Report of the

Kenya Association of Hotel Keepers & Caterers

KAHC

FINANCE CONFERENCE

Making Kenya's hospitality globally competitive
KENYA ASSOCIATION OF HOTEL KEEPERS AND CATERERS

24–25 March

2023

Mnarani Club
KILIFI


LFB.598

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List of Abbreviations

CBA	Collective Bargaining Agreement
DTA	Double Tax Agreement
ETR	Electronic Tax Register
ERP	Enterprise Resource Planning
HELB	Higher Education Loans Board
IT	Information Technology
KAHC	Kenya Association of Hotel keepers and Caterers
KNBS	Kenya National Bureau of Statistics
KRA	Kenya Revenue Authority
KICC	Kenyatta International Convention Centre
MICE	Meeting, Incentives, Conferences and Exhibitions
NITA	National Industrial Training Authority
NSSF	National Social Security Fund
PAYE	Pay As You Earn
TIMS	Tax Invoice Management Systems
VAT	Value-Added Tax

Welcome Remarks

By Catherine Murage
KAHC Finance Chairperson

In her remarks, Ms Murage informed the meeting that this was the third Finance Conference, where like-minded people from the finance departments of the hospitality sector, come together to network, learn from the various speakers, and from each other (build their capacity).

By Henk Venter
General Manager, Mnarani Club

Mr Henk wished all participants a successful conference and a pleasant stay at the facility.

By Mike Macharia
CEO, KAHC

Mr Macharia informed participants that the genesis of the KAHC Finance Conference was precipitated by the need to effectively address the issues affecting the hospitality sector, particularly from a financial point of view, and come up with solutions. He stated that the conference will have an output in form of a workshop report that will, among other items, list out the proposed action items for purposes of follow-up and ensuring that they are achieved. Outside of the Finance Conference and for bonding purposes, Mr Macharia informed participants of scheduled activities that included a cocktail and an excursion.

Keynote Speech

Ms. Patricia Ondeng

Ag. Managing Director, Kenyatta International Convention Centre (KICC)

In her remarks, Ms Ondeng affirmed that the hospitality industry is extremely delicate and responds, almost instantly, to both positive and negative occurrences. This requires the industry to respond swiftly to emerging challenges to ensure the sector remains top in Africa. In this regard, the role of the finance teams in facilitating the execution of strategic activities to ensure Kenya remains the top destination for tourists cannot be gainsaid.

Being the lead agency in marketing and promoting the destination rating incentive, travel conferencing and exhibition tourism, KICC focuses on the holistic approach to destination marketing, which entails being able to enhance Kenya's capacity in hosting international conferences and exhibitions. It is critical, she said, to take cognizance of the overall contribution of the tourism sector to the country's Gross Domestic Product (GDP), which stood at Kshs 8.0 billion (2017) and Kshs 16 billion (2019). If fully explored, the sector, she said, will significantly contribute to the country's economic growth.

In this regard, KICC is in the process of rolling out MICE (Meetings, Incentives, Conferences and Exhibitions) mashinani programmes that will be geared towards creating awareness of the impact of MICE as well as conducting capacity building for key MICE stakeholders. This campaign, she said, is aimed at showcasing the benefit of MICE to the economic growth of the region, through, among other areas, the creation of job opportunities. Towards this end, collaboration with all units in the sector is critical.

In closing, she declared the 3rd Finance Conference officially opened.

Tax Invoice Management System (TIMS)

By Hakamba Wangwe

Chief Manager and Head of TIMS Operations, Kenya Revenue Authority (KRA)

In her presentation Ms Wangwe stressed that one of the key focus areas for KRA is on Value-Added Tax (VAT) compliance, specifically sealing existing loopholes and optimising revenue collection. A key strategy for achieving this is using the Tax Invoice Management System (TIMS).

The presentation titled *"TIMS Status Update"* established that currently the taxpayers on board TIMS and eTIMS, as of 21/03/2023 stood at 69,317 (TIMS) and 545 (eTIMS). Those that had not on-boarded stood at 43,377. The overall objective of TIMS is to increase VAT compliance, minimise VAT fraud and increase tax revenue through real-time validation of invoices at the trader tills, before issuance to customers and transmission to KRA. This will be achieved through:

- Integration with trader systems, i.e., ETRs, ERPs, and Point of Sales (POS) systems.
- Standardisation and authentication of tax invoices at the time of generation by the trader and transmission to KRA.
- Seamless integration with iTax.
- A module for storage of tax invoice data.
- Verification of the validity of a tax invoice by officers, traders and the general public through the Invoice QR Code or Tax Invoice Checker on the iTax portal.

A key focus for KRA is on those who have not on-boarded to TIMS[1] which can be attributed to:

- The high cost of upgrading/cost of compliance to TIMS.
- The challenges in integrating with the TIMS ETR devices are due to the complexity of the billing system.
- Capacity/performance issues with invoice transmission for taxpayers dealing in bulk invoicing.

Based on these challenges, KRA embarked on the next phase of TIMS implementation by developing eTIMS which is positioned to complement and not replace the existing TIMS implementation[2]. It will mainly target the 38% of active VAT taxpayers who have not upgraded their ETR devices. The pilot phase commenced in February 2023 and the full rollout is set to commence in May 2023.

The overall objectives of eTIMS will be to:

- Increase tax revenue
- Provide additional options to taxpayers in transmitting invoices to KRA

1 Currently 66 (40%) of KAHC members have not been on-boarded to TIMS.
2 The main difference between the two implementations is that TIMS is device-based (ETR), while eTIMS provides various software solutions to taxpayers geared towards e-invoicing.

- Minimise the cost of compliance
- Increase tax compliance and accountability
- Act as groundwork to expand the reach to taxpayers in other tax heads
- Address the 'missing trader' phenomena – SCM

The eTIMS software solutions have been developed and made available to taxpayers as long as they have access to a computer or a phone, for very small-sized taxpayers. KRA then facilitates and installs the software that will allow taxpayers to transmit their invoices. The eTIMS software solutions are available as follows:

- eTIMS pay point (Windows): This is suitable for taxpayers' selling goods at a single location with a single pay point/cashier till . It contains a stock management module.
- eTIMS multi-pay point (Windows): This is suitable for taxpayers' selling goods and having multiple locations and pay points or cashier tills . It contains a stock management module.
- eTIMS Pay point (Android): This is suitable for small taxpayers selling goods. It runs on a tablet with Android version 8 and above operating system. It also contains the stock management module.

For taxpayers with the software billing systems, there are two other solutions whereby their invoices will be validated by and transmitted to KRA, they are:

- The virtual sales control unit which has the offline capability.
- The online sales control unit. One will have to be online when generating and transmitting their invoice to KRA.

