



LYSON LAW GROUP
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PRACTICE NOTE

Trust Law and Family Trusts in Tanzania

Registration, Ongoing Compliance, Tax Exemption and Tax Obligations, Advantages, Practical Guidance and Tanzanian Case Law

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1 Purpose and Scope of This Note

This practice note consolidates the current legal framework applicable to trusts and, in particular, family trusts in Mainland Tanzania. It is written for use in advising settlors and trustees and is organised around the questions clients most commonly ask: how a trust is set up and registered, what a trustee must keep doing to stay compliant, whether and how a trust can obtain tax exemption, what tax a trust must pay and file in the ordinary course, why a family should consider a trust at all, and what the Tanzanian courts have said when trust arrangements have been tested in litigation.

The note draws on the Trustees' Incorporation Act [Cap. 318 R.E. 2023] and its Rules, the Trustee Investments Act [Cap. 53 R.E. 2023], the Income Tax Act [Cap. 332 R.E. 2019], the Trustees' Incorporation (Transparency of Beneficial Ownership) Rules (GN No. 139A of 2024), the Public Trustee (Powers and Functions) Act [Cap. 31 R.E. 2023], and decided cases reported on the Tanzania Legal Information Institute (TanzLII). It is a working reference, not a legal opinion; matter-specific advice should still be given on the facts of each engagement.

2 What a Trust Is

A trust is a legal arrangement under which a settlor transfers property to one or more trustees, who hold and manage that property for the benefit of one or more beneficiaries, or for a specified purpose. The trustee holds legal title; the beneficiaries hold the equitable or beneficial interest. This separation of legal and beneficial ownership is the organising idea of trust law in Tanzania, as in other common-law jurisdictions.

Trusts may be created expressly (by a trust deed or by will), or may arise by operation of law as resulting or constructive trusts, which Tanzanian courts recognise and apply where fairness requires it for instance, to recognise a spouse's or family member's equitable contribution to property held in another's name (see Section 11 below).

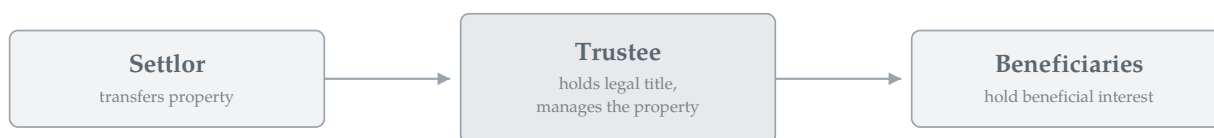


Figure 1. The separation of legal and beneficial ownership at the heart of a trust.

3 Legal Framework

Tanzania has no single consolidated Trusts Act. The operative regime is spread across the following instruments:

- **Trustees' Incorporation Act [Cap. 318 R.E. 2023]** and the Trustees' Incorporation Rules incorporation of trustee bodies, prescribed forms, filings and fees.

- **Trustee Investments Act [Cap. 53 R.E. 2023]** trustees' investment powers, authorised classes of investment, concentration limits, and protections/liabilities.
- **Probate and Administration legislation** (including the Probate Rules, 1963 and the Indian Succession Act as applied in Tanzania) governs testamentary trusts created by will, grants of probate/letters of administration.
- **Public Trustee (Powers and Functions) Act [Cap. 31 R.E. 2023]** establishes the Public Trustee as an official trustee of last resort (minors' estates, charitable and public-interest trusts).
- **Trustees' Incorporation (Transparency of Beneficial Ownership) Rules, GN No. 139A of 2024** beneficial ownership ("BO") collection and disclosure obligations, part of Tanzania's AML/CFT reforms.
- **Income Tax Act [Cap. 332 R.E. 2019]**, read with the Tax Administration Act [Cap. 438 R.E. 2019] taxation of trusts, trustees and beneficiaries, and the charitable-organisation exemption route.

These instruments are administered principally by the Registration, Insolvency and Trusteeship Agency (RITA), acting through the office of the Administrator-General, and by the Tanzania Revenue Authority (TRA).

4 Family Trusts: Nature and Types

A family trust (or private trust) is created to hold and manage family assets for the benefit of family members a spouse, children, grandchildren or dependants, typically to govern succession, protect a family business, provide for vulnerable beneficiaries, or achieve estate-planning objectives. Family trusts are distinct from charitable/public trusts and from the bodies expressly excluded from registration as trusts under section 1A of the Trustees' Incorporation Act (civil societies, religious organisations, trade unions, agricultural associations, political parties, sports associations, VICOBA/microfinance groups and co-operative societies).

