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THE DIGITAL ECONOMY AND THE TAX LANDSCAPE: EXAMINING THE EVOLUTIONARY TRENDS OF LAW AND POLICY IN NIGERIA

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THE DIGITAL ECONOMY AND THE TAX LANDSCAPE: EXAMINING THE EVOLUTIONARY TRENDS OF LAW AND POLICY IN NIGERIA

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1.0. INTRODUCTION

The tax environment as we know it is ever-changing. It has metamorphosed from Biblical times that speaks of the taxman as going from door to door for tax collection, to a time when this practice would be deemed as barely scratching the surface as it relates to tax enforcement and compliance. With the benefit of heightened international trade and commerce, it appears that this development has caused a train wreck reaction in the operation of law and business in its traditional sense. Such that what was initially efficient in taxing the income of individuals and corporates is now far from ideal given the cross-border nature of business, the increasing complexity associated thereto, and the impact of a clash between the tax laws of various countries.

To unravel the current state of the law as it relates to the taxation of the digital economy in Nigeria *vis-a-vis* the international tax space, this paper will interrogate the traditional nexus for taxation as recognized in most tax legislation and address the new era of digitalization and its impact on the tax system. Subsequently, we will do a deep dive into the reaction of policymakers in the international space and carry out a critique of the state of Nigerian law on the taxation of the digital economy. This paper will argue that the Nigerian tax administrators have jumped the gun in its desperate attempt to tap the spoils of the digital economy. Instead, a strategic, patient, and more calculated

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approach will have done the Nigerian tax system much better and will have put the country in a more advantageous position in the long run.

2.0. TRADITIONAL NEXUS FOR TAXATION

The taxation of income of either individuals or corporate entities is typically premised on some form of connecting factor which determines whether the entity will be liable to tax within a particular jurisdiction. Traditionally, income taxes are premised on a structure and its imposition is limited to the geographical location of a taxable entity with the basic considerations of the source of income and/or fixed base.

Under Nigerian law, section 9 of the Companies Income Tax Act[1] (CITA) expounds on this by subjecting all profits of any Nigerian company, from any trade accruing in, derived from, brought into, or received in Nigeria, to Companies Income Tax (CIT) in Nigeria. Against the same overarching principle, section 13 of CITA, prior to the amendments introduced by the Finance Act 2019, provides concerning non-resident companies that where the taxable entity has (a) a fixed base for business purposes, (b) does business through an authorized agent, (c) operates a business (contract for surveys, deliveries, installation or construction) in Nigeria, or (d) where the trade or business is between the company and another person controlled by it, such an entity will be liable to tax in Nigeria.

Notably, the provision of section 13 is a replication of Article 7 of the Organisation for Economic Cooperation and Development (OECD) Model Double Taxation Treaty (Model DTT)[2] which guides how business profits of a company ought to be taxed in a particular country.

The foregoing reflects the connecting factor for determining the liability of a company to tax on its income in Nigeria. In sum, a Nigerian company is liable to tax based on the fact of its *residence in Nigeria* and

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[1] Companies Income Tax Act (CITA), Cap. C21, Laws of the Federation of Nigeria (LFN) 2004 (as amended).

[2] Organization for Economic Cooperation and Development (OECD), "Articles of the Model Convention with Respect to Taxes on Income and on Capital", available at https://www.oecd.org/tax/treaties/1914467.pdf. (accessed 4 November 2020).

a non-resident entity is liable to Nigerian tax based on the *source of its revenue in Nigeria* (italics for emphasis). This foundation operates as a thread that runs through almost every gamut of tax law. All of these work with the underlying assumption that the entity is physically present either as an incorporated entity in Nigeria or otherwise, and that its activities are attributable to such tangible structures.

With the evolution the world has undergone, such tangible structures are only a minuscule form of business activities such that growth in science and technology has made the world a single community linked by telecommunications - a global village connected by technology.

3.0. NEW REALITIES OF THE DIGITAL ECONOMY

Whilst the saying has become drab rhetoric, the message it communicates is still profound and relevant. It is said that:

> Uber, the world's largest taxi company, owns no vehicles. Facebook, the world's most popular media owner, creates no content. Alibaba, the most valuable retailer, has no inventory. And Airbnb, the world's largest accommodation provider, owns no real estate… Something interesting is happening.[3]

This is a classical illustration of the shift in the assumptions surrounding corporates and the operation of the tax system as a whole.