For both of the above solutions, the taxpayer will not have to rely on ETR suppliers; they have the option to build the virtual or online sales control unit using their internal Informational Technology (IT) teams, without necessarily relying on outsourcing suppliers to do it.

The solution for the hotel and restaurant sector is slightly different from the above as it provides them with:

- The opportunity to capture reserve funds in different denominations. It provides a module that allows one to keep a record of available balances and if one needs to meet unexpected expenses.
- An intermediate deposit module. It provides a record of expenses that have been incurred throughout the day, in various currency denominations.
- Record income coming in from the various areas of operation; it allows one to organise stock, and services on item classification.
- A sales and invoice module.

The key considerations in determining the taxpayers to onboard on eTIMS include:

- Taxpayers who have not onboarded on TIMS by upgrading their ETR.
- Taxpayers in the process of complying, but facing challenges integrating with TIMS ETR devices due to the complexity of the billing systems.
- Taxpayers who have businesses but are technologically challenged, i.e., they do not have computers and do manual invoicing.
- Taxpayers dealing in bulk invoicing and facing capacity/performance issues with invoice transmission.
- Voluntary taxpayers.

3 This runs on a computer/laptop with Windows 10 and above Operating System.
4 This runs on a computer/laptop with Windows 10 and above Operating System.

The onboarding of pilot taxpayers on eTIMS is being facilitated by KRA and not the ETR suppliers.

"This eTIMS tax system envisages a situation where things are working perfectly well."

1.1 Plenary Discussions

The following were the discussion outcomes:

1. *Support from KRA:* Its focus is on building capacity within its support mechanisms (staff) to reduce the impact on businesses (downtime) right to the lowest level, for example, in the event of system failures. The technical heavy lifting, by larger taxpayers who build more advanced systems, is done at the cost of the organisation by their respective IT teams as opposed to the much smaller taxpayers who receive direct support from KRA.
2. *The 2% withholding tax:* When generating an invoice of an entity, KRA is provided with a record of the sales transaction. This acts as a record of who has been taxed through withholding agents.
3. *Issuing of discounts and credit notes:* This is provided by eTIMS to the limitation of what is being provided for in law; in this regard the system will not allow for the raising of a credit note that is beyond 6 months. For an amendment to this period, industry players will need to advocate for policymakers to have it included in the country's budget proposal cycle.
4. *Not being able to scan the QR code and invoice number:* This can be attributed to the way the configuration of devices is done and how the validation is done on the KRA side. KRA is now working with the ETR suppliers on how best to correctly carry out the configuration.
5. *Invoices that do not have QR codes:* By law, it states that in the event a taxpayer's device fails they will need to notify the KRA Commissioner of the same. They also need to show this communication to those they are raising the invoice to.
6. *Slowing down of transmission as a result of bulk invoicing:* The solution to this is for the taxpayer to have a software approach to eTIMS to make it as efficient as possible (making provision for enough capacity for the kind of business. For example, more devices included and load balancing effectively considered which will be based on the volume of transactions (invoice transmissions) at any one time.
7. *Advance billing:* A customer wanting an advance billing (tax invoice) to a customer before staying at a facility and wanting a tax invoice at that point at the end of their stay to generate the payment in advance. The eTIMS systems taxes these two steps independently. This can be addressed at the point of configuration of the eTIMS system in the billing module.
8. *The VAT inconsistency notifications.* The taxpayer has to be fully onboard with eTIMS for these notifications to reduce or outrightly come to an end.
9. *Support for TIMS and verifications:* They can be obtained from timssupport@kra.go.ke

1.2 Emerging Issues

Emerging issues that need to be addressed:

1. Information/support from KRA is not forthcoming or fast enough, especially when eTIMS fails at night.
2. The 2% withholding tax even as one migrates to eTIMS is resulting in cut-off differences with vendors and as a result a reconciliation nightmare
3. Raising credit notes that are beyond 6 months. The law currently does not allow for this.

TIMS Post Implementation - Novacom Systems

By Irene Nyambura
Sales and Marketing Manager

Novacom Systems Limited are Oracles resellers of its hospitality products in Eastern Africa; they are a trusted partner and authorised distributor for Oracle Hospitality for over 24 years.

On TIMS, Novacom has mainly concentrated on Types B[5] and C[6] for purposes of integration with its systems; they are approved KRA TIMS providers for onboarding taxpayers and for enhancing integration of the same. Item and Invoice details are captured and remitted to TIMS for processing the VAT obligation. This information is internally transferred to the taxpayers' iTax account by KRA daily.

Novacom Systems Limited is the approved TIMS Middleware provider of KRA. It develops and provides integration for TIMS and Oracle Hospitality Applications for all its customers. It provides full circle solutions, i.e., control unit sale, application integration, implementation and support as well as guidance and support to its customers through onboarding and implementation processes.

The following were the challenges cited in the implementation of the system:

- *Challenges with ERP incorrect data in certain scenarios:* Its customers have reported some challenges in certain types of scenarios where they are unable to generate a fiscal due to data from ERP not providing correct data and being rejected during the validation process. Novacom is working with the ERP developers to have this fixed.
- *Tax Exemptions for Non-VAT Organisations:* Novacom is working with its customers to enhance the process of issuing invoices for Non-Governmental Organisations (NGOs) and diplomatic organisations to ease operations and reconciliation challenges within the current process.
- *Credit Notes for Legacy Applications – Work in progress:* Legacy ERP applications do not offer "Credit Note" functions; traditional point-of-sale operations also do not have a function for credit notes. The Novacom team is currently working on solutions for customers in these environments to ease this operational process.
- *Scanning QR codes and then not finding data:* This was mainly due to rounding issues which have been addressed by both KRA on TIMS as well as by Novacom with updates to CU devices and integration application ZSIGN.

Since the full implementation of the TIMS project, there have been some operational and technical challenges that both KRA and all TIMS suppliers have been working on to assist in resolving across all types of businesses. For post-implementation, Novacom provided the following information:

5 For receipting applications using 80mm type of receipts.
6 For invoicing applications using A4 type of invoices.

- An update of device firmware (Ver 3.5) has been deployed with additional validations and rounding checks to avoid the invalidation of invoices during the KRA end-of-day process.
- New updates are available for OPERA, SIMPHONY and ZSIGN to enhance validation and invoice processing.
- Customers using Legacy ERP systems to review and migrate to more recent versions of the applications to take advantage of better and quick solutions.
- For customers to continually report on challenges they are experiencing to Novacom support to assist them in resolving and enhancing the TIMS integration project.

