TAX APPEALS TRIBUNAL
Justice in Taxation

www.tat.go.ug

#teamkisanjanomoresleep

Performance Highlights

A report by the Tax Appeals Tribunal

For the period 1 July 2025– 30 June 2026

#teamkisanjanomoresleep

Contents

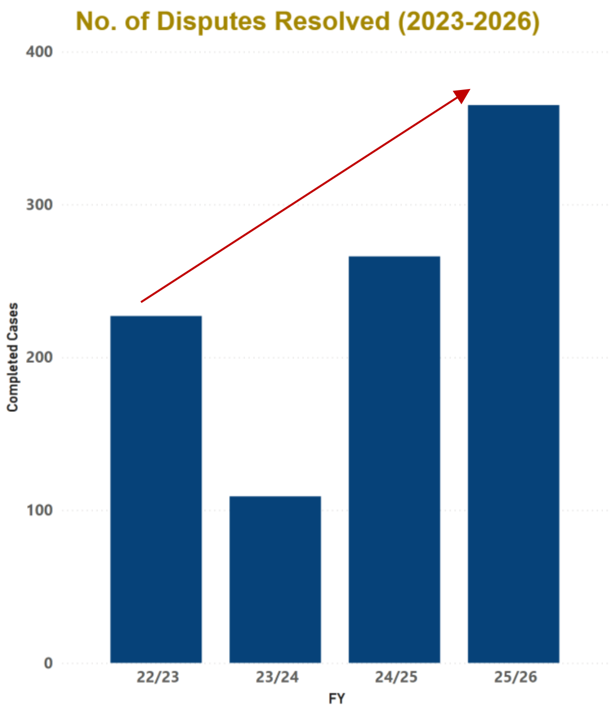
#teamkisanjanomoresleep

At a glance: Disputes resolved

1

Disputes resolved in FY 26

#teamkisanjanomoresleep



22/23	227 Completed Cases
23/24	109 Completed Cases
24/25	266 Completed Cases
25/26	365 Completed Cases

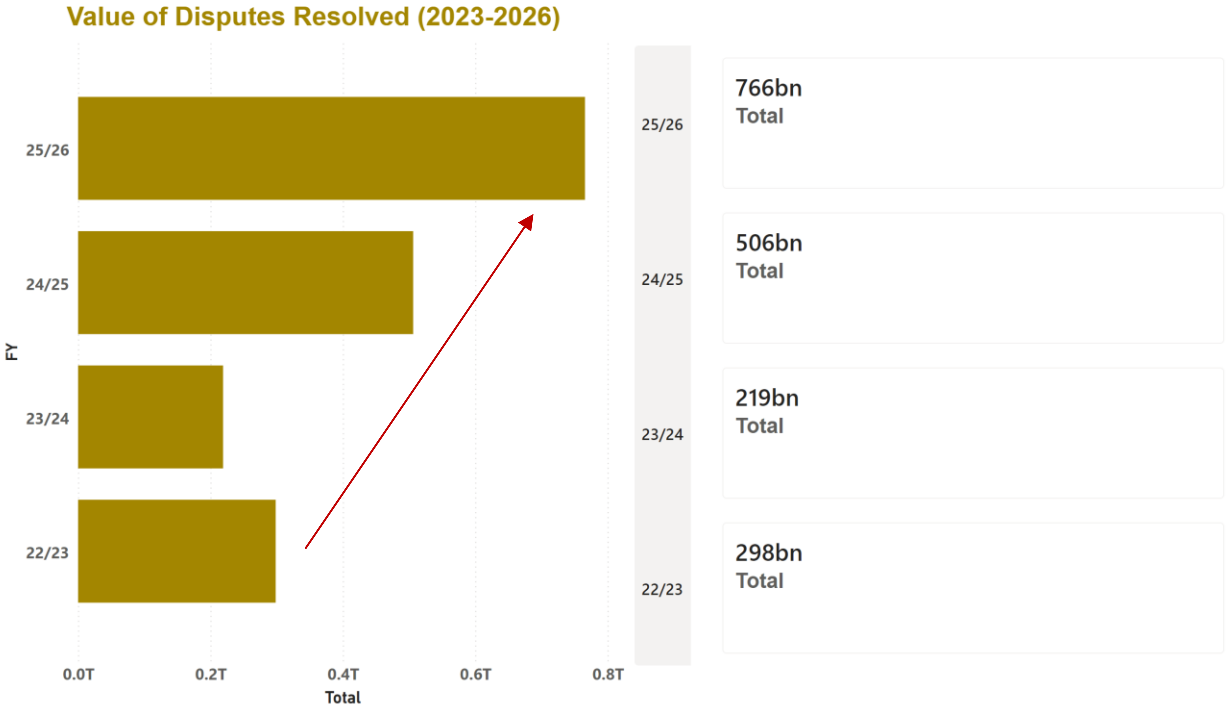
Building Momentum: Tribunal Drives Efficiency and Growth

