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INTRODUCTION

Transfer pricing is increasingly influencing significant changes in tax legislation around the world. This 29th issue of BDO's Transfer Pricing Newsletter focuses on recent developments in the field of transfer pricing in Germany, Greece, Latvia, Malawi, Panama, and Uganda. As you can read, major changes in legislation have been made and will be made in the coming period, with interesting developments in various countries around the world.

We are very pleased to bring you this issue of BDO's Transfer Pricing News, which we were able to produce in close co-operation with our colleagues from the above-mentioned countries. We trust that you will find it useful and informative. If you would like more information on any of the items featured, or would like to discuss their implications for your business, please contact the person named under the item(s). The material discussed in this newsletter is intended to provide general information only, and should not be acted upon without first obtaining professional advice tailored to your particular needs.

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GERMANY

NEW CIRCULAR FOR CCAs

On 5 July 2018, the German Federal Ministry of Finance (BMF) issued a circular with regard to Cost Contribution Arrangements. This circular will replace the existing circular 'Administrative Principles for the Examination of Income Allocation between Internationally Associated Companies by means of Cost Contribution Arrangements' dated 30 December 1999. The new circular refers to the recommendations provided in Chapter VIII (on 'Cost Contribution Arrangements') of the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax administrations (OECD GL 2017), which will apply for fiscal years beginning after 31 December 2018. In this article we briefly summarise the key differences compared to the current administrative interpretation.

Cost Contribution Arrangements among multinational group companies

A Cost Contribution Arrangement (CCA) within the meaning of the BMF circular dated 30 December 1999 is an arrangement amongst companies of multinational groups which collaborate on a mutual basis and under a common interest for a joint purpose such as the outcome of joint research and development activities, or the joint production or procuring of assets, services or intangible assets. The assessment of CCAs for tax transfer pricing purposes is likewise subject to the guidelines of Chapter VIII of the OECD GL 2017, which has witnessed a fundamental update following the OECD's Base Erosion and Profit Shifting Project (BEPS).

CCAs should be strictly distinguished from cost allocation agreements. Based on cost allocation agreements, one (or more than one) entity provide(s) services for the benefit of one or multiple service recipients on a contractual basis and is remunerated appropriately. However, participants of a CCA contribute their efforts (and bear expenses in this regard) to realise a joint purpose to achieve a benefit for all CCA participants, including the contributing one. The main difference compared with cost allocation agreements is that a CCA participant also incurs expenses for its own expected benefit and not solely on a contractual basis for the benefit of other parties.

Key differences

By reference to the provisions set out in the significantly revised Chapter VIII OECD GL 2017, the view of the BMF regarding the assessment and treatment of CCAs witnesses a paradigm shift. Against the background of the three objective pillars of the BEPS initiative, i.e. 'substance', 'coherence' and 'transparency', Chapter VIII of the OECD GL 2017 was revised in order to clarify that participants of a CCA must be functionally able to control the risks that may materialise due to their participation in a CCA, and furthermore must be able to have the financial capacity to assume these risks.

In comparison, the BMF, likening participants' CCA participation to that of partners of an undisclosed partnership, has so far put emphasis on the joint purpose that CCA participants strive for and, thus, on the attribution of expenditure spent to achieve that purpose according to a benefit based key. In the absence of a contractual and exclusive obligation to engage in activities for the immediate benefit of other parties only, German tax authorities have so far disallowed a mark-up on costs incurred under a CCA.

However, Chapter VIII OECD GL 2017 broadens this perspective by stating that the individual contribution of the parties shall be valued at market price first and then set in relation to the expected benefits, meaning that a mark-up on costs incurred in connection with activities under a CCA will not be explicitly ruled out if at arm's length both in its merits and amounts. By now making reference to Chapter VIII OECD GL 2017, the German tax authorities appear to adopt the OECD view in general terms. Notwithstanding the aforesaid, whether and to what extent German tax authorities will in the future accept mark-ups in relation to costs incurred in connection with activities under a CCA is likely to depend on the individual case and the assessment of the functional and risk profile of the companies participating in a CCA.