The digital economy is a world of commercial transactions conducted electronically on the internet.[4] It includes sales, marketing, banking, and supply chain management. It may be business to business or business to consumer.[5]

The taxation of profits derived from e-commerce has been a problem in the sphere of international taxation for some time and, as

[3] T. Goodwin, "The Battle is for the Customer Interface", available at https://techcrunch.com/2015/03/03/in-the-age-of-disintermediation-the-battle-is-all-for-the-customer-interface/ (accessed 26 August 2020).

[4] OECD, "The Digital Economy, New Business Models and Key Features", available at https://www.oecd-ilibrary.org/taxation/addressing-the-tax-challenges-of-the-digital-economy/the-digital-economy-new-business-models-and-key-features_9789264218789-7-en (accessed 16 January 2021).

[5] *Ibid*.

highlighted above, the traditional mechanisms used in double tax treaties (which allocate taxing rights in various ways) do not effectively address the particular issues arising from the flexible and dynamic business models and structures found in the e-commerce environment.[6]

Scale without mass, a heavy reliance on intangible assets, and the role of data and user participation work together to enable highly digitalised businesses to create value by activities closely linked with a jurisdiction without needing to establish a physical presence.[7] This remote participation in the national economy which operates through the instrumentality of the digital economy is indeed the key issue in the digital tax debate particularly given its defiance of the assumptions referred to in the preceding paragraphs of this work.

Domestic tax legislation and indeed the work of international organisations such as the OECD have struggled to keep up and ultimately tax this constantly changing area of the world economy which is promoting base erosion and profits shifting.[8] This difficulty is apparent in the very small number of countries that have taken actual legislative steps to tax this space and indeed the very volatile nature of the space.

4.0. PRELIMINARY STEPS BY THE INTERNATIONAL COMMUNITY- ORGANISATION FOR ECONOMIC CORPORATION AND DEVELOPMENT (OECD)

In 2015, the OECD, in its Base Erosion and Profits Shifting (BEPS) Action plan identified as its Action Plan 1, addressed the tax challenges of the digital economy. The Interim Report by way of exposition analyses in depth the value creation across different digitalised business models, whilst highlighting the main characteristics of digital

[6] *Ibid*.
[7] *Ibid*.
[8] *Ibid*.

markets.[9] In particular, it identified three characteristics that are frequently observed in certain highly digitalised business models namely: (i) scale without mass; (ii) reliance on intangible assets; and (iii) data and user contributions.[10] Additionally, it was acknowledged that these characteristics are expected to become common features of an even wider number of businesses as digitalisation advances. Whilst possible options to address these concerns were identified by the OECD, no consensus was reached on an approach to extinguish the problem and further work to be carried out in this regard.[11]

4.1. The Two-Pillar Approach

As part of the collective approach towards addressing the tax challenges of the digital economy, the Inclusive Framework, working through its Task Force on the Digital Economy (TFDE), in January 2019 issued a short Policy Note, which grouped the preliminary proposals of the OECD under consideration into two pillars.

Under Pillar One: It is proposed that there should be a modification of the international rules that divide the right to tax the income of multinational enterprises (MNEs) among jurisdictions. This would include a re-examination of the so-called "nexus" rules that determine whether an MNE has a taxable connection with a particular jurisdiction. This would also require work to be done on the rules which govern how much profit is allocated. The Inclusive Framework is exploring proposals to allocate more taxing rights to market or user jurisdictions, in situations when the value may be perceived as being created through user participation, and this is not currently recognised in the framework for allocating profits. Such proposals would go beyond the current "arm's length" principle of profit allocation that currently underpins transfer pricing rules.

The inclusive framework focuses on the allocation of taxing rights and seeks to undertake a coherent and concurrent review of the profit

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[9] OECD, "Action 1: Tax Challenges arising from Digitalization", available at https://www.oecd.org/tax/beps/beps-actions/action1/ (assessed 15 September 2020).
[10] *Ibid*.
[11] *Ibid*.

allocation and nexus rules. Pillar One comprises the "user participation" (advocated principally by the United Kingdom), "marketing intangibles" (advocated principally by the United States), and "significant economic presence" proposals. The Policy Note stated that these proposals would entail solutions that go beyond the arm's length principle.