The move to the current applications will provide customers with the following advantages:

Opera Property Management System	Symphony Point of Sale
Setup - Premise and Cloud Based – Single or Multiple Property	*Setup* - Premise and Cloud Based – Single or Multiple Property
Enhanced Functions - Accessibility, Mobility, Reporting and Analytics, Automated Scheduled Upgrades	*Enhanced Functions* - Reporting and Analytics, Enterprise Management
Technology - Current and backward compatibility of OS, Database Applications	*Technology* - Current and Backward compatibility of OS, Database Applications
Integrations - Enhanced Integration capability	*Integrations* - Enhanced Integration capability
Fiscal Compliant - KRA, URA, TRA; in progress with RRA	*Fiscal Compliant* - KRA, URA, TRA, RRA

support@novacom.co.ke

2.1 Plenary Discussions

The following were the discussion outcomes:

1. *Validation of Invoices:* Users should ensure their firmware on the control units is updated to Version 3.5. This update allows for all invoices to be validated before being sent to KRA; it will also stop the mismatches KRA encounters with the invoices sent to them when carrying out end-of-day procedures. When mismatches are encountered, the KRA portal automatically rejects them.
2. *Users on Legacy systems:* Users should upgrade to the current more enhanced systems as the solution is much faster as compared to the Legacy system whereby upgrades have since been stopped. Novacom will, however, still support users on it.
3. *Creation of a Working Group:* This should be created for all users under Novacom so that issues can be discussed and dealt with collectively.

2.2 Emerging Issues

Emerging issues that need to be addressed:

1. Is there a law that says if one raises an invoice, one <u>must</u> pay tax? Is a zero bill or blank bill allowed?
2. Opera Cloud and whether it is accessible to anyone, anywhere and whether there is a restrictive function.
3. NOVACOM to come up with a solution for advanced packages with rooting.
4. The Opera solution not having direct integration with MPESA.

Tax Exposure Areas in the Hospitality Industry

By Robert Waruiru
(ICHIBAN Associates)

Robert's presentation was rightly titled *"Tax lessons and points to ponder"* as there are certain issues within the tax industry that all players in the hospitality industry should be aware of. Having a common approach, as hospitality industry players can point KRA towards understanding how issues are dealt with in the industry.

To bring out the issues the hospitality sector faces, Robert presented a case study on a hospitality sector player who was issued with a full-fledged assessment (2012-2017) by KRA. The potential liability was in excess of Kshs 500 billion for inadvertent non-compliance with the tax laws. This dispute went all the way to the High Court of Kenya. The following were the main disputes brought to the High Court:

- In the proceedings that ensued, the Tribunal tried to explain why the 5-year period came into play because all taxpayers are meant to maintain their tax records for this period. The Tribunal, however, argued that the audit started within the 5-year scope; the High Court did not challenge this. This goes to show that KRA can assess a taxpayer beyond 5 years.
- Corporation tax: The client was operating in a group setting and so KRA was not able to determine whether the expenses listed were incurred in generating income. KRA chose to disallow them.

Key Questions and Learnings from the Case Law

- By law, how far back can KRA go in auditing a taxpayer? KRA should not audit a taxpayer beyond 5 years.
- It is imperative to:
  - Discuss with audit teams so that the facts are explained.
  - Maintain all forms of documentation, including transfer pricing documentation, if operating as a group with a regional presence. This will help show the pricing of transactions and the commercial benefits that arise.
- How does a company based in Kenya demonstrate that its entity, for example in Uganda, has received a service?
- In the case study, neither the KRA Commissioner nor the taxpayer did not understand what was required to demonstrate the expense in dispute. There was a lack of specificity in terms of information that the KRA Commissioner required for purposes of the taxpayer defending their case.

- If KRA inquires about something that is not clear, the taxpayer should ask for clarity and document it for reference purposes.
- For cooperation tax purposes, the fact that an item is not taxed in Kenya does not mean that it should not be allowed as an expense (need to research on existing double tax treaties to optimise this expense). Structure the transaction in a way that fully optimises the tax liability from a group or corporate perspective (McKinsey & Total Kenya cases).
- When setting up accounting records ensure that there are no accruals so that there is no withholding tax on them.
- If a person is employed by a non-resident person, then the law allows KRA to go for the resident representative of that employer; i.e., the fact that one is employed in Uganda does not mean KRA cannot go there and collect tax from a Kenyan-related entity.
- It is important to consider the impact of double tax treaties (DTAs) Kenya has with South Africa, South Korea and the United Arab Emirates (UAE). These DTA have provisions around residents and those who have taxing rights.

Areas for consideration by industry players

- *Hotel building allowances:* When constructing a new hotel/wing one is entitled to a hotel building allowance which has to be approved by the regulator or authority, in this case, the Tourism Regulatory Authority. The property will have to be licensed by the appropriate authorities for one to be able to claim the allowance. It should be claimed upon the commissioning of the building.
- *Customs duty exemptions:* When furnishing and equipping the properties, under customs law, if these goods already have the logo of the hotel, then one can qualify for customs duty exemptions.
- *Tour services:* They are VAT-exempt under the law, which means that one is not required to charge VAT. When management and professional fees are imported or royalties, one will be required to account for VAT on the imported service. This is because by making VAT-exempt supplies one cannot claim the full input VAT; one will be required to account for reverse VAT.
- *Service Charge:* It is excluded from VAT; however, one will have to meet the two conditions:
    - It is distributed to the employees, according to an agreement that has been set up between the employer and the employee.
    - The service charge cannot exceed 10% of the value of the service.

  On meeting these two criteria, the service charge will be exempt from VAT.
- *On deposits:* Once a deposit or part-payment is received for a potential supply then VAT is due[7]. The challenge then remains in raising a credit note, which at times can stretch beyond the allowable six months.
- *Withholding tax:*
    - The liability is expressed as, 'upon payment, you deduct, therefore'. It is critical to establish where one is paying to. If, for example, one is paying to South Africa, these payments are not subject to withholding tax. If there is withholding tax, then it will be at a reduced rate.
    - If one accrues an expense which is subject to withholding tax, then in the following month, the withholding tax will be due.

7 The VAT Act does not consider whether one has received an income or not.

- Accrual gratuity: The income tax which provides for the payment of gratuity is the same one that provides for withholding tax. If one has accrued an amount for gratuity purposes one is deemed to have paid it based on the case law.
- The industry should lobby not to accept deposits that will put them in a tax liability. Cancellation of deposits should be done in a way that once the date matures, authority is given to the establishment to load the cancellation fees onto the customer's credit card.

