imported under tariff subheadings 1507.90.00.000, 1508.90.00.000, 1509, 1510.90.00.000, 1511.90.00.000, 1512.19.00.000, 1512.29. 00.000, 1513.19.00.000, 1513.29.00.000, 1514.19.00.000, 1514.99.00.000, 1515.19.00.000, 1515.29.00.000, 1515.30.00.000, 1515.50.00.000, 1515.90.00.000 and 1516.20.00.000 ;
- imported cocoa beans, including those intended for use as raw materials of tariff heading 1801;
- imported dog or cat feed of tariff subheading 2309.10.00.000;
- imported charcoal of tariff heading 4402.

(b) The reduced rate of excise duty shall apply to:



.....,
.....;
.....;
.....,
.....;
.....;
.....;
.....;

- imported cereal products (corn flakes) and food preparations obtained from imported cereal flakes of tariff subheadings 1904.10.00.000 and 1904.20.00.000.

The rest shall remain unchanged.

C – DEDUCTIONS

Section 143: (1) Value Added Tax upstream on the price of a taxable operation shall be deductible from the tax applicable to such transactions, as concerns registered taxable subject assessed on the basis of the actual earnings, in the following manner:

- (a) The Value Added Tax which was applied to the price of a taxable transaction shall be deductible during the corresponding month.
- (b) To be deductible, Value Added Tax should appear:

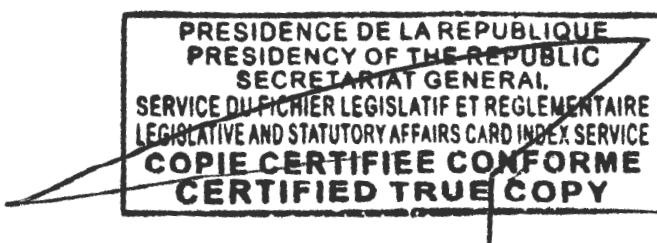
- on a bill duly issued via the tax authority's electronic invoicing tracking system by a registered supplier, entered in the taxpayer's file active at the time of invoicing, who is assessed on the basis of actual earnings and bearing his single identification number. However, these conditions shall not apply for suppliers abroad;

The rest shall remain unchanged.

- (2)
- (3)
- (4)

Value Added Tax deductions at source shall be made upon production of the certificate of deduction at source issued by the entity authorized to deduct taxes at source **via the tax authority's computer system**.

Any certificate of deduction at source issued outside the tax authority's computer system shall not give entitlement to VAT deduction.



CHAPTER III
RULES OF PROCEDURE

DIVISION I
METHOD OF PAYMENT OF THE TAX

Section 149: (1)

(2) For suppliers to the State, regional and local authorities, administrative public establishments and public and semi-public enterprises, and some private sector companies, the lists of which are drawn up by regulation, Value Added Tax shall be deducted at source during settlement of an invoice and transferred to the tax office or, otherwise, to the accounting office with territorial jurisdiction, under the same conditions and time-limits applicable to the other transactions. Such deductions shall concern both initial invoices and credit notes relating to commercial reductions. **The deduction thus made shall give rise to the issuance of a certificate of deduction at source which must be generated from the tax authority's computer system.**

The rest shall remain unchanged.

(4) No application for refund or offsetting of value added tax may be submitted based on receipts of payments in cash.

.....
.....
.....
.....
They shall be refundable:

- within a period of three months to firms having a structural credit status due to deduction of tax at source.

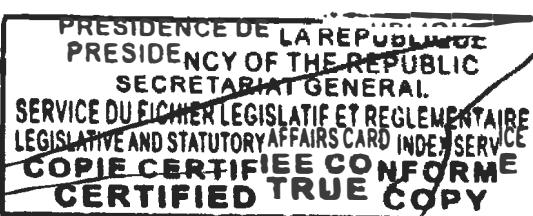
Any certificate of deduction at source issued outside the tax authority's computer system shall not give entitlement to refund.

The rest shall remain unchanged.

ANNEXES TO PART II

ANNEX II: LIST OF PRODUCTS SUBJECT TO EXCISE DUTY

Heading No.	Tariff description
.....
.....
6703. to 6704	Hair, wigs, wool, beards, eyebrows, eyelashes, locks and other textile materials imported for the manufacture of wigs or similar articles of human hair
.....
.....



4421.20.00.000 and 4421.99.00.900	Imported Wooden coffins and other wooden articles
9403.10.00.000	Imported Metal furniture of the types used in offices
9403.40.00.000	Imported Wooden furniture of the types used in kitchens
9403.70.00.000	Imported Plastic furniture
1904.10.00.000 and 1904.20.00.000	Imported cereal-based products (corn flakes) and food preparations obtained from imported cereal flakes
1507.90 00 000, 1509.20 00 000, 15.09.20 00 000, 1508.90 00 000, 1509. 90 00 000, 1510.90 00 000, 1511.90 00 000, 1512.19 00 000, 1512.29 00 000, 1513.19 00 000, 1513.29 00 000, 1514.19 00 000, 1514.99 00 000, 1515.19 00 000, 1515.29 00 000, 1515.30 00 000, 1515.60 00 000, 1515.90 00 000 ;	Imported refined vegetable oils
1602.20.10.000	Imported Industrial sausage, excluding giblets , which are already subject to excise duty at the rate of 25 %
1801	Imported cocoa beans, including those intended for use as raw materials
2309.10.00.000	Imported feed for dogs and cats
4402	Imported charcoal
0901.11.12.000 to 0901.11.19 ; 090111 22 to 0901.11.49.000 ; 090111.11.52.000 to 090112.00.000 ; 0901.21.00.000 and 0901.22.00.000 ; 2101	Imported coffee

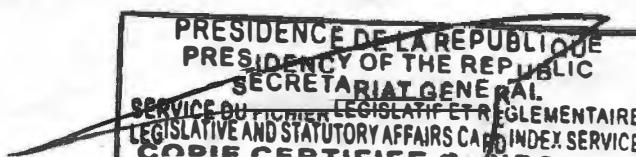
PART IV
SUNDAY TAXES AND DUTIES

CHAPTER III
SPECIAL INCOME TAX

Section 225: (1) Subject to international tax treaties, a special tax is hereby instituted on income paid to natural persons or corporate bodies domiciled out of Cameroon, by natural persons or corporate bodies located in Cameroon, the State or regional or local authorities in respect of:

The rest shall remain unchanged.

Section 226: In order to be taxable, the above proceeds shall be taxable where they are paid by natural persons or corporate bodies located in Cameroon, by the State or regional or local authorities to persons having no permanent nor fixed establishment in Cameroon, or where they are factored as deductible charges for the calculation of



the results of the payer. Where deduction of such proceeds as charges is not allowed, they shall be considered as distributed profit and taxed accordingly.

PART IV SPECIAL TAXATION

CHAPTER I SPECIAL TAX ON PETROLEUM PRODUCTS

Section 231: The rates of the special tax on petroleum products shall be as follows:

-;
-;
- 60 francs per cubic metre for natural gas for industrial use.

CHAPTER II PROVISIONS RELATING TO THE MINING SECTOR

Section 239b: (1) The fixed charges for the grant, renewal or transfer of all mining titles, annual area royalties, the ad valorem tax, the extraction tax on quarry products and the royalties on the production of spring water, mineral water and thermos spring water shall be paid exclusively to the competent tax collector.

However, the ad valorem tax on mineral substances and the corporate tax payable by companies engaged in less or semi-mechanized non-industrial mining may be collected in kind by deduction from the gross production of the said companies. An order of the minister in charge of finance shall determine the conditions for recording of collections in kind.

The minister of finance may, as appropriate, authorize any body or entity in charge of supervising mining activities to assist the tax authority in collecting in kind the ad valorem tax on mineral substances and corporate tax.

The terms and conditions of application of this authorization shall be laid down jointly by the ministers in charge of finance and mines.

The rest shall remain unchanged.

PART VI REGISTRATION, STAMP DUTY AND TRUSTEESHIP

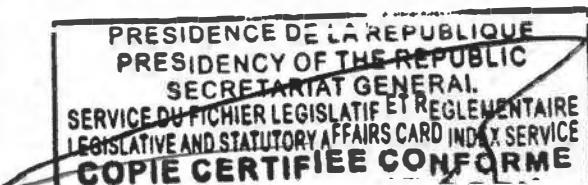
CHAPTER XIV STAMP AND STAMP DUTY

DIVISION III

STAMP ON THE ISSUE OF SOME DOCUMENTS AND MISCELLANEOUS ITEMS

G – SPECIFIC STAMPS ON SOME DOCUMENTS

Section 470a: Contentious and non-contentious claims, applications for deferment of payment, applications for compensation, refund or restitution of taxes, applications for



tax incentives and rebates, applications for tax transactions and for approvals or authorizations of any kind shall be subject to a specific stamp duty.

