

# Tax Cards | 2021

**A summary of tax facts of countries  
in the EMEA region**

# Tax Cards | 2021

The AGN EMEA Tax Surveys of:

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# AUSTRIA

## 2021 TAX CARD (IN EUROS)

### 1. Basis of Taxation

Income is taxed on a yearly basis and taxpayers are required to submit tax returns on a self-assessment basis. Subject to bilateral tax treaties, residents are taxed on their worldwide income, whereas non-residents are taxed on their Austrian sourced income.

The main taxes levied in Austria can be divided into five categories:

- taxes on income (income tax and corporation tax)
- Social security contributions (health insurance, pension insurance, unemployment insurance and accident insurance)
- Sales (Value added) tax
- Income tax on non-residents
- Other Taxes (Capital gains tax, Real estate transfer tax, Vehicle tax, Municipal tax, Excise duty)

### 2. Corporate Tax

Corporation tax is a tax, in principle payable annually, on all profits generated in Austria by companies and other legal entities.

If corporations (AG, GmbH) have their legal seat or place of effective management in Austria, they are subject to unlimited taxation in Austria of their entire (domestic and foreign) income. Non-Austrian residents are subject to limited taxation on certain sources of income in Austria.

In Austria, corporations are independent tax subjects. Therefore a distinction needs to be made between tax ramifications at the level of the company and those at the shareholder level.

- Level of the company: standard corporate income tax (CIT) rate of 25%, regardless of whether profits are retained or distributed.
- Level of the shareholder: withholding tax (WHT) of 25% for corporations and 27,5% for other recipients in case of profit distributions.

A minimum CIT has to be paid from companies in a tax-loss position. The minimum CIT can be credited against future CIT burdens without time limitation.

- Minimum CIT for an AG: 875 euros per quarter of a year
- Minimum CIT for a GmbH founded before 30.06.2013: 437,50 euros per quarter of a year
- Minimum CIT for a GmbH founded after 30.06.2013: 125 euros per quarter of the first five years and 250 euros for the next five years.

### 3. Withholding Tax Rate (non-treaty)

	Resident individual	Non-Resident	
		Individual	Corporation
Dividends	27,5%	27,5%	25-27,5%
Interest	0/25/27,5%	0/25/27,5%	
Royalties		20%	20%

Intra-European regulations, as well as numerous international tax treaties, can significantly reduce or eliminate the withholding taxes indicated above.

#### 4. Resident Individual

Tax assessment base:  
sum of income  
- income-related expenses  
- special expenses  
- extraordinary burdens  
- tax-free amounts  
= tax assessment base

There is a progressive rate of income tax (0-55%) in Austria. The level of income tax depends on the taxable income in a given calendar year.

Income in EUR	Tax rate
Until 11.000	0%
Above 11.000 up to 18.000	20 %
Above 18.000 up to 31.000	35 %
Above 31.000 up to 60.000	42 %
Above 60.000 up to 90.000	48 %
Above 90.000	50 %

On other remuneration, particularly one-time payments (eg 13th and 14th salary) up to one-sixth of the yearly recurring payments (Jahressechstel) the following rates apply:

Other remuneration	Tax rate
For the first EUR 620	0%
For the next EUR 24.380	6%
For the next EUR 25.000	27%
For the next EUR 33.333	35,75%
Above EUR 83.333	50%

In the calendar years, 2016 until 2025, income above EUR 1 Mio is taxed with a rate of 55%.

#### 5. Non-Resident Individual Tax Rates

The rules relating to Austrian income received by persons domiciled outside Austria are in principle the same as for persons domiciled in Austria. However, for some income, a withholding tax is applied that can in some cases be exempt from all future taxation.

#### 6. Goods and Services tax

##### Value-added tax

VAT is a general consumption tax levied on goods supplied and services provided in Austria.

Liability to VAT is determined by the type of the transactions or products concerned, regardless of the personal situation of the liable person or customer. VAT is finally borne by the end-user, since it is included in the sale price of products or services. Each intermediary (manufacturer, retailer, etc.) collects the tax provided from the customer and pays it on to his local tax office, minus the VAT on inputs paid to his own supplier.

## 6. Goods and Services tax (cont.)

The Austrian VAT rates are as follows:

- Regular tax rate: 20%
- Reduced tax rates: 13%, 10% and 5%\*

The reduced tax rates apply for instance to foodstuffs, books, passenger transportation and accommodation.

\*Temporarily reduction to 5% for specified sectors due to the COVID-pandemic.

### Tax exemptions

A distinction is made between:

- Exemptions with credit: the turnovers are exempt from the sales tax, but the right to deduct input tax remains.
  - \* The most important cases are exports to third countries.
- Exemptions without credit: the sales tax is not invoiced, and the corresponding input tax cannot be claimed. Examples:
  - \* Small business owners
  - \* insurance companies
  - \* insurance agents
  - \* rentals for business premises

VAT returns and payments have to be done monthly or quarterly depending on the annual amount of turnover.

## 7. Estate duty

### Inheritance and gift tax

Estates or donations after the 1st August 2008 are not taxable. However, real estate transfer tax has to be paid in the case of an inheritance of a property.

### Real estate transfer tax

There are different types of real estate transfers in Austria:

- transfers with compensation: 3,50% (generally)
- Free-of-charge transfers (i.e. family and non-family transfers): The property value is the taxable base for this kind of transfer. A three-fold assessed ratable value (capped at 30% of the fair market value) is taken as the tax base and a tax rate of 2% is applied for real estate transfers within the closest family circle.
- transfers without compensation: This kind of transfer is subject to different levels:

Property value	Tax rate
... of below EUR 250.000	0,5%
... up to EUR 400.000	2%
... over EUR 400.000	3,5%

- Business transfers: In this case, the tax is capped at 0,5% of the property value. In special cases in connection with corporate restructuring under the Reorganisation Tax Act, the two-fold assessed standard rateable value is taken as the tax base, and the standard tax rate applies. 0,5% of the property value amounts as the standard tax rate.

An exemption is real estate transactions with a tax base of EUR 1100 or below as there is no taxation.

## 8. Stamp duty

For certain legally predefined transactions, stamp duties are imposed. If there is a written contract (e.g. lease contracts, bills of exchange, assignments of receivables or even electronically signed emails) and at least one party is Austrian or the contract is related to Austria, stamp duties are triggered. However, various possibilities are available to structure legal transactions in a way without triggering stamp duties (e.g. setting up of contracts abroad, offer-acceptance procedure, usage of audio-tapes).

The stamp duty rates for the most common legal transactions are as follows:

Legal transactions	Stamp duty (%)
Lease agreements (1)	1,00
Certificates of bonds/pledges	1,00
Bill of exchange	0,13
Assignment of receivables	0,80
Loan and credit agreements	Are not subject to stamp duty

### Share transfers

0,5%

## 9. Property tax

In Austria there is no property tax.

## 10. Income tax filing deadlines

Types of form	Taxpayer	Deadlines (of the following year)
E1	Residential individual	30th April (30th June in case of online submission via FinanzOnline)
E7	Non-residential individual	30th April
K1	Companies	30th April

## 11. Double Tax Agreements

Austria has signed 92 tax treaties with all major trading countries. Some of the treaties provide for elimination or partial elimination of double taxation by a foreign tax credit. Under the majority of treaties, however, double taxation is avoided or partially avoided by an exemption-with-saving clause as to progression. As an exception to the rule, dividends and interest are usually fully taxable with a foreign tax credit.

For more information on each of the countries, please visit: <https://english.bmf.gv.at/taxation/The-Austrian-Tax-Treaty-Network.html>

# BELGIUM

## 2021 TAX CARD (IN EUROS)

### 1. Basis of Taxation

Income is taxed on a year basis and taxpayers must submit tax returns on a self-assessment basis.

Belgium levies taxes which can be categorized as follows:

- taxes on income (income and corporate tax);
- taxes on expenditure (VAT);
- taxes on assets (registration duties, inheritance and gift duties, etc.);
- local taxes (property tax, etc.).

The normal Belgian income year runs from 1 January to 31 December.

The Belgian taxation system is based on two main principles:

- Residence jurisdiction principle: individuals or corporations that are registered as residents of Belgium are subject to Belgian tax on their worldwide income, arising both in Belgium and/or elsewhere.
- Source jurisdiction principle: the source jurisdiction of taxation means that Belgium taxes non-resident individuals and corporations on income arising to them from sources within Belgium only.

### 2. Corporate Tax

Additional definitions related to the corporate taxation period:

**Financial year** is the year in which revenue is arising.

**Tax year** is the year in which the revenue is taxed.

Revenue arising during the financial year ending on 31 December is following the taxation rules of the next year (tax year = financial year + 1).

Revenue arising during the financial year ending before 31 December is following the taxation rules of the year in which the financial year ends, and not the taxation rules of the next year (tax year = financial year).

A Belgian resident company and a company that is taxable in Belgium due to the 'Source jurisdiction principle' are subject to Belgian corporate income tax.

The following tax rates apply to Belgian companies and establishments of foreign companies for the financial year 2021 (tax year 2022).

## 2. Corporate Tax (cont.)

Table 2.1

Type of the tax rates	Tax rate
Small and medium-sized companies <sup>1</sup> subject to the reduced tax rate	See table 2.2
Large companies and companies not subject to the reduced tax rate <sup>2</sup>	25,00%

<sup>1</sup> Small and medium-sized companies are as per definition of the Belgian legislation the ones that DON'T exceed any of the following limits at the end of the latest closed financial year:

- Annual average personnel: 50 EUR
- Annual turnover (excl. VAT): 9M EUR;
- Total of the balance: 4.5M EUR.

If more than one of the aforementioned criteria is exceeded or no longer exceeded, this will only have an impact if this new situation lasts for two consecutive financial years. So, the impact will start as from the financial year following to the financial year in which more than one of the criteria is exceeded or no longer exceeded for the second time.

<sup>2</sup> Companies not subject to reduced tax rate (TY 2021): Companies not being an SME based on the criteria listed in point 1 above and/or one of the following exclusions is not applicable:

- Company's financial participations is higher than 50% of its capital adjusted with taxed reserves;
- Affiliates that are owned by other companies for 50 or more % of its shares;
- Companies that paid less than 45.000 EUR as a salary to Director during the FY;
- Investment funds and pension funds.

Table 2.2

Taxable revenue EUR	Tax rate
0-100.000	20,00%
→100.000	25,00%

## 3. Withholding tax rate (non-treaty)

Table 3.1

Taxable revenue EUR	Tax rate Resident Individual/ Corporation		Tax rate Non-Resident Individual/Corporation
Dividends	30%	30%	30%
Interest	30%	0% <sup>3</sup>	30%
Royalties/know-how	30%	30%	30%
Rents (for moveable property)	0%	30% <sup>4</sup>	30% (specific cases)
Salaries	WHT scales NA		WHT scales NA
Management fees	NA		NA
Technical fees	NA		16,5% <sup>5</sup>
Directors' fees	NA		NA

<sup>3</sup> Concerns a tolerance of the Belgian tax authorities.

<sup>4</sup> Applicable in specific cases.

<sup>5</sup> Concerns a specific Belgian tax regime.