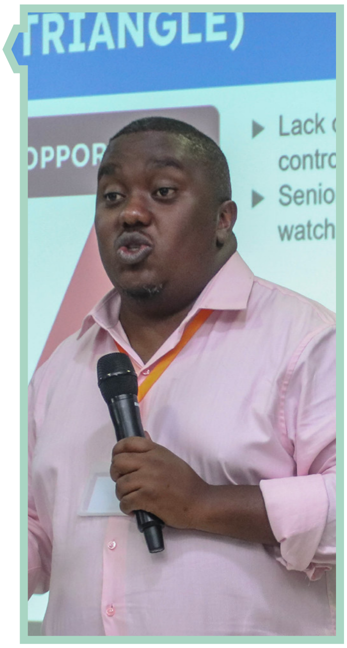
3.1 Emerging Issues

Emerging issues that need to be addressed:

1. Raising of credit notes beyond the allowable six months period. The industry should lobby lawmakers to address this specific issue. The lobby paper should be based on both prepayments as well as on flexibility as to when payments will be received.
2. Seeking interpretation of the 5-year timeframe as to how long records should be kept.

Effective Emotional Leadership

By Francisco Kitonga
Business Coach



The focus of Mr Kitonga's presentation was on leadership and management and specifically the human element concerning managing a team and protecting against fraud.

Fraud, he said, can be controlled by human beings who have values. In an organisation, values can be stated as fundamental beliefs that help shape its culture. Values, in other words, are the heart of culture, they are what control culture and are what carry a business.

Values are also in individuals; one obtains them from religious beliefs, experiences, societal, family, etc. Values are a human element, they are what can attract and hold a team together.

Values vs. Convictions are differentiated in the table below:

Values	Convictions
Will commit to	Will sacrifice for
Will contemplate the cost of	No cost is too great
Are negotiable	Is non-negotiable
Ask others to subscribe	Demands others to subscribe
Decided by the group	Decided by the individual
Is it for a season	Is for a lifetime
Can be changed by a vote	Cannot be changed by a vote
External compliance acceptable	Internal ownership is essential
Can be political	Is never political
Can remain if changed	Cannot remain if changed

When people lead teams, the connecting part is not on how well the income statement was done, it is in the ability of that individual to connect with his/her team. Individuals are made up of the following parts:

- Emotional
- Social
- Intellectual
- Spiritual
- Physical

How we are operating in our values will be affected by either our needs or wounds in our life.

Our needs:

The six most important needs of a human being:

Certainty	Assurance you can avoid pain and gain pleasure; a sense of safety and security
Uncertainty / Variety	The need for the unknown, change, stimuli, adventure
Significance	Feeling unique, of value, important special or needed
Connective / Love	A strong feeling of closeness or union with someone or something
Growth	An expansion of capacity, capability or understanding
Contribution	A sense of service and focus on helping, giving to and supporting others

"When people do not know their needs, they will meet them, but in the wrong way".

One may, therefore, have a need, that he/she does not recognise, but which drives him/her to do something. These needs will be compensated, sometimes, with a lot of anger, drinking, etc, where they will connect (a need that is being met). A lack of knowledge in this area is an exposure to oneself but also to one's team.

Key questions to ponder:

- What are your needs?
- What are the needs of your team?
- What is your team, or individuals in your team looking for?
- What kind of skillset must I have to help my team meet their needs?
- What skill do I need to have for me to know my needs and meet them?

Our wounds in life

The blows that hit us in life are psychological; this can happen to us in five ways:

- Humiliation or a sense of injustice
- Feeling rejected
- Abandonment

All people have in one way or another been hit by either of these blows. The key question is if they have found a way to free themselves from it else it will show up in one's leadership capacity, for example.

When there are unmet needs or wounds, some things in life can occasionally become a trigger, for example, the death of a loved one, divorce, loss of a job, etc.

Take home Message

- Can we become experts at this as well, not just on tax and accounting matters so we can effectively take care of ourselves, our family and our teams?
- A leader who is not in touch with his emotional side is walking with one leg.
- You need to identify and face your shadow. Everybody can see your weakness, except yourself. It affects your ability to connect and relate with others, yet you do not see it or do not want to face it.
- When you are self-aware of the issues, they can be fixed.
- People's lives are broken and they need fixing.

- Leaders must understand their own emotions, motivations, patterns, and behaviours to recognise and address their emotional blind spots.
- Prioritise rest and reflection. Rest should be regularised in one's life.

National Industrial Training Authority (NITA)

By Galm Guyo
Manager Levy Administration

Below are the highlights of the presentation:

NITA is a state corporation established under the Industrial Training (Amendment) Act of 2011. Its mandate is to promote the highest standards in the quality and efficiency of Industrial Training in Kenya and ensure an adequate supply of properly trained manpower at all levels in the industry, both formal and informal.[8] With regards to the industrial training levy, a recent change in the law has seen NITA now doing the administration in terms of distribution and disbursement.

Industrial Training means training for a specified industry (capacity building of existing workforce) conducted under the following schemes and programmes:

- *Skills upgrading courses*
- *Apprenticeship schemes:* Conducted in NITA Centres/Accredited Centres for Artisan, Craft and Technician apprentices (Dual System-In-Plant & In-Centre).
- *Indentured Learnership Scheme:* Fully on-the-job training in areas that may not be available in regular formal training institutions.
- *Industrial Attachment Scheme:* Placement of a person in a workplace to gain knowledge and practical skills. A grant may be paid to up-to-date employers after 3 months upon successful evaluation.
- *Trade Test:* A systematic way of evaluating the competency of a person in a given trade or occupation.

Specific courses supported under the scheme include:

- Supervisory and technical courses (Attendance or Certification)
- Professional workshops and seminars
- Fire, Safety & First Aid
- HIV and other wellness courses
- In-house courses (both within and outside employer premises)
- Oversees training of more than two weeks for skills not available locally
- Industrial attachment
- Apprenticeship and Indentured learner ships

8 NITA has five training centres, regional offices and over 400 training providers on the panel.

In carrying out its training, NITA segments the employers into nine different sectors[9]; the hotel and hospitality industry is placed under, "Commercial, Distributive, Wholesale, Retail Trade and Allied Agencies".

The following is the support that NITA provides directly to the hotel and hospitality industry:

- Developing training standards in Food & Beverage (F&B) and inclusion of Food and Beverage as an examinable Trade Area.
- Quality assurance of all trainers within the hospitality sector through NITA accreditation.
- Collection of levy amongst members within the hospitality industry for stakeholders to take advantage of the Levy Fund.
- Integration of Labour Market Information (LMI) into skill development.
- Development of a Homecare Curriculum that has seen a rise in numbers from its commencement in 2018. The syllabus aims at creating a qualified, productive, healthy workforce with practical knowledge and skills in homecare management.

About the industrial training levy, key facts:

- The training levy is a statutory contribution that goes towards the registration and operation of the fund.
- The Act, CAP 237 provides for the administration of the levy fund by the Authority.
- The industrial training levy is a statutory contribution by each employer in respect of each employee (casual or permanent).
- The levy orders further provide for the registration and operation of the fund.
- Not a deduction from employees but employers contribute on their behalf, including casuals.
- Not a tax but a contribution to specifically finance work-based training (reimbursements).
- It is a statutory obligation just like PAYE, NSSF, NHIF, and HELB.
- It is filed with PAYE and paid to KRA iTax; it is payable through a separate cheque.
- This Act defines employers and employees.