The Tribunal sustained its upward trajectory, achieving a **37.5% year-on-year increase** in dispute resolutions in FY26. This impressive growth builds on the foundation laid in FY25, reflecting the Tribunal's unwavering commitment to efficient and effective justice.

Over the past four years (2023–2026), the Tribunal has achieved a remarkable **61% increase** in the case disposal rate, showcasing its dedication to timely dispute resolution and enhanced operational excellence.

Value unlocked

#teamkisanjanomoresleep



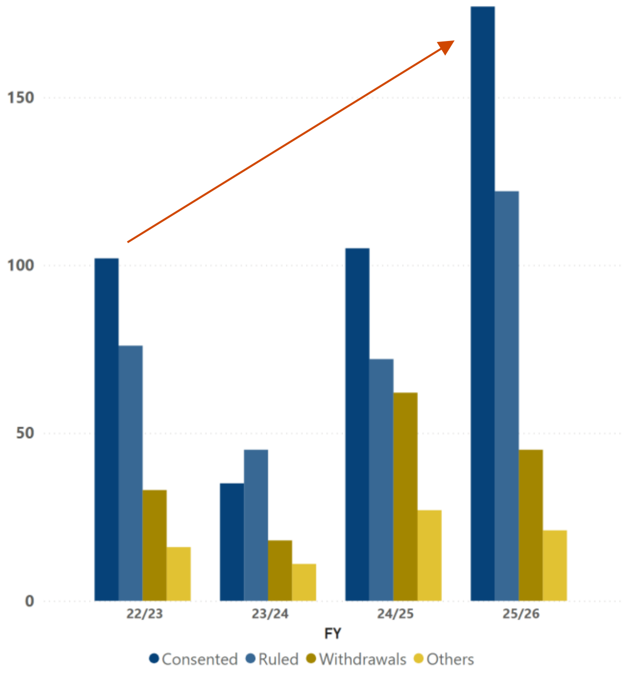
<u>Unlocking Value: Tribunal Boosts Economic Impact</u>

The Tribunal's upward trajectory is further underscored by its growing contribution to the economy. In FY26, monies released back to the economy **increased by 52%** year-on-year, building on the progress made in FY25.

Over the past four years (2023–2026), the Tribunal has achieved a staggering **157% increase** in monies released – a remarkable performance that highlights its pivotal role in fostering economic growth and taxpayer confidence.

ADR produced wins

Breakdown of Disputes resolved (2023-2026)



22/23	102 Consented	76 Ruled	33 Withdrawals	16 Others
23/24	35 Consented	45 Ruled	18 Withdrawals	11 Others
24/25	105 Consented	72 Ruled	62 Withdrawals	27 Others
25/26	177 Consented	122 Ruled	45 Withdrawals	21 Others

Mediation Drives Efficiency, Judgments Unlock Big-Ticket Disputes

Mediation remained the go-to method for resolving disputes, accounting for **48% of resolved cases**, followed by rulings/judgments at 33%.

Notably, judgments unlocked significant value, with Shs. 505 billion in disputes resolved – double that of mediation.