Under Pillar Two: It is proposed that the remaining BEPS issues that directly or indirectly piggyback on and affect or are affected by the digital economy be resolved. It is further proposed that this will be done by the exploration of two sets of "interlocking rules" which are structured to provide a solution in circumstances where income is subject to little or no taxation. This Pillar could see the introduction of income inclusion rules and a tax on base erosion payments. This will however be similar to the "GILTI"[12] and "BEATS"[13] regime which is operational In the United States (US).

The Two-Pillar approach is certainly not an all-encapsulating proposition by the OECD to solve the problems of the digital economy and it is still expected that the final recommendation of the OECD will be received by the international community in 2020.

5.0. TAXATION OF THE DIGITAL ECONOMY IN NIGERIA

Prior to the Finance Act 2019, the highest level of taxes that a digital services company would have been faced with is withholding tax on its income where it enters into a contract with a Nigerian company or individual and that company, by reliance on the relevant provisions of the CITA, deducts the appropriate tax at source and remits same to the Federal Inland Revenue Service (FIRS). Other than this, the bulk of the activities were not subject to tax and little regulation in Nigeria.

With the enactment of the Finance Act 2019 and its coming into force on 13 January 2020, a new regime for the taxation of digital services

[12] GILTI (Global Intangible Low Tax Income) is the income earned by foreign affiliates of US companies from intangible assets such as patents, trademarks, and copyrights. The Tax Cuts and Jobs Act imposes a new minimum tax on GILTI.
[13] BEATS – Base Erosion Anti-Abuse Tax.

companies in Nigeria was firmly introduced. Section 13(ii)(c) now provides that the profits of a company other than a Nigerian company from any trade or business shall be deemed to be derived from Nigeria:

> if it transmits, emits or receives signals, sounds, messages, images or data of any kind by radio, electromagnetic systems or any other electronic or wireless apparatus to Nigeria in respect of any activity, including electronic commerce, application store, high frequency trading, electronic data storage, online adverts, participative network platform, online payments and so on, to the extent that the company has *significant economic presence in Nigeria* and profit can be attributable to such activity; and (e) if the trade or business comprises the furnishing or technical, management, consultancy or professional services outside of Nigeria to a person resident in Nigeria to the extent that the Company has *significant economic presence in Nigeria* (italics mine, for emphasis).

Broadly speaking, companies in the digital services space, given that they are most likely not incorporated in Nigeria, are treated as non-Nigerian companies and are thus taxed in Nigeria based on significant economic presence (SEP). SEP is thus the connecting factor for determining whether a digital services company or a foreign company providing services of a technical nature will be liable to companies' income tax in Nigeria.

5.1. What is Significant Economic Presence?

In the exercise of powers contained in section 13(4) of the CITA, the Federal Minister of Finance, by an order dated 3 February 2020 published in the Federal Gazette, the Companies Income Tax (Significant Economic Presence) Order 2020 (the Order), in a bid to define the SEP principle and aid its implementation and enforcement.

The Order provides separate SEP thresholds for e-commerce/digital services companies; and services of a specialized/technical nature. The Order provides that where an e-commerce/digital services companies (a) derives gross turnover or income of more than ₦25,000,000

(Twenty-Five Million Naira) or its equivalent in other currency, (b) it uses a Nigerian domain name (.ng) or registers a website in Nigeria; or (c) has a purposeful and sustained interaction with persons in Nigeria by customizing its digital page or platform to target persons in Nigeria including reflecting its prices in Nigerian Naira, then such a company will be deemed to have a significant economic presence in Nigeria and be liable to tax in Nigeria on its income derived from Nigeria.[14]

5.1.1. Services of a Specialized/Technical Nature

Concerning services of a specialized nature, the Order provides that a non-Nigerian company providing services of a technical, professional, management, or consultant nature has a significant economic presence in Nigeria "where it earns income or receives payment from a Nigerian resident or a fixed base or agent of a company, other than a Nigerian company". Specialized services have been defined to include advertising services, training, or the provisions of personnel that do not fall within the category of professional, management, or consultancy services.

In this case, the withholding tax on the income will be regarded as the final tax on the income of a non-resident where it is not liable to tax under section 13(2) CITA which provides for when the income of a non-resident entity is liable to tax in Nigeria.