An amendment made to the Act 2002 enforces the following:

- Assessment and collection transferred to KRA.
- Contribution remains at Kshs 50 per month per employee; the due date is the 5th of every month.
- Payments to be made to KRA iTax – Separate payment from PAYE.
- Employers are to register with NITA and obtain a registration number.
- Employers are to be issued with a compliance certificate by NITA upon request.
- KRA to enforce compliance.

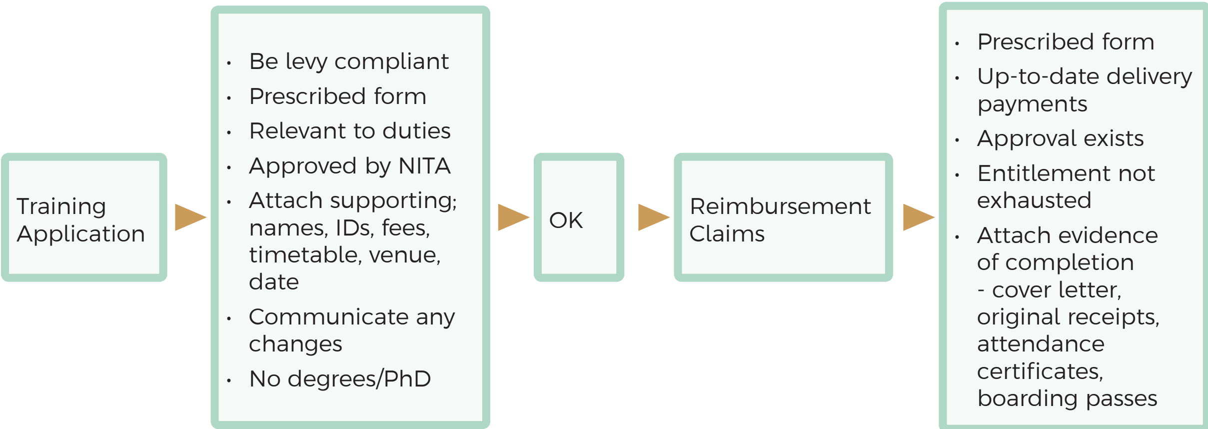
Benefits of the Levy Fund:

- It covers the costs of employee training in full or in part;
  - Reimbursement of training costs @ 200% of the previous year's contributions
  - Training opportunities in over 400 training institutions, including KSG and other, approved public institutions and get reimbursed.

9 Sector training committees, within NITA, help in identifying the training needs of various sectors to support them in various ways, such as training career development.

- Entitlement from the levy fund can be utilised to cover the costs of training in NITA centres and in-house staff training using NITA trainers.
- Grants to employers at Kshs 3000 per month per student attachés.
- Apprenticeship support for costs of wages, tuition, etc.
- Support employers' training budgets for continuous training.
- Full sponsorship of vulnerable girls under the female engineering program

For training and reimbursement, one will have to seek approval for any training that reimbursement is sought (the set guidelines must be followed). The training and reimbursement process is as follows:



Areas for partnership with NITA would include:

- Designing tailor-made training programs (specialised enhancement)
- Customise training support programs; approval, reimbursement, upfront utilisation, approvals)
- Curriculum development
- Sensitisation
- RPL model to the hospitality industry
- Research
- Compliance of Association Members

Recommendation by NITA

- For as many players in the hotel and hospitality industry to sign-up to NITA to enjoy the benefits it provides.

5.1 Plenary Discussions

The following were the discussion outcomes:

1. *Harmonising the dates to the 9th of every month:* NITA is having discussions with KRA to have it changed to this date.
2. *Courses offered by Utalii College:* The college is currently not a training provider on NITA's panel. The process to have it on the panel is ongoing. Once this is finalised then all training done at the college will be refundable. Reimbursement can only be done for training which is undertaken with a trainer on the NITA panel.

3. *Casuals for a day and whether this is payable:* It is administratively challenging to identify a casual who has been hired for a day. NITA currently looks at the payroll of the organisation as a basis for its collection; however, upon the transition to KRA, this frame will change. KRA will follow the law which considers a casual hired for a day as an employee.
4. *Arrears and penalties:* NITA has agreed with KRA that it de-touches the issue of historical areas with payments for the future for compliance purposes.
5. *Delayed reimbursement for trainings already carried out:* NITA is currently streamlining the process of having payments refunded on time.

5.2 Emerging Issues

Emerging issues that need to be addressed:

1. Alignment of timelines of NITA and PAYE

Group Excursion

Breaking Down the National Social Security Fund (NSSF) Act of 2013

By Martin Mathai
Head of Corporate Business, APA Life Assurance Ltd

Mr Mathai's presentation sought to break down the NSSF Act of 2013. The following are the key highlights:

Background of the NSSF Act:

The new NSSF Act of 2013 was a game changer; it sought to change how one would access their retirement benefits, moving from a provident fund to a pension fund. The contribution rates increased to 6% of the gross earnings; the contribution breakdown from the onset of the fund is as per the table below:

1966 - 1977	10%	Ceiling Kshs 80.00
1977 - 2001	10%	Ceiling Kshs 160.00
2001 - to-date	10%	Ceiling Kshs 400.00

There was a need to, i) increase one's contribution to help improve the adequacy of the benefits once one retires, ii) mobilise more retirement savings and promote economic growth through contracting out Tier II contributions to other registered retirement benefits schemes with approval by the Authority.

The NSSF Act of 2013 was meant to be a scheme that was set up for employers who do not have a retirement scheme; however, by the time it was accented to, some clauses within it had been changed, one of which was that all Kenyan citizens have to contribute to NSSF. This amendment to the Act was challenged in court by Workers' Unions; the courts then suspended the Act from its implementation. A ruling made by the Employee and Labour Court in 2022 made a ruling that the NSSF Act of 2013 was illegal (unconstitutional) and should therefore be cancelled. This ruling was appealed by NSSF; in February 2023 the court ruled that the Employee and Labour Court did not have jurisdiction to make a ruling on that matter. The earlier ruling was therefore nullified and the NSSF Act came back into effect in February 2023. On this ruling, the Supreme Court did not give Stay orders; employers are therefore required to comply with the NSSF Act of 2013 and contribute towards it.

About the NSSF Act:

It establishes a Pension Fund, which is a move from the Provident Fund. In this case "Provident Fund" means when one reaches the retirement age all the money saved is given to the saver in a lump sum; it caters for self-employed persons and informal sector employees as well as those willing to make voluntary contributions to the NSSF. A "Pension Fund", on the other hand, means when one hits retirement age the monies saved are converted to an income, tax-payable every month for the rest of the saver's life. It also provides for a minimum amount of time in which these monies should be paid. The Pension fund also caters for all persons engaged in formal employment aged above 18 years but who have not attained retirement age.