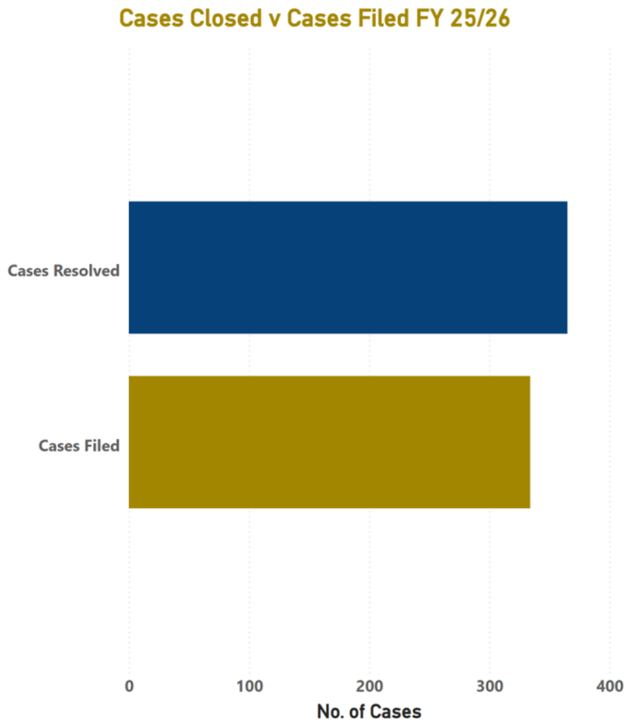
This reflects the Tribunal's role in tackling complex, high-stakes cases that often require litigation.

#teamkisanjanomoresleep

Performance analysis

2

Case clearance rate



<u>An impressive case clearance rate</u>

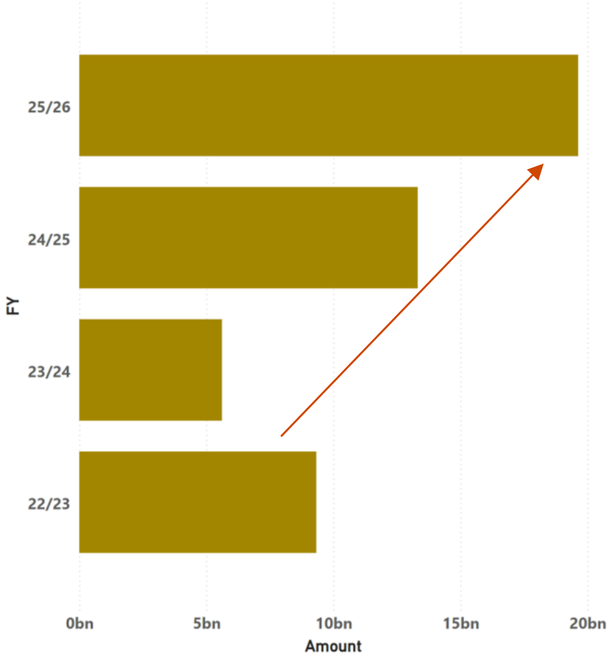
The Tribunal demonstrated exceptional efficiency, resolving 365 disputes in FY 26, surpassing the 334 new applications received. This impressive 109% case clearance rate signifies a significant reduction in the active pipeline, effectively tackling and clearing older, stagnant backlog cases.

The Tribunal's proactive approach has yielded tangible results, showcasing its commitment to delivering timely justice and ensuring a more streamlined process for taxpayers.

Productivity on the rise

#teamkisanjanomoresleep

Productivity per Capita (2023-2026)



FY	Amount	Total Headcount
25/26	19.63bn	39
24/25	13.32bn	38
23/24	5.62bn	39
22/23	9.33bn	32

