Addis
Tax Initiative

ATI WEBINAR

Landmark Transfer Pricing Ruling: Lessons from the Zambia Revenue Authority vs. Nestlé Zambia Case

19 NOVEMBER 2025 | 09:30-10:30 (CET) | MS TEAMS | ENGLISH

Background

The Addis Tax Initiative (ATI) is a multi-stakeholder partnership promoting domestic revenue mobilisation (DRM) through enhanced cooperation, capacity development, and peer learning among partner countries and development partners. In its Seville Declaration on Domestic Revenue Mobilisation, ATI members committed to four collective actions. Action 3 calls on members to ***"apply coherent and coordinated policies that foster DRM and combat tax-related illicit financial flows (IFFs)"***, including by strengthening international tax cooperation, transparency, and the governance of tax expenditures.

Against this backdrop, the Zambia Revenue Authority (ZRA) has achieved a landmark victory in August 2025, when the Supreme Court of Zambia has ruled in favour of ZRA in a transfer pricing case against Nestlé Zambia Trading Limited, ordering the company to pay over K13.8 million (approx. 565,000 USD) in taxes.

The case stemmed from a ZRA transfer pricing audit covering the period 2010–2014, during which Nestlé Zambia had consistently reported losses. While the company initially succeeded on most grounds before the Tax Appeals Tribunal, the Supreme Court reversed that decision, upholding ZRA's position that the burden of proof had been improperly shifted and affirming the Authority's right to aggregate related-party transactions in line with internationally recognised transfer pricing principles.

This precedent-setting judgment underscores the growing importance of transfer pricing enforcement in Zambia and the region.

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Objectives

- Present the facts, arguments, and outcomes of the Zambia Revenue Authority vs. Nestlé Zambia case;
- Discuss legal and technical lessons for tax administrations on transfer pricing enforcement and dispute resolution;
- Highlight how such cases contribute to fair international taxation and the goals of ATI Action 3 on combating tax-related IFFs;
- Facilitate peer learning among ATI partner countries and development partners on strengthening international tax cooperation.

Agenda (preliminary)

Time (CET)	Item	Speaker
09:30-09:40	**Welcome and background**	*ATI Secretariat*
09:40-10:00	**Presentation of case ZRA vs. Nestlé**	***Fanwell F. Chibwe****, Assistant Director, Litigation & Corporate Advisory, ZRA*
10:00-10:25	**Q&A and open discussion**	*All participants*
10:25-10:30	**Closing remarks**	*ATI Secretariat*

Logistical information

The event will take place online via Microsoft Teams and will be held in English.

This webinar is organised by the ATI Secretariat, facilitated by the International Tax Compact and implemented by GIZ.

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