Transitional rule

The principles laid down in the circular dated 30 December 1999 will cease to apply on 31 December 2018. Grandfathering will be provided for CCAs already in force on and before 5 July 2018. The stipulations of those CCAs concluded until 5 July 2018 will be assessed and examined according to the principles set out in the prior BMF circular dated 30 December 1999 until 31 December 2019. All CCAs entered into after 5 July 2018 are subject to assessment and examination according to the principles of Chapter VIII OECD GL 2017.

Recommendation

We recommend that German taxpayers participating in CCAs review the underlying agreements for compliance with the recommendations provided by the OECD and consider making adjustments to these agreements, if necessary.

Multinational groups not yet using CCAs, but intending to enter into such arrangements with related parties should consider setting up CCAs according to the provisions laid down in Chapter VIII of the OECD GL 2017.

Essentially, the OECD GL 2017 demand an assessment of the value contribution each party makes within the respective CCA at market prices. They also recommend that a comparison of these market prices and the expected benefits derived therefrom should be conducted. Against the background of the updated OECD GL 2017 the compliance rules under the new German administrative circular can be expected to lead to a higher level of complexity and an increased documentation burden for affected German taxpayers participating in a CCA.

We will be happy to provide our support in reviewing and adjusting existing agreements.

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GREECE

TRANSFER PRICING DOCUMENTATION IN GREECE – RECENT DEVELOPMENTS (BEPS-ACTION PLAN 13)

The Organisation for Economic Co-operation and Development's (OECD's) Base Erosion and Profit Shifting (BEPS) Action Plan 13 describes a standardised three tiered approach for transfer pricing documentation consisting of the CbC Report, the Master File, and the Local File. The Greek legislation had already introduced the Master File and Local File, and the new Law 4484/2017, to be codified in Articles 1-8, confirms that Greece will also implement the CbC Report.

Master File and Local File (In brief)

The Transfer Pricing (TP) Documentation File consisting of the Master File and the Greek Documentation File must be prepared by the filing deadline for income tax returns. The TP Documentation File must be accompanied by the Summary Information Table (SIT), which must be submitted electronically to the Tax Administration by the same deadline.

- The SIT contains information regarding the group an entity belongs to, the functions performed and the risks assumed, as well as a short description of the transfer pricing documentation method(s) adopted;
- The TP Documentation File must be kept at the headquarters of the taxable legal person throughout the period for which there is an obligation to keep the books and records of the respective fiscal year. The TP Documentation File must be made available to the Tax Administration upon request within 30 days from serving the relevant request;
- The Master File may be kept in an internationally accepted language, preferably English, when it is a foreign group, with an obligation for translation into the Greek language upon request of the tax authority within a reasonable timeline and not more than 30 days from receiving the relevant request. In all other cases, the TP Documentation File must be kept in the Greek language.

Country-by-Country Report

On 1 August 2017, Law 4484/2017 (the Law), which modified the Greek Corporate Income Tax L.4170/2013, L.4378/2016 and L.4474/2017 with respect to Country-by-Country (CbC) reporting, was published in the *Government Gazette*. The law was approved by Parliament on 28 July 2017. In essence the modifications adopted the European Union (EU) Directive 2015/2376/EU on automatic exchange of information in the field of taxation. The new Law 4484/2017 harmonises Greek legislative framework with the provisions of the EU Directive 2016/881.

With respect to the content of the CbC Report, the new law requires the following items to be included for each jurisdiction in which the MNE group is active:

- Revenues (from related and unrelated parties);
- Earnings before income tax;
- Income tax paid;
- Income tax accrued;
- Shared Capital;
- Accumulated earnings;
- Number of employees;
- Tangible assets (other than cash and cash equivalents);
- A description of each group entity of the MNE group, noting the jurisdiction in which the group entity is a tax resident, and if different, the jurisdiction under whose laws the group entity has been incorporated, as well as the nature of the main business activity or business activities of the group entity.

The CbC reporting requirements are generally aligned with the OECD guidance from the implementation package.