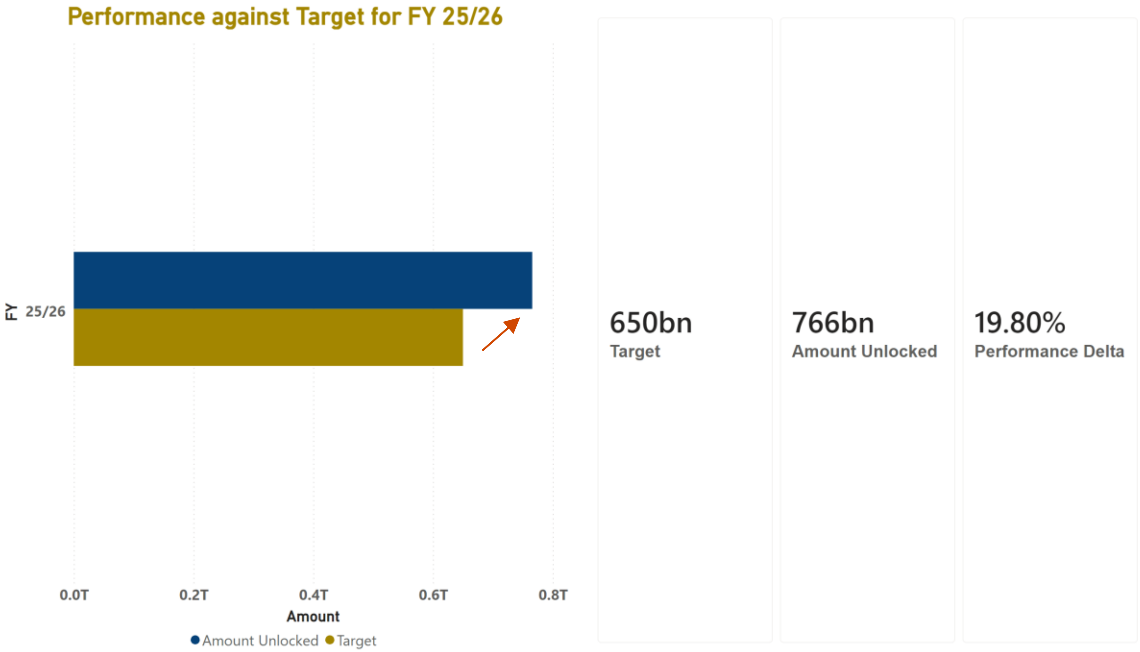
Delivering Value for Money: Tribunal's Productivity Soars

This year, we introduced a new performance metric focusing on productivity, measuring output relative to our headcount.

The results are clear: we delivered exceptional value, ensuring that every resource counts.

The Tribunal achieved a remarkable per capita productivity of Shs. 19.63 billion, **up by 110%** from Shs. 9.33 billion in 2023. This demonstrates that the teamwork of the staff, mediators and members of the tribunal, who are productively engaged, showcasing our commitment to efficiency and effectiveness.

Targets exceeded

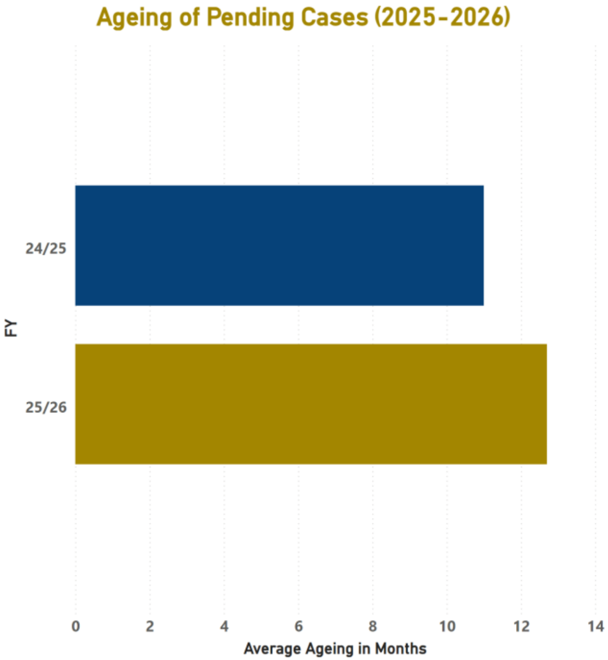


Exceeding Targets, Unlocking Value

We set an ambitious goal to grow case disposal by 30% in both volume and value, aligning with the needs of government and business.

The results? We exceeded our targets - case disposal increased by 38%, while the value of disputes resolved jumped by 52% – exceeding our target by 22% and unlocking significant economic value.

The downside



FY	Pending Cases	Average Ageing
24/25	468	11.0
25/26	463	12.7

<u>The Disappointment: Case Ageing Increases Slightly</u>

On the downside, our case ageing went up by 1.6 months to 12.7 months, largely due to the departure of four members in May 2026, a critical period in the tax calendar.