The Act established a provident fund for people who would want to voluntarily contribute to NSSF, the minimum of which is Kshs 200 per month or Kshs 4800 P.A.

The 'upper earnings limit' is the maximum amount of one's salary that can be subjected to NSSF. This limit is defined by NSSF as half of the national average earnings; in 2013 this was at Kshs 36,000. The maximum amount NSSF can apply for 2023 is 6% on Kshs 18,000. In 2024, the maximum NSSF can apply will be equivalent to the national average earnings (double the amount of the current year) until the fifth year upon which it will be up to the Cabinet Secretary in charge of Finance to determine how much of the citizens' salary they can touch.

Tier 1 Contributions	Tier 2 Contributions
• Are at 6% of the lower earnings limit. • Increases by Kshs 60 every year. • The contributions have to go to NSSF, a minimum of Kshs 360.	• Doubles are based on the value of the national average earnings. • The contributions should go to NSSF if one does not have a private retirement scheme; or if one has a private retirement scheme and does not have a certificate – a contracting out the certificate – then contributions for Tier 1 and 2 will be to NSSF. • If one has a contracting out certificate then Tier 2 contributions can be enjoined with the other retirement benefits that contributions have been directed towards. • Also known as protected rights.

Contributions to the new NSSF Act:

- The current contribution to the NSSF is Kshs 400 per month split equally between employee and employer.
- The contributions are set to graduate over five years.
- New contributions rates for both employer and employee to be increased to 12% of pensionable earnings up to the upper earning limit.

The following is the contribution schedule:

Year	Lower Earning Limit (LEL)	Upper Earning Limit (UEL)
1 (2023)	KES 6,000	50% of the National Average Earning
2 (2024)	KES 7,000	1 x National Average Earnings
3 (2025)	KES 8,000	2 x National Average Earnings
4 (2026)	KES 9,000	3 x National Average Earnings
4 (2027) Onwards	Lower earnings as defined in the Act	4 x National Average Earnings

The National Average Earnings is the earnings published by the KNBS in the Economic Survey

The contracting out process:

Employer's Role	Trustees & Administrators' Role
Resolve to Contract Out of Tier II citing the following: • The effective date of Contracting Out • Categories of staff included in the Contracting Out and those excluded • Changes, if any of the Contribution Structure	Trustees' Resolution to accept the NSSF Tier II Contributions into the scheme and to assume responsibility to oversee the Tier II contributions
Employers undertaking to meet the obligation on the minimum contributions as per the NSSF Act	Following the sponsors' resolution to contract out, fill in the C1 Form
Written Notice to the members	Facilitate the Administrator to comply with the Protected Rights
	Prepare a Deed to Change to the Trust Deed and Rules ate the
	Apply for the scheme referral test

Contracting Out by the employer:

An employer may Contract Out of paying Tier II contributions and pay these into a contracted-out scheme. The following conditions apply:

- Written applications must be made to the Retirement Benefits Authority (RBA) giving at least 60 days' notice;
- Applications to set out details of the contracted-out scheme for the RBA to ensure that the scheme meets the Reference Scheme Test;
- Within 30 days of receipt of the application, the RBA shall respond by approving or otherwise to the employer and notify the Board accordingly.
- Where approval is received, Tier II contributions already made to the Fund shall be transferred from the NSSF Pension Fund to the approved contracted-out scheme.
- With voluntary contributions and one has been allowed to contract out, only Tier I goes to NSSF, and all the other monies go to the private scheme.

The contracting out certificate issued by the RBA is the employer's authority to remit Tier III contributions to a contracted-out scheme.

Benefits of retirement:

Retirement pension shall be payable to a member who has attained a pensionable age (60 years) or has opted for early retirement (50 years).

- A member can opt to have the funds applied to a pension payable to the member.
- A member may opt to assess his benefits in lump sum payment that does not exceed 1/3rd of his Tier II credits. The remaining part of the fund is then converted to a pension.
- If the pension is of a trivial amount, the member may opt to receive the total funds as a lump sum.
- A member may choose to take 2 tier pension fund in the form of an income drawdown.

APA's Life's Recommendations:

- It advises employers who do not currently have a pension scheme to set up a Private Pension Scheme with APA Life to be able to qualify to opt out of Tier II contributions to the NSSF Fund and enjoy the benefits of a privately managed pension scheme.
- It has a range of options on the type of Pension Scheme that will best suit the organisation's needs and ensure they are eligible to qualify for contracting out Tier II contributions.
- Conversions of Gratuity Funds allowed – Tax-free benefits on Transfer amounting to Kshs 240,000 per person per annum.

6.1 Emerging Issues

Emerging issues that need to be addressed:

1. The national percentage rate of a pension scheme is a minimum of 6%.
2. On the national percentage rate of a pension scheme there is a need to determine the following so that both employers and employees do not lose out:
   - What is the CBA
   - What will be provided for under the employer?
   - What will be provided for the employer under the NSSF Act?
3. Once the NSSF kicks in, the gratuity scheme stops. As long as the employer has paid Tier 2 to NSSF the gratuity scheme stops. The calculation for all staff will need to be done, how much they ought to have been paid as of 1st January 2023.

7

Hospitality Industry Collective Bargaining Agreement (CBA)

By Mike Macharia
CEO, KAHC

In this presentation, Mr Macharia provided the following key highlights of the outcomes of the just concluded CBA discussions, specifically those that touched on finance issues.

- With depressed revenues for the three years, before the CBA discussions, the inflation rates moved from approximately 5.5% to almost 10% when the negotiations began.
- Negotiations of the CBA are mainly based on food inflation, which most of the staff spend their money on. These negotiations were mainly to cushion them. At the point of negotiation food inflation was at approximately 16.9%. The negotiations settled at a general increment of 10%.
- The results of a questionnaire done among players in the hospitality industry revealed that, i) 40% of the revenues, on average, go to payroll and related costs, and ii) 25% of the revenues go into the supply chain. For most hotels' profitability, after tax, on a net basis will be approximately 15%. This shows a lot of input for very little output considering the wealth created in the value chain.
- The CBA awarded a 19% increase spread over two years.
- In 2023 the industry stands to experience the following:
  - A 10% increase on the payroll in terms of salary
  - A 10% increase in house allowance
- In 2024, a 9% increase in house allowance.
- Other areas where increases are expected include, leave allowance, safari allowance and contributions towards bereavement.
- Service charge: A 1% contribution was agreed upon for the joint industrial council and CDC at the coast as well as training on labour-related issues for shop stewards and human resource managers.
- Gratuity: A clause put in the CBA stated that if one moved to a full-time pension, a provident fund or a pension scheme, then they would stop accruing gratuity. Others who did not take the offer waited, as they continued accruing gratuity until the NSSF Tier II kicked in, and at that point, gratuity was cut off.
- The calculation of the daily rate was retained as is.
- The industry should not pay anyone below the government minimum.