## 4. Resident and non-resident individual tax rates (for Tax Year 2020)

### Progressive tax rate

Table 4.1

Taxable Income (TY 2022) EUR	Tax rate
0 - 13.540	25%
13.540 - 23.900	3.385,00 + 40% of excess over 13.540
23.900 - 41.360	7.529,00 + 45% of excess over 23.900
> 41.360	15.386,00 + 50% of excess over 41.360

5. Value Added Tax	<p>VAT rates in Belgium are:</p> <ul style="list-style-type: none"><li>- 21% general rule for all goods and services;</li><li>- 12% or 6% on exceptional goods and services</li><li>- 0% for the exempted goods and services</li></ul> <p>Belgium follows the European Intracommunity VAT rules ( 0% rate on goods exported to other EU countries)</p>																		
6. Inheritance tax	<p>Progressive tax rate depending on the next following factors:</p> <ol style="list-style-type: none"><li>1. Region in which taxed (Flanders, Wallonia or Brussels).</li><li>2. Relatives grade (husband/wife, children, sisters/brothers).</li></ol> <p>Example: Flanders, straight line (partners, parents or children) relatives:</p> <p>Table 6.1</p> <table><tr><th>Taxable amounts EUR</th><th>Tax rate</th></tr><tr><td>0 – 50.000</td><td>3%</td></tr><tr><td>50.000 – 250.000</td><td>9%</td></tr><tr><td>→250.000</td><td>27%</td></tr></table>	Taxable amounts EUR	Tax rate	0 – 50.000	3%	50.000 – 250.000	9%	→250.000	27%										
Taxable amounts EUR	Tax rate																		
0 – 50.000	3%																		
50.000 – 250.000	9%																		
→250.000	27%																		
7. Stamp duty	<p>As from 1 January 2007, the Belgian stamp duty has been abolished.</p>																		
8. Registration fees	<p>The general rule in Flanders: as from 1st January 2020 acquisition of real estate property for private residence is subject to a general rate of 6%.</p> <p>The Walloon and Brussels Capital Region apply a rate of 12,5%. Other rates and tariffs apply for the registration of documents, deeds, etc.</p> <p>The Walloon region applies a rate of 6% if the cadastral revenue is lower than Eur 745.</p>																		
9. Property Taxes	<p>Belgium imposes land-tax which is levied on the value of all immovable property.</p> <p>Property tax is based on the cadastral revenue allocated to the immovable property.</p>																		
10. Income tax filing deadlines	<table><tr><th>Types of Form</th><th></th><th>Deadlines*</th></tr><tr><td>Tax Return</td><td>Individuals</td><td>30 June</td></tr><tr><td>Tax Return</td><td>Companies</td><td>6 months after the end of the financial year</td></tr><tr><td>Management fees</td><td>NA</td><td>NA</td></tr><tr><td>Technical fees</td><td>NA</td><td>NA</td></tr><tr><td>Directors' fees</td><td>NA</td><td>NA</td></tr></table> <p>*Various extensions are available for filing.</p>	Types of Form		Deadlines*	Tax Return	Individuals	30 June	Tax Return	Companies	6 months after the end of the financial year	Management fees	NA	NA	Technical fees	NA	NA	Directors' fees	NA	NA
Types of Form		Deadlines*																	
Tax Return	Individuals	30 June																	
Tax Return	Companies	6 months after the end of the financial year																	
Management fees	NA	NA																	
Technical fees	NA	NA																	
Directors' fees	NA	NA																	

**11.  
Double Tax  
Agreements  
(cont.)**

Belgium signed 96 international tax treaties with foreign countries to avoid double taxation.

An overview of these treaties can be found: [https://financien.belgium.be/nl/particulieren/internationaal/internationale\\_akkoorden](https://financien.belgium.be/nl/particulieren/internationaal/internationale_akkoorden)

# CYPRUS

## 2021 TAX CARD (IN EUROS)

### 1. Basis of Taxation

Income is taxed on a calendar year basis and taxpayers are required to submit tax returns on a self-assessment basis. Subject to bilateral tax treaties, residents are taxed on their worldwide income (subject to exemptions based on domicile) whereas non-residents are taxed on their Cypriot sourced income. The main taxes levied in Cyprus are as follows:

- taxes on income (income tax and corporation tax)
- taxes on expenditure (VAT)
- stamp duty
- property tax (transfer fees)

### 2. Corporate Tax

A company resident in Cyprus is subject to corporation tax at the rate of 12,5% on taxable profits. A non-resident company is taxed on its Cyprus source income at the same rate as a resident company.

### 3. Withholding tax rate (non-treaty)

	Resident Individual	Non-resident Individual/Corporation
Dividends	17%	0
Interest	30%	0
Royalties/know-how	NA	10% (zero if used outside Cyprus)
Rents (for moveable property)	NA	0
Management fees	NA	0
Technical fees	NA	0
Directors' fees	NA	0

### 4. Resident individual tax rates

Taxable Income	Tax Payable
0–19,500	Nil
19,501–28,000	Nil + 20% of excess over 19,500
28,001–36,300	1,700 + 25% of excess over 28,000
36,301–60,000	3,775 + 30% of excess over 36,300
60,001+	10,885 + 35% of excess over 60,000

### 5. Non resident individual tax rates

Taxable Income EUR	Tax Payable
0–19,500	Nil
19,001–28,000	Nil+ 20% of excess over 19,500
28,001–36,300	1,700 + 25% of excess over 28,000
36,301–60,000	3,775 + 30% of excess over 36,300
60,001+	10,885 + 35% of excess over 60,000

<b>6. Value added tax</b>	VAT is levied at a rate of 19% (Reduced taxes apply to certain goods and services). Businesses have to register if the annual turnover is expected to exceed €15.600.									
<b>7. Estate duty</b>	Cyprus does not have death or estate taxes.									
<b>8. Stamp duty</b>	<p>Stamp duty is payable on any document relating to assets in Cyprus or any matter which shall take place in Cyprus, irrespective of the place of the creation of the document.</p> <p>Rates are as follows:</p> <table><tr><td>For amounts up to EUR 5.000</td><td>Nil</td></tr><tr><td>For amounts from EUR 5.001- EUR 170.000</td><td>0,15%</td></tr><tr><td>For amounts over EUR 170.000</td><td>0,2% with maximum amount payable EUR 20.000</td></tr></table>	For amounts up to EUR 5.000	Nil	For amounts from EUR 5.001- EUR 170.000	0,15%	For amounts over EUR 170.000	0,2% with maximum amount payable EUR 20.000			
For amounts up to EUR 5.000	Nil									
For amounts from EUR 5.001- EUR 170.000	0,15%									
For amounts over EUR 170.000	0,2% with maximum amount payable EUR 20.000									
<b>9. Property tax</b>	<p>Immovable property tax was abolished in Cyprus as from 1 January 2017. Immovable property transfer fees are payable by the buyer on the purchase of immovable property as follows:</p> <table><tr><th>Value of property</th><th>Transfer fees</th></tr><tr><td>Up to EUR 85.430</td><td>1,5%</td></tr><tr><td>85.431-170.860</td><td>2,5%</td></tr><tr><td>Over 170.860</td><td>4%</td></tr></table>	Value of property	Transfer fees	Up to EUR 85.430	1,5%	85.431-170.860	2,5%	Over 170.860	4%	
Value of property	Transfer fees									
Up to EUR 85.430	1,5%									
85.431-170.860	2,5%									
Over 170.860	4%									
<b>10. Income tax filing deadlines</b>	<table><tr><th colspan="2">Types of Form</th><th>Deadlines</th></tr><tr><td>Tax Return</td><td>Individuals</td><td>31 July of the following year</td></tr><tr><td>Tax Return</td><td>Companies</td><td>31 March of the year following the tax year</td></tr></table>	Types of Form		Deadlines	Tax Return	Individuals	31 July of the following year	Tax Return	Companies	31 March of the year following the tax year
Types of Form		Deadlines								
Tax Return	Individuals	31 July of the following year								
Tax Return	Companies	31 March of the year following the tax year								
<b>11. Double Tax Agreements</b>	<p>Cyprus has signed 65 such treaties.</p> <p>For information for each country, please visit: <a href="https://www.mof.gov.cy/ird">https://www.mof.gov.cy/ird</a></p>									

**Joannides+Co.**

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**Firm:** Joannides & Co

# CZECH REPUBLIC

## 2021 TAX CARD (IN CZECH CROWNS)

### 1. Basis of Taxation

Personal Income Tax shall be levied by individuals who have tax residents in the The Czech Republic as well as by individuals who are non-residents for tax purposes in the The Czech Republic.

Generally, the individuals are liable to declare and pay tax in the Czech Republic on their worldwide incomes (i.e. employment incomes, incomes from self-employment, rental incomes, investment incomes and capital gains and other taxable incomes).

Corporate Income Tax shall be levied by enterprises which have tax resident (i.e. the establishment) in the Czech Republic or non-resident in special cases when this liable is determined by the double tax treaty agreement.

The income tax year can be determined as the calendar year (i.e. 1 January – 31 December) or as a fiscal year (12 consecutive months).

### 2. Corporate Tax

The Czech Republic has a flat corporate tax of 19 %.

### 3. Withholding tax rate (non- treaty)

	Resident	Non-resident Individual/Corporation
Dividends	15 %	15 % / 35 %
Interest	0 %	15 % / 35 %
Royalties/know-how	0 %	15 % / 35 %
Financial leasing	0 %	5 %
Rents (for moveable property)	N/A	N/A
Management fees	N/A	N/A
Technical fees	N/A	N/A
Directors' fees	N/A	N/A

### 4. Residential individual tax rates

Personal Income Tax rate:

Social security and health insurance contributions are paid by both the employer and the employee on employment income at the following rates: (see below)

	Employer %	Employee %	Total %
Social security			
- Old-age pension	21,5	6,5	28,0
- Sickness	2,1	0	2,1
- Unemployment	1,2	0	1,2
Health insurance	9,0	4,5	13,5

<b>5. Goods and Services tax</b>	<p><b>VAT Registration and Deregistration Thresholds:</b></p> <ul style="list-style-type: none"> <li>• VAT Registration: CZK 1,000,000</li> <li>• Distance Selling: CZK 1,140,000</li> <li>• Intra-EU acquisitions: CZK 326,000</li> <li>• VAT Deregistration: turnover <math>\leftarrow</math> CZK 1,000,000</li> </ul> <p><b>VAT rates:</b></p> <ul style="list-style-type: none"> <li>• Standard rate: 21 %</li> <li>• Reduced rate: 15 %</li> <li>• Super Reduced rate: 10 %</li> </ul> <p><b>VAT Return Filing Periods:</b></p> <ul style="list-style-type: none"> <li>• Turnover <math>\leftarrow</math> CZK 10,000,000    Monthly or quarterly (optional)</li> <li>• Turnover <math>\rightarrow</math> CZK 10,000,000    Monthly</li> </ul> <p><b>VAT Return Filing and Payment Deadlines:</b></p> <ul style="list-style-type: none"> <li>• Paper returns (only an individual person without data box): 25 days from the period end</li> <li>• Electronic returns: 25 days from the period end</li> </ul> <p><b>Filing Periods and Deadlines – other returns:</b></p> <ul style="list-style-type: none"> <li>• EC Sales Lists (Goods) – Filing Periods:             <ul style="list-style-type: none"> <li>* Quarterly VAT payer: Monthly</li> <li>* Monthly VAT payer: Monthly</li> </ul> </li> <li>• EC Sales Lists (Services) – Filing Periods:             <ul style="list-style-type: none"> <li>* Quarterly VAT payer: Quarterly</li> <li>* Monthly VAT payer: Monthly</li> </ul> </li> <li>• EC Sales Lists – Filing deadlines:             <ul style="list-style-type: none"> <li>* Paper returns: N/A</li> <li>* Electronic returns: 25 days from the period end</li> </ul> </li> </ul> <p><b>VAT Control Statement – Filing Periods:</b></p> <ul style="list-style-type: none"> <li>• Quarterly VAT payer             <ul style="list-style-type: none"> <li>* Monthly (legal person)</li> <li>* Quarterly (individual person)</li> </ul> </li> <li>• Monthly VAT payer: Monthly</li> </ul> <p><b>VAT Control Statement – Filing deadlines:</b></p> <ul style="list-style-type: none"> <li>• Paper returns: N/A</li> <li>• Electronic returns: 25 days from the period end</li> </ul>
<b>6. Road tax</b>	<p>Road tax is generally payable by the operator of a vehicle registered in the Czech Republic. The tax rate varies from CZK 1,200 to CZK 4,200 in the case of passenger vehicles and from CZK 1,800 to CZK 50,400 in the case of other vehicles.</p>
<b>7. Estate tax</b>	<p>Estate duty is not applicable in the Czech Republic.</p>