The CbC Report is applicable to Greek tax resident entities that are members of a multinational enterprise (MNE) group, with a consolidated group turnover exceeding EUR 750 million in the fiscal year preceding the fiscal year to which the CbC Report applies. If the Reporting entity (Parent/Surrogate/Constituent) of an MNE group is a Greek tax resident and subject to CbC reporting requirements, this entity is required to provide a CbC Report to the tax authorities within twelve months after the last day of the tax year to which it refers. The filed CbC Report will subsequently be exchanged automatically with jurisdictions in which the MNE operates and with which Greece has concluded an information exchange agreement within 15 months after the last day of the tax year to which it refers. The first fiscal year covered for CbCR filing is the year commencing 1 January 2016.

In the following situations, a Greek tax resident entity, not being the Ultimate Parent Entity (UPE) of a qualifying MNE group, would need to file a CbC Report in Greece if one of the following conditions exists:

- The country in which the UPE is a tax resident has not established CbC reporting obligations;
- The country in which the UPE is a tax resident does not have a signed agreement in place regarding an automatic exchange of information with Greece on CbC Reports (CbC MCAA);
- The country of tax residency of the UPE has systemically failed to comply with the submission of the CbC Report (systemic failure).

If the MNE group has multiple Greek resident group entities, and one or more of the above conditions are met, the MNE group can designate one of these group entities to fulfil the requirement to provide the CbC Report.

Specific penalties for non-compliance with the CbC reporting requirements

Under Article 7 of L.4484/2017 the penalty for non-submission of the CbC Report has been set at EUR 20,000, and for late submission or submission of inaccurate information the penalty has been set at EUR 10,000.

Notifications

The new law requires a Greek tax resident entity (Constituent entity), which is a member of an MNE group subject to CbC reporting, to notify the Greek tax authorities:

A) Whether it is the UPE or the Surrogate Parent Entity; and

B) If not, it must notify the identity and tax residence of the Reporting Entity, no later than the last day of the Reporting Fiscal Year of such MNE Group. There are no penalties for non-submission.

Activated exchange relationships for Country-by-Country Reporting

As of November 2018, the total number of bilateral exchange relationships that are currently activated in Greece reached 64. Furthermore, Greece is among the 74 countries so far that signed (on 18 October 2018) the Multilateral Competent Authority Agreement on the exchange of CbC Report (the 'CbC MCAA').

Conclusions

The issue of national guidelines on transfer pricing has put Greece among the countries with advanced transfer pricing legislation and in line with recent updates made internationally by the BEPS project. However, Greece's domestic legislation still does not contain specific guidance on crucial TP issues such as Hard To Value Intangibles evaluation, Profit Split method application, pricing of low adding value intragroup services transactions, Cost Contribution Agreements and transactions involving intangibles.

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LATVIA

NEW REQUIREMENTS FOR THE PREPARATION OF TP DOCUMENTATION

On 14 November 2018 the Latvian Parliament (Saeima) announced amendments to Section 152 of the Latvian law On Taxes and Duties regarding new requirements for the preparation of transfer pricing (TP) documentation, thereby fully implementing a three-tiered approach (as stipulated in the OECD BEPS Action Plan 13) into the Latvian legislation. The amendments concern only Master File and Local File requirements, as the requirements for the preparation and submission of a Country-by-Country Report (CbCR) were already implemented in July 2017.

The new amendments provide guidelines regarding thresholds for Master File and Local File submission, content and other requirements. These amendments will apply to all transactions undertaken in a review period which starts in 2018. Inter alia, the intended effect of these amendments is to relieve the obligation for the preparation of TP Documentation for non-substantial transactions. Additionally, these amendments introduce a fine for non-submission of TP Documentation or omission of important parts of documentation, which makes it impossible to determine the arm's length principle for a controlled transaction. No such fines were present in the previous legal framework.