4.1 Living (Inter Vivos) Trusts

Created and activated during the settlor's lifetime. The settlor and trustee(s) execute a trust deed describing the trust property, the beneficiaries, and the trustee's powers. Living trusts are usually revocable, and a principal attraction is that they bypass probate on the settlor's death avoiding the delay, cost and public exposure of probate proceedings for the assets the trust holds.

4.2 Testamentary Trusts

Created by will and activated only on the settlor's death. They are administered under probate rules and generally require a grant of probate or letters of administration before the trustee can deal with the estate. Testamentary trusts are generally irrevocable once they take effect, unless the beneficiaries unanimously agree to vary the terms.

4.3 The Trust Deed

A robust trust deed is the foundation of any family trust. At minimum it should set out: the settlor's intent; the identity of the trustees and the mechanism for their appointment, removal and replacement; the class of beneficiaries (fixed or discretionary); the trust property; the trustees' powers of investment, management and distribution; the duration and events of termination; and a dispute-resolution clause (mediation/arbitration is strongly advisable given the cost and duration of ordinary litigation).

5 Registration and Incorporation Process

In Tanzania Private Trusts are Incorporated under the Trustees' Incorporation Act save for the Will (optional). It is common practice for larger family trusts, especially those that will hold land or need continuity of legal personality despite changes in the individuals acting as trustee.

5.1 Why Incorporate

- **Continuity:** an incorporated trustee body does not change its legal personality when the individual trustees change, which materially simplifies holding land, bank accounts and shares over multiple generations.
- **Capacity to sue and be sued** in its own corporate name, rather than requiring all individual trustees to be joined as parties (see *Scan-Tan Tours Ltd v Registered Trustees of the Roman Catholic Diocese of Mbulu*, discussed at Section 11).
- **Easier succession** on the death, resignation or incapacity of a trustee.

5.2 Step-by-Step Procedure (RITA / Administrator-General)

1. **Prepare the constitutive documents:** a trust deed/constitution and rules recording the settlor's intent, the trustees, the beneficiaries and the trustees' powers.
2. **Hold a trustees'/founding meeting** to approve the constitution and formally appoint the trustees; record this in minutes, which form part of the application.
3. **Complete Form T.I.1** the prescribed application for incorporation as a body corporate, addressed to the Administrator-General.
4. **Assemble the supporting bundle:** a copy of the constitution and rules; each trustee's curriculum vitae, passport-size photograph and identity document; and letters of recommendation from the Ward Executive Officer, the District Commissioner's office and the local government authority for the area in which the trust will be based.
5. **Pay the prescribed incorporation fee** (though fee schedules should always be checked against the current RITA tariff before advising a client, as they are periodically revised) once RITA issues the invoice.
6. **Respond to verification requests:** the Administrator-General may call for an oath or further evidence to verify the particulars given in the application.
7. **Certificate of incorporation:** once satisfied, the Administrator-General incorporates the trustees and issues a certificate of registration.
8. **Gazettement:** the notice of incorporation is published in the Government Gazette keep the Gazette reference on file, as third parties (banks, the Land Registry, TRA) will ask for it.



Figure 2. The eight-step incorporation pathway through RITA and the Administrator-General (Section 5.2).

5.3 Land Vesting

Where land is to be vested in the trustees, or in the incorporated trustee body, the application (and any later vesting notice) must specifically identify the land and address any consent or approval requirements under the applicable land tenure regime (right of occupancy under the land act, customary right of occupancy under the village land act, or lease). Regardless of the type, any disposition of land to the trust will attract similar fees such as stamp duty, registration fee and capital gains tax (exceptions reserved)

5.4 Post-Registration Filing

An incorporated trustee body must file an annual return with RITA. Missing this filing is one of the most common (and most easily avoided) compliance failures seen in practice build it into the client's annual calendar alongside the tax return dates discussed at Section 7.

6 Ongoing Regulatory Compliance

6.1 Beneficial Ownership Disclosure

The Trustees' Incorporation (Transparency of Beneficial Ownership) Rules, GN No. 139A of 2024, require every trustee (whether of an incorporated or unincorporated trust) to collect and keep current information on the settlor, the trustees, the beneficiaries, and any person exercising ultimate effective control, and to submit the prescribed BO forms to the Administrator-General/RITA. BO information must be made available to competent authorities named in the Rules as including the Financial Intelligence Unit and the TRA while confidentiality is otherwise to be maintained and unlawful disclosure is itself penalised. Non-compliance attracts its own penalties. In practice, appoint a named person within the family office or trustee body as BO compliance owner, and calendar the BO filing alongside the annual RITA return.