SUB-PART II
NON-HARMONIZED LEGISLATION IN THE CEMAC ZONE

CHAPTER I
RATES OF REGISTRATION DUTIES

DIVISION I
PROPORTIONAL DUTIES

Section 543: The following shall be subject to:

(a) the high rate of 15%:

- instruments and transfers of businesses provided for in Section 341(1) of this Code, with the exception of new goods, which are subject to the reduced rate of 2% when the conditions set out in the said paragraph are met
.....(deleted).

(b) the intermediate rate of 10%:

- instruments and transfers of urban built-on estates;
- instruments and transfers provided for in Section 341(2) of this Code, excluding leases of buildings in rural areas for business purposes;
- transfers of use of businesses and customers;
- instruments and transfers of businesses provided for in Section 341(1) of this Code, excluding new goods, which are subject to the reduced rate of 2% where the conditions set out in the said paragraph are met.

(c) Unchanged.

(d) Unchanged.

(e) the super-reduced rate of 1%:

- instruments and transfers provided for in Section 344 above. However, as regards release of mortgages, the tax calculated shall be reduced by three quarters;
- notwithstanding the provisions of Section 344 of this Code, instruments and transfers of property to associations recognized as being of public utility and duly authorized faith-based bodies.

The rest shall remain unchanged.

DIVISION V
ADMINISTRATIVE EVALUATIONS

Section 546a: (1) Notwithstanding the provisions of Sections 324 and 325 supra, the estimate that served as basis for the levying of proportional, progressive or digressive duty on movable or immovable property assigned in ownership, usufruct or possession shall not be lower than that resulting from implementation of the official price list.

In the specific case of transfers resulting from inheritance, division, release from joint ownership and gifts inter vivos in the direct line and between spouses, the value used as basis for calculating registration duty shall be determined by applying a discount of 50% to the value resulting from applying the official price list.

The rest shall remain unchanged.

DIVISION VI **SPLITTING OF DUTIES**

Section 546b: Notwithstanding the provisions of Sections 304, 312 and 313 of this Code, the amount of the registration duty for a long lease may be split into as many payments as there are three-year periods in the term of the lease.

Section 546c: (1) Where the payment of duties is split into installments, the registration formality shall be granted as and when the installments are paid and for the amount of each installment.

(2) Failure by the taxpayer to comply with the terms and conditions for payment in installments shall invalidate the installments granted and render the amount of duty still due immediately payable, without prejudice to late payment penalties of an additional duty.

CHAPTER II STAMP DUTY RATES

DIVISION II

SPECIAL STAMP DUTY PAYABLE ON SOME DOCUMENTS AND OTHER FEES

F- STAMP ON TRANSPORT CONTRACTS

Section 556: Stamp on transport contracts shall be fixed as follows:

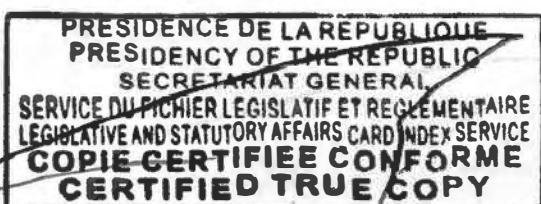
- 1) ;
- 2) ;
- 3) CFAF 10 000 per bill of lading for transport of goods by air.

Stamp duty on transport contracts shall be paid by the transporter exclusively at the revenue office of his or her taxation centre. In the case of air transport contracts, the stamp duty shall be collected by the express mail company.

SUB-PART III UNHARMONIZED CODE IN CEMAC ZONE

CHAPTER V STAMP DUTY ON MOTOR VEHICLES

Section 598: The stamp duty on motor vehicles shall be collected by insurance companies at the time of subscribing to a civil liability insurance policy.



Insurance companies shall collect the stamp duty on motor vehicles at the rate referred to in Section 597 above from the very first payment of the insurance premium during the year, be it partial or total payment.

Collection of the stamp duty on motor vehicles shall be subject to the issuance of a receipt by the insurance company, generated by the tax authority's computer system.

The rest shall remain unchanged.

Section 598a: Under pain of the fine provided for in Section M 104 of the Manual of Tax Procedures, insurance companies shall be required to attach to their annual return a file of their intermediaries specifying their name or company name, their single identification number, their address and location.

Failure to issue a certificate of payment of the stamp duty on motor vehicles in the tax authority's computer system shall be liable to payment of the fine provided for in Section M 104(1) of the Manual of Tax Procedures.

Section 601: Failure to produce justification of payment of the stamp duty on motor vehicles by presenting a payment certificate of the said stamp duty generated by the tax authority's computer system to the authorized control officials shall constitute a second-class offence, punishable under Section 362(b) of the Penal Code.

BOOK TWO
MANUAL OF TAX PROCEDURES

SINGLE CHAPTER
OBLIGATIONS OF TAXPAYERS

DIVISION I
OBLIGATION TO FILE RETURNS

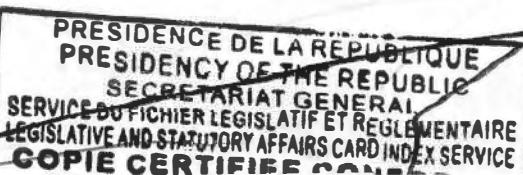
SUB-DIVISION I
GENERAL PRINCIPLE

Section M 1: Any natural or legal person liable, as a statutory or actual taxpayer, to payment of a tax, duty or levy or an installment thereof, by virtue of the provisions of the General Tax Code, must file an application for registration with the competent tax authority of his area, within 15 (fifteen) working days following the start of his activities, and attach to such application a site plan, the subscription references of the public water or electricity distribution service company, as appropriate, the telephone number and a valid e-mail address.

After completion of the registration procedure, a registration receipt stating the taxpayer's single identification number, tax system and registration centre shall be issued to the taxpayer by the tax authority.

The rest shall remain unchanged.

Section M 2: (1) Any natural person or corporate liable as a statutory taxpayer to payment of a tax, duty or levy or an installment thereof, or designated to effect deduction at source by virtue of laws and regulations, shall be bound to file returns, including the Statistical and Fiscal Declaration (DSF), using official forms supplied by



the Cameroonian tax authority, along with mandatory annex documents, within the deadlines prescribed by law.

(2) The returns referred to in paragraph 1 above must be filed electronically. In this case, the generated tax assessment notice shall serve as the basis for payment of the corresponding duties and taxes.

(3) However, enterprises under the jurisdiction of a specialized management unit shall be bound to file their tax return and statistics exclusively by using the electronic computer system set up by the tax authority.

..... (deleted).

Section M 2(a): (1) Notwithstanding the provisions relating to the system of declaration, the Tax Authority may send to any natural or legal person liable to pay a tax, duty or levey as per the laws and regulations in force, in the event of a clear absence or inadequacy of a return, a pre-completed return of collected revenue or any other taxable item, with the tax amount owed.

The rest shall remain unchanged.

Section M 2b: (1) Up-to-date taxpayers shall be entered in the register of active taxpayers of the General Directorate of Taxation.

Newly registered taxpayers shall be entered in the database of active taxpayers effective from the date of filing of the first tax return.

In the event of failure to file returns by a taxpayer over a period of two consecutive months, the latter shall automatically be deleted from the said database. Automatic deletion shall take place from the first failure to file annual returns for the non-professional taxpayer. S/he may be reinserted therein only after regularizing his/her tax situation.

(2) No professional taxpayer may carry out import or export transactions without being entered in the active taxpayers' register of the General Directorate of Taxation and does not own a certificate of tax compliance.

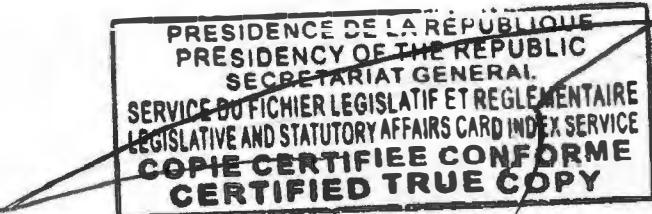
SUBDIVISION II NOTICE TO FILE RETURN

Section M 3: Any taxpayer who fails to file a return within the time-limit prescribed by law shall receive a letter reminding him to do so. He shall then have 7 (seven) days within which to regularize his situation, following receipt of the letter, the postmark or signed mail register, in case of hand delivery, being proof thereof.

The rest shall remain unchanged.

DIVISION II OBLIGATION TO PRESERVE DOCUMENTS AND PERIOD OF PRESERVATION

Section M 6a: Notwithstanding the provisions of Section M 6 of this Code and under pain of application of the penalty provided for in Section M 104 (2) of the Manual of Tax Procedures, the taxpayer shall be bound to spontaneously transmit to his tax centre within 15 (fifteen) days:



- the auditor's reports, as soon as the company has been notified thereof;
- inventories, duly signed and initialled, from the date on which they submitted to court registries.

DIVISION IV ADMINISTRATIVE OBLIGATIONS

Section M 8a: (1) Corporate billing and invoice production shall be monitored electronically by the tax authority under conditions laid down by order of the Minister in charge of finance.