8. Stamp duty	Stamp duty is not applicable in the Czech Republic.																							
9. Real Estate Tax and Property transfer tax	<b>Real Estate Tax:</b> The tax on buildings is based on the area of land occupied. The rates range from CZK 2 to 10 for buildings. Increased rates apply in certain circumstances. Real estate tax on agricultural land is 0.75 % of the deemed value. Special rates apply for forests, lakes and ponds. For other types of land, the tax is based on the area; the rate is CZK 2 per square meters for building land, CZK 5 per square meters for improved land surface used for business and CZK 0.20 per square meters in other cases. Real estate tax is deductible for corporate income tax purposes.																							
10. Energy Taxes	Energy taxes apply to natural gas and other gases, electricity and solid fuels. Only supplies of these products delivered within the Czech Republic are subject to energy taxes. There is a wide range of exemptions (e.g. for energy used in metallurgic or mineralogical processes). In order to claim an exemption, approval needs to be obtained from the customs authority.																							
11. Consumption Taxes	Excise tax is imposed on entities that produce or import certain goods, including hydrocarbon fuels and lubricants, alcohol and spirits, beer, wine and tobacco products. The tax is based on the number of goods expressed in specific units and tax may be levied only once on particular goods.																							
12. Income tax filing deadlines	<table><tr><th>Types of Form</th><th></th><th>Deadlines</th></tr><tr><td>Tax Return</td><td>Individuals</td><td>30 June*</td></tr><tr><td>Tax Return</td><td>Companies</td><td>Until 6* months from ending of the financial year</td></tr></table> <p>*In case that the tax return is filed by the tax advisor (based on the Power of Attorney) or the corporation is obliged to have a statutory financial audit, the deadlines are prolonged.</p>	Types of Form		Deadlines	Tax Return	Individuals	30 June*	Tax Return	Companies	Until 6* months from ending of the financial year														
Types of Form		Deadlines																						
Tax Return	Individuals	30 June*																						
Tax Return	Companies	Until 6* months from ending of the financial year																						
13. Double Tax Agreements	<table><tr><th rowspan="2">Country</th><th colspan="3">WHT (%)</th></tr><tr><th>Dividends %</th><th>Interest %*</th><th>Royalties %</th></tr><tr><td>Resident Corporations</td><td>15</td><td>0</td><td>0</td></tr><tr><td>Resident Individuals</td><td>15</td><td>0</td><td>0</td></tr><tr><td>Non-resident corporations and individuals:</td><td></td><td></td><td></td></tr><tr><td>Non treaty</td><td>15/35</td><td>15/35</td><td>15/35</td></tr></table>	Country	WHT (%)			Dividends %	Interest %*	Royalties %	Resident Corporations	15	0	0	Resident Individuals	15	0	0	Non-resident corporations and individuals:				Non treaty	15/35	15/35	15/35
Country	WHT (%)																							
	Dividends %	Interest %*	Royalties %																					
Resident Corporations	15	0	0																					
Resident Individuals	15	0	0																					
Non-resident corporations and individuals:																								
Non treaty	15/35	15/35	15/35																					

### 13. Double Tax Agreements (cont.)

Country	WHT (%)		
	Dividends %	Interest %*	Royalties %
Treaty:			
Albania	5/15	0/5	10
Armenia	10	5/10	5/10
Australia	5/15	10	10
Austria	0/10	0	5
Azerbaijan	8	5/10	10
Bahrain	5	0	10
Bangladesh	DDT has not been announced in the Collection of Laws yet		
Barbados	5/15	5	5/10
Belarus	5/10	0/5	5
Belgium	5/15	10	0/10
Bosnia	5	0	0/10
Botswana	5	7,5	7,5
Brazil	15	10/15	15/25
Bulgaria	10	0/10	10
Canada	5/15	0/10	0/10
Chile	15	4/5/10/15	5/10
China, People's Republic of	5/10	7.5	10
Colombia	5/15/25	0/10	10
Croatia	5	0	10
Cyprus	0/5	0	0/10
Democratic People's Republic of Korea	0/10	0/10	0/10
Denmark	0/15	0	10
Egypt	5/15	0/15	15
Estonia	5/15	0/10	10
Ethiopia	10	0/10	10
Finland	5/15	0	0/1/5/10
France	10	0	0/5/10
Georgia	5/10	0/8	5/10
Germany	5/15	0	5
Ghana	6	10	8
Greece	Local rates	0/10	0/10
Hong Kong	5	0	10
Hungary	5.15	0	10
Iceland	5.15	0	10
India	10	0/10	10
Indonesia	10/15	0/12.5	12.5

**13.  
Double Tax  
Agreements  
(cont.)**

Country	Dividends %	Interest %*	Royalties %
Iran	5	5	8
Ireland, Republic of	5/15	0	10
Israel	5/15	0/10	5
Italy	15	0	0/5
Japan	10.15	0/10	0/10
Jordan	10	0/10	10
Kazakhstan	10	0/10	10
Korea, Republic of	5/10	0/10	0/10
Kuwait	0/5	0	0/10
Kyrgyzstan	5/10	5	10
Latvia	5.15	0/10	10
Lebanon	5	0	5.10
Liechtenstein	0/15	0	10
Lithuania	5/15	0/10	10
Luxembourg	0/10	0	0/10
Macedonia	5.15	0	0/10
Malaysia	0/10	0/12	12
Malta	5	0	5
Mexico	10	0/10	10
Moldova	5/15	5	10
Mongolia	10	0/10	10
Morocco	0/10	0/10	0/10
Netherlands	0/10	0	5
New Zealand	15	0/10	10
Nigeria	12.5/15	0/15	15
Norway	0/15	0	0/5/10
Pakistan	5/15	0/10	10
Panama	0/10	0/5/10	0/10
Philippines	10.15	0/10	10/15
Poland	5	0/5	10
Portugal	10/15	0/10	10
Romania	10	0/7	10
Russia	10	0	10
Saudi Arabia	5	0	10
Serbia and Montenegro	0/10	0/10	0/5/10
Singapore	5	0	10
Slovak Republic	5/15	0	0/10
Slovenia	5/15	0/5	10
South Africa	5/15	0	10
Spain	5/15	0	0/5
Sri Lanka	15	0/10	0/10

**13.  
Double Tax  
Agreements  
(cont.)**

Country	Dividends %	Interest %*	Royalties %
Sweden	0/10	0	0/5
Switzerland	0/15	0	5 (4)/10
Syria	10	10	12
Tajikistan	5	0/7	10
Thailand	10	0/10	5/10/15
Tunisia	10.15	0/12	5.15
Turkey	0/10	0/10	0/10
Turkmenistan	10	10	10
Ukraine	5.15	5	10
United Arab Emirates	0/5	0	10
United Kingdom	5.15	0	0/10
United States	5.15	0	0/10
Uzbekistan	5.10	0/5	10
Venezuela	5.10	0/10	12

# FRANCE

## 2021 TAX CARD (IN EUROS)

### 1. Basis of Taxation

Income is taxed on an annual basis and taxpayers are required to submit tax returns on a self-assessment basis. Subject to bilateral tax treaties, residents are taxed on their worldwide income whereas non-residents are taxed on their French sourced income.

The main taxes levied in France could be divided into four categories:

- taxes on income (income tax and corporation tax)
- taxes on expenditure (VAT,....)
- taxes on assets (registration duties, inheritance and gifts duties, real estate wealth tax (IFI) ...)
- direct local taxes (property tax, residence tax, ...)

### 2. Corporate Tax

Corporation tax is a tax, in principle payable annually, on all profits generated in France by companies and other legal entities.

- Standard rate: 26,5 %

Reduced rate: 21% up to a profit of EUR 38.120 for small and medium size companies, owned directly or indirectly at least by 75% of individuals.,

The rate should then be gradually reduced to 25% in 2022.

Corporation tax payers whose turnover exceed EUR 7.63 m are liable to a social contribution of 3.3% of the corporation tax minus EUR 763.000.

A system of carry back, carry forward and tax consolidation is set up in France;

French and foreign legal entities (companies, trusts, ...) that hold directly or indirectly real property (ies) or property rights located in France could be liable to a 3% annual tax based on the market value of such properties or rights (exemptions exist under certain conditions )

### 3. Withholding tax rate (non-treaty)

	Resident individual	Non-resident Individual/Corporation	
Dividends	12.80%	12.80%	30.00%
Interests	12.80%	0.00%	0.00%
Royalties	0.00%	33.33%	33.33%
Capital gain (real estate)	19.00%	19.00%	33.33%
Salaries		0% -20%	-
Sport benefits		15.00%	15.00%
Artist benefits		15.00%	15.00%

Intra-European regulations as well as numerous international tax treaties can significantly reduce or eliminate the withholding taxes indicated above. On the other hand, for non-cooperative countries, the rates of certain withholding tax may be raised to 75%.

#### 4. Residential individual tax rates (cont.)

Personal income tax is in principle a comprehensive tax levied on an individual's total income in a given year. Unless otherwise provided, all income, regardless of origin, is aggregated to give an overall net income to which a single tax scale is applied. The scale has progressive income bands. However, there are many provisions in the method for calculating income tax that allow taxation to be adjusted to personal circumstances.

The progressive tax scale is then applied to the taxable income per part.

The portion of taxable income (one part)	Rate
For the portion under EUR 10.084	0%
For the portion over EUR 10.084 and less than or equal to EUR 25.710	11 %
For the portion over EUR 25.710 and less than or equal to EUR 73.516	30 %
For the portion over EUR 73.516 and less than or equal to EUR 158.122	41 %
For the portion over EUR 158.122	45 %

Certain types of income (for example capital gain) are taxed on a flat-rate basis at lower rates than the progressive tax scale.

From 1 January 2019, France introduced the system of prepayment of tax by withholding tax on all income from French sources, with annual regularization through the annual income tax return.

In addition, a wealth tax ("Impôt sur la Fortune Immobilière" - IFI), is assessed when the value of real estate or similar assets owned exceed EUR 1.300.000 .

#### 5. Non-resident individual tax rates

The rules relating to French incomes received by persons domiciled outside France are in principle the same as for persons domiciled in France. However, for some income a withholding tax is applied that can in some cases exempt from all future taxation.

#### 6. Goods and Services tax

##### Value Added Tax

VAT is a general consumption tax levied on goods supplied and services provided in France.

Liability to VAT is determined by the type of the transactions or products concerned, regardless of the personal situation of the liable person or customer. VAT is finally borne by the end-user since it is included in the sale price of products or services. Each intermediary (manufacturer, retailer, etc.) collects the tax provided from the customer and pays it on to his local tax office, minus the VAT on inputs paid to his own supplier.

The French VAT rates are as follows:

- Standard rate: 20%
- Reduced rates: 10%, 5.5% and 2.1%
- Exemption: 0%

VAT returns and payments have to be done monthly or quarterly depending on the annual amount of VAT. VAT exemptions exist for taxable persons with low turnover.

## 7. Estate duty

Estate duties are applicable in France and are in principle payable by the beneficiary:

- when the donor or deceased is domiciled in France at the time of death: on all the deceased's movable and immovable properties worldwide (with eventual tax credit on foreign property),
- when the donor or deceased is not domiciled in France,
  - » on all movable and immovable properties received by the beneficiary if he is domiciled in France or has been for at least 6 years, in the last 10 years
  - » only on movable and immovable properties located in France, if the beneficiary is not domiciled in France.

Some specific assets benefit from partial or total exemption. Fixed allowances per beneficiary can be applicable (ex : 100k € per beneficiary in direct line).

Different scales of taxation exist according to the link uniting the deceased to the entitled person. In case of direct line (parents – children) the scale is as follows:

Fraction of net taxable part	Rate (%)
up to EUR 8,072	5%
between EUR 8,072 and EUR 12,109	10%
between EUR 12,109 and EUR 15,932	15%
between EUR 15,932 and EUR 552,324	20%
between EUR 552,324 and EUR 902,838	30%
between EUR 902,838 and EUR 1,805,677	40%
over EUR 1,805,677	45%

## 8. Stamp duty

**Transfer duties are applicable in France as follows:**

Sales of real property:

- **5.80%** (subject to small variations between area)

Transfers of businesses and similar transfers:

- Up to EUR 23,000: 0%
- Between EUR 23,000 and EUR 200,000: 3%
- Over EUR 200,000: 5%

Transfers of shares for valuable consideration:

- For shares and related securities: 1%
- For shares classified as "parts sociales": 3% with a maximum of EUR 23,000
- For transfers of shares of real estate Cie: 5%

Others :

Certain administrative formalities are also subject to small fix stamp duties.

<div>9.</div> <div>Property tax</div>	<p>Property tax is levied on developed land or undeveloped land situated in France. It's levied annually on owners, except where there is an entitlement to permanent exemption or temporary exemption.</p> <p>The tax base is the cadastral income, proportional to the notional rental value regularly updated by the authorities.</p> <p>The tax is payable by the owner of the property at 1 January of the year of taxation. The amount of tax is calculated by multiplying the tax base by the rates voted by each beneficiary local authority for the year in question.</p>												
<div>10.</div> <div>Income tax filing deadlines</div>	<table><tr><th>Types of form</th><th>Taxpayer</th><th>Deadlines (of the following year)</th></tr><tr><td>2042</td><td>Residential individual</td><td>Between 3rd June to 10th June</td></tr><tr><td>2042 NR</td><td>Non-residential individual</td><td>3rd June</td></tr><tr><td>2572</td><td>Companies</td><td>4th May</td></tr></table>	Types of form	Taxpayer	Deadlines (of the following year)	2042	Residential individual	Between 3rd June to 10th June	2042 NR	Non-residential individual	3rd June	2572	Companies	4th May
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2042 NR	Non-residential individual	3rd June											
2572	Companies	4th May											
<div>11.</div> <div>Double Tax Agreements</div>	<p>France has signed 124 tax treaties to avoid double taxation of which 26 are European countries.</p> <p>For information for each country, please visit : <a href="https://www.impots.gouv.fr/portail/les-conventions-internationales">https://www.impots.gouv.fr/portail/les-conventions-internationales</a></p>												

# GERMANY

## 2021 TAX CARD (In Euros)

### 1. Basis of Taxation

The liability to German income tax is determined by the tax residence status and the source of income. The residents are taxed on their worldwide income. The non-residents are taxed only on German-sourced income.