One annual compliance timetable, three filings

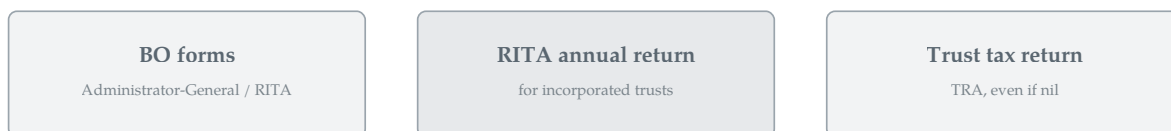


Figure 3. Aligning the beneficial-ownership, RITA and tax filings on a single calendar (Sections 6 and 8).

6.2 Investment Governance

Where the trust holds investable assets, the Trustee Investments Act constrains what the trustees may do with them:

- Authorised classes of investment (section 4) include government securities, specified bank deposits, certain regional development bank securities, and shares or debentures of scheduled corporations and mortgages, each subject to conditions.
- Concentration limits (section 9): investment in any single company ordinarily may not exceed one-tenth of the trust fund; total investment in companies may not exceed one-third of the fund; and the combined ceiling across permitted categories is two-thirds.

- Company/mortgage conditions (sections 10-11): minimum capital-to-profit thresholds for company investments, and loan-to-value, lease-term, minimum-interest and independent-valuation requirements before a trust fund may be lent on mortgage.
- A trustee who continues to hold an investment that later ceases to be an authorised class is not automatically liable for that reason alone, but making a new, non-authorised investment or breaching the concentration limits, can expose the trustee to personal liability to restore the loss.

6.3 Fiduciary Conduct and Records

Trustees must keep accurate accounts, minutes of decisions, valuations and beneficiary communications; avoid conflicts of interest and secret profits; disclose related-party and connected-person transactions (note that company law treats trustees as "connected persons" in certain related-party transactions where beneficiaries fall within defined categories); and act strictly within the powers given by the trust deed. Failure on any of these fronts is the fact pattern behind most breach-of-trust litigation (Section 11).

7

Tax Exemption: Procedure and Realistic Limits for Family Trusts

7.1 Exemption Is Never Automatic

A recurring misconception is that a trust is tax-exempt simply because it is not a commercial venture, or because it has a memorandum of understanding with a government body. Neither is correct. Under section 10 of the Income Tax Act, only the Minister for Finance may grant a tax exemption, and an exemption takes effect only once the Minister is satisfied and issues a Government Notice publishing the exempt person and the scope, commencement and expiry of the exemption in the Government Gazette. TRA will not treat any income as exempt until it has sight of that Gazette notice an MOU or donor/government agreement, without more, confers nothing.

7.2 The Charitable-Organisation Route

The main statutory route by which a trust can obtain favourable tax treatment on its income is the charitable-organisation regime under section 64 of the Income Tax Act. "Charitable organization" is defined at section 64(8) as a resident entity of a public character that (i) is established and functions solely for the relief of poverty or distress of the public, the advancement of education, or the provision of general public health, education, water or road construction/maintenance; and (ii) has been issued a ruling to that effect by the Commissioner-General under section 11 of the Tax Administration Act] and the Income Tax Act.

The procedure is, in outline:

1. **Apply to the Commissioner-General of TRA** for a charitable-organisation ruling, supported by the trust's constitution/trust deed, audited financial statements, project/activity reports and income records evidencing that the trust in fact functions solely for one of the qualifying public-character purposes.
2. **Obtain the ruling** under section 11 of the Tax Administration Act read with section 131 of the Income Tax Act.
3. **Apply to the Minister for Finance** under section 10 of the Income Tax Act for the exemption itself, where the relief sought goes beyond the section 64 deduction (for example, a full exemption rather than a partial deduction).

4. **Await the Government Notice** and confirm its publication in the Gazette before treating any income as exempt.

Once the ruling is granted, section 64(2)(b)(ii) allows a deduction, in computing taxable income, of amounts applied exclusively in pursuit of the qualifying charitable activity, plus a further 25% of income in the computation of taxable income for the year, so an organisation that applies the great majority of its income to its qualifying purpose can in practice reduce its taxable income to nil.