It should be noted that the Order also provides that where the payment made in relation to a specialized service provider is (a) made either by an employee of the person making the payment under a contract of employment, or (b) for teaching in an educational institution, or teaching by an educational institution, or (c) by a foreign fixed base of a Nigerian company, the specialized service provider will

[14] In determining whether a company meets the threshold, the Order takes the activities of connected persons into account. Connected persons in this context refers to connected persons as defined under the Companies and Allied Matters Act or persons that are business associates in any form, i.e., one person participates in the management, control or in the capital of the other, or the same person or persons participate in the management, control or in the capital of both enterprises either directly or indirectly.

not be regarded as having created a fixed base in Nigeria and will consequently be exempted.

5.2. Practical Implications for Non-Resident Companies (NRCs)

Given the foregoing changes to the Nigerian tax law, the implications for the tax revenue generation efforts in Nigeria as well as for the subject companies which bear the ultimate burden are manifold.

It follows that all NRCs that meet the thresholds described above will be required to register for income tax purposes with the FIRS and will also be required to file its returns at the appropriate time with the tax authorities.[15] Additionally and where applicable, the company will also be required to register for Value Added Tax purposes where the company either provides VATable goods or services.

Notably, section 16 of the Finance Act 2020 specifically provides that where any company is liable to tax under section 13(2) of the CITA (including companies with significant economic presence), such a company will be required to submit a return for the relevant year of assessment containing: (a) the company's full audited financial statement and financial statement of the Nigerian operations attested by an independent qualified or certified accountant in Nigeria; tax computation schedules based on the profits attributable to its Nigerian operations; a true and correct statement, in writing, containing the amounts of profits from each and every source in Nigeria; and duly completed Company's income Tax Self-assessment forms.

Concerning the nature of the returns to be filed by the NRC, it is important to note that the company will be required to file its returns on an actual profit basis as opposed to a deemed income basis[16] which

[15] S. 55 CITA.

[16] Under the deemed income regime, the practice was for the FIRS to deem 20% of the turnover as profit and subject such profit to income tax at the rate of 30%. The cost incurred is assumed to be 80%. This eventually translates to an effective tax rate of 6%; and most NRCs will then make a cash payment of 1% of the

was previously accepted by the FIRS. As such, the FIRS will no longer rely on its powers to charge turnover tax and will instead require all companies to operate on an equal playing field and file its returns as necessary in line with the extant provisions of the CITA.[17]

Where the threshold is not met by providers of services of a technical nature, the withholding tax paid on the transaction will be the final tax on their income, and in any case, Nigerian resident companies as well as the fixed base of NRCs will nonetheless be required to account for withholding tax on payments made to NRCs.[18]

5.2.1. Enforcement Against NRCs

A salient and rather fundamental question as it relates to the taxation of the digital economy in Nigeria, in view of the new position of the law, is the level of exposure for NRCs and the methods of enforcement that may be adopted by the FIRS. Whilst the first leg of this inquisition has been addressed in the preceding subhead, the potential means of enforcement will be addressed below.

The enforcement options include (a) taxation based on Best of judgement; (b) utilization of the power of substitution/appointment of an agent; (c) application of information exchange provisions, etc.

a. Use of Technology and Technology Service Providers

Whilst it remains to be seen the exact means by means this will operate, section 51 of the Finance Act 2020 empowers the FIRS to deploy any proprietary or third-party payment, processing or other digital platform or application to collect and remit taxes due on international transactions in the supply of digital services to and from a person in Nigeria, particularly in relation to transactions carried out through remote, digital, electronic, or other such platform.

turnover given that taxes have ab initio been withheld from their invoice at an average rate of 5% with respect to their contracts.

[17] S. 30 CITA.

[18] S. 7 Finance Act 2020.

This rather broad provision of the law now clearly provides additional means via which the FIRS may seek to ensure compliance with the new significant economic presence. It will be particularly useful where taxpayers caught by the SEP rules choose non-compliance.

b. Taxation Based on Best of Judgement

Additionally, where affected NRCs fail to voluntarily comply, the FIRS may, in reliance on powers conferred on it in section 65(3) of the CITA, assess a digital service company that it believes ought to file returns in Nigeria to tax based on its best of judgment. The referenced provisions of the CITA essentially empowers the FIRS to act on its best of judgment to determine the amount of the Company's total profits and make an assessment accordingly (BOJ assessment) where a company has not delivered a return.