This shall apply in particular to businesses in the information and communication technology (ICT) sector, online trade, electricity, games of chance and entertainment, insurance, beverages, oilseed products and digital bouquets sectors, as well as all enterprises under the entity responsible for managing large enterprises of the tax authority.

To implement the system of electronic monitoring of corporate billing and invoice production, the tax authority may use external experts under the conditions laid down by agreement between the parties.

(2) Irrespective of their status or nature, companies shall be bound to comply with the electronic monitoring system referred to in paragraph (1) above.

Without prejudice to the collection of taxes evaded, together with the penalties and criminal sanctions provided for in Section M 108 et seq of the Manual of Tax Procedures, failure to comply with the obligations relating to the electronic invoicing or production monitoring system shall be punishable with a fine equal to:

- the value of the invoices in question, in the case of electronic invoice monitoring;
- the production value concealed as a result of the breach, in the case of electronic production monitoring.

The rest shall remain unchanged.

SUB-PART II TAX CONTROL

CHAPTER I RIGHT TO CONTROL

DIVISION III CONDITIONS FOR EXERCISING THE RIGHT TO CONTROL

SUBDIVISION I ON-THE-SPOT CHECK

Section M 13 new: (1) At least 15 (fifteen) days before the date scheduled for the first intervention, the tax authority shall send, by registered mail or by hand with



acknowledgement of receipt or by discharge slip, an accounting verification notice or verification of the overall tax situation.

Mention must be made in the audit notice, under pain of the latter being null and void, of the possibility of:

- being assisted by a CEMAC-approved tax adviser registered with the order or a centre of approved management of their choice;
- consulting the audited taxpayer's charter on the tax authority's website.

The rest shall remain unchanged.

Section M 19 a (new): (1) Enterprises established in Cameroon and which are dependent on or control companies located in Cameroon or outside Cameroon, within the meaning of Section 19a of this Code, and which meet one of the conditions set out below, must make available to the tax authority, on the date of commencement of the accounting audit, in electronic format, documents enabling them to justify the transfer pricing policy applied in transactions of any kind carried out with affiliated enterprises established in Cameroon or outside Cameroon within the meaning of Section 19a of this Code:

- have an annual turnover excluding tax or gross assets whose amount is equal to or greater than CFAF 1,000,000,000 (one billion); or
- hold directly or indirectly, at the end of the financial year, more than 25% of the share capital or voting rights of an enterprise established in Cameroon or outside Cameroon whose annual turnover excluding tax or gross assets is greater than or equal to CFA 1,000,000,000 (one billion).

The rest shall remain unchanged.

DIVISION V LIMITS OF THE RIGHT TO CONTROL

Section M 41 (a) - (1) Notwithstanding the provisions of Sections M 9, M 10, M 11, M 12, M 16 and M 21 of the Manual of Tax Procedures, a tax payer may be exempted from a tax audit in respect of a given tax year if, at the end of the said financial year, he shows a rate of increase in taxes and duties payable on a voluntary basis of at least 25% compared with the previous year.

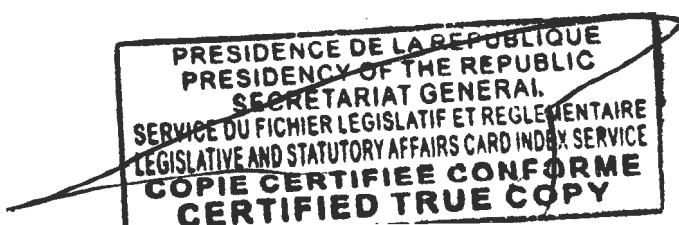
The rest shall remain unchanged.

SUB-PART III TAX COLLECTION

CHAPTER I METHODS OF COLLECTION

DIVISION II NOTICE OF ISSUE FOR COLLECTION

Section M 53: (1) The Notice of Issue for Collection shall be an enforceable deed for the forcefull collection of taxes, duties and levies.



(2) The Notice of Issue for Collection shall be drawn up and notified to the taxpayer where a written declaration is not accompanied by means of payment or following a non-market value return or of the final procedure document in the case of a control.

Subject to the approval of the Director General of Taxation, the Notice of Issue for Collection may be drawn up before filing the final procedure document, in particular in the context of a general accounts audit, where the taxes have been expressly accepted in the minutes by the taxpayer. In this case, a Partial Notice of Issue for Collection shall establish the principal amount of the tax accepted and the penalties and interest for late payment normally due. At the end of the control procedure, a supplementary notice of issue for collection shall be drawn up for the outstanding taxes.

The rest shall remain unchanged.

(3) The taxpayer may also be issued and notified of the Notice of Issue for Collection by electronic means. In this case, the Notice of Issue for Collection shall be deemed to have been notified when the system generates an acknowledgement of receipt.

CHAPTER II PROCEEDINGS

DIVISION II SPECIAL LEGAL PROCEEDINGS

SUBDIVISION VI EXCLUSION FROM SPECIFIC PROCEDURES

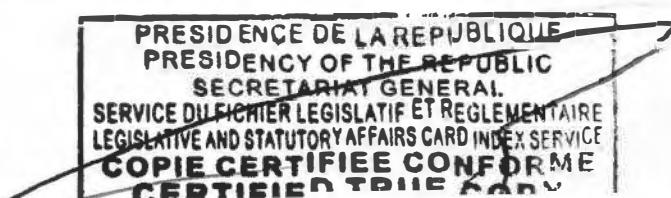
Section M 79: Failure to pay levies, taxes and duties following a formal notice shall entail a temporary ban from bidding for public contracts, expression of intent to buy a public corporation under privatization, carrying out stock market transactions, bidding for logging permits or applying for the issuance of secure consignment notes, and a permanent ban in case of a further offence.

The Director General of Taxation shall, in each quarter, draw up a list of taxpayers banned from bidding.

CHAPTER III COLLECTION GUARANTEES

DIVISION III JOINT AND SEVERAL PAYMENT

Section M 86: The notice of issue for collection regularly drawn up shall be enforceable not only against the taxpayer who is mentioned therein, but also against his representatives or rightful claimants.



Where the rights over natural resources or stocks, shares and business of an enterprise under Cameroonian law are transferred abroad, the Cameroonian law enterprise and the transferor shall be jointly and severally liable to payment of the sums due under such transfer.

The rest shall remain unchanged.

CHAPTER IV TAX COMPLIANCE CERTIFICATE

Section M 94a: (1) Any natural person or corporate body liable to a tax, duty or levy, in good standing with the declaration and payment of such taxes, duties and levies may, upon request, be issued a tax compliance certificate from the tax authority. This shall certify that the taxpayer is in good standing with his or her tax declaration obligations and does not owe any tax as at the date of issue.

(2) Notwithstanding the provisions of paragraph 1 above, the tax compliance certificate may also be issued to a taxpayer who owes a tax debt, where:

- the deadline provided for in Section M 53 of the Manual of Tax Procedures for payment of the tax debt has not expired;
- the taxpayer is under a payment suspension or moratorium duly granted by the competent authorities.

In such a case, the tax debt and the nature of the suspensive instrument shall be indicated on the tax compliance certificate.

The rest shall remain unchanged.

(3) The tax compliance certificate shall be issued online from the tax authority's computer system. The authenticity of any tax compliance certificate issued electronically shall be verified by its presence on the list of tax compliance certificates published electronically by the tax authority.

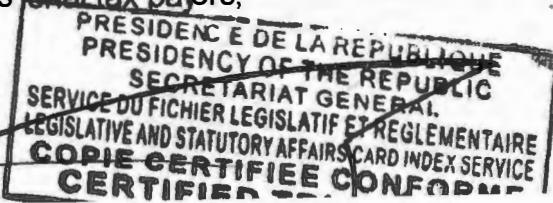
The tax compliance certificate shall be valid for 3 (three) months with effect from the date on which it is signed. This period shall be reduced to 1 (one) month where the taxpayer has benefited from a suspension of payments or a moratorium on his or her tax debt.

Section M 94b: (1) Any natural person or corporate body liable for tax, duties or levies that requests a title, licence, certification, attestation, authorization or approval whatsoever from public or semi-public government services within the context of carrying out their activities, must necessarily mention their Single Identification Number (SIN) on the request and attach thereto a valid tax compliance certificate. Failure to produce this document shall lead to inadmissibility of the request.

(2) The tax compliance certificate shall serve as tax or non-tax certificate and tax situation slip. It shall be the only valid document in all administrative procedures to prove the tax situation of a taxpayer.

Section M 94c: (1) The following shall be subject to presentation of a valid tax compliance certificate:

- transfers of funds abroad by professional tax payers;



- issuance of exemption certificates and payment of taxes and duties;
- payment of invoices and subsidies by the State, regional and local authorities, public establishments, semi-public or public enterprises and private companies, the list of which shall be drawn up by the minister in charge of finance;
- export transactions;
- visa applications at diplomatic and consular missions.