7.3 Why an Ordinary Family Trust Will Usually Not Qualify

NOTE

This is the point most often missed in client conversations: a family trust holding assets for the private benefit of named family members is not "of a public character" and does not exist "solely" for relief of poverty, education, health, water or road purposes. On the statutory definition, it will not qualify for a charitable-organisation ruling merely because the family also happens to be generous, or because the trust deed recites broad philanthropic aspirations.

Practical consequence: a settlor who wants the succession and asset-protection benefits of a private family trust should not expect to obtain a section 64 exemption for it. If philanthropic intent is genuinely part of the plan, the cleaner structure is usually a separate charitable trust or foundation, constituted solely for a qualifying public-character purpose and kept legally and financially distinct from the family's private wealth-holding trust, with its own application for a Commissioner-General ruling.

7.4 The Relief That Does Apply to Ordinary Family Trusts

The tax feature relevant to most family trusts is not an exemption of the trust itself but the treatment of distributions under section 52(2) of the Income Tax Act: distributions of a resident trust are exempt in the hands of the trust's beneficiaries (they do not need to include the distribution in their own taxable income), whereas distributions of a non-resident trust must be included in calculating the beneficiaries' income. This is discussed further in Section 8.2.

8 Tax Compliance Obligations of a Trust

8.1 Registration and Residence

A trust is a resident trust for a year of income if it was established in Tanzania, or if at any time in the year a trustee is a resident person, or if a resident person directs or may direct the trust's senior managerial decisions. On formation, the trustee should register the trust for a Taxpayer Identification Number (TIN) with TRA, this is required before the trust can open bank accounts in its own name, file returns, or (where relevant) register for VAT.

8.2 Income Tax on the Trust and on Distributions

Unless specifically exempted, a trust is taxed separately from its beneficiaries under section 52 of the Income Tax Act the trustee files and pays tax on the trust's income in the trustee's capacity as trustee. Distributions out of a resident trust are then exempt in the beneficiaries' hands under section 52(2)(a); distributions out of a non-resident trust are included in the beneficiaries' income under section 52(2)(b). Advisers should flag to clients that, because the trust is taxed on its income and (for non-resident trusts) the beneficiary may also be taxed on the distribution, there is a live risk of effective double taxation on non-resident trust structures, with

no automatic relief for tax already paid by the trust a further reason to prefer a Tanzania-resident trust structure for local family wealth.

8.3 Withholding, Payroll and Consumption Taxes

- **PAYE:** if the trust or its trustees, acting for the trust, employ staff (e.g., estate managers, household staff paid through the trust), PAYE must be deducted from salaries and remitted to TRA.
- **Skills Development Levy (SDL):** payable at the prescribed rate of gross emoluments where the trust's employee headcount exceeds the statutory threshold under the Vocational Education and Training Act confirm the current threshold and rate before advising, as both have been amended by successive Finance Acts.
- **Withholding tax:** due on payments the trust makes for services such as consultancy, rent and contracted works, to be deducted at source and remitted to TRA.
- **VAT:** if the trust is VAT-registered (for example, because it carries on a business through the trust, such as leasing family property), VAT is due on taxable supplies, subject to the zero-rating/exemption schedules in the Value Added Tax Act

8.4 Annual Returns and Records

The trustee must file the trust's annual income tax return declaring estimated and actual income and the tax payable, even where the return shows nil chargeable income. Keep the return aligned with the annual RITA return and the BO filing so the trust's compliance calendar runs on one timetable rather than three. Retain supporting accounts, valuations and distribution records, TRA, RITA and (in a dispute) the courts can all call for them.

9

Advantages of a Family Trust, Why a Family Should Consider One

- **Controlled succession:** the settlor fixes, in the trust deed, how, when and to whom family assets pass across one or several generations, rather than leaving distribution to default intestacy rules or to a probate process the settlor cannot influence after death.
- **Avoidance of probate delay and publicity:** assets settled into a living trust during the settlor's lifetime generally pass to beneficiaries under the trust deed without needing a grant of probate or letters of administration, sparing the family the cost, delay and public exposure of probate proceedings.
- **Continuity for family businesses:** an incorporated trustee body holding shares or business assets does not change legal personality when individual trustees change, avoiding the disruption that share transmission on death can otherwise cause to a family business.
- **Protection for vulnerable or minor beneficiaries:** a discretionary trust lets trustees manage and apply funds for minors, dependants with disabilities, or beneficiaries who are not yet ready to manage capital directly, rather than handing assets over outright.
- **A measure of asset protection:** because trust property is legally owned by the trustee rather than by any individual beneficiary, a properly and honestly constituted trust can, in some circumstances, shield family assets from an individual beneficiary's personal creditors or from unsettled inheritance disputes, though this is not absolute, and courts will unwind arrangements that amount to a sham or a fraud on creditors.

