

Tax & TP Disputes & Litigation

*Specialist tax advisory and
litigation capability, across Africa.*



Tax disputes across Africa are growing in frequency, complexity and financial impact. Authorities are scrutinising cross-border transactions, targeting transfer pricing and challenging long-standing positions.

What was once an audit can now escalate into a significant dispute. The difference lies in how early and how effectively it is managed.

A Different Approach

Most businesses split disputes between tax advisors and legal counsel engaged late. Regan van Rooy offers an integrated model, the first of its kind in South Africa:

- Technical tax and TP expertise
- Senior litigation counsel working alongside tax specialists
- One coordinated strategy from audit to litigation
- Pan-African experience

One team. One strategy. One outcome.

From Audit to Litigation

We support clients across the full dispute lifecycle:



Our focus is proactive strategy, not reactive defence.

Selected Experience

- Multi-billion rand TP exposure reduced by more than 85% through structured dispute engagement
- Disputes resolved through alternative dispute mechanisms
- Complex TP litigation across multiple jurisdictions

We focus on outcomes, not theory.

Our Services

We provide a comprehensive offering:

- ✓ Transfer pricing disputes
- ✓ International tax controversy
- ✓ Audit readiness and defence
- ✓ Engagement with tax authorities
- ✓ Tax tribunal & court litigation in SA & sub-Saharan Africa
- ✓ APA strategy and support
- ✓ Tax Administration Act (TAA) advisory and dispute management

Pan-African Capability

South Africa | Kenya | Nigeria | Mauritius
Zimbabwe | Zambia | Botswana | Namibia
Uganda | Ghana | Tanzania | Malawi

We provide coordinated, cross-border dispute strategies aligned to local regulatory environments.

Why Regan van Rooy

- ✓ Integrated tax and litigation capability.
- ✓ Strong TP expertise.
- ✓ Commercial, practical and partner-led.
- ✓ Pan-African reach.

Leadership



**Caoilfhionn
van der Walt**

Founder and Managing Partner



**Cabrini
McCarrick**

Head of Transfer Pricing



**Dr Daniel N
Erasmus***

Senior Tax Litigation Specialist
*Independent Counsel

Supporting Team

Russell Eastaugh
Rajnish Singh
Tuli Nkonki

Work With Us

Facing an audit or dispute, concerned about TP exposure, or expanding across Africa? We can support you.

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