SUB-PART IV
PENALTIES

CHAPTER I
FISCAL PENALTIES

DIVISION II
SPECIAL PENALTIES

Section M 104: (1) A fixed fine that might go up to CFAF 5 000 000 (five million) shall be applied to any person who gives false information, who objects to the right to communication or to the notice to third party holders, or who refuses to provide the information or documents required by the Tax Authority pursuant to the provisions of Sections 18 (4), 18b (deleted), 79, 93i (6), 245, 583, 583a (1), 583b (1), 598a, M 1, M 6, M 8d and M 48b of the Manual of Tax Procedures. Similarly, a fine of CFAF 100 000 (one hundred) per day of delay, beyond the time limits indicated on the request, shall be applied for any attempt to object to the execution of the right to communication or notification of third-party holders.

(2) The fine referred to in (1) above shall be increased to CFAF 50 000 000 (fifty million) in the event of failure to comply with the obligations set out in Sections 18b, 18c and M 6a of this Code.

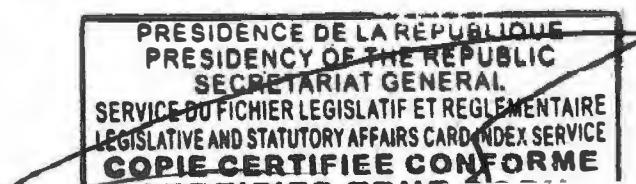
Section M 104b: Without prejudice to the collection of taxes evaded, together with penalties, failure to issue a certificate of deduction at source or payment of taxes using the tax authority's computer system shall be punishable with a fine corresponding to the amount of the transaction carried outside the system.

CHAPTER II
PENALTIES

DIVISION I
PRINCIPAL PENALTIES

Section M 108: The penalties referred to in Section M 107 above shall also be inflicted upon whoever:

- fails to make or ensure the making of entries, or abets the making of inaccurate or fake entries into the journals and balance sheet books



provided for by the OHADA Uniform Act or into documents serving as such, as well as any person convinced of having drawn up or abetted the drawing UP of false balance sheets;

- through all types of manoeuvres, obstructs the implementation of the system for the electronic monitoring and production of invoices by enterprises;

The rest shall remain unchanged.

SUB-PART V
TAX DISPUTES

CHAPTER I
CONTENTIOUS JURISDICTION

DIVISION I
PRIOR REFERRAL BEFORE THE TAX AUTHORITIES

SUBDIVISION III
STAY OF PAYMENT

Section M 121 (new): (1) A taxpayer who disputes the justification for or the amount of a tax levied on him may obtain an administrative stay of payment of the disputed part of the said tax, under the following conditions:

- a.
- b.
- c.

(2)

(3) The stay of payment may be issued manually within 15 (fifteen) days from the date of receipt of the request. Failure by the tax authorities to respond within this period shall be tantamount to tacit acceptance of the deferment of payment.

(4) The stay of payment shall cease to have effect 8 (eight) days after notification of the decision of the authority seized or, in the event of silence, after expiry of the time limit for the latter to take a decision.

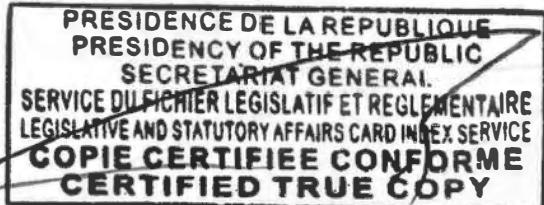
The rest shall remain unchanged

DIVISION II
TRANSACTIONS

Section M 125: The Minister in charge of finance may, on the recommendation of the Director-General of Taxation, may as part of a transaction, authorize the moderation of all or part of the taxes in the following two cases:

- prior to collection following an audit procedure;
- during the entire litigation procedure, including for taxes whose claims have been declared inadmissible on formal grounds, where such taxes may be reviewed on the merits.

The rest shall remain unchanged



**CHAPTER II
VOLUNTARY JURISDICTION**

**DIVISION II
TAX PAYERS' PETITIONS**

**SUBDIVISION II
DECISION OF THE TAX AUTHORITY**

Section M 145: (1) Decisions on remission or reduction shall be notified online through the IT System of the General Directorate of Taxation.

(2) However, the Minister of Finance and the Director-General of Taxation may, within the limit of their relevant thresholds as outlined below, grant remission or reduction higher than the rates set in Section M 144 (new) above, as follows:

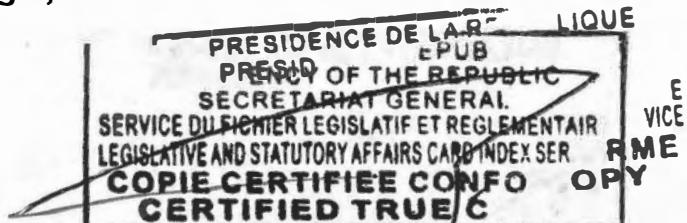
**CHAPTER THREE
PROVISIONS REGARDING OTHER RESOURCES**

SECTION SIXTEEN: Establishment of a voluntary regularization programme

1. Taxpayers who, on their own initiative, voluntarily regularize their tax situation with regard to their income and assets owned outside Cameroon during the 2024 financial year, shall be exempt from the corresponding penalties.
2. At the end of the 2024 financial year, no remission of penalties shall be granted for these types of income for the period not prescribed.

SECTION SEVENTEEN: Institution of a fee to finance the digital transformation of the tax administration

1. A fee is hereby instituted to finance the digital transformation of the tax administration.
2. The fee for financing the digital transformation of the tax administration shall be levied on all documents generated from the tax administration's IT system, in particular:
 - the registration certificate;
 - the tax compliance certificate.
3. The fee provided for in (1) above shall be fixed at CFAF 1 000.
4. Proceeds from the fee for the financing of the digital transformation of the tax administration shall be allocated as follows:
 - 40% to the State budget;



- 60% for the financing of the digital transformation of the General Directorate of Taxation.

SECTION EIGHTEEN: Readjustment of water abstraction tax rates

The provisions of **SECTION ELEVEN** of the Finance Law No. 2004/026 of 30 December 2004 are amended and supplemented as follows:

"SECTION ELEVEN" (NEW):

Rates for the abstraction of surface or groundwater for industrial or commercial purposes shall be as follows:

- CCAF 150 per cubic metre for the first 1 000 cubic metres of water abstracted;
- CCAF 75 per cubic metre for water used in excess of 1 000 m³;
- CCAF 25 per cubic metre for the abstraction of water for agricultural, livestock or fish farming purposes in excess of 5 000 (five thousand) person equivalents per day.

The rest shall remain unchanged

SECTION NINETEEN: Establishment of an amnesty for non-commercial real estate transfers

- (1) An amnesty is established for real estate transfers submitted for registration between 1 January 2024 and 31 December 2024, as well as for real estate transfers declared before 1 January 2024.
- (2) The amnesty referred to in (1) above shall apply to real estate transfers by way of inheritance, division, release from joint ownership and inter vivos donations in direct line and between spouses.
- (3) The non-commercial real estate transfers referred to in this section shall be exempt from penalties and any other tax increases.
- (4) The amnesty shall be granted at the request of the taxpayer, which must be filed with the taxpayer's local tax office.

SECTION TWENTY: Establishment of a special procedure for settling tax claims issued before 31 December 2022

- (1) The tax administration shall be authorized to implement a special procedure for settlement of tax claims issued before 31 December 2022.
- (2) The special settlement procedure shall run from 1 January to 31 December 2024 and as follows:
 - a) Transactions relating to taxes in contentious proceedings:
 - For disputes in the administrative phase: a 50% deduction on the outstanding amount in dispute, with sureties being forfeited to the Treasury. In this case, the amount to be paid may be subject to a schedule of not exceeding three months;



- For disputes at the jurisdictional phase: a 65% deduction on the outstanding amount in dispute, with sureties being forfeited to the Treasury. In this case, the amount to be paid may be subject to a schedule not exceeding three months;

b) Transactions relating to uncontested tax arrears:

- For public or semi-public entities: a 70% reduction, with the possibility of spreading payments over a maximum period of twelve months;
- For private entities: a 50% reduction with the possibility of spreading payments for up to twelve months.

(3) To implement the special settlement relating to disputed tax debts, the sureties required by law for contentious appeals must have been paid.

(4) Tax arrears settled through the mutual debt set-off procedure for reciprocal debts shall not be covered by this special settlement procedure.

(5) No request for a special settlement shall be acceptable beyond 31 December 2024.

(6) Where the taxpayer accepts the transaction proposal, he willingly undertakes:

- not to lodge a subsequent claim;
- to withdraw any claims or requests made.

SECTION TWENTY-ONE: Amendment of some provisions relating to State property, cadastral and land revenue

The provisions of Section Twenty-three of Law No. 2022/020 of 27 December 2022 relating to the Finance Law of the Republic of Cameroon for the 2023 financial year are amended as follows:

"SECTION TWENTY-THREE (new)": Provisions relating to State property, cadastral and land revenue.