A company is resident if its statutory seat or place where it is run - place of management - is in Germany. An individual is treated as a resident if he/she has his/her permanent residence or habitual abode in Germany for six months and over.

### 2. Corporate Tax/ Trade tax

The tax period is the calendar year or financial year.

The corporate tax rate is 15.825 % (including solidarity surcharge) of tax base reduced by tax losses. Limitations apply if the tax loss is above EUR 1,000,000.

There is a trade tax in Germany as well. The trade tax varies depending on the area. The minimum rate is 7 %. The usual tax rate averages from 12 % to 17 %

Company exit taxation will apply if:

- a tax resident company in Germany relocates its assets from Germany to a permanent establishment abroad, or
- a company German tax non-resident transfers its assets from the permanent German establishment to a foreign country.
- a company, tax resident in Germany relocates its statutory seat or place of management from Germany to a country outside the European Union.

Germany has several anti-abuse regulations in place, particularly targeting certain business structure(s) and interest & royalty payments.

Germany also has comprehensive TP stipulations.

### 3. Withholding tax rate (non-treaty)

	Resident	Non-resident	
	Individual/ Corporation	Individual	Corporation
Dividends*	25 %	25%*	25%*
Interest*	25 %	25%*	25%*
Royalties/know-how	NA	30% / 15%	15 %
Rents (for moveable property)	NA	NA	NA
Management fees	NA	NA	NA
Technical fees	NA	NA	NA
Directors' fees	As wages	As wages	NA
Artistic service	NA	15%	15%
Use of artistic service	NA	15%	15%
Supervisory board remuneration	NA	30%	30%

\* Flat rate withholding tax | N/A: Obligation to file income tax return

<b>4. Resident individual tax rates</b>	<table border="1"> <thead> <tr> <th>Taxable Income (excluding capital gains)</th><th>Tax Rate</th></tr> </thead> <tbody> <tr> <td>EUR 0 – EUR 9,744</td><td>0 %</td></tr> <tr> <td>EUR 9,745 – EUR 57,918</td><td>progressive tax rate; starting by 14 % up to 42 %</td></tr> <tr> <td>EUR 57,919 – EUR 274,612</td><td>42 %</td></tr> <tr> <td>EUR 274,613 +</td><td>45 %</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Taxable Income (capital gains)</th><th>Tax Rate</th></tr> </thead> <tbody> <tr> <td>EUR 0.00 +</td><td>25 %*</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Taxable Income (dividends)</th><th>Tax Rate</th></tr> </thead> <tbody> <tr> <td>EUR 0.00 +</td><td>25 %*</td></tr> </tbody> </table> <p>The taxpayers may claim:</p> <ul style="list-style-type: none"> <li>• social security and health care contributions,</li> <li>• a flat-rate deduction of EUR 1,000 is available for employed income</li> <li>• the tax bonus of a child allowance in the amount of EUR 2,730 per parent per child plus a childcare allowance of EUR 1,464 per parent per child,</li> <li>• support to dependent relatives residing in the same residence</li> <li>• special tax calculation if married</li> </ul> <p>* flat rate withholding tax.</p>	Taxable Income (excluding capital gains)	Tax Rate	EUR 0 – EUR 9,744	0 %	EUR 9,745 – EUR 57,918	progressive tax rate; starting by 14 % up to 42 %	EUR 57,919 – EUR 274,612	42 %	EUR 274,613 +	45 %	Taxable Income (capital gains)	Tax Rate	EUR 0.00 +	25 %*	Taxable Income (dividends)	Tax Rate	EUR 0.00 +	25 %*
Taxable Income (excluding capital gains)	Tax Rate																		
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EUR 0.00 +	25 %*																		
Taxable Income (dividends)	Tax Rate																		
EUR 0.00 +	25 %*																		
<b>5. Non-resident individual tax rates</b>	<p>The non-resident individual tax rates are the same as the resident individual tax rates. The scope of taxable income is different; there is no tax-free income of EUR 9,744.</p> <p>The dividend income tax rates are the same.</p>																		
<b>6. Goods and Services tax</b>	<p>The Value Added Tax is levied in Germany:</p> <ul style="list-style-type: none"> <li>• on the supply of goods and services where the place of supply is Germany,</li> <li>• on EU supply of goods for consideration from other EU Member State,</li> <li>• on the import of goods from outside the European Union.</li> </ul> <p>The standard rate is 19%. The reduced rate of 7% is applied to certain goods (for example certain foods, books, antibiotics and orthopaedic items). Some goods and services are VAT exempt (for example insurance services, financial services).</p> <p>There is a registration duty for VAT purposes.</p> <p>If the taxable turnover is not expected to exceed EUR 50,000 and does not exceed EUR 22,000 in the prior year, the business is not obliged to charge VAT. There are registration thresholds for so-called distance selling. The German threshold is EUR 100,000.</p>																		
<b>7. Estate duty</b>	<p>Germany has the estate tax or the inheritance tax.</p>																		
<b>8. Stamp duty</b>	<p>Germany does not have stamp duty.</p>																		

## 9. Property tax

**Real estate tax** is levied as an annual real estate tax on all immovable property by the municipal authorities. The effective tax rate is usually between 1.5% to 2.3% of a historic value. The tax period is the calendar year.

The taxpayers are obligated to pay the property tax annually to the municipal authorities.

**Real estate transfer tax** is levied on the transfer of real estate, which is sited in Germany and certain transactions with companies owning real estate in Germany.

The tax rate depends on the location of the real estate. It ranges depending on the federal state between 3.5 % to 6.5 % of the tax base.

## 10. Income tax filing deadlines

Types of Form		Deadlines
Income Tax Return	Individuals	By July 31st in the year following the tax year
Income Tax Return	Companies	By July 31st in the year following the tax year

\* Extensions (by February 28th after the close of the following tax year) are automatically granted if advised by a tax consultant.

## 11. Double Tax Agreements

Germany concluded 96 tax treaties to avoid double taxation in the area of income tax. Germany also signed the Multilateral Instrument (the MLI) on June 7th, 2017.

For further detail please view: [Bundesfinanzministerium - Stand der Doppelbesteuerungsabkommen und anderer Abkommen im Steuerbereich sowie der Abkommensverhandlungen am 1. Januar 2021](#)

Overview of tax rates under double tax treaties that are applied to dividends, interest income and royalties for individuals.

For further detail please view: [https://www.bzst.de/DE/Privatpersonen/Kapitalertraege/AuslaendischeQuellensteuer/auslaendischequellensteuer\\_node.html](https://www.bzst.de/DE/Privatpersonen/Kapitalertraege/AuslaendischeQuellensteuer/auslaendischequellensteuer_node.html)

## 12. Inheritance tax / Gift tax

Unrestricted tax liability arises if the testator or inheritor, or the donor or gift recipient, are residents at the time of the inheritance / gift. Whether or not you are resident is generally based on your place of residence or habitual abode at the time of the inheritance / gift.

There is an exception for German citizens if they have not moved abroad for more than 5 years (in which case they are still considered residents). Corporations are subject to unlimited tax liability if they have their registered office or management in Germany. In the case of unlimited tax liability, the entire inheritance / gift is subject to inheritance tax / gift tax in Germany. Tax liability is limited if the above conditions are not met. Only the acquisition of domestic assets, within the meaning of Section 121 BewG, is subject to tax.

**12.  
Inheritance  
tax /  
Gift tax  
(cont.)**

## Allowances:

In the case of unlimited tax liability, the tax exemption is up to EUR 500,000, depending on the family relationship. In the case of limited tax liability, the exemptions are taken into account proportionally, calculated according to the ratio of total income to domestic assets.

## Tax rates:

The applicable tax rates lie between 7% and 50%



# GREECE

## 2021 TAX CARD (IN EUROS)

### 1. Basis of Taxation

The liability to Greek income tax is determined by the tax residence status and the source of income. The Greek tax residents are taxed on their worldwide income. The tax non-residents are taxed only on income which arises to them from Greek-source.

A company is the resident if its seat or place of effective management is considered in Greece. An individual is treated as resident if he has his permanent residence or habitual abode or lives for at least 183 days in each calendar year in Greece.

The main taxes levied in Greece, could be divided in four categories:

- taxes on income (income tax and corporation tax)
- taxes on expenditure (VAT)
- taxes on assets (registration duties, inheritance and gifts duties, real estate wealth tax (IFI))
- direct local taxes (property tax, residence tax, ...)

### 2. Corporate Tax

The tax period is the calendar year or financial year

The corporate tax rate is 24%.

The tax loss of the previous years is decreasing the taxable income of the year.

The taxation upon leaving the country (exit tax) will apply if:

- the company, tax resident in Greece moves its assets from Greece to its permanent establishment abroad, or
- the company, Greek tax non-resident moves its assets from the Greek permanent establishment to its centre in another country or to its permanent establishment abroad.

Taxation is calculated in a special tax base, whereas the tax base must be positive. There are special conditions for calculation, tax period as well as due date and penalties.

The thin cap rules are in force in Greece. Interests from loans exceeding 3.000.000 euro per year are tax deductible only up to the amount of 30% of EBITDA indicator, i.e. accounting result before depreciation, interest and tax. These rules do not relate to the financial institutions and leasing companies.

### 3. Withholding tax rate (non-treaty)

	Individual/Corporation
Dividends	5 %
Interest	15 %
Royalties/ know-how	20 %
Rents (for moveable property)	24 %
Management fees	20 %
Technical fees	3 %
Directors' fees	As salaries

### 3. Withholding tax rate (non-treaty) (cont.)

There is no withholding tax in the dividends, if the shareholder

- a) Is EU resident,
- b) has more than 10% and
- c) for more than two years

### 4. Residential individual tax rates (cont.)

Personal income tax is in principle a comprehensive tax levied on an individual's total income in a given year. Unless otherwise provided, all income, regardless of origin, is aggregated to give an overall net income to which a single tax scale is applied. The scale has progressive income bands.

The progressive tax scale is then applied to the taxable income per part.

Taxable Income (excluding capital gains)	Tax Rate
0,00-10.000	9%
10,001 – 20.000	22%
20.001-30.000	28%
30.001-40.000	36%
40.001+	44%

Taxable Income (capital gains)	Tax Rate
0.00 +	20%

Taxable Income (dividends)	Tax Rate
0.00 +	5%

Income from rent of land/houses/ apartments	Tax Rate
0.00 – 12.000	15%
12.001- 35.000	35%
35.001+	45%

In Greece, they are also paid social and health insurance contributions.

### 5. Non-resident individual tax rates

The non-resident individual tax rates are same with the resident individual tax rates. The non-resident is taxable for the income in Greece, only.