Such BOJ assessment will then be served on the company including interest and penalties for failure to file and remit taxes within the appropriate time.

c. Power of Substitution

Additionally, section 49 of the CITA provides for the power of the FIRS to appoint an agent for enforcement of income tax liability. The extant provision of the CITA provides that the FIRS may, by notice in writing, appoint any person to be the agent of any company and may be required to pay any tax which is or will be payable by the company from any amount of money which may be held by him for, or due by, or to become due by him to the company whose agent he has been declared to be, and, in default of such payment, the tax shall be recoverable from him.[19]

By implication, where an NRC is owed by a Nigerian company and the NRC is in arrears of taxes which FIRS believes ought to have been paid, this power may be triggered by the FIRS thus appointing the debtor of the NRC as the agent of the NRC for the purpose of its alleged owed taxes to the FIRS. The appointment may be made to a

[19] See also s. 31 of the Federal Inland Revenue Service Establishment Act, Cap. F36 LFN 2004.

company or more importantly, a Nigerian bank that holds deposits on behalf of a non-Nigerian company.

Whilst the continued validity of this provision is questionable given the recent decision of the Federal High court in *Ama Etuwewe* v *FIRS*,[20] this remains a huge concern for Non-resident companies and an incentive to ensure compliance and limit its exposure to enforcement actions by the FIRS.

d. Information Exchange Provisions

Nigeria is a signatory to the Multilateral Convention on Mutual Administrative Assistance in Tax Matters (MAC) and the Multilateral Competent Authority Agreement (MCAA) on the Automatic Exchange of Financial Account Information,[21] and these may prove useful to the FIRS in acquiring useful information for the taxation of the digital economy in Nigeria.

Essentially, the Nigerian Income Tax (Common Reporting Standards) Regulations 2019[22] and the various agreements signed by the Nigerian Government which took effect from 1 July 2019 will enable the FIRS to receive specific information from over 105 countries where Nigerian tax residents have bank accounts. The Regulations also require qualifying financial institutions within Nigeria to submit returns in electronic form which specify financial account information of certain persons and such returns are to be filed with the FIRS on an annual basis.

The information acquired through this media will be useful to the FIRS to recover taxes that may be owed by the NRC. However, it remains

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[20] Unreported judgment delivered on Monday, 30 September 2019 in Suit No. FHC/WR/CS/17/2019, by Hon. Justice Emeka Nwite of the Federal High Court, Warri Division.

[21] PwC Nigeria, "The FIRS has published Regulations on Common Reporting Standard", available at https://pwcnigeria.typepad.com/tax_matters_nigeria/2019/09/the-firs-has-published-regulations-on-common-reporting-standard.html (assessed 15 September 2020).

[22] Statutory Instrument No. 28 of 2019.

to be seen how these provisions will be applied in practice and the extent to which the FIRS will seek to enforce its powers in this regard.

6.0. DIFFICULTIES WITH THE NIGERIAN APPROACH

Notably, Nigeria is one of very few countries to take a unilateral approach to the taxation of digital services companies. As is predictable and foreseeable, the approach is not without pitfalls. These include:

1. Difficulties associated with enforcement and compliance: In this regard, it is notable that the companies which are the primary participants of the digital economy are companies that are not in Nigeria, and in many cases have no contact point whatsoever within Nigeria. This state of facts comes with the corollary implication that the FIRS will find it difficult to contact such entities and also to serve any documents or notices on such entities.

   It is notable that whilst the FIRS may decide to adopt emails and other electronic means, the FIRS will be left with very limited options in terms of enforcement against such an entity and many cases may be left without options as it relates to the taxation of the companies in this sector.

2. The problem of technology: In addition to the above which may require the use of technology for the enforcement process, technology will certainly be important to the FIRS for data collection and specifically for ascertaining the revenue of an NRC from Nigeria and to determine whether the threshold has been met. Given the low level of technological advancement within the FIRS, it is foreseeable that the Service will encounter severe difficulties with tracking, recording, and taxing companies effectively.

3. The lack of profit allocation methodology: Interestingly, the Order and other provisions of Nigerian law on the subject do not provide a formula for the determination of the profit of an NRC in Nigeria which will be liable to CIT. In the same vein,

it is unclear how the costs incurred by such NRC in generating the profit will be accounted for in the determination of the taxable profit of the NRC.