This led to a backlog of pending judgments and rulings, impacting 30 disputes worth Shs. 136 billion. To mitigate this in future, we propose aligning the end of members' contracts with the end of the financial year to minimise disruption to service delivery.

Driving success through strategic outreach

Our success is driven by a deliberate strategy to enhance the Tribunal's visibility, accessibility, and relevance to the public. Key initiatives include:

(i) **Streamlined Processes and Tailored Dispute Resolution** We've simplified procedures and reduced legal formalities, making it easier for SME taxpayers to navigate the dispute resolution process while maintaining robust processes for larger corporates.

(ii) **Data-Driven Decisions:** By leveraging data analytics, we inform our decision-making and drive operational improvements.

(iii) **Tech-Enabled Access:** We're expanding access to our services through technology, making it easier for taxpayers to engage with us remotely.

(iv) **Proactive Engagement:** Through increased taxpayer sensitisation and outreach, we're building trust and awareness of the Tribunal's role.

(v) **Team Collaboration:** The commendable teamwork of Tribunal members and staff has been instrumental in driving our success.

Persistent challenges in FY 26

The Tax Appeals Tribunal continued to face significant challenges in FY26, mirroring issues from the previous year. Key concerns include:

(i) **Rising Caseload:** The Tribunal registered 334 new applications valued at Shs 1.1 trillion, up from Shs.656 billion in 410 cases in FY25. This surge reflects an increase in high-value and complex tax disputes.

(ii) **Weak Administrative Dispute Resolution:** URA's independent review processes often fail to resolve disputes administratively, leading to escalated Tribunal filings.

(iii) **Inaccurate Assessments: U**RA's assessments show low accuracy, with only a 16% realisation rate (Shs. 16 collected per Shs. 100 assessed) in cases that were resolved by mediation. This contributes to case backlog and strains the Tribunal's limited resources.

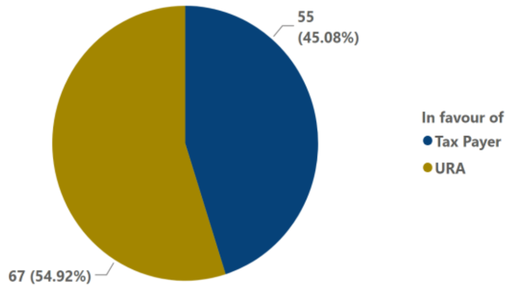
(iv) **Critical Underfunding:** Despite a growing workload, the Tribunal's budget of Shs. 7.6 bn in inadequate to meet the service delivery demands, especially in the regional stations, which are significantly under resourced.

Outcomes for the URA and taxpayers

3

Outcomes for the URA and taxpayers - judgments

FY 25/26 Success Rate



	No. of Rulings	Win Rate	Sum of Value
Tax Payer	55	45%	275bn
URA	67	55%	229bn

Outcomes from judgments/rulings

55% of the 122 judgments delivered were in favour of the URA, while 45% were for taxpayers. However, more value was unlocked for taxpayers (55%). Key factors contributing to the URA’s lower-than-expected success rate include:

(i) Inaccurate assessments,

(ii) Limitations in URA’s internal dispute resolution framework,

(iii) Weak internal controls – particularly between assessing departments and the legal unit,

(iv) Lack of proper documentation or evidence by the URA and inadequate representation by URA,

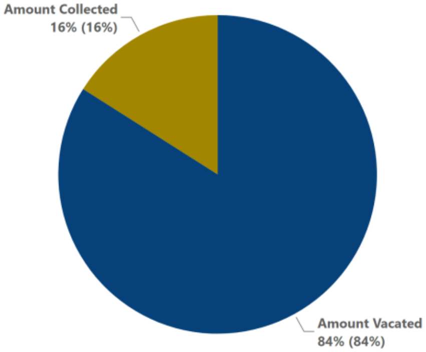
(v) Taxpayers' improved understanding of tax laws and rights,

(vi) In some cases, a failure to follow due process in the administrative handling of disputes

Outcomes for the URA and taxpayers - settlements

#teamkisanjanomoresleep

URA Realization from Settlements FY 25/26



Amount Collected

32bn
Total

Amount Vacated

171bn
Total

Outcomes from mediation/settlements

177 cases with a total tax in dispute of Shs. 202.5 bn were resolved amicably through mediation

At filing, the 177 cases had a tax in dispute of Shs.202.5 billion. Out of this amount, the URA realised Shs. 32 billion and vacated Shs. 171 billion, hence achieving a realisation rate of 16%.