<b>6. Goods and Services tax</b>	<p>The Value Added Tax is levied in Greece:</p> <ul style="list-style-type: none"><li>• On the supply of goods and services for consideration performed in Greece by taxable persons,</li><li>• On the Intra-Community supply of goods for consideration from other EU Member State,</li><li>• On the imports of goods.</li></ul> <p>The standard rate is 24 %. The reduced rate of 13 % is applied to certain goods (for example basic foodstuffs, energy etc). Some goods and services are VAT exempt (for example insurance services, financial services and cultural services). Super reduced rate 6% is applied for medicine and books.</p> <p>If the taxable turnover within the last 12 calendar months will reach the registration threshold of EUR 10.000 the taxable persons are obligated to register for VAT purposes. The taxable persons which supply real properties have to register for VAT if the legal conditions are met. The voluntary VAT registration is possible.</p>									
<b>7. Estate duty</b>	<p>Greece does have the estate tax or the inheritance tax. The tax is charged as follows:</p> <p>a) For individuals</p> <ol style="list-style-type: none"><li>1. between 1,20 and 13,00 EURO per square meter based on the price of the place.</li><li>2. a supplementary tax is paid, based on the total value of the price.</li></ol> <p>b) For legal entities</p> <ol style="list-style-type: none"><li>1. a tax 0,1% on the value of the property is applied.</li><li>2. a supplementary tax is paid, based on the total value of the price.</li></ol>									
<b>8. Stamp duty</b>	<p>Fees are applied based on the type of activity.</p>									
<b>9. Property taxes</b>	<p>The real estate tax consists of the land tax, building tax and apartment tax. The persons liable for payment of property tax are the owners of property or in certain cases the property managers.</p> <p>The tax period is the calendar year. The tax return must be filed by <b>30 days after the purchase of the property</b>. The taxpayers are obligated to pay the property tax annually to the municipal authorities.</p> <p>The tax for the purchase of the property is amounted to 3% on the value of the land, building or apartment. The estate tax is mentioned in the previous paragraph (8). The inheritance tax start from 0% up to 40%.</p>									
<b>10. Income tax filing deadlines</b>	<table><tr><th>Type of form</th><th></th><th>Deadlines*</th></tr><tr><td>Income Tax Return</td><td>Individuals</td><td>By June 30<sup>th</sup> in the year following the tax year</td></tr><tr><td>Income Tax Return</td><td>Companies</td><td>By June 30<sup>th</sup> in the year following the tax year</td></tr></table> <p>* Various extensions are available for lodgement up to March / April / May / June / September in the year following the tax year</p>	Type of form		Deadlines*	Income Tax Return	Individuals	By June 30 <sup>th</sup> in the year following the tax year	Income Tax Return	Companies	By June 30 <sup>th</sup> in the year following the tax year
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Income Tax Return	Individuals	By June 30 <sup>th</sup> in the year following the tax year								
Income Tax Return	Companies	By June 30 <sup>th</sup> in the year following the tax year								

Greece concluded 57 tax treaties to avoid double taxation. Slovakia also signed the Multilateral Instrument (the MLI) on June 7th, 2017.

Overview of tax rates under double tax treaties that are applied to dividends, interest income and royalties:

Country	Dividends %	Interest %*	Royalties %
Albania	5%	5%	5%
Armenia	10%	10%	5%
Austria	5% or 15%	8%	7%
Azerbaijan	8%	8%	8%
Belgium	5% or 15%	5% or 10%	5%
Bosnia and Herzegovina	5% or 15%	10%	10%
Bulgaria	40% or 10%	10%	10%
Canada	5% or 15%	10%	10%
China	5% or 10%	10%	10%
Croatia	5% or 10%	10%	10%
Cyprus	25%	10%	0% or 10%
Czech Republic	10%	10%	10%
Denmark	38% or 18%	8%	5%
Egypt	10%	15%	15%
Estonia	5% or 15%	10%	5% or 10%
Finland	47% or 13%	10%	10%
France	10%	10%	5%
Georgia	8%	8%	5%
Germany	25%	10%	0%
Hungary	10% or 45%	10%	10%
Iceland	5% or 15%	8%	10%
India	10%	15%	20%
Ireland	5% or 15%	5%	5%
Israel	10%	10%	10%
Italy	15%	10%	5%
Korea	5% or 15%	8%	10%
Kuwait	5%	5%	15%
Latvia	5% or 10%	5%	5% or 10%
Lithuania	5% or 15%	10%	5% or 10%
Luxembourg	38% or 7,5%	8%	5% or 7%
Malta	5% or 10%	8%	8%
Mexico	10%	10%	10%
Moldova	5% or 15%	10%	8%
Morocco	5% or 10%	10%	10%
Netherlands	5% or 15% or 35%	8% or 10%	5% or 7%
Norway	20% or 40%	10%	10%

### 13. Double Tax Agreements

### 13. Double Tax Agreements (cont.)

Country	Dividends %	Interest %*	Royalties %
Poland	10%	10%	10%
Portugal	15%	15%	10%
Qatar	5%	5%	5%
Romania	20% or 45%	10%	5% or 7%
Russia	5% or 10%	7%	7%
San Marino	5% or 10%	10%	5%
Saudi Arabia	5%	5%	10%
Serbia	5% or 15%	10%	10%
Slovakia	15%	10%	10%
Slovenia	10%	10%	10%
South Africa	5% or 15%	8%	5% or 7%
Spain	5% or 10%	8%	6%
Sweden	10%	10%	5%
Switzerland	5% or 15%	10%	5%
Tunisia	10% or 35%	15%	12%
Turkey	15%	12%	10%
UAE	5%	5%	5%
Ukraine	5% or 10%	10%	10%
United Kingdom	10%	0%	0%
USA	10%	15%	20%
Uzbekistan	8%	10%	8%

# IRELAND

## 2021 TAX CARD (In Euros)

### 1. Basis of Taxation

Income is taxed for individuals on a calendar year basis and for corporates based on their accounting period date. Taxpayers are required to submit tax returns on a self-assessment basis.

In general terms, residents are taxed on their worldwide income whereas non-residents are taxed on their Irish sourced income. In the case of resident individuals, who are non-Irish domiciled, they may avail of the remittance basis of taxation in respect of non-Irish source investment income and the income derived under a foreign contract of employment where the duties of employment are exercised outside of Ireland. Reliefs are available under Ireland's extensive double tax treaty network.

Resident individuals are taxed on capital gains on a worldwide basis. This is with the exception of non-domiciled individuals, who are taxed on gains derived outside Ireland only as the capital is remitted to Ireland. Non-resident individuals are taxed on gains on certain Irish situate assets, such as Irish situate land and buildings and unquoted shares deriving their value from such.

In the case of corporates, resident companies are taxed on worldwide income and gains. A corporate not resident in Ireland but carrying on a trade through a branch there will be taxable on the trading income from this, and on gains from Irish property.

Different rules apply to determine the tax residence of corporates depending on whether they were incorporated pre or post 1 January 2015. For companies incorporated in Ireland after this date, they will be treated as an Irish resident, unless they would be held to be otherwise resident under a tax treaty. There are transitional rules in place for companies incorporated in Ireland before 1 January 2015, until they will also be subject to the standard position from 1 January 2021. Under the transitional rules, the place of residence for such companies will be determined by their place of central management and control. There is an exception to this where there is both a change in ownership and a major change in the nature of the business, and the standard rule will apply from the point of such change.

In the case of corporates incorporated outside Ireland, their residence will be determined by their place of management and control.

### 2. Corporate Tax

There are two rates of tax for corporates

- 12.5% for trading income
- 25% for passive/investment income

The lower rate may only apply where a company is actively trading in Ireland, and there have been numerous test cases on the nature of trading. Where it is determined that there is not sufficient trading substance in Ireland, the higher rate would be applied.

## 2. Corporate Tax (cont.)

The lower rate may also apply in the case of dividend income received from a trading company, in certain circumstances.

There is the facility to use losses to reduce prior period profits, current year passive income (on a value basis), future profits from the same trade, or profits within another company in a corporate group structure.

An additional surcharge tax may apply where investment income is retained in a company post year end. A separate surcharge applies in the case of a company in which a professional service is undertaken.

## 3. Withholding tax rate (non- treaty)

	Resident individual	Non-resident Individual /corporation	
Dividends	25%	25%	25%
Interests	20%	20%	20%
Royalties	20%	20%	20%
Capital gain (Certain specified assets such as land and buildings where consideration above threshold and pre clearance not obtained)	15%	15%	15%
Salaries (including social insurance charges)	-	0% - 52%	-

The withholding tax rates may be reduced to zero in cases where the recipients are located in another EU Member State or in a double tax treaty country. This is subject to prior clearance being obtained from the Irish tax authorities.

## 4. Resident individual tax rates

In general terms, an individual's total income is pooled and subject to Income Taxes at progressive rates. This is with the exception of deposit interest income which is ring- fenced at a rate of 33% plus social insurance of 4%. An individual will be entitled to certain tax credits to reduce their tax charge

There are two rates of Income Tax. A standard rate of 20% applies on income up to € 35,300 (single), €44,300 (married, one income) and € 44,300 plus up to € 26,300 (married, two incomes). Income above these thresholds is taxed at 40%.

In addition, there are social insurance charges in the form of PRSI (4%) and USC (Progressive rates from 0.5% to 8%, with a further 3% charge in the case of non-employment income above € 100,000).

Income from employment exercised in Ireland or from director fees will be subject to payroll taxes, which will be applied at source by the employer. There is no wealth tax in operation in Ireland.

## 5. Non-resident individual tax rates

The rates of tax are as set out for individuals, the exceptions being that a non-resident can only be assessed as a single person unless both spouses income will be subject to Irish tax, and there is limited scope to claim credits. They will not be subject to PRSI (4%) on passive income. Lastly, a retention of 20% must be applied in the case of non-residents deriving rental income from Irish property. This may be eliminated where an Irish based collection agent is appointed, who will be responsible for the filing and payment of taxes.

<b>6. Goods and Services tax</b>	<p>VAT is a tax on the provision of goods and services by Irish businesses, which is levied regardless of the status of the Irish consumer (i.e. business or private individual). The Irish VAT rates are as follows:</p> <ul style="list-style-type: none"> <li>• Standard rate: 23%</li> <li>• Reduced rates: 9% and 13.5%</li> <li>• Zero rates with recovery: 0%</li> <li>• Exempt</li> </ul> <p>The VAT thresholds in place are €37,500 for the supply of services and €75,000 for the supply of goods. A business may elect to register if they are below these thresholds but are not obliged to do so.</p> <p>A business must register where they make an intra-community acquisition of goods or services regardless of turnover.</p> <p>The threshold for registration where a business makes distance sales of goods to Irish private customers is €35,000.</p> <p>Periodic VAT returns are filed, with the standard basis being bi-monthly. This is reduced to a lesser frequency after a period of time if the liability/repayment is a minor amount.</p>				
<b>7. Gift/ Inheritance Taxes</b>	<p>Capital Acquisitions Tax is a tax payable at the rate of 33% by a beneficiary on the receipt of a gift or inheritance.</p> <p>The tax is levied where the donee or beneficiary is Irish resident, or if the item transferred is Irish situate. There are exceptions where the recipient is not Irish domiciled, in these cases they will not be subject to this tax for the first 5 years of residence.</p> <p>The tax is levied on the amount received less a threshold determined by the relationship between both parties. These thresholds are</p> <ul style="list-style-type: none"> <li>• 335,000 Euros (received by a child)</li> <li>• 32,500 Euros (received by a parent, sibling, niece/nephew, grandparent (or other lineal ascendant), grandchild (or other lineal descendant))</li> <li>• 16,250 Euros (all other persons)</li> </ul> <p>All prior benefits received since December 1991 are aggregated in looking at how much of the threshold has expired.</p> <p>An annual € 3,000 exemption applies to gifts, this is available multiple times between different parties. Significant reliefs are available for the transfer of certain business or agricultural assets.</p>				
<b>8. Stamp duty</b>	<p>There are a number of rates of Stamp Duty on documents executed in Ireland or relating to property located in Ireland or things to be done in Ireland.</p> <p><b>Residential Property</b></p> <table> <tr> <td>First € 1,000,000:</td> <td>1%</td> </tr> <tr> <td>Excess over € 1,000,000:</td> <td>2%</td> </tr> </table>	First € 1,000,000:	1%	Excess over € 1,000,000:	2%
First € 1,000,000:	1%				
Excess over € 1,000,000:	2%				

<b>8. Stamp duty (cont.)</b>	<p><b>Non-Residential Property:</b> 7,5%</p> <p><b>Transfer of Shares:</b> 1% (this does not apply if the consideration is € 1,000 or less and it does not form part of a series of transactions)</p> <p>There are reliefs available in certain circumstances in the cases of group restructuring and intragroup transfers.</p>
<b>9. Property tax</b>	<p>A property tax applies on residential property at graduating rates depending on the property value. Residential property is defined as any building or part of a building which is used as or is suitable for use as a residence. It includes any yard, gardens, driveway or other land associated with the property up to one acre in size. It also includes any other buildings or structures that belong with the residence such as garages and sheds.</p> <p>A person is liable to this tax where they held the property at 1 November in the preceding year. The value of the property for the purposes of the charge is currently frozen based on declared values in 2013.</p> <p>There are a limited number of exemptions available, which relate to a small range of properties.</p>
<b>10. Income tax filing deadlines</b>	<p>For individuals, the return pay and file deadline is 31 October in the year following the return year. There is a requirement to make an advance payment of tax in the current year.</p> <p>For corporates, the return pay and file deadline will depend on their accounting period end, and will be 8 months and 21 days following this, for example, 21 September for a 31 December period. There is a requirement to pay tax in advance one month before the period end (for small companies) and during the 6th month of the period along with one month before the end of the period (for large companies i.e. those with prior period tax liabilities exceeding €200,000).</p>
<b>11. Income tax filing deadlines</b>	<p>Ireland has signed double tax treaties with 74 countries, 73 of these are currently in effect.</p> <p>A list of the agreements can be found at:</p> <p><a href="https://www.revenue.ie/en/tax-professionals/tax-agreements/double-taxation-treaties/index.aspx">https://www.revenue.ie/en/tax-professionals/tax-agreements/double-taxation-treaties/index.aspx</a></p>

# ITALY

## 2021 TAX CARD (In Euros)

### 1. Basis of Taxation

Income is taxed on a year basis and taxpayers are required to submit tax returns on a self-assessment basis. Subject to bilateral tax treaties, residents are taxed on their worldwide income whereas non-residents are taxed on their Italian sourced income.