Submission requirements and thresholds

Residents or non-resident permanent establishments must substantiate the arm's length approach for transactions undertaken with:

1. A related foreign entity;
2. A related natural person;
3. Entities or natural persons residing in low-tax or no-tax states or territories;
4. A related resident person – if the transaction, commercial or financial relations (based on performed functions, undertaken risks and used assets) are economically related, i.e. occur within a single supply chain with another related foreign entity or other entities or natural persons residing in low-tax or no-tax states or territories.

For transactions with persons and entities listed under Points 1-3, taxpayers are obliged to submit the following documentation to the Latvian State Revenue Service (SRS) within twelve months after the end of the financial year:

- Master File:
  - If the annual sum of controlled transactions exceeds EUR 15 million; or
  - If the annual net turnover exceeds EUR 50 million and the annual controlled transactions sum exceeds EUR 5 million.
- Local File:
  - If the amount of controlled transactions exceeds EUR 5 million.

Furthermore, taxpayers must submit the following documentation for transactions with persons and entities listed under Points 1-3 within twelve months following a request from the SRS:

- Master File, if the net turnover of the taxpayer does not exceed EUR 50 million and the annual controlled transactions sum is EUR 5 million - EUR 15 million;
- Local File, if the annual controlled transactions sum is EUR 250,000 - EUR 5 million.

For transactions with persons listed under Point 4, taxpayers must prepare a Local File and submit it within 90 days following a request from the SRS if the annual controlled transactions sum exceeds EUR 250,000.

Non-material transactions and simplified TP Documentation

Transactions not exceeding EUR 20,000 can be omitted from a Local or Master File.

However, it is important to note that even transactions that do not meet the aforementioned thresholds must be functionally and economically justified and follow the arm's length principle.

Documentation regarding transactions of low value-adding services which do not exceed EUR 250,000 must be prepared within twelve months after the end of the financial year and submitted within one month following a request from the SRS[1].

[1] The requirements for the simplified TP documentation will be stipulated by the Latvian Cabinet of Ministers Regulations which are currently being drafted.

Documentation requirements

The new amendments also include the minimum requirements of Master and Local Files[2].

The Master File should include all information regarding the Multinational Enterprise (MNE) group, including:

- The organisational and legal structure of the MNE group;
- The description of the economic activity of the MNE group;
- Information about intangible assets of the MNE group;
- Internal financial activity of the MNE group;
- Financial statements and taxes of the MNE group.

The Local File must include only information regarding the controlled transaction of the taxpayer, including:

- Information about the taxpayer and its related MNE group;
- Information about every significant controlled transaction in which the taxpayer is involved;
- Financial information.

In addition, the TP Documentation must be available in electronic format with the search function available. The Master File may be prepared in either Latvian or English; however, the SRS can request a full or partial translation from English to Latvian. There are currently no language requirements for the Local File, but it is expected that it will have to be prepared in Latvian.

Furthermore, documentation must be revised every year, unless there have been no significant changes in the methodology used, in which case the TP Documentation may be revised only once every three years. Nonetheless, financial data must be revised every year.

Fines

The new amendments introduce fines for non-submission of TP Documentation or omission of important parts which make it impossible to evaluate the arm's length principle for a particular transaction. In such cases, the taxpayer can be subject to a fine of 1% of the controlled transaction's sum, up to a maximum of EUR 100,000.

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[2] A detailed list of the required information that must be included in the Global and Local Files will be stipulated by the Latvian Cabinet of Ministers Regulations which are currently being drafted.

MALAWI

AMENDMENTS TO THE TRANSFER PRICING REGULATORY REGIME AND DOCUMENTATION REQUIREMENTS

The Minister of Finance issued a number of changes to the Taxation Act and Transfer Pricing Regulations with effect from 1 July 2017.