7.1 Plenary Discussions

1. *The copy of the CBA:* Is a benefit, only members of KAHC. It should not be shared with non-members.
2. *Leave accruals:* This should be discouraged as much as possible because of the eventual costs that will have to be paid out to the employee. Leave accruals in the balance sheet can result in red flags being raised.

Tax Advocacy

By Paul Ndirangu
Senior Manager, PWC

In this presentation, Mr Ndirangu took participants through what PWC does, from a tax perspective, and how it supports tax advocacy to its clients. PWC works with clients to come up with solutions; it does this by looking at the long-term, building trust and delivering sustained outcomes. Below are the key highlights:

The range of tax services PWC offers in Kenya includes:

- Tax reporting and strategy
- Tax consulting solutions
- Legal business solutions
- Transfer pricing solutions
- Indirect taxes

Over the years, the tax landscape has been turbulent, with amendment Acts being introduced. All these changes bring in new requirements or changes in how tax is administered. A company failing to keep abreast of these changes faces the risk of being found non-compliant or just not taking advantage of the existing opportunities, exemptions, etc.

On Tax Policy and Advocacy PWC helps its clients understand pieces of legislation that may not be clear to them (those that are not clear or are ambiguous) or those that make their daily administrative processes less efficient or more costly. By understanding these policies, its client would then be able to educate policymakers and advocate for changes to be made to the identified policies or outright removal of the same. PWC, therefore, helps its clients take full advantage of the existing platforms to address shortfalls in the legislation. Cases need to be developed meticulously and argued based on evidence or a basis in law. Common tax issues and lobby opportunities for the hospitality industry include:

- PAYE: staff meals and housing, motor vehicle benefits, staff transport, alignment of NITA and PAYE due dates, other staff benefits including telephone, pension, gratuity, etc, fringe benefits tax, PAYE and NSSF on casual workers, service charge and tips, consultants.
- VAT: transfer services, hotel booking deposits, cancellation fees, advance bookings, etc.
- Corporation tax and withholding tax: reduction of capital allowances, licencing requirements for hotel bookings, application of DTAs, e.g., withholding tax on management and professional fees.

8.1 Plenary Discussions

Accounting for tips: Employees should account for this through self-assessment. Any tips paid through the hotel, for example, service charges should go through the payroll.

8.2 Emerging Issues

Emerging issues that need to be addressed:

- Lack of clarity on KRA exemptions through funds and waivers.
- Whether there is VAT on tips given.
- VAT on deposits and how it should be handled and at what point it should be accounted for (follow-up with KRA to review the previous stand taken on their last communication).

Feedback that Counts

By Anthony Gitonga

"We can do nothing without feedback; if feedback is not there, ones' performance will not be optimal."

The focus of Mr Gitonga's presentation was on Feedback the Counts, not on the perspective of giving feedback but on the perspective of receiving feedback.

Why does feedback matter anyway?

- Continuous improvement is predicated on feedback.
- It produces a framework of accountability that helps one to take actions that have been agreed upon and move them to the next level.
- It helps articulate the behaviour that deserves recognition (impact).
- It empowers the recipient.
- It leads to satisfying of customers.

The problem with feedback is not the proficiency of giving it, but the frequency of giving it. One of the ways of mainstreaming feedback and making it part of what one does is to give it out more. Any feedback one will obtain will be painful; it is not so much how the feedback has been given that matters, it is the way it is perceived or received by the recipient. Positively receiving feedback helps one improve, among other things, their work performance.

> *"The effectiveness of our feedback is more of how we receive than how we give it. There is no guarantee that even the best-given feedback will be positively received or acted upon. The recipient of feedback has the final word."*

The following are barriers worth overcoming towards receiving feedback positively:

- Protective wiring: Human beings are by nature critical of any feedback they receive. Overcoming this will be by one learning how to drop their guard and give the giver of the feedback the benefit of the doubt as there is no single criticism that is going to be 100% unwarranted; there will be some truth in it. One's response should be to identify the truth and possibilities of making progress.
- Emotional rashness: For example, through a response such as, "What gives you the right to talk to me like that?" No one can make another person angry; it is one who chooses to be angry or mad – it is what we tell ourselves. Everything one feels is largely a perspective issue; everyone is responsible for their emotions.

> *"We should never build our emotional life around the weaknesses of other people, otherwise we*

give them permission to continue to mess up our lives; we give our future away…..do not give over your power to another."

Activity (1): Recall some feedback you received whose value was masked by personal insecurities. Which of these three filters blocked the feedback the most?

- Truth filters: Personal insecurity makes us believe we are as good as we'll ever get.
  - *Do you think you are as good as you will ever get to be?*
  - *Are you willing to receive feedback, good, bad and ugly that would help you get to the next level?*
  - *Shouldn't it then be your responsibility to look at the good, bad and ugly to pick out that can propel you forward and leave behind what will not help you?*
  - *Do not label everything as a mistruth; there is some truth in every criticism.*
- Identity filters: Insecurity makes us want to validate an incorrect picture we have painted of ourselves.
  - Many times we have an incorrect image of who we are; it takes an external person to correct you to help you change your perspective on self or others. Everybody can notice this incorrect image but yourself.
- Relational filters: Insecurity makes our focus shift from the feedback to the audacity of the person giving it and not the quality of the feedback. The message and the messenger are rejected together.

Activity (2): Recall some feedback you received whose value you optimised. Which of these three factors did you make the most of?

- *Master your responsibility:* Choose to take ownership.
- *Master your stories:* Feelings come from stories, and stories are our own inventions.
- *Master your response:* Feel as you may, but then consider acting on the value of feedback.

"It is not so much in the length of our years of experience that gives us the wisdom that is needed to turn around an organisation, it is about having an attentive ear of listening to feedback."

What should we do?

- Take personal ownership: This begins by clarifying and asking the messenger some questions about the feedback he/she has given. The messenger would then feel free to expound on the feedback he/she had provided. One then begins taking more personal ownership.
- Master your own stories: Feelings come from the stories we tell ourselves some of which are not always based on facts. They are based on other feelings, experiences, and relationships that one may have gotten these stories from.
- Master your response: "Feel as you may, you should consider acting on the value of the feedback." Any feedback that causes you to grow will cause you pain.