The main taxes levied in Italy could be divided in four categories:

- taxes on income (income tax and corporation tax)
- taxes on expenditure (VAT,...)
- taxes on assets (registration duties, inheritance and gifts duties)
- direct local taxes (property tax)

### 2. Corporate Tax

Corporation tax is a tax, in principle payable annually, on all profits generated in Italy by companies and other legal entities.

The tax period is the calendar year or financial year.

A system of carry back, carry forward and tax consolidation is set up in Italy.

Taxation is calculated in a special tax base, whereas the tax base must be positive. The tax rate is 24 %. There are special conditions for calculation.

### 3. Withholding tax rate (non-treaty)

	Resident individual	Non-resident/Corporation	
		Individual	Corporation
Dividends	26%	26%	26%
Interest	26%	26%	26%
Royalties	20%	30%	30%

Intra-European regulations as well as numerous international tax treaties can significantly reduce or eliminate the withholding taxes indicated above.

On the other hand, for non-cooperative countries, the rates of certain withholding tax may be raised to 75%.

### 4. Resident individual tax rates

Personal income tax is in principle a comprehensive tax levied on an individual's total income in a given year. Unless otherwise provided, all income, regardless of origin, is aggregated to give an overall net income to which a single tax scale is applied.

The scale has progressive income bands. However, there are many provisions in the method for calculating income tax that allow taxation to be adjusted to personal circumstances.

The progressive tax scale is then applied to the taxable income per part.

<b>4. Resident individual tax rates (cont.)</b>	<table border="1" data-bbox="424 159 1458 434"> <thead> <tr> <th>Portion of taxable income (one part)</th><th>Rate</th></tr> </thead> <tbody> <tr> <td>For the portion under 15.000 EUR</td><td>23%</td></tr> <tr> <td>For the portion over 15.000 EUR and less than or equal to 28.000 EUR</td><td>27 %</td></tr> <tr> <td>For the portion over 28.000 EUR and less than or equal to 55.000 EUR</td><td>38 %</td></tr> <tr> <td>For the portion over 55.000 EUR and less than or equal to 75.000 EUR</td><td>41 %</td></tr> <tr> <td>For the portion over 75.000 EUR</td><td>43 %</td></tr> </tbody> </table> <p>Certain types of income (for example capital gain) are taxed on a flat-rate basis at lower rates than the progressive tax scale.</p>	Portion of taxable income (one part)	Rate	For the portion under 15.000 EUR	23%	For the portion over 15.000 EUR and less than or equal to 28.000 EUR	27 %	For the portion over 28.000 EUR and less than or equal to 55.000 EUR	38 %	For the portion over 55.000 EUR and less than or equal to 75.000 EUR	41 %	For the portion over 75.000 EUR	43 %
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For the portion over 75.000 EUR	43 %												
<b>5. Non-resident individual tax rates</b>	<p>The rules relating to Italian incomes received by persons domiciled outside Italy are in principle the same as for persons domiciled in Italy.</p>												
<b>6. Goods and Services tax</b>	<p><b>Value added tax</b></p> <p>VAT is a general consumption tax levied on goods supplied and services provided in Italy. Liability to VAT is determined by the type of the transactions or products concerned, regardless of the personal situation of the liable person or customer. VAT is finally borne by the end-user since it is included in the sale price of products or services. Each intermediary (manufacturer, retailer, etc.) collects the tax provided from the customer and pays it on to his local tax office, minus the VAT on inputs paid to his own supplier.</p> <p>The Italian VAT rates are as follows:</p> <ul style="list-style-type: none"> <li>• Standard rate: 22%</li> <li>• Reduced rates: 4% and 10%</li> <li>• Exemption: 0%</li> </ul> <p>VAT returns and payments have to be done monthly or quarterly depending on the annual amount of VAT. VAT exemptions exist for taxable persons with low turnover.</p>												
<b>7. Estate duty</b>	<p>Estate duties are applicable in Italy and are in principle payable by the beneficiary:</p> <ul style="list-style-type: none"> <li>• when the donor or deceased is domiciled in Italy at the time of death: on all the deceased's movable and immovable properties worldwide (with eventual tax credit on foreign property),</li> <li>• when the donor or deceased is not domiciled in Italy only on movable and immovable properties located in Italy, if the beneficiary is domiciled in Italy.</li> </ul> <p>Some specific assets benefit from partial or total exemption. Fixed allowances per beneficiary can be applicable.</p> <p>Different scales of taxation exist according to the link uniting the deceased to the entitled person:</p>												

<b>7. Estate duty (cont.)</b>	<table border="1"> <thead> <tr> <th>Relationship</th><th>Fraction of net taxable part</th></tr> </thead> <tbody> <tr> <td>Spouse and relatives in straight line</td><td>between EUR 0 and EUR 1,000,000: 0% over EUR 1,000,000: 4%</td></tr> <tr> <td>Brothers and sisters</td><td>between EUR 0 and EUR 1,000,000: 0% over EUR 1,000,000: 6%</td></tr> <tr> <td>Relatives up to the fourth degree</td><td>6%</td></tr> <tr> <td>Others</td><td>8%</td></tr> </tbody> </table> <p>Fees are applied but they usually are an insignificant amount.</p>	Relationship	Fraction of net taxable part	Spouse and relatives in straight line	between EUR 0 and EUR 1,000,000: 0% over EUR 1,000,000: 4%	Brothers and sisters	between EUR 0 and EUR 1,000,000: 0% over EUR 1,000,000: 6%	Relatives up to the fourth degree	6%	Others	8%
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Relatives up to the fourth degree	6%										
Others	8%										
<b>8. Stamp duty</b>	<p>Fees are applied but they usually are an insignificant amount.</p>										
<b>9. Property tax</b>	<p>Property tax is levied on developed land or on undeveloped land situated in Italy. It's levied annually on owners, except where there is entitlement to permanent exemption or temporary exemption.</p> <p>The tax base is the cadastral income, proportional to the notional rental value regularly updated by the authorities.</p> <p>The tax is payable by the owner of the property at 1 January of the year of taxation.</p> <p>The amount of tax is calculated by multiplying the tax base by the rates voted by each beneficiary local authority for the year in question.</p>										
<b>10. Income tax filing deadlines</b>	<table border="1"> <thead> <tr> <th>Taxpayer</th><th>Deadlines (of the following year)</th></tr> </thead> <tbody> <tr> <td>Residential individual</td><td>30 November</td></tr> <tr> <td>Non-residential individual</td><td>30 November</td></tr> <tr> <td>Companies</td><td>30 November</td></tr> </tbody> </table>	Taxpayer	Deadlines (of the following year)	Residential individual	30 November	Non-residential individual	30 November	Companies	30 November		
Taxpayer	Deadlines (of the following year)										
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<b>11. Double Tax Agreements</b>	<p>Italy has signed 97 tax treaties to avoid double taxation.</p> <p>For information for each country, please visit :</p> <p><a href="https://www.finanze.gov.it/opencms/it/fiscalita-comunitaria-e-internazionale/convenzioni-e-accordi/convenzioni-per-evitare-le-doppie-imposizioni/">https://www.finanze.gov.it/opencms/it/fiscalita-comunitaria-e-internazionale/convenzioni-e-accordi/convenzioni-per-evitare-le-doppie-imposizioni/</a></p>										



# LIECHTENSTEIN

## 2021 TAX CARD (In Swiss Francs)

### 1. Basis of Taxation

The Liechtenstein income tax year runs from 1 January to 31 December for individuals. For companies, the tax year corresponds to the accounting year.

Corporate Taxation: Tax liability - unlimited based on the place of residence or place of effective administration in Liechtenstein, or limited by domestic property or business establishment.

Individual Taxation: Personal tax liability - unlimited based on residence or habitual residence in Liechtenstein, or limited by domestic property or establishment.

### 2. Corporate Tax

The corporate tax rate is 12.5% (article 61 of the SteG).

A minimum corporate tax is levied in the amount of CHF 1'800.00 (article 62 of the SteG). The tax is fully deductible against the corporate income tax.

However, small commercial entities (as defined by the law) are not subject to the minimum corporate income tax.

Under the Liechtenstein corporate income tax system, dividends distributed to resident and non-resident shareholders are not taxable.

### 3. Withholding tax rate (non-treaty)

	Resident	Non-resident Individual/Corporation
Dividends	NA	NA
Interest	NA	NA
Royalties/know-how	NA	NA
Rents (for moveable property)	NA	NA
Management fees	NA	NA
Technical fees	NA	NA
Directors' fees	NA	12%

There is a withholding tax of 12% on payments for the remuneration of non-executive directors, i.e. persons who are only members of the supervisory board.

### 4. Resident individual tax rates (for financial years ending 31 December 2021)

Tax rate: 0% to 24% on the taxable income (depending on acquisition and community affiliation). There are different tax rates for single parents, married and other taxpayers. There is a state tax as well as a municipal tax. The tariff of the state tax proceeds progressively in eight stages with a top tariff level of 8%. The council tax is levied by means of a surcharge to the determined state tax. This supplement ranges from 150% to 250% of the state tax and is set annually by each municipality within this framework at its discretion.

<b>5. Non-resident individual tax rates</b> (for financial years ending 31 December 2021)	Tax rate: 4% to 19% on the taxable income (depending on earned income). There are different tax rates for single parents and married couples. A distinction is made between public and private employment as well as frontier workers and non frontier workers, taking into account the respective DTT agreements.									
<b>6. Goods and Services tax</b>	<p>VAT is levied at a rate of 2.5%, 3.7% and 7.7%. Entities have to register once turnover reaches CHF 100'000.00 (Swiss Francs 150,000 for non-profit entities).</p> <p>From 1 January 2018, companies domiciled abroad, who render supplies and services, regardless of turnover, must also register for VAT.</p>									
<b>7. Estate duty</b>	Liechtenstein does not have death or estate taxes. In exceptional circumstances, a deduction tax of 10.5% on the estate may apply.									
<b>8. Stamp duty</b>	Public limited companies, limited liability companies and companies with shared capital, are the tax subject of the stamp duty. The stamp duty of 1.0% is due for a capital injection with an exemption limit of CHF 1 million. Deposits without a capital increase cannot benefit from the exemption threshold of CHF 1 million.									
<b>9. Property tax</b>	The seller of a property situated in Liechtenstein has to pay a property profit tax on the property profit. The property profit equals the difference between the sales proceeds and investment costs. The tax rate is 0% to 24%. The recoveries are subject to income tax.									
<b>10. Income tax filing deadlines</b>	<table><tr><th>Types of Form</th><th></th><th>Deadlines*</th></tr><tr><td>Tax Return</td><td>Individuals</td><td>20 April</td></tr><tr><td>Tax Return</td><td>Companies</td><td>1 July</td></tr></table> <p>*In certain cases, if the provisional tax liability has been settled, an extension of the deadline can be requested.</p>	Types of Form		Deadlines*	Tax Return	Individuals	20 April	Tax Return	Companies	1 July
Types of Form		Deadlines*								
Tax Return	Individuals	20 April								
Tax Return	Companies	1 July								
<b>11. Double Tax Agreements</b>	Liechtenstein has signed 20 tax treaties to avoid double taxation For information for each country, please visit: <a href="https://www.llv.li/files/stv/int-uebersicht-dba-tiea-engl.pdf">https://www.llv.li/files/stv/int-uebersicht-dba-tiea-engl.pdf</a>									

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Updated: May 2021

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# NETHERLANDS

## 2021 TAX CARD (In Euros)

### 1. Basis of Taxation

Income is taxed on a year basis and taxpayers are required to submit tax returns on a self-assessment basis. Subject to bilateral tax treaties, residents are taxed on their worldwide income whereas non-residents are taxed on their Dutch sourced income.