What changed in the TP regulations?

a) A transfer pricing document on transactions with related parties should be in place when filing annual returns with the Commissioner and should be made available upon request within 45 days;

b) The documentation is expected to verify that the conditions in the controlled transactions for the relevant tax year are consistent with the arm's length principle;

c) Regulations shall be interpreted in accordance with the Organisation for the Economic Cooperation and Development (OECD) Transfer pricing guidelines for Multinational persons and Tax Administrations;

d) In case of any inconsistency between the Act and these Regulations, on one hand and the OECD Guidelines, on the other hand, the Act and the Regulations prevail;

e) A tax jurisdiction provides a beneficial tax regime to a person where the amount of tax due on the person's income is 50% or less of the amount of income tax that would be due if the persons income were liable to tax in Malawi;

f) The qualifying threshold of transactions between related parties is the equivalent of USD 135,000 in Malawi Kwacha at the prevailing exchange rate.

Deemed interest income

Further amendments were made to the 2015/2016 Budget pronouncement on Section 27 of Part III of the Taxation Act to introduce a provision on 'Deemed Interest' where no interest is charged on a loan, and to subject such deemed interest income to taxation. The change took effect from 1 July 2018 and is expected to provide clarity and bring fairness on the treatment of domestic and foreign loans which attract no interest.

The key changes introduced on 1 July 2015 under Section 27, stated that:

" (8) Any interest not charged on a loan by a lender to another person shall be deemed as income to have accrued from a source within Malawi;

(9) The Commissioner General shall determine the interest foregone in Subsection (8) using the prevailing commercial rate per annum. "

Amendments to thin capitalisation rules

The thin capitalisation rules now prescribe the debt-equity ratio for the Mining sector of 5:1 and a general debt-equity ratio of 3:1 applicable to all Sectors, which will be limited to related-party debt, whether direct or indirect based on current international best practice.

Other key changes

– Imposition of a tax liability on the withholding agent for failure to withhold the Non-Resident Tax effective 1 July 2018;

– Transfer of the administration and collection of royalty from the Ministry of Mines to Malawi Revenue Authority;

– The mining fiscal regime to provide separate provisions for the taxation of mining projects even if the projects are owned by the same company. Each project to pay its fair share of tax and grant tax incentives to qualifying investors.

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PANAMA

TP RULES FOR COMMERCIAL AND FINANCIAL TRANSACTIONS CARRIED OUT BY MULTINATIONAL COMPANIES HEADQUARTERS

On 24 October 2018, Law N° 57 introduced amendments on Law N° 41, 2007, which created the special regime on Multinational Companies Headquarters (MHQ or SEM, *Sede de Empresa Multinacional*).

Formerly exempt from Corporate Income Tax and Transfer Pricing Compliance, the new law contains substantial changes on both fields for SEM Entities.

The most significant points of Law N° 57, 2018 are found mainly in the modification of the tax regime, and in the fulfilment of the documentation and analysis of the intercompany transactions under the local Transfer Pricing Provisions.

a) What services are established in the scope of the SEM Regime?

The main objective of this special regime is to set up the conditions for the creation of Regional Service Centers or Headquarters in Panama.

The SEM Regime includes technical, financial and/or administrative assistance, as well as other support services.

The range of services is comprehensive and also includes financial management services, credit and risk analysis, due diligence and a data processing centre.

b) Who are the recipients of the services?

Under the SEM Regime Law, the main function of a Multinational Company recognised as SEM (MHQ) will be providing the above-mentioned services to related entities.

c) Partial elimination of Tax Benefits

Among other amendments, as from fiscal year 2019, SEM entities will be subject to **5% Corporate Income Tax**, as a result of the services provided. However, similar to the former Law N° 41, they will be exempt from dividend tax.

d) Transfer Pricing Documentation

Because of the elimination of the said Corporate Tax Benefits, and following the OECD recommendations, the commercial and financial transactions carried out by the SEM entities and their related parties will be subject to the Transfer Pricing rules.

That is, they must be aligned to the Transfer Pricing provisions of the Republic of Panama: Law N° 33 of 31 December 2010, Law N° 52 of 28 August 2012, and Executive Decree 390 of October 2016.

The scope of the regulation will be significant as it is expected to cover transactions with foreign related parties, domestic affiliates, and those affiliates established in preferential or special areas (Colon Free Zone, Oil-Free Zone, Panama-Pacific, SEM, City of Knowledge, and any other areas) (*see illustration below*).