The rates for fees relating to the State property, cadastral and land tenure operations listed in Section Thirteen of Law No. 91/003 of 30 June 1991: Finance Law of the Republic of Cameroon for the 1991-1992 financial year are amended as follows:

"SECTION THIRTEEN" (new):

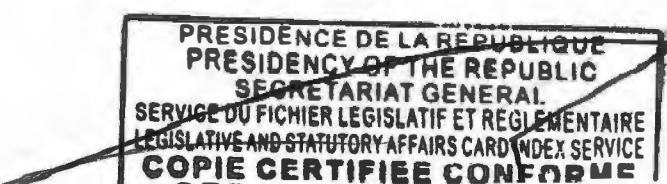
Section 14 of Finance Law No. 90/001 of 29 June 1990 is amended as follows:

Paragraph 1: The rates of fees relating to the State property, cadastral and land tenure operations listed in Article 19 of Ordinance No. 74/1 of 6 July 1974 to establish rules governing land tenure are amended as follows:

I- ESTABLISHMENT OF A LAND TITLE

b) By parcelling out existing properties.

- **2% of the purchase price in the event of an expensive purchase;**



- 2% of the market value stated in the notarial deed in the case of a free acquisition.
 - 3% of the purchase price where the property is acquired at high cost;
 - 2% of the market value specified in the notarial deed where the property is acquired free of charge.
-
.....
.....

II. VARIOUS ENTRIES IN THE LAND REGISTER

- a) Mortgages and liens;
 - 1.25% of the market value of the properties concerned;
 - b) Total transfers;
 - **By sale: 3% of the purchase price.**
-
.....
.....

V- TOPOGRAPHIC AND CADASTRAL WORKS:

V-1-1- Planimetrics

- a) - Demarcation:

Land registration, concession, parcelling and simple delimitation marking.

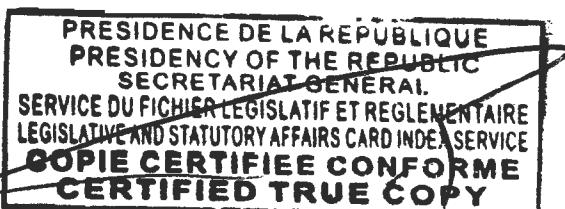
For the execution of these works, the following fees shall be charged:

For land located within the urban perimeter

- 50 000 francs for a surface area less than or equal to 5 000 m²
 - **5 000 francs per additional hectare for an area greater than 5 000 m².**
-
.....
.....

VI. CONCESSIONS AND LEASES ON NATIONAL LAND, AS WELL AS LEASES ON THE PRIVATE PROPERTY OF THE STATE

The basic fee for concessions and leases on national land provided for in Article 15 of Decree No. 76/166 of 27 April 1976 to lay down the terms and conditions for managing the national estate, **as well as ordinary or long leases on the private property of the State as provided for in estate provided for in Decree No. 76/167 of 27 April 1976 to lay down the terms and conditions for managing the private property of the State** shall, depending on the nature and use of the land, be fixed as follows per square metre:



a) Temporary concessions and leases

Land use	Urban land/m ²	Rural land/m ²
Residential	2 000 CFAF	1 000 CFAF
Commercial	3 000 CFAF	1 500 CFAF
Industrial	900 CFAF	450 CFAF
Social	300 CFAF	150 CFAF
Cultural	150 CFAF	80 CFAF
Agricultural	4 CFAF	2 CFAF
Religious	10 CFAF	10 CFAF

VIII- FEE FOR THE TEMPORARY OCCUPATION OF THE PUBLIC DOMAIN

The provisions in force shall be those of Decree No. 2014/3209/PM of 29 September 2014 to fix the minimum annual fees for the occupation of State land appurtenances.

The rest shall remain unchanged.

SECTION TWENTY-TWO: Provisions relating to non-tax revenue derived from the social affairs sector

1) The following are hereby established in the social affairs sector:

a) charges relating to services provided by specialized establishments and operational technical units;

b) fees relating to the examination of applications for the establishment of private social welfare schemes shall be as follows:

- fees for examining applications for agreement in principle for the establishment open a Private Social Welfare Institution;
- fees for examining applications for the final authorization for the establishment of a private social welfare scheme.

2) Provisions relating to fees for services provided by specialized establishments and operational technical units

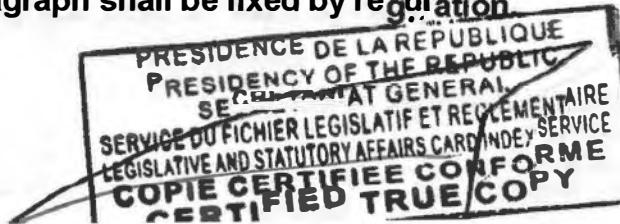
a) The fees referred to in this paragraph must be paid by any person seeking to benefit from the services provided and who meets the criteria for admission to the said entities.

b) The fees referred to in this paragraph shall be fixed by regulation.

3) Provisions relating to the cost of examining applications for the establishment of private social welfare schemes

a) Any natural or legal person wishing to establish a private social welfare scheme shall be required to pay the fees referred to in this paragraph.

b) The fees referred to in this paragraph shall be fixed by regulation.



SECTION TWENTY-THREE: Provisions relating to non-tax revenue derived from the agriculture and rural development sector.

1) The following are hereby instituted within the meaning of Law No. 2001/014 of 23 July 2001 on seed-related activities:

- fees for the registration of plant species and varieties on the official catalogue;
- fees for the rental of seed farms (storage warehouse, packaging units, tractor, greenhouse, hangar, land, etc.);
- administrative costs and fees for the conduct of Differentiation – Homogeneity – Stability (DHS) and Agronomic and Technological Value (ATV) tests.

2) Any natural or legal person engaged in seed-related activities within the meaning of the law of 23 July 2001 shall be subject to the payment of the fees and royalties referred to in paragraph 1 above.

3) The fees for the registration of plant species and varieties in the Official Catalogue shall be as follows:

a) Registration of plant species and varieties in the Official Catalogue for a period of 5 (five) years:

- seeds from locally produced plant species and varieties: CFAF 100 000 per variety;
- seeds from imported plant species and varieties: CFAF 200 000 per variety.

b) Reregistration of plant species and varieties in the Official Catalogue for a period of 5 (five) years:

- seeds from locally produced plant species and varieties: CFAF 50 000;
- seeds from imported plant species and varieties: CFAF 100 000.

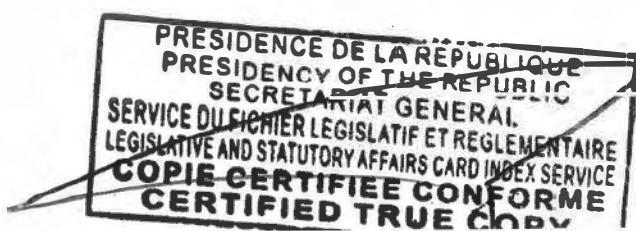
4) The costs of renting seed farms (storage warehouse, packaging unit, tractor, greenhouse, shed, land, etc.) shall be fixed by regulation.

5) The administrative costs and fees for carrying out the differentiation-homogeneity-stability (DHS) and agronomic and technological value (VAT) tests shall be CFAF 2 000 000 per variety.

SECTION TWENTY-FOUR: Provisions relating to non-tax revenue derived from the trade sector

1) The following fees are hereby instituted in the trade sector:

- application fees for authorization to carry out commercial activities in Cameroon;
- annual licence application fees for the importation of motorbikes and their spare parts;



- fees relating to the examination of the application for a declaration of existence;
- application fees for the obtention of a certificate of deficiency for any product subject to excise duty prior to importation by an economic operator;
- application fees for metrology approval.

2) Provisions relating to application fees for authorization to carry out commercial activities in Cameroon.

a) The following shall be subject to payment of the fees referred to in (1) above every 3 (three) years:

- legal persons carrying out commercial activities of which at least 50% of the share capital is held by foreigners;
- natural persons carrying out commercial activities in Cameroon who are not of Cameroonian nationality.

b) The fees referred to in (1) above shall be as follows:

- CFAF 1 000 000 for public limited companies (PLC) and simplified joint stock companies;
- CFAF 500 000 for limited liability companies (SARL), collective name companies (SNC) and limited partnerships (SCS);
- CFAF 200 000 for individuals.

3) Provisions relating to the annual licence application fees for the importation of motorbikes and their spare parts;

a) Legal and natural persons importing motorcycles and their spare parts shall be subject to the payment of the fees referred to in (1) above;

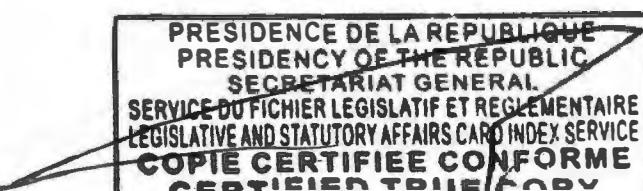
b) The fees referred to in (1) above shall be as follows:

- CFAF 1 000 000 for public limited companies (PLC) and simplified joint stock companies;
- CFAF 500 000 for limited liability companies;
- CFAF 100 000 for individuals.