In simple terms, for every Shs. 100 that the URA assessed, Shs. 16 was collected/realised upon settlement of the dispute.

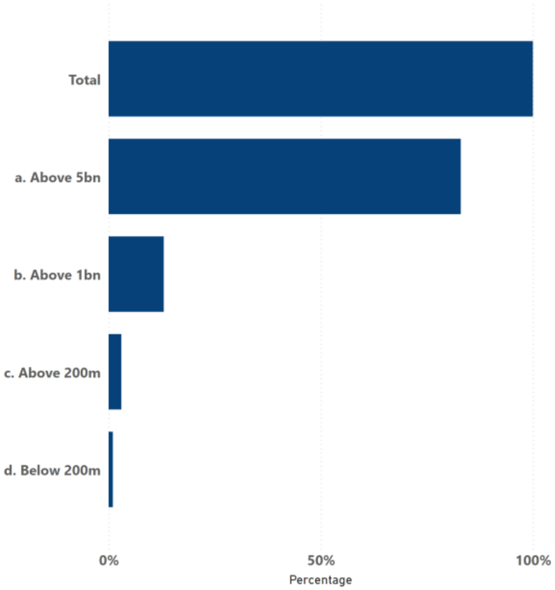
This statistic is consistent with litigation outcomes, which showed a lower-than-expected success rate for the URA.

Looking forward: FY 27 caseload

4

Case load / pending cases

Cases Pending as at 30th June 2026



	No. of Cases	Value	Percentage of Value
a. Above 5bn	49	1T	83%
b. Above 1bn	87	202bn	13%
c. Above 200m	103	53bn	3%
d. Below 200m	224	13bn	1%

Looking forward: FY 27 opening caseload

We started FY 27 with 463 cases with a total monetary value of Shs. 1.5 trillion. This consists of:

- High-value disputes (Shs. 5 billion+): 49 cases (10% of total cases), accounting for Shs. 1 trillion (82% of total disputed tax). These mostly involve multinational enterprises and large corporates.
- Low-value disputes (below Shs. 200m): 235 cases (49% of total cases), accounting for just 1% of the disputed tax (Shs. 13 billion). These are mostly disputes filed by SMEs, highlighting the disproportionate impact of tax disputes on smaller businesses

These figures highlight the need for tax policies that support SMEs and streamline dispute resolution to shape a tax regime that's fair, efficient, and business-friendly.

“

Our statistics highlight a significant concentration of fiscal exposure in a small number of high-value appeals and underscore the importance of adopting a risk-based case management approach, whereby high-value and complex disputes receive enhanced monitoring and prioritisation, while routine matters continue to be managed under the Tribunal's standard case management processes.

FY 27 priorities: Enhancing dispute resolution

Building on our mission to deliver a tax dispute resolution system that is clear, uniform, rapid, affordable, and just, our focus in FY 27 continues to be:

- **Simplifying processes:** Making our services more accessible to all taxpayers.
- **Digital transformation:** Enhancing service delivery through digitalisation.
- **Effective mediation:** Streamlining mediation for faster resolutions.
- **Transparency & accountability:** Providing timely information to build trust.
- **Stakeholder partnerships:** Collaborating to expand our reach and impact.

Acknowledgments

5

Acknowledgments

We extend our sincere gratitude to the Ministry of Finance, stakeholders, and taxpayers for entrusting us with the critical mandate of resolving tax disputes. Your trust, financial support, and enabling environment have been instrumental in our mission to serve. We are committed to upholding the highest standards of fairness, efficiency, and transparency in all our endeavours.

Thank you for the opportunity to contribute to Uganda's tax ecosystem.