Compliance for SEM entities will be similar to the rest of the entities that are currently obliged to prepare transfer pricing documentation:

1. Preparation of the transfer pricing report (local file), according to Regulation 390 of 24 October 2016;
2. Presentation of Form 930 (TP Form), according to Resolution N° 201-1973 of 2 April 2018.

However, the obligation is expected to be burdensome due to the above-mentioned scope.

What's next?

Within the scope of the Inclusive Framework promoted by the OECD, Panama continues to implement changes in its regulatory framework.

The changes are an integral part of the fight against BEPS, encouraged by this organisation.

The BEPS Action Plan 5, 'Countering Harmful Tax Practices More Effectively, Taking into Account Transparency and Substance', is expected to have a direct effect on **all Panamanian free zones and special regimes** as of the year 2019.

Bill 654, of 16 July 2018, in its Article 11, increases the extent of the said Action Plan 5 aiming at increasing Transfer Pricing compliance:

1. The aforementioned article states that all "natural or legal persons that carry out transactions with related parties that are established in the Colon Free Zone, the Oil-Free Zone, the Panama Pacific Special Economic Area, SEM, the City of Knowledge [..] will be subject to the Transfer Pricing regime.";
2. It will also cover all natural or legal persons established in preferential zones that deal with related parties in other special zones, within Panamanian territory or abroad;
3. Similarly, it will cover those companies exempt from Corporate Income Tax.

The transfer pricing obligation will be dual. That is, if a Panamanian fiscal resident entity carries out a commercial or financial transaction with an entity established in any Panamanian Special Zone, the obligation to submit Transfer Pricing documentation will fall on both entities.

Bill 654 is aligned not only with the OECD's request; It incorporates many of the specifications that other countries in the region already have when incorporating amendments to their special zones regimes.

The Bill promotes compliance from the fiscal year 2019.

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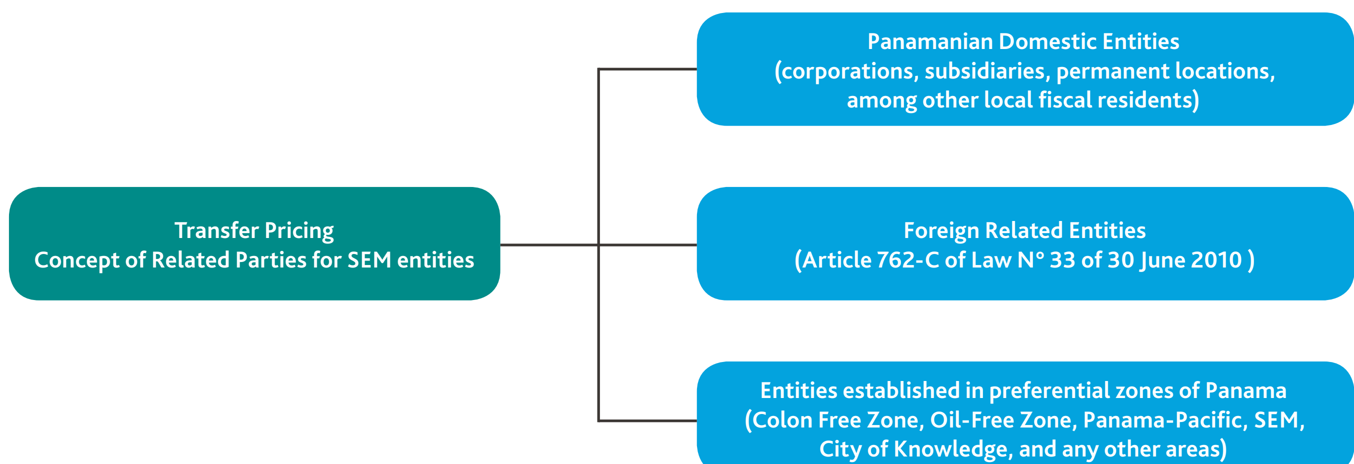

UGANDA

TRANSFER PRICING REGULATIONS IN UGANDA

Under Section 7 of the Income Tax (Transfer Pricing) Regulations, Ugandan taxpayers are required to determine that the income and expenditure resulting from a controlled transaction is consistent with the arm's length principle.