4) Provisions relating to fees relating to the examination of the application for a declaration of existence

a) Any economic operator wishing to market cocoa or coffee in Cameroon shall be subject to the payment of the fees referred to in (1) above and must obtain a certificate of declaration of existence issued by the Ministry in charge of trade.

b) The fees for examining the application for the aforementioned certificate shall be fixed as follows for a period of 5 (five) years:



- CFAF 1000 000 for public limited companies (PLC) and simplified joint stock companies;
- CFAF 500 000 for limited liability companies;
- CFAF 200 000 for individuals.

- c) However, producers and industrialists shall not pay the above charges.
- d) The following shall be exempt from the payment of the fees referred to in (1) above: organizations established by producers and local processing units.

5) Provisions relating to the application fees for the obtention of a certificate of deficiency for any product subject to excise duty prior to importation by an economic operator.

- a) Economic operators wishing to be exempted from import excise duties under the conditions laid down by tax and customs legislations shall be subject to payment of the fees referred to in (1) above.
- b) The certificate referred to in (1) above shall be issued by the Minister in charge of trade on a one-off or occasional basis for each transaction.
- c) The fees referred to in this paragraph shall be CFAF 1 000 000.

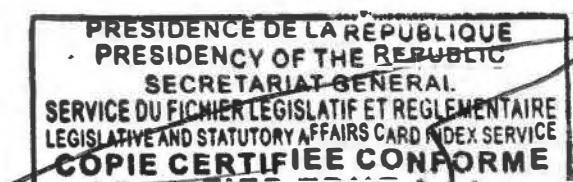
6) Provisions relating to fees for applications for metrology approval issued by the Minister in charge of trade for a period of 3 (three) years

- a) Importers, manufacturers, suppliers and repairers of measuring instruments, as well as laboratories carrying out calibrations and metrological tests, shall be subject to payment of the fees referred to in (1) above.
- b) The fees referred to in (1) above shall be as follows:
 - importers, repairers and manufacturers of measuring instruments: CFAF 1 000 000;
 - calibration and metrological testing laboratories: CFAF 1 000 000.

c) Where the application for metrological approval covers several activities, the highest amount shall be deducted without accumulation.

7) Provisions relating to offences provided for in Law No. 2015/018 of 21 December 2015 governing commercial activity in Cameroon.

- a) Violations of the provisions of Law No. 2015/018 of 21 December 2015 governing commercial activity in Cameroon shall be punishable by a fine equal to 5 (five) times the value of the goods in question, with a minimum fine of CFAF 30 000 (thirty thousand) for natural persons and CFAF 100 000 (one hundred thousand) for legal persons.
- b) The offences provided for in the law referred to in this paragraph shall be punishable by a financial penalty equal to 10 (ten) times the value of the goods in question, with a minimum of CFAF 100 000 (one hundred thousand) for natural persons and CFAF 250 000 (two hundred and fifty thousand) for legal persons.



SECTION TWENTY-FIVE: Provisions relating to non-tax revenue derived from the communication sector

1) Revenue derived from the communications sector as stipulated in Law No. 2015/007 of 20 April 2015 governing audiovisual activity in Cameroon and Law No. 2006/018 of 29 December 2006 to regulate advertising in Cameroon, shall notably of:

- fees, charges and royalties for the issuance and operation of audiovisual licences;
- fees and charges for the issuance and use of the authorization to carry out some audiovisual activities;
- fees for the issuance and use of accreditation for the production and provision of audiovisual programmes limited in time and space;
- application fees for the accreditation of foreign journalists wishing to work in Cameroon on a temporary basis;
- miscellaneous fines;
- Fees for examining applications for authorization and for the operation of authorizations to engage in the advertising profession;

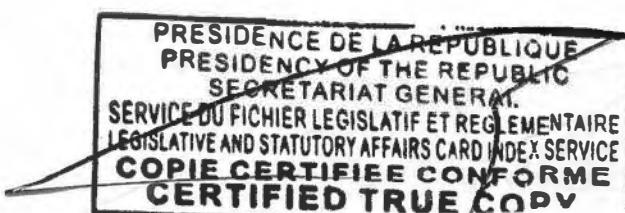
2) Provisions relating to fees, rights and royalties for the issuance and use of audiovisual licences.

a) Natural or legal persons engaged in the following activities shall be subject to the payment of fees and royalties for the grant and use of the audiovisual licences referred to in (1) above:

- publishers;
- service providers;
- aggregators;
- audiovisual content aggregators;
- distributors of audiovisual services;
- conditional access system operators;
- publishers of personal mobile television services;
- satellite television operators;
- cable television operators;
- operators of audiovisual content broadcasting platforms.

b) The cost, fees and royalties for the issuance and operation of audiovisual licences shall be as follows:

1. Fees for the examination of applications for, or renewal, of audiovisual licences:



- local radio broadcasting: CFAF 250 000;
- national radio broadcasting: CFAF 500 000;
- foreign radio broadcasting: CFAF 1000 000;
- national television broadcasting or programme editing: CFAF 500 000;
- foreign television broadcasting or programme editing: CFAF 500 000
- national audiovisual content package distributor, audiovisual content aggregator of Cameroonian nationality (cable, terrestrial or satellite distribution): CFAF 500 000;
- national audiovisual content package distributor and foreign audiovisual content aggregator (cable, terrestrial or satellite distribution): CFAF 500 000.

2. Fees for obtaining or renewing a licence to operate an audiovisual communication enterprise:

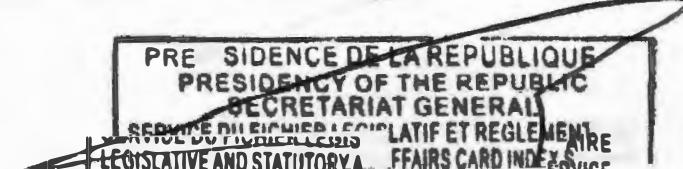
- local radio broadcasting / 5 years: CFAF 5 000 000;
- national radio broadcasting /5 years: CFAF 25 000 000;
- foreign radio broadcasting /5 years: CFAF 50 000 000;
- television broadcasting or national TV programme editing / 5 years: CFAF 100 000 000;
- national audiovisual content package distributor, audiovisual content aggregator of Cameroonian nationality (cable, terrestrial or satellite distribution) / 5 years: CFAF 100 000 000;
- national audiovisual content package distributor, foreign audiovisual content aggregator (cable, terrestrial or satellite distribution) / 5 years: CFAF 150 000 000.

3. Audiovisual licence fee: 3% of annual turnover excluding taxes.

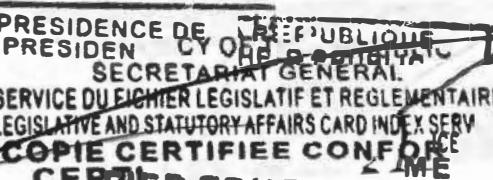
3) Provisions relating to the payment of fees and royalties for the granting and operation of licences to engage in certain audiovisual activities.

a) Natural or legal persons carrying out the following activities shall be subject to the payment of fees and royalties for the granting and operation of licences to carry out some of the audiovisual activities referred to in (1) above:

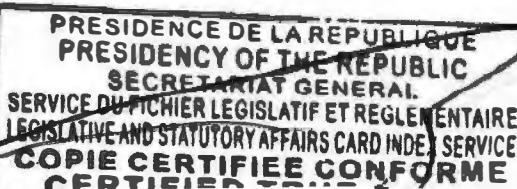
- the marketing of products or services provided by either publishers or producers;
- the installation of audiovisual content storage platforms;
- the installation and adjustment of audiovisual production equipment;
- the operation of audiovisual production resource centres;
- the marketing of production equipment and reception terminals;