- **Professional management:** trustees (individual or an incorporated body, potentially including professional or corporate trustees) can bring investment discipline to family wealth, operating within the statutory safeguards of the Trustee Investments Act.
- **Favourable treatment of distributions:** distributions from a Tanzania-resident trust are exempt in the beneficiaries' hands under section 52(2)(a) of the Income Tax Act, which is a genuine and available tax advantage for ordinary family trusts (as distinct from the charitable exemption discussed in Section 7, which most family trusts will not obtain).
- **Confidentiality:** a trust deed is a private instrument (subject to the BO disclosure obligations owed to competent authorities); unlike a probated will, its terms are not automatically a public court record.

10 Do's and Don'ts

10.1 For Settlers

- Do record your intentions in a properly drafted, signed trust deed do not rely on informal understandings with family members about how assets should eventually be shared.
- Do choose trustees for competence and willingness to act, not only out of sentiment or seniority; a trust with disengaged or conflicted trustees is a trust that will end up in dispute.
- Do build in a mechanism to replace or remove a trustee, and a dispute-resolution clause (mediation/arbitration), before a disagreement arises not after.
- Do take independent tax and land-tenure advice before settling business interests or land into the trust; do not assume the trust will automatically be tax-exempt or automatically able to hold every category of asset.
- Don't use a family trust as a vehicle to defeat existing creditors or to disguise assets from a spouse in ongoing matrimonial proceedings Courts will look through such arrangements, and a settlement made in fraud of creditors or of a spouse's claim is liable to be set aside.

10.2 For Trustees

- Do keep the trust's money and property entirely separate from your personal assets, and keep contemporaneous minutes and accounts of every material decision.
- Do observe the Trustee Investments Act concentration limits and conditions before making or renewing any investment, and obtain independent valuations where the Act requires them (mortgages in particular).
- Do file the BO forms, the RITA annual return and the trust's tax return on time, every year, and keep evidence of each filing.
- Do communicate proactively and transparently with beneficiaries about material decisions, distributions and the trust's financial position.
- Don't make secret profits from the trusteeship, self-deal, or enter transactions in which you have an undisclosed personal interest disclose and, where the deed or the law requires it, obtain beneficiary or court consent first.
- Don't assume that ceasing to act informally ends your duties or liability, formally resign or be removed in accordance with the deed and the Act, and hand over records and property properly.

- Don't treat an unincorporated trust's informality as licence to skip governance discipline, the fiduciary duties and the Trustee Investments Act apply whether or not the trustee body is incorporated.

The following decisions are the ones most frequently useful in a family-trust practice.

Case and citation	Court	Relevance to trust practice
Registered Trustees of Tanzania Assemblies of God v William Lusito and Emmanuel Lazaro [1990] TZCA 5 (25 May 1990)	Court of Appeal	Long-running internal church dispute over who validly held office as trustee. The Court examined whether a person had ceased to be a trustee at all, holding that if he had, he could not be in breach of trust and there was no question of removing him i.e. breach-of-trust and removal remedies presuppose a subsisting trusteeship. A useful authority on the threshold question in any trustee-removal dispute: is the respondent still a trustee?
Bi Hawa Mohamed v Ally Sefu , Civil Appeal No. 9 of 1983, [1983] TZCA 12 (29 November 1983)	Court of Appeal	Landmark matrimonial-property decision holding that a spouse's domestic contribution to the welfare of the family counts as 'contribution' to the acquisition of family/matrimonial assets, giving rise to a beneficial (equitable) share even where legal title sits with the other spouse. Although not decided under the Trustees' Incorporation Act, its equitable reasoning underpins how our courts will treat undocumented claims to a beneficial interest in family property, exactly the informal arrangements a properly drawn family trust is designed to preempt.
Scan-Tan Tours Ltd v The Registered Trustees of the Roman Catholic Diocese of Mbulu , Court of Appeal at Arusha; see also Misc. Civil Application No. 38 of 2020, [2021] TZHC 9029 (3 September 2021)	Court of Appeal / High Court (Arusha)	Addresses the locus standi and suing/being-sued capacity of an incorporated trustee body in its corporate name. Confirms the practical value of incorporation under Cap. 318: an incorporated trustee can sue and be sued without joining every individual trustee, but the capacity in which proceedings are brought or defended must still be correctly pleaded.
Registered Trustees of Social Action Fund v Commissioner General (TRA) , Application No. 17 of 2024	Tax Revenue Appeals Tribunal	A registered trustee body in dispute with TRA's Commissioner General, illustrating that trusts (including those with a public/social character) are not immune from tax assessment and must be prepared to litigate exemption and assessment questions before the tax tribunals like any other taxpayer.