The main Dutch taxes can be divided into four categories:

1. taxes on income (personal income tax, wage tax and corporate income tax, withholding taxes);
2. taxes on expenditure (VAT);
3. taxes on assets (inheritance and gift tax, transfer tax...);
4. local taxes (property tax, residence tax...)

### 2. Taxes on Income

#### Personal Income Tax:

Residents are subject to personal income tax in respect of their worldwide net income. Under the income tax regime, income is divided into three separate categories of income (the three boxes), each of which is governed by its own rules. An individual's taxable income is based on the aggregate income in these three boxes.

Box 1: (living and working) covers business and employment income and income from the main private residence. Regarding box 1, tax is calculated by applying a progressive tax rate schedule to taxable income.

The Dutch government reduced the number of income tax brackets down to two in 2020. In 2020 the two bands will operate as follows.

Bracket	Euros	Income tax rate	Social security	Totality
1.	0	9.70%	27.65%	37.35%
2.	35,129	37.10%		37.10%
3.	68,508 +	51.75%		49.50%

As the overview above shows, in addition to personal income tax, Dutch social security contributions are paid at a rate of 27.65% (up to Euros 35,129 / bracket 1) or 9.75% for pension-age residents.

Box 1 covers income from the primary residence. The deemed income from the primary residence depends on its value. Mortgage interest payments are tax deductible up to 30 years if certain conditions are met. Mortgages taken out on or after 1 January 2013 must, in principle, be fully repaid within a maximum period of 360 months based on an annuity or linear repayment scheme. If the income from the primary residence is negative (deemed income minus mortgage payments), this loss can be offset against other income covered by Box 1. A capital gain from the sale of a primary residency is not subject to income tax.

## 2. Taxes on Income (cont.)

Box 1 also covers profits from business activities of individuals (non-corporate entities): sole proprietorship and partnerships. These partnerships are transparent i.e. for tax purposes every partner is considered to have his own one-man business. A substantial part of their profits is exempted from taxation if the conditions are met. The taxable profit can be reduced if there are deductible losses. The losses are initially offset against the profits from the previous 3 years (carry back). If this is not possible, the losses may be offset with future profits (carry forward), which is limited to 9 years. For buildings in business use, for tax purposes it is allowed to depreciate until 50% of the Valuation of Immovable Property (WOZ) value is reached.

2. Box 2: (substantial interest) includes income and gains from substantial interests in companies. A substantial interest means (options to) 5% or more of the shares or a profit right of 5% or more. Dividends and capital gains are taxed at a flat tax rate of 26,90%.

3. Box 3: (savings and investments) covers income from capital. A flat tax rate of 30 percent is applicable on deemed income from savings and investments.

The deemed income depends on the total value of assets and liabilities on 1 January of the tax year. Certain goods for personal use (as a car for personal use) are not considered assets to include in the net capital in Box 3.

Capital gains from assets covered by Box 3 are not taxable because the deemed income is taxable and not the actual income or the actual gain. Thus, if actual income exceeds the deemed income, no tax is due on the excess. Conversely, there is no reduction in tax if actual income is less than the deemed income. The way in which income is computed under Box 3 means that interest (for example, in order to finance leased real estate) and other expenses (for example expenses incurred for the maintenance of real estate) are no longer relevant for tax purposes.

The Dutch tax system entitles each resident in the Netherlands to a tax-free capital threshold of €50,000 in 2021 (or 100,000 for fiscal partners).

The deemed income is calculated as follows:

Bracket	Savings/investment amount	Deemed income	Average Deemed income
0	first € 50,000 tax-free	0.07% 5.28%	0.000%
1	€ 1 - € 50,000	67% 33%	1.900%
2	€ 50,000 - € 950,000	21% 79%	4.500%
3	€ 950,000+	0% 100%	5.690%

### Example

- No fiscal partner
- Savings and investments (amount) € 150,000
- Exempted € 50,000 -/-
- To be taxed € 100,000

Bracket 1:  
 $50,000 \times 1.9000\% = € 960$

Bracket 2:  
 $50,000 \times 4.5000\% = \text{€ } 2,250$

Deemed income € 3.210

Taxation (30% x €3.210) € 963

(Roundings may result in slight differences). Expatriates could be exempt from taxation in Box 2 and Box 3 (i.e. an option in case of the 30% facility).

### **Wage Tax**

Wage tax is payable by:

- persons resident in the Netherlands receiving a wage or salary from an employer established in the Netherlands for work they are doing or have done;
- persons resident abroad receiving a wage or salary from an employer established in the Netherlands for work they are doing or have done in the Netherlands;
- persons resident abroad who are members of the board of management or the supervisory board of a company established in the Netherlands for work they are doing or have done;
- persons resident abroad receiving a wage or salary from a Dutch public corporation for work they are doing or have done;
- non-resident artists and professional sportsmen who in accordance with an agreement of short duration or pursuance of any short term cause or reason perform in the Netherlands;

except where the Netherlands has not been granted the right to collect taxes under an agreement to prevent double taxation.

Many persons pay only wage tax and are not subject to personal income tax. For persons with a high income or many tax-deductible items, the wage tax serves as an advance levy on personal income tax. The rates are progressive (see above: Box 1, the overview). Some costs can be deducted and tax free allowances can be provided.

Contributions by employers to qualifying employer pension schemes are not taxable. Contributions from employees to such schemes are in principle tax deductible, if employer withholds these contributions. Pension benefits paid out under the scheme are, conversely, taxable. It is possible to request the Dutch Tax Authorities to consider the non-Dutch pension scheme as a qualifying pension scheme for a maximum period of 60 months if certain conditions are met (a period of 120 months under certain tax treaties).

The Netherlands has a special tax facility for expatriates working in the Netherlands. It is known as the 30% ruling. If the necessary requirements are met, the employer is allowed to grant a tax free allowance up to 30% of the remuneration subject to Dutch wage tax. This allowance is considered to be a compensation for extra territorial expenses an expatriate incurs when working in a foreign country. In addition, the employer may reimburse the fees for his employee's children to attend an international school (or international department of a local school) tax-free. The maximum period for which the 30% ruling is granted is 5 years. If the 30% ruling has been granted, most expats will not have to deal with Box 2 and Box 3. In case the social security coverage of the expatriate's homeland applies (i.e. he is not subject to Dutch social security), no Dutch social contributions are due.

## **2. Taxes on Income (cont.)**

## 2. Taxes on Income (cont.)

### Corporate Income Tax

A private or public limited company (B.V. or N.V.) pays corporate income tax (CIT) on the taxable profit in a single financial year. The taxable profit can be reduced if the company has any deductible losses. A company may offset losses with future profits or the profit from the previous year. The company offsets losses initially against the profit from the previous year (carry back). If this is not possible, the company may offset its losses with future profits (carry forward), which is limited to 6 years.

As part of the Tax Plan 2019, the following measures have been introduced.

Bracket	Euro	CIT
1.	0 - 245,000	15.00%
2.	245,000+	25.00%

As part of the Tax Plan 2019, for 2021 a further reduction of the CIT rate has been planned:

Bracket	Euro	CIT
1.	0 - 395,000	15.00%
2.	395,000+	21.70%

If the company's activities are innovative and the company is making a profit then the company may be able to put the profit from these activities in a special tariff box on its corporate income tax return: the innovation box. In that case the company pays less tax. It is conditional that the company has a (foreign) patent or applies for the R&D payroll tax allowance (WBSO).

Companies are no longer allowed to use buildings in company use for depreciation in their corporate income tax return, unless these buildings are in the company books for a value that exceeds the Valuation of Immovable Property (WOZ) value. This brings this measure into line with the regulation for buildings used as investment property.

### Withholding Taxes

The Netherlands levies withholding tax (WHT) on dividends from Dutch companies, not on interests or royalty payments.

Dividends from Dutch companies are generally subject to a 15% Dutch dividend WHT. In some cases the WHT rate is lower, due to tax treaties it could be 5% or even 0%.

Subject to meeting the conditions for the participation exemption, a Dutch company or branch of a foreign company is exempt from Dutch tax - such as WHT on dividends - on all benefits connected with a qualifying shareholding, including cash dividends, dividends in kind, bonus shares, hidden profit distributions, capital gains and currency exchange results.

Within the framework of tackling international tax avoidance, a tax at source is applicable as from 2021 on interest and royalty payments to countries with very low taxes, countries on the EU-list of non-cooperative jurisdictions and in certain tax abuse situations.

### 3. Taxes on expenditure - (VAT)

The value added tax system (VAT) in the Netherlands corresponds with that used by all other EU-states. VAT is a general consumption tax levied on goods supplied and services provided in the Netherlands.

Liability to VAT is determined by the type of the transactions or products concerned, regardless of the personal situation of the liable person or customer.

VAT is finally borne by the end-user since it is included in the sale price of products or services. Each intermediary (manufacturer, retailer etc.) collects the tax provided from the customer and pays it on to his local tax office minus the VAT on inputs paid to his own supplier. If an exemption applies, VAT payments are not deductible.

The VAT rates in the Netherlands:		
standard rate		21% (input tax deductible)
reduced rates	a. certain goods and services such as food, water, repairment of bicycles	9% (input tax deductible)
	b. certain goods and services such as export of goods to non-EU countries, international passenger transport	0% (input tax deductible)
exemption	certain goods and services such as investment gold, real estate, health care, education	input tax non-deductible

### 4. Taxes on assets

#### Inheritance Tax

Inheritance tax has to be paid on any inheritance heirs receive. An inheritance consists of the net estate left by a deceased person. This is the value of all moveable and fixed assets minus outstanding debts and funeral costs. The assets include: (1) all gifts donated within 180 days before death and (2) proceeds of a life insurance, if law obliges the deceased to contribute to such insurance.

Part of the inheritance is exempt from tax. The precise amount depends on the heir's relationship to the deceased person. The inheritance tax has to be paid on the amount exceeding the exemption.

Exemptions	Euro
Spouse / partner	671,910 depending on pension values.
Children and grandchildren	21,282
Sick and disabled children	63,836
Parents	50,397
All others	2,244

Inheritance tax rates		
Spouse / partner and children	a. 0 - 128,750	10%
	b. 128,750+	20%
Grandchildren	a. 0 - 128,750	18%
	b. 128,750+	36%
All others	a. 0 - 128,750	30%
	b. 128,750+	40%

If a business is inherited, inheritance tax has to be paid on its value. If the heir continues to run the business, the heir could qualify for the business succession scheme and pays less or no inheritance tax.

Charities and social welfare community organizations are exempted from inheritance tax in the Netherlands.

Certain foreign nationals will be subject to double taxation, meaning they are liable to pay taxes in the Netherlands and their home country. With several countries, the Netherlands has concluded tax treaties to avoid double taxation.

### Gift Tax

Gift tax is levied on the value of anything accepted as a gift from a resident in the Netherlands.

Exemptions		Euros
Annual donations to your children		6,604
A one-time donation to your child at the age of 18 – 40	free disposable	26,881
	expensive study	55,996
A one-time donation to your child at the age of 18 – 40 to be spent on their privately owned primary residence		105,302
Annual donations to other recipients		3,244

#### 4. Taxes on assets (cont.)

### Gift tax rates:

The gift tax rates are the same as the inheritance tax rates. If a business is donated, gift tax has to be paid on its value. If the beneficiary continues to run the business, he could qualify for the business succession scheme (also applicable to gifts) and pays less or no gift tax.

Charities and social welfare community organizations are exempted from gift tax in the Netherlands.

### Transfer tax

Transfer tax is levied on the transfer of:

- property (for example a house, building or land)
- rights to property (for example building lease)
- shares in a legal entity (B.V., N.V.) or participation in a partnership in which possessions exist mostly of real estate.

The Dutch Tax Department uses two tax rates. The tax rate of 2% applies to houses and associated appurtenances for own use (0% applies in case the transaction value does not exceed EUR 400k and the buyer is not older than 35 years). The tax rate of 8% applies to all other property.

## 5. Tax Agreements / Double Taxation (Avoidance) Decree

To avoid that income or capital is taxed more than once, the Netherlands has concluded tax treaties with a considerable number of countries.

In the event the Netherlands has not concluded a tax treaty with the country concerned, the Double Taxation (Avoidance) Decree (2001) applies. Application of this Decree will also result in the avoidance of double taxation.