"No amount of personal competence compensates for personal insecurity"

Feedback on the conference by participants

In this session participants provided feedback on the conference on the following areas:

- What did we do well?
- What did we not do well?
- What can we do better?
- The conference venue
- The quality of topics
- The conference presenters
- Accommodation facilities
- Topics to be considered in the next conference

The table below contains the participants' responses:

What did we do well?	• The conference was well planned; the notice was issued out in good time • The selection of topics for discussion was relevant and well researched • The cocktail • The KAHC team was engaging
What did we not do well?	• The compact schedule made the presenters rush through the topics • There was a limited number of sponsors
What can we do better	• Move the next meeting to, at least, a 4 or 5-star hotel • Give more room for interaction after every session • More time is needed on topics on emotional health • Host the conference in mid-April. The conference days (March) are too close to the annual audits • Time keeping • Set aside more time for the industry players to discuss matters concerning the industry • Having one all-rounded expert on tax matters to present the various topics on tax • Assign all technical topics to DAY 1 of the Conference; DAY 2 to be on mental issues • Discuss more emerging issues and challenges in the industry • Create a session for internal discussion for all industry players • In the 2024 conference provide feedback on the matters that arose out of the 2023 and what was achieved • Provide a certificate of participation for all members who participated in the conference
The Conference venue	• Accessibility was not friendly

The quality of topics	• The critical things presented on tax and the industry challenges were well researched • The choice of topics was relevant • Tax issues were well presented

10.1 Next Steps

- Approach the Finance Managers who are still not part of the KAHC and convince them to become members.
- Sought for more partners/sponsorship for the subsequent conferences.
- A three-member team, backed up by KAHC to identify partners that can join KAHC.
- No addition of an extra day to the conference, however, the number of presentations to be reduced.
- Discussion on mental issues be retained in the programme.
- Matters arising from the conference are to be discussed through an online meeting, a month after the end of the conference.
- At the 2024 conference the issues that arose in the 2023 conference should be presented and whether they will have been resolved
- Consider other regions to host the 2024 conference
- Print out certificates for all participants of the 2024 Finance Conference

Evening Cocktail




Appendix 1: List of Participants

NO.	NAME	ORGANISATION
1.	Cathrine Murage	& beyond Kenya
2.	Rufus Kimani	And beyond - Kichwa
3.	Phillip Wachira	Andbeyond
4.	Jack Nzomo	Angama Mara
5.	Hitesh Gohil	Ashnil Hotels Ltd
6.	Josphine Kimeu	Basecamp Explorer
7.	Anthony Gitonga	Consultant
8.	Munaa Said	Diani Sea Resort
9.	Peter Njuguna	Eka Hotel
10.	Ikua Karanja	Enashipai Resort and Spa
11.	Dickson Rutto	FC Ibis Styles Hotel
12.	Leena Mugadia	Golf Hotel Limited Kakamega
13.	Gumato Abudo	Golf Hotel Limited Kakamega
14.	Micheal Obiero	Jacaranda Indian Ocean Beach
15.	Simon Ngararu	Karen Blixen Camp
16.	Ruth Dero	MCC/NITA
17.	Wycliff Kazungu	Mnarani club
18.	Irene Kimani	Musiara/Governors
19.	Roffin Mutambu	Muthaiga Country Club
20.	Peter Waweru	Neptune Hotels
21.	Galm Guyo	NITA
22.	Daniel Mbugua	North Coast Beach Hotel
23.	Irene Nyambura	Novacom Systems
24.	Samuel Kimani	Novacom Systems
25.	Patrick Gitagama	Ole Sereni
26.	Alex Nzioka	Pinewood Beach Resort
27.	Paul Ndirangu	PWC
28.	Fredrick Mandi	Rapporteur Consulting
29.	Victor Omanyo	Safari Park Hotel
30.	Dennis Muthoka	Sarova Hotels
31.	Ezekiel Mwangi	Sarova Hotels
32.	Paul Murugu	Saruni Camp
33.	Julius Mutugi	Serena Beach Hotel
34.	Aron Birir	Serena Hotels
35.	Peter Wesonga	Somerset Westview
36.	Felix Munywoki	Travellers Beach Hotel
37.	Leah Nganga	KAHC Secretariat
38.	Joyce Maina	KAHC Secretariat
39.	Lawrence Wafula	KAHC Secretariat
40.	Mike Macharia	KAHC Secretariat
41.	Samwel Ikwaye	KAHC Secretariat

Appendix 2: Conference Agenda

DAY 1

TIME	EVENT	RAPPORTEUR
8.00 - 8.30 am	Participants' Arrival and Registration	KAHC Secretariat
8.30 - 8.45 am	Introductions	
8.45 - 8.55 am	Welcome Remarks	GM- Mnarani Club Cathrine Murage - KAHC Finance Chairman
8.55 - 9.15 am	Official Opening & About KAHC Advocacy Agenda	Mike Macharia- KAHC CEO Patricia Ondeng- Ag. MD- KICC
9.20 - 10.10 am	Presentation 1 -Tax Invoice Management System (TIMS) Post Implementation Critique- Wins and Challenges	Hakamba Wangwe
10.10 - 10.30 am	Q & A	
10.30 - 11.00 am	TEA BREAK	
11.00 - 11.35 am	Presentation 2- Novacom Systems	Irene Nyambura
11.35 - 11.45 am	Q & A	
11.45 - 12.45 pm	Presentation 3---Tax Exposure Areas in the Hospitality Industry	Robert Waruiru (ICHIBAN Associates)
12.45 - 01.00 pm	Q & A	
01.00 - 2.00 pm	LUNCH BREAK	
2.00 - 3.15 pm	Presentation 4--- Effective Emotional Leadership	Francisco Kitonga
3.15 - 3.30 pm	Q & A	
3.30 - 4.15 pm	Presentation 5- National Industrial Training Authority (NITA)	Ruth Dero
4.15 - 4.30 pm	Q & A	
4.30 - 4.40 pm	WRAP UP- DAY ONE	
6.30 - 8.00 pm	Welcome Cocktail	

DAY 2

TIME	EVENT	RAPPORTEUR
8.30 - 9.00 am	Participants' Arrival and Registration	KAHC Secretariat
9.00 - 9.40 am	Presentation 6- PENSION ADMINISTRATION • NSSF Act • APA Life Insurance	Martin Mathai
9.40 - 9.50 am	Q & A	
9.50 - 10.15 am	Presentation 7- Hospitality Industry CBA	Mike Macharia
10.15 - 10.30 am	Q & A	
10.30 - 11.00 am	TEA BREAK	
11.00 - 11.25 pm	Tax Advocacy	PWC
11.25 - 11.40 pm	Q & A	
11.40 - 12.40 pm	Presentation 8----- Feedback that Counts	Antony Gitonga
12.40 - 12.55 pm	Q & A	
12.55 - 1.05 pm	WRAP UP- DAY TWO	

Making Kenya's hospitality globally competitive
KENYA ASSOCIATION OF HOTEL KEEPERS AND CATERERS