Case and citation	Court	Relevance to trust practice
MSPH Tanzania LLC v Commissioner General of TRA , Tax Appeals Nos. 327, 328, 329, 330, 335 and 336 of 2019	Tax Revenue Appeals Board	The Board held that a not-for-profit organisation was exempt from tax on the facts before it, a rare instance of a taxpayer succeeding against TRA on exemption grounds. Useful persuasive authority when advising a genuinely charitable trust or foundation on the strength of its Commissioner-General ruling application, though it does not assist a private family trust seeking exemption for the private benefit of its beneficiaries.

NOTE

Trust case laws in Tanzania is thinner than in more mature trust jurisdictions, and much of it arises from disputes over church and religious trustee bodies rather than private family trusts.

12 Practical Compliance Checklist

- Trust deed (or will clause) in place, clearly setting out settlor intent, beneficiaries, trustee powers, distribution rules, trustee appointment/removal, duration and dispute resolution.
- Decision made and documented on whether to incorporate under Cap. 318; if yes, Form T.I.1 and annexures filed, fees paid, certificate obtained and Gazette notice on file.
- Beneficial ownership register maintained and BO forms filed with the Administrator-General/RITA under GN No. 139A of 2024; a named compliance owner appointed.
- Investment governance: all holdings tested against the Trustee Investments Act authorised classes and concentration limits; independent valuations obtained where required; rationale for each material investment documented.
- TIN obtained; annual income tax return filed even where nil; PAYE, SDL, withholding tax and VAT positions reviewed annually against current thresholds and rates.
- Land tenure confirmed and any acquisition/vesting consents obtained before land is settled into or acquired by the trust.
- Conflict-of-interest and related-party policy adopted; connected-person transactions disclosed and, where required, consented to in advance.
- RITA annual return filed on schedule (for incorporated trusts).
- Accounts, minutes, valuations and beneficiary correspondence retained and readily producible to TRA, RITA or a court.

13 Conclusion

A family trust remains one of the more effective tools available under Tanzanian law for controlled succession, business continuity and protection of vulnerable beneficiaries, and the tax treatment of distributions from a resident trust makes it a genuinely useful planning vehicle even without charitable status. The trade-off is a real and ongoing set of compliance obligations, incorporation formalities where chosen, beneficial ownership disclosure, investment governance, and annual tax and RITA filings and a tax-exemption route that, realistically, is available to charitable trusts and not to ordinary private family trusts. Advising a family into a trust structure without walking them through both sides of that trade-off is where most avoidable disputes and compliance failures originate; this note is intended to make sure that conversation happens up front.

REFERENCES

- The Trustees' Incorporation Act and Trustees' Incorporation Rules [Cap. 318, R.E. 2023]
- The Trustee Investments Act [Cap. 53, R.E. 2023]
- Trustees' Incorporation (Transparency of Beneficial Ownership) Rules, GN No. 139A of 2024
- Public Trustee (Powers & Functions) Act [Cap. 31, R.E. 2023]
- The Income Tax Act [Cap. 332, R.E. 2019]
- The Tax Administration Act [Cap. 438, R.E. 2023]
- The Value Added Tax Act [Cap. 148, R.E. 2023]
- The Vocational Education and Training Act [Cap. 82, R.E. 2023]
- Probate Rules, 1963, and applicable succession legislation
- Registration, Insolvency and Trusteeship Agency (RITA), rita.go.tz
- Tanzania Revenue Authority (TRA), tra.go.tz
- Tax Revenue Appeals Tribunal (TRAT), trat.go.tz
- Tanzania Legal Information Institute (TanzLII), tanzlii.org, for full text of all cases cited at Section 11
- Lyson Law Academy, lysonlaw.co.tz/academy



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