4. Extremely Low threshold: Compared to other jurisdictions where the threshold for SEP is much higher, it appears that the ₦25,000,000 (Twenty-Five Million Naira)[23] threshold for the SEP determination is extremely low. For example, the threshold for the Spanish Digital Service Tax is €750,000,000 (Seven Hundred and Fifty Million Euros) in worldwide revenue and up to €3,000,000 (Three Million Euros) in revenue with users in Spain. In the United Kingdom (UK), companies with annual worldwide revenues arising from relevant digital services activity which exceed £500,000,000 (Five Hundred Million Pounds); and more than £25,000,000 (Twenty-Five Million Pounds) of these annual digital services revenues that are attributable to UK users are subject to the Digital Services Tax regime in the UK. A similarly high threshold is applicable in France thus highlighting the relatively low threshold applicable in Nigeria.

   Whether by legislative oversight or otherwise, the threshold remains applicable in Nigeria and will have the effect of expanding the tax net as it relates to entities that are actually taxable in Nigeria thus limiting the number of companies that will escape the net of Nigeria's SEP provisions.

7.0. HIGHLIGHTS ON SEP REGIMES IN OTHER JURISDICTIONS

7.1. India

Under the Indian Finance Act 2018,[24] the scope of the domestic law definition of the term "Business Connection" was expanded to include a new nexus to tax benefit profits of NRCs having Significant Economic

[23] This is about $55,500 at the current Central Bank of Nigeria exchange rate.
[24] The Finance (No. 2) Act 2019, No. 23 Of 2019.

Presence into its Income Tax Act from 1 April 2018.[25] Under Indian law, SEP was defined to mean; (a) transaction in respect of any goods, services, or property carried out by a non-resident in India, including the provision of download of data or software in India, subject to payment threshold to be prescribed; or (b) systematic and continuous soliciting of business activities or engaging in interaction with such number of users as may be prescribed in India through digital means.[26]

The SEP provisions cover transactions which include; (a) sale or purchase of goods, services, or property through digital means, (b) any transaction involving download of data or software in India (like in-app purchases) (c) provision of online training/gaming services (Provision of services of streaming of e-content (audio/video) (d) interaction with customers such as for troubleshooting, etc. (e) websites, online database, cloud storage, and computing services, with a significant user base in India. Unlike its Nigerian equivalent which fails to provide a profit allocation methodology, the Indian SEP adopts the fractional apportionment method for profit allocation.[27]

7.2. Israel

Israel has also adopted the SEP standard for the taxation of its digital economy. The criteria in Israel for a foreign company to be considered as having a significant digital presence in Israel are that; (a) there are significant amount of contracts for internet services with Israeli residents; (b) a large number of Israeli customers utilizing the digital service; (c) the online service is adjusted for Israeli users (e.g., use of Hebrew language, style, use of Israeli currency, etc.); (d) high web traffic by Israeli users; (e) Close correlation between the consideration paid to the foreign company and the level of internet usage of Israeli users.

However, in Israel, the tax authority is yet to release the official legislation incorporating these provisions. In any case, it does not have

[25] Deloitte, "Taxation of Non-Residents through a Significant Economic Presence", available at https://www2.deloitte.com/in/en/pages/technology-media-and-telecommunications/articles/significant-economic-presence.html (assessed 15 September 2020).

[26] *Ibid*.

[27] *Ibid*.

the desired clarity and does not provide for how profit ought to be allocated. It is notably very similar to the criteria laid down by the OECD.

It should be noted on a general note that other countries that have also adopted a unilateral approach have adopted digital services tax which is a variant of value-added tax in the taxation of the digital economy. These include France and the UK.

8.0. CONCLUSION

From the analysis of the position of international law, particularly the progress made by the OECD as it relates to the taxation of the digital economy, and the position under Nigeria law as well as the corollary challenges, it is not in doubt that the coming years will unfold interesting outcomes as it relates to the digital services space and the approach of the OECD, and indeed individual countries.

It is hoped that the OECD will succeed in reaching a semblance of consensus in order to increase the likelihood that this windfall which the digital economy is generating will be adequately tapped by countries of the world and more importantly so, for the Nigerian tax authorities that are constantly looking for new methods to increase the tax base and revenue generation.

Without a doubt, there appear to be interesting times ahead and all indicators show that the tax space will lose sleep for the long haul and most of 2020. The Nigerian Order is one of such indicators and only time will tell the strides that will be achieved with this approach.