Tax treaties do not include any rules for the levy of national insurance contributions. Other (international) rules apply to this.

With regard to the avoidance of double inheritance and gift tax, separate tax treaties have been concluded. If, in a certain case, there is no such tax treaty, application of the Double Taxation (Avoidance) Decree may prevent double taxation.

# POLAND

## 2021 TAX CARD (In POLISH ZLOTYS)

### 1. Basis of Taxation

Income taxes:

- tax-residents individuals and corporations are taxed on their worldwide income;
- non-residents individuals and corporations are taxed on their Polish income;
- the standard income tax year runs from January 1 to December 31. However, the tax year of corporations matches their statutory year.

Other main taxes are VAT, inheritance and gifts tax (estate duty), stamp duty and real estate local tax.

### 2. Corporate Tax

Polish resident companies are taxed on their worldwide income. Non-residents companies are taxed on certain income sourced in Poland.

The following tax rates apply to companies:

- 19% - standard flat rate;
- 9% - flat rate for companies which gross sales in the current year did not exceed EUR 2,0 million and their gross sales in the previous year did not exceed EUR 2,0 million; 9% rate doesn't apply to capital gains.

Income obtained from qualified intellectual property rights might be taxed on special terms with a 5% rate (so-called IP Box).

There is special way of taxation of income from real estate (excluding some residential building which are being rented within public social schemes) which initial book value exceeds PLN 10 million (so-called minimum income tax). Owners of such estate have to pay a tax of 0,035% in excess of above PLN 10 million of book value of real estate per month.

Generally, excluding some kinds of agricultural production, farming is not subject to income tax. There is a special agricultural tax for farming activities.

Apart from the corporate income tax, financial institutions in Poland also pay special tax based on the value of assets.

Since 2019, as the result of the implementation of EU Anti-Tax Avoidance Directive (2016/1164), a special tax on income from unrealized gains is in force in Poland (so-called exit tax). It is applicable in case of transferring of assets abroad or changing of tax residence. The tax rate is 19%.

### 3. Withholding tax rate (non-treaty)

	Individuals	Corporation
Dividends	19%	19%
Interest	19%	20%
Royalties/know-how	20%	20%
Rents (for moveable property)	20%	20%
Management fees	20%	20%
Technical fees	20%	20%
Directors' fees	20%	20%

#### 4. Resident individual tax rates

Taxable Income (PLN)	Tax Payable (PLN)
0–8000	Nil
8000–85528	17%
85528 and over	14539,76 + 32% of excess over 85528

Individuals under 26 Years with annual incomes not exceeding PLN 85.528 pay income tax.

Individuals running business activity may choose special rules of taxation with 19% flat tax rate.

Individuals who obtain in a tax year income exceeding PLN 1 million pay also solidarity tax. The rate of solidarity tax is 4%. It applies to the excess of income over PLN 1 million per tax year.

There are optional tax schemes for individuals running small businesses or renting property.

Since 2019, as the result of the implementation of EU Anti-Tax Avoidance Directive (2016/1164), a special tax on income from unrealized is in force in Poland (so-called exit tax). It is applicable in case of transferring assets abroad or changing of tax residence. The tax rate of exit tax is 19% or 3%.

#### 5. Non-resident individual tax rates

Taxable Income (PLN)	Tax Payable (PLN)
0–8000	Nil
8000–85528	17%
85528 and over	14539,76 + 32% of excess over 85528

20% flat rate for income of Board members with place of residence outside Poland.

#### 6. Goods and Services tax

The threshold for mandatory VAT registration is sales turnover of PLN 200 000 in current and precedent year.

The standard rate of VAT tax is 23%. The reduced rates are 8%, 5% or 0%.

VAT rules in Poland are based on EU regulations and should comply with them.

#### 7. Estate duty

Estate duty applies to inheritances and gifts received by individuals. Tax rates vary from 3% to 20% depending on the relationship between the receiver and the person from whom the inheritance or gift is received.

Inheritance and gifts between close family (spouses, descendants, ancestors, siblings, stepchildren, stepparents) are exempted from tax- 6 months deadline to declare.

#### 8. Stamp duty

Some transactions are subject of civil transaction tax (e.g. sale of assets or rights, exchange of assets or rights, loans, mortgage, articles of association of company).

The tax rates vary from 0,5% to 2% depending on the kind of transaction. Civil transaction tax doesn't apply to transactions taxed with VAT.

<div>9. Property tax</div>	<p>Real property tax is levied by the local authorities. It is based either on the area of land/building or their value in the tax books, depending on the kind of property.</p> <p>If taxation is based on the value of a property, the tax rate is 2%. If taxation is based on the area of land/building, the tax rates vary from 0,50 PLN/m2 to 23,90 PLN/m2 per year, depending on the kind of property and its use.</p>												
<div>10. Income tax filing deadlines</div>	<table><tr><th>Types of Form</th><th></th><th>Deadlines</th></tr><tr><td>Annual Income Tax Return</td><td>Individuals</td><td>30 April</td></tr><tr><td>Annual Income Tax Return</td><td>Companies</td><td>The end of the third month following the tax year</td></tr><tr><td>Annual Income Tax Return</td><td>Partnerships</td><td>Only joint-stock partnership is obliged to file an income tax return by the end of the third month following the tax year. Other partnerships are tax transparent and don't file income tax returns.</td></tr></table> <p>TPR – C – Transfer pricing information – until 30 September.</p>	Types of Form		Deadlines	Annual Income Tax Return	Individuals	30 April	Annual Income Tax Return	Companies	The end of the third month following the tax year	Annual Income Tax Return	Partnerships	Only joint-stock partnership is obliged to file an income tax return by the end of the third month following the tax year. Other partnerships are tax transparent and don't file income tax returns.
Types of Form		Deadlines											
Annual Income Tax Return	Individuals	30 April											
Annual Income Tax Return	Companies	The end of the third month following the tax year											
Annual Income Tax Return	Partnerships	Only joint-stock partnership is obliged to file an income tax return by the end of the third month following the tax year. Other partnerships are tax transparent and don't file income tax returns.											
<div>11. Double Tax Agreements</div>	<p>There are 90 tax treaties signed by Poland with foreign countries regarding avoidance of double taxation.</p> <p>Poland also signed and ratified Multilateral Instrument to Modify Bilateral Tax Treaties (so-called MLI Convention). Poland notified 78 tax treaties to be covered by the MLI Convention. So far MLI Convention applies to tax treaties with Australia, Austria, Azerbaijan, Belgium, Canada, Denmark, Finland, France, India, Ireland, Iceland, Israel, Japan, Lithuania, Luxembourg, Latvia, Malta, New Zealand, Norway, Serbia, Singapore, Slovakia, Slovenia, Ukraine, United Kingdom and United Arab Emirates.</p>												



# PORTUGAL

## 2021 TAX CARD (In Euros)

### 1. Basis of Taxation

The Portuguese income tax year runs from 1 January to 31 December. There are two fundamental platforms determining liability to Portuguese tax, commonly known as the source rule and residence rule.

The source jurisdiction of taxation means that Portugal taxes non-resident individuals and corporations on income arising to them from sources within Portugal only.

The residence jurisdiction involves the taxation of Portugal's resident individuals and corporations on income arising both in foreign countries and Portugal itself. Residents of Portugal are subject to Portuguese tax on their worldwide income.

### 2. Corporate Tax

A Portuguese resident company is subject to company tax, a non-resident company is taxed on its Portuguese source income at a different rate from a resident company. For a resident company the tax rate applicable is 21% and for a non-resident company is 25%. Plus Municipal Tax (tax rates between 0% – 1,5%)

For a PME (small and medium-sized company) the tax rate applicable until 25.000 of profit is 17% and 21% for remaining profit.

### 3. Withholding tax rate (non-treaty)

	Resident Individual	Non-resident Individual	
		With International Tax Treaties	Standard
Dividends	28% <sup>[a]</sup>	5%-15%	28%
Interest	28%	5%-15%	28%
Royalties/know-how	16,5%	5%-15%	25%
Rents	25%		25%
Capital Gains	28%		28%
Management fees	NA	NA	NA
Technical fees	NA	NA	NA
Directors' fees	NA	NA	NA

[a] If individual opts to include dividends in income tax statement only consider 50% of income

	Resident Corporations		Non-resident Corporations		
	Standard	Participation Exemption (1)	With International Tax Treaties	Standard	Participation Exemption (1)
Dividends	25%	0%	5% - 15%	25%	0%
Interest	25%	0% <sup>[2]</sup>	5% - 15%	25% 35% for offshores	0% <sup>[2]</sup>
Royalties/ know-how	25%	0% <sup>[3]</sup>	5% - 15%	25%	0% <sup>[3]</sup>

### 3. Withholding tax rate (non-treaty) (cont.)

	Resident Corporations		Non-resident Corporations		
	Standard	Participation Exemption (1)	With International Tax Treaties	Standard	Participation Exemption (1)
Rents	25%			25%	
Capital Gains	21%	0% <sup>(5)</sup>			0% <sup>(4)</sup>
Management fees	NA	NA	NA	NA	NA
Technical fees	NA	NA	NA	NA	NA
Directors' fees	NA	NA	NA	NA	NA

<sup>(1)</sup> Tax exemption: shareholding → or = 10% and owned more than 1 year.

<sup>(2)</sup> Under the directive 2003/49/CEE.

<sup>(3)</sup> Under the directive 2003/49/CEE.

<sup>(4)</sup> Only if the foreign shareholder is not resident in a tax haven country and if the total assets of Portuguese company have no more than 50% of buildings.

<sup>(5)</sup> If total assets of Portuguese company have no more than 50% of buildings.

### 4. Resident individual tax rates (1 January - 31 December 2021)

Taxable Income	Tax Payable	
	Standard	Average
0–7,112	14,50%	14,500%
7,112–10,732	23,00%	17,367%
10,732–20,322	28,50%	22,621%
20,322–25,075	35,00%	24,967%
25,075–36,967	37,00%	28,838%
36,967–80,882	45,00%	37,613%
80,882 and over	48,00%	-

  

Additional Solidarity Tax Rate	
More than 80.000 until 250.000	2.5%
More than 250.000	5%

### 5. Value Added Tax

VAT Rates		
Standard Rate	23.00 %	18 % in Azores and 22% in Madeira
Reduced Rate	13.00 %	9 % in Azores and 12% in Madeira
Super Reduced Rate	6.00 %	4 % in Azores and 5% in Madeira

If the distance selling to individuals exceed the threshold (EUR 35.000 of annual turnover), the company must obtain a Portuguese VAT number and charge the Portuguese VAT.

### 6. Inheritance Tax

The inheritance tax rate, named as stamp tax, is fixed on 10% over the total amount of assets. Spouse, children or ascendants are tax exempt.

Heirs must present before tax authorities a list of the inherited assets.

## 7. Stamp duty

Stamp duty is due on acts, contracts, documents, titles, books, papers and other facts foreseen in the General Table, which occur in Portugal and are not subject or exempt from VAT.

Onerous acquisition or donation of property (0,8%), letting or sub letting (10%), use of credit (0,04%-0,6%), consumer's credit (0,141%-1,76%), interest (4%), commission for given guarantees (3%), other commission for financial services (4%), are some examples where stamp duty is applied.

## 8. Property tax and Property transfer tax

IMI (Imposto Municipal sobre Imóveis) is computed on the tax registration value of urban and rural properties located in Portuguese territory. It is due by the owner, the usufructuary, or the holder of the surface right of a property with reference to 31 December of the year that it concerns.

The tax registration value is determined by means of valuation, based on the type of property.

Property	Rates
Urban property	0.3% to 0.45%
Rural property	0.8%
Property owned by residents in offshore (except individuals)	7.5%

IMT (Imposto Municipal sobre a Transmissão Onerosa de Imóveis) is a municipal tax levied on onerous transmissions of real estate located in Portuguese territory. It is due by the acquirer.

Description	Rates
Rural property	5%
Other urban properties and other onerous acquisitions	6.5%
The acquirer is a tax resident in an offshore (except individuals)	10%
Urban property or autonomous fraction of urban property exclusively intended to a permanent place of residence	0% - 7,5%
Urban property or autonomous fraction of urban property exclusively intended to residence (non-permanent)	1% - 7.5%

## 9. Income tax filing deadlines

Types of Form		Deadlines*
Tax Return	Individuals	30 June
Tax Return	Companies	31 May
Tax Return	Partnerships (Special Tax Regime of Group Taxation - RETGS)	31 May
Annual declaration (IES)	Companies	15 July