It is therefore important to know whether the entities involved in the transactions under review are associates in order to determine whether the transfer pricing regulations as set out in The Income Tax (Transfer Pricing) Regulations apply to transactions between these entities.

Section 3, of the Ugandan Income Tax Act, defines an associate as follows:

a) Where any person, not being an employee, acts in accordance with the directions, requests, suggestions, or wishes of another person whether or not they are in a business relationship and whether those directions, requests, suggestions, or wishes are communicated to the first-mentioned person, both persons are treated as associates of each other;

b) Where the person is a company, the definition applies to:

   i. A person who, either alone or together with an associate or associates under another application of this Section, controls 50% or more of the voting power in the company, either directly or through one or more interposed companies, partnerships, or trusts; or

   ii. Another company in which the person referred to in Subparagraph (i.) of this paragraph, either alone or together with an associate or associates under another application of this section, controls 50% or more of the voting power in that other company, either directly or through one or more interposed companies, partnerships, or trusts.

Documentation requirements

The Regulations require resident entities that transact with related parties to transact at arm's length prices, and taxpayers are required to prepare contemporaneous documentation.

Although there are no requirements to lodge the transfer pricing documentation with the Uganda Revenue Authority (URA), the documentation must be in place prior to the due date for submission of the tax return for the year in question. This implies that taxpayers must update their transfer pricing documentation on an annual basis.

In order to be compliant, the policy should include, among others, the following:

- Company details – history, ownership, related parties;
- Functional analysis – risk assumed and functions performed for company and associated parties;
- Transaction details – parties, scope, nature, timing, frequency and value of the transaction, contractual terms and conditions, etc.;
- Economic conditions affecting transactions (controlled and uncontrolled) – market size, regulatory framework, industry analysis, trends, etc.;
- Benchmarking of each transaction; and
- A summary or conclusion as to whether the controlled transactions comply with the arm's length principle and whether any adjustments are required.

Advance Pricing Agreements

The Regulations contain provisions for Advance Pricing Agreements (APAs) which allow taxpayers to apply for binding rulings with regard to the determination of transfer prices for future controlled transactions over a specified duration. The Regulations envisage the following types of APAs:

- Unilateral APAs – Agreement between a Ugandan taxpayer and the URA;
- Bilateral APAs – Agreement involving a Ugandan taxpayer, the URA, and a foreign tax authority; and
- Multilateral APAs – Agreements among a Ugandan taxpayer, the URA, and two or more foreign tax authorities.

Taxpayers wishing to enter into an APA may apply to the Commissioner and enclose specified information pertaining to the controlled transactions and proposed transfer prices. The Commissioner may accept, reject or modify the proposal. Once an APA is concluded, the controlled transactions in question will not be subject to transfer pricing adjustments for the duration of the APA provided the taxpayer complies with the terms specified in the APA.

Recognition of OECD Guidelines

The Regulations recognise the application of the OECD Guidelines as well as the OECD Model Tax Convention on Income and Capital.

Penalties

There is a penal tax equivalent to UGX 50 million shillings on a person who, upon request by the Commissioner, fails to provide records in respect of transfer pricing within 30 days after the request.

Conclusion

Transfer pricing legislation provides a key tool by which governments protect their corporate tax base. To prevent the artificial shifting of profits within Multinational groups (MNGs) of companies to countries that provide effective tax rates, MNGs operating in Uganda must be able to demonstrate that intragroup prices are at arm's length.

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CURRENCY COMPARISON TABLE

The table below shows comparative exchange rates against the euro and the US dollar for the currencies mentioned in this issue, as at 7 January 2019.

Currency unit	Value in euros (EUR)	Value in US dollars (USD)
Euro (EUR)	1.00000	1.13920
US dollar (USD)	0.87724	1.00000
Malawi Kwacha (MWK)	0.00118	0.00135
Uganda Shilling (UGX)	0.00023	0.00027

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