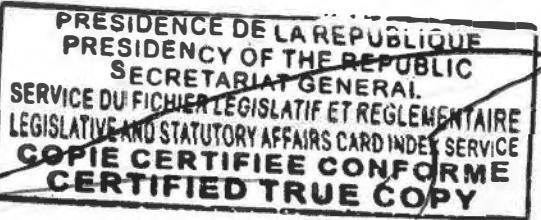
- the provision of value-added services related to the digital television environment.
- b) The fees and royalties for the granting and operation of licences for certain audiovisual activities shall be as follows:
- application fees for licences relating to the activities of audiovisual communication companies: CFAF 500 000;
 - royalty for the operation of the licence relating to the activities of audiovisual communication companies: 3% of annual turnover excluding taxes.
- 4) Provisions relating to the payment of fees for the granting and operation of accreditation for the production and distribution of audiovisual programmes limited in time and space.
- a) Natural or legal persons producing and/or publishing audiovisual programmes shall be subject to the payment of fees for the issue and use of the accreditation for the production and distribution of audiovisual programmes limited in time and space referred to in (1) above.
- b) The fees for the issuance and operation of accreditation for the production and provision of audiovisual programs shall be as follows:
- fees for the examination of applications for accreditation: CFAF 250 000;
 - fees for the use of accreditation for the production and distribution of audiovisual programmes: FCFA 500 000.
- 5) The application fee for the accreditation of foreign journalists wishing to work in Cameroon on a temporary basis, as referred to in (1) above shall be CFAF 100 000.
- 6) Provisions relating to the payment of fees for the issue and operation of advertising licences
- a) Natural or legal persons engaged in the advertising professions shall be subject to the payment of fees for the issue and operation of the advertising licences referred to in (1) above.
- b) The fees for issuing and operating advertising licences shall be as follows:
- fees for the examination of applications for advertising licences: CFAF 500 000;
 - advertising licence fee: 2% of turnover, excluding taxes (excluding VAT).
- 7) The fines referred to in (1) above, applicable to the communication sector shall be as follows:
- a) from CFAF 250 000 to CFAF 2 500 000 and a penalty of from CFAF 100 000 to CFAF 1 000 000 per issue or per day of publication, for any owner of a media or audiovisual communication outlet without an editor provided for in Sections 8 and 37 of the 20 April 2015 Law referred to in (1), as well as for any



- person who publishes a media outlet without a declaration or who publishes a foreign media outlet that is prohibited;
- b) from CFAF 300 000 to CFAF 3 000 000 and a penalty of CFAF 100 000 to CFAF 1 000 000 per issue published, for any person who publishes a press outlet that has been banned;
 - c) from CFAF 200 000 to CFAF 5 000 000 for any person who secures ownership of or acquires holdings in more than three written press outlets and more than one audiovisual communication outlet in breach of the provisions of the law on the financial transparency of social communication outlets, or contravenes the provisions of the law on the financial transparency of social communication outlets;
 - d) from CFAF 100 000 to CFAF 1 000 000 and a penalty of from CFAF 20 000 to CFAF 200 000 per day of residence outside the national territory, for any editor who does not reside in Cameroon;
 - e) from CFAF 100 000 to CFAF 1 000 000 and a penalty of from CFAF 100 000 to CFAF 500 000 per number of newspapers published, for any person who publishes a press outlet that has been suspended;
 - f) from CFAF 100 000 to CFAF 1 000 000 and a penalty equal to the value of the copies distributed, for any person who continues to distribute and sell a press outlet that has been impounded or a foreign press outlet that has been impounded;
 - g) from CFAF 100 000 to CFAF 2 000 000 for any person who refuses to publish or broadcast any rectification without justification;
 - h) from CFAF 50 000 to CFAF 2 000 000 for any person who refuses to publish or broadcast any response;
 - i) from CFAF 100 000 to CFAF 1 000 000 per newspaper issue published, for any editor who does not comply with the obligations laid down by the law on the financial transparency of social communication organs, as well as the authors jointly and severally liable for the financial penalties imposed on third parties against the persons designated in the two preceding articles, as well as any person who puts up election posters in violation of the provisions of the law on the financial transparency of social communication organs;
 - j) from CFAF 30 000 000 to CFAF 100 000 000 for any licenced audiovisual operator who assigns or transfers his licence to a third party, or lends his name or company name, in any manner whatsoever, to a person applying for a licence to provide audiovisual communication services;
 - k) from CFAF 30 000 000 to CFAF 100 000 000 for any audiovisual operator who provides audiovisual services without having subscribed to the technical obligations of encryption;
 - l) from CFAF 50 000 000 to CFAF 150 000 000 for any licenced audiovisual operator who modifies the distribution of shares in his company, and/or modifies the shares involving the entry of a new partner or shareholder in the capital of the said company, without the approval of the competent authority;



- m) from CFAF 100 000 000 to CFAF 300 000 000 for any natural person or legal entity of foreign nationality, that holds, directly or indirectly, more than 49% (forty-nine per cent) of the capital or voting rights in a company that is licenced to operate one or other audiovisual communication activity;
- n) from CFAF 100 000 000 to CFAF 300 000 000 for any licenced audiovisual operator or any natural or legal person who controls, alone or together with other shareholders, the activities of another licenced or authorized operator with the same corporate purpose;
- o) from CFAF 50 000 000 to CFAF 300 000 000 for any public or private operator of a multiplex or broadcast of the 31 audiovisual communication signals who, without justification, refuses to grant access to the technical platform to any licence or accreditation holder;
- p) from CFAF 50 000 000 to CFAF 200 000 000 for any public or private operator of a multiplex or broadcast of audiovisual communication signals who, through his technical platforms, establishes or operates, or provides a network, sub-network or audiovisual service to persons without a licence or accreditation;
- q) from CFAF 100 000 000 to CFAF 500 000 000 for any person who transmits, or causes the transmission of, an audiovisual programme, irrespective of the technical means used, without a licence or accreditation;
- r) from CFAF 50 000 000 to CFAF 300 000 000 for any audiovisual operator who fails to comply with a decision to suspend or withdraw his licence;
- s) from CFAF 50 000 000 to CFAF 300 000 000 for any audiovisual operator who fails to comply with the clauses of a specification;
- t) from CFAF 50 000 000 to CFAF 100 000 000 for any audiovisual operator who fails to comply with the information and documentation requirements laid down by the legislation in force;
- u) from CFAF 200 000 000 to CFAF 300 000 000 for any de jure or de facto manager of a satellite broadcasting company who provides audiovisual services to the public without having obtained an operating licence, and for any de jure or de facto manager of a terrestrial broadcasting company who has provided audiovisual services to the public on a frequency other than that allocated to him or who has carried out his activity in breach of the provisions relating to the power or location of the transmitter;
- v) from FCFA 25 000 000 to FCFA 75 000 000 for any person who manufactures, imports or possesses, with a view to selling or offering for sale or installing, any equipment, material, device or instrument designed, in whole or in part, for the fraudulent interception of broadcast programmes, when such programmes are intended for a specific public which has access to them in return for payment to the operator of the service, as well as for any person who orders, designs, organizes or disseminates advertisements promoting, directly or indirectly, any equipment, material, device or instrument referred to in this point.



w) Any operator or person in the audiovisual sector who broadcasts, or causes to broadcast transmit or disseminates an audio-visual programme that shows or tends to popularize, in violation of the regulation in force deviant practices in Cameroon shall be liable to pay a fine of from CFAF 50 000 000 to CFAF 300 000 000.

SECTION TWENTY-SIX: Provisions relating to non-tax revenue derived from the higher education sector

1) The following are hereby instituted in the higher education sector:

- application fees for the equivalence of foreign qualifications, grades and certificates;
- fees for the establishment, opening, approval, accreditation and extension of private higher education institutions;
- registration fees for candidates taking national examinations (Brevet de Technicien Supérieur and Higher National Diploma);
- registration fees for candidates sitting national medical training examinations.

2) Provisions relating to application fees for the equivalence of foreign qualifications, grades and certificates

- a) Holders of foreign certificates, qualifications and grades shall be subject to payment of the fees referred to in this paragraph;
- b) The fees referred to in this paragraph shall be CFAF 25 000 per qualification, grade or certificate.

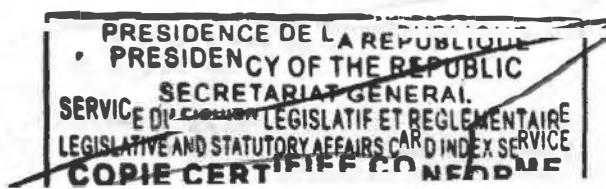
3) Provisions relating to fees for the establishment, opening, licensing, accreditation and renewal of courses of study of private higher education institutions.

- a) Promoters of private higher education institutions shall be subject to payment of the fees referred to in this paragraph;
- b) The costs referred to in this paragraph shall be as follows:

Request for authorization to establish a PHEI	CFAF 500 000
Application for authorization to open a PHEI	CFAF 500 000
Application for the registration of a PHEI	CFAF 1 000 000
Application to extend a PHEI	CFAF 500 000 for every new course of study

4) Provisions relating to fees for the registration of candidates for national examinations (Brevet de Technicien Supérieur and Higher National Diploma)

- a) Candidates for the Brevet de Technicien Supérieur and Higher National Diploma examinations shall be subject to payment of the fees referred to in this paragraph;



b) The fees referred to in (1) above shall be as follows:

5) Provisions relating to registration fees for candidates for national medical training examinations.

a) Candidates for national examinations in medical, pharmaceutical and odontostomatological training shall be subject to payment of the fees referred to in this paragraph;

b) The fees referred to in this paragraph are fixed as follows:

Type of fees	Categories of revenue to be collected	Amount payable (CFAF)
Application fees for the Brevet de Technicien Supérieur and Higher National Diploma examinations	Category A	35 500
	Category B	40 500
	Category C	45 500
	Category D	50 500
	Category E	55 500
Application fees for medical school entrance examinations	National aptitude test for medical, pharmaceutical and odonto-stomatological training	20 000
	National Specialisation Examination	50 000

5) Provisions relating to the registration fees of candidates for national medical training examinations

a) Candidates for national medical, pharmaceutical and odonto-stomatological training examinations shall be subject to payment of the fees referred to in this paragraph;

b) The fees referred to in this paragraph shall be as follows:

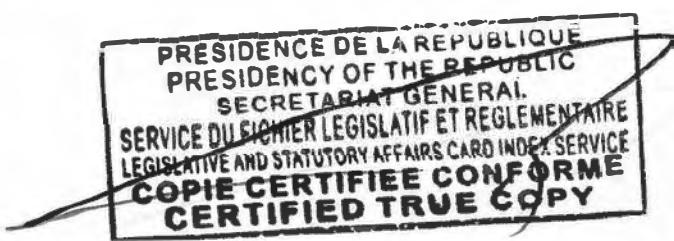
Examinations	Amount to be paid (CFAF)
National aptitude test for medical, pharmaceutical and odonto-stomatological training	20 000
National specialization examination	50 000

SECTION TWENTY-SEVEN: Provisions relating to non-tax revenue derived from the environment sector

1) The following fees are hereby instituted in the environment sector:

- annual Environmental Compliance Attestation (ECA) application and renewal fees;
- environmental fines.

2) Provisions relating to the annual Environmental Compliance Attestation (ECA) application and renewal fees.



a) Any natural or legal person holding an Environmental Compliance Attestation (ECA) or an Environmental Compliance Certificate (ECC) must pay annual application and renewal fees for an Environmental Compliance Attestation (ECA).

b) The costs referred to in this paragraph shall be as follows:

No.	Categories of Assessment	Amount (CFAF)
1	Project that has conducted a Strategic Environmental Assessment (SEA) or a detailed Environmental and Social Impact Assessment (ESIA) Facilities/establishments that have conducted an Environmental and Social Audit (ESA)	500 000
2	Project that has conducted a summary Environmental and Social Impact Assessment (ESIA)	300 000
3	Project that has prepared an Environmental Impact Statement (EIS)	50 000

3) Any application for renewal shall be subject to payment of the fees referred to in (1) above;

4) Provision relating to environmental fines.

a) Any natural or legal person who causes damage to the environment shall be liable to an environmental fine as referred to in this paragraph.

b) The costs referred to in this paragraph shall be determined in accordance with the scale set out in Annex 1 to this Chapter.

SECTION TWENTY-EIGHT: Provisions relating to non-tax revenue derived from the forestry and wildlife sector.

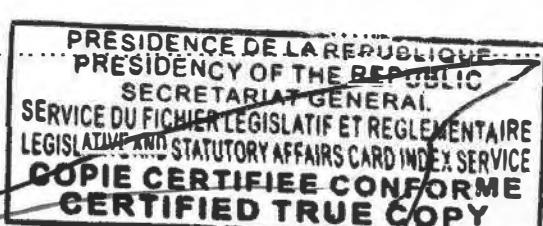
The provisions of Section 14 of Law No. 96/08 of 1 July 1996 relating to the Finance Law of the Republic of Cameroon for the 1996/1997 financial year are amended as follows:

“SECTION FOURTEEN” (NEW):

“SECTION 15” (NEW):

PHOTOGRAPHIC HUNTING

•
2 - TAX FOR HUNTING IN A CLOSED HUNTING AREA AND CONDUCT OF HUNTING EXPEDITIONS IN A FORESTED AREA OF THE NATIONAL FOREST DOMAIN



-
-

3- LEASING RIGHTS IN CYNEGETIC AREAS

-
-

4 – GAME HUNTING TAX

The rates for the game hunting tax are specified in the schedule in Annex 2A of this chapter.

5 - CAPTURE FEES

The fees for the capture and retention of wildlife are specified in the schedule in Annex 2B of this chapter.

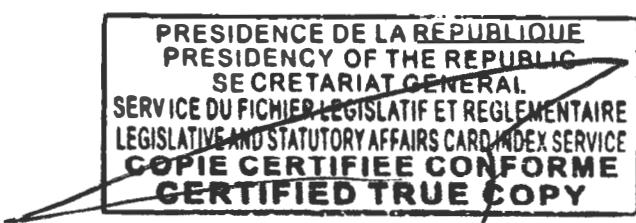
The rest shall remain unchanged

SECTION TWENTY-NINE: Rates for some revenue from wildlife services and protected areas

The rates of revenue from wildlife services and protected areas, depending on their nature, shall be as follows:

- 1) Application fee for the review of ZIC and ZICGC wildlife inventory survey plans: CFAF 100 000;
- 2) Application fee for the review of ZIC and ZICGC wildlife inventory reports: CFAF 100 000;
- 3) Application fee for secure wildlife transport documents: CFAF 10 000 per unit;
- 4) Gorilla Sanctuary visiting fees per hour
 - Nationals CFAF 15 000
 - Residents (foreign residents): CFAF 50 000
 - Tourists (non-resident foreigners): CFAF 100 000
- 5) Fees for visits to clearings of elephants, giraffes, parrots, pigeons, Touraco and other emblematic species and sites per hour:
 - Nationals: CFAF 5 000
 - Residents (foreign residents): CFAF 20 000
 - Tourists (non-resident foreigners): CFAF 30 000.

SECTION THIRTY: Provisions relating to non-tax revenue derived from the housing and urban development sector.



- (1) Annual fees are hereby instituted for obtaining or renewing the licence to operate as a property developer, a real estate agent or a jointly owned building manager.
- (2) The fees referred to in (1) above shall be payable by any natural or legal person wishing to operate as a property developer, real estate agent or a jointly owned building manager.
- (3) The application fees referred to in (1) above shall be as follows:
 - CCAF 1 500 000 for a property developer's licence;
 - CCAF 1 000 000 for a real estate agent's professional card;
 - CCAF 250 000 for the jointly owned building manager's card.
- (4) The renewal fees referred to in paragraph 1 above are set as follows:
 - CCAF 1 000 000 for the real estate promoter's licence;
 - CCAF 500 000 for a real estate agent's professional card;
 - CCAF 200 000 for the co-ownership group card.

SECTION THIRTY-ONE: Provisions relating to non-tax revenues from the Youth Affairs and Civic Education sector.

- (1) Revenues from the Youth Affairs and Civic Education sector consist mainly of:
 - registration and course fees for the Multi-Purpose Youth Promotion Centres (CMPJ);
 - registration and course fees for the Multi-Purpose Youth Promotion Centres (CMPJ);
 - course fees at the National Centre for Youth and Sports (CENAJES) in Kribi, any person admitted for training at the CENAJES in Kribi;
 - the cost of issuance and renewal of the Biometric Youth Card;
 - rental fees for the Ministry of Youth Affairs and Civic Education's animation logistics.

x) Provisions relating to registration and course fees in Multi-Purpose Youth Promotion Centres (MYPC).

- a) Any youth wishing to undergo training in a Multi-Purpose Youth Promotion Centre (MYPC) is required to pay registration and course fees.
- b) The registration and course fees for the Reference, Regional, Divisional and Sub-divisional Multi-Purpose Youth Promotion Centres, as well as the collection procedures, are set as follows:

Registration fees:

No.	Types of structure	Amount (in CCAF)
1	Reference MYPC	25 000
2	Regional MYPC	10 000

3	Divisional MYPC	7 500
4	Sub-divisional MYPC	5 000

Course fees:

No.	Types of structure	Amount (in CFAF)
1	Reference MYPC	100 000
2	Regional MYPC	75 000
3	Divisional MYPC	50 000
4	Sub-divisional MYPC	25 000

y) Provisions relating to the course fees at the National Centre for Youth and Sports in Kribi, for all persons admitted for training at the CENAJES in Kribi.

a) Any person admitted for training at the CENAJES of Kribi shall pay course fees at the National Centre for Youth and Sports in Kribi.

b) Registration, course and accommodation fees at CENAJES Kribi are fixed as follows:

- Student civil servant: CFAF 75 000 per year;
- Independent candidate: CFAF 200 000 per year;
- Accommodation: CFAF 100 000 per year.

z) Provisions relating to fees for the issuance and renewal of the Youth Biometric Card.

a) Any young Cameroonian wishing to obtain a Youth Biometric Card must pay the issuance and renewal fees of the Youth Biometric Card.

b) The Youth Biometric Card issuance and renewal fee is set as follows:

- Issuance: CFAF 10 000.
- Renewal: CFAF 10 000.

aa) The rental costs of the Ministry of Youth Affairs and Civic Education's animation logistics are set according to the scale in Appendix 3 of this chapter.

SECTION THIRTY-TWO: Provisions relating to non-tax revenues from the public health sector.

1) Revenues from the public health sector are service revenues that are normally included in the State budget.

2) Revenues from the public health sector comprise:

- approval fees for food supplements;
- opening, operation and renewal costs as well as fines for the suspension or withdrawal of the approval of a private hygiene and/or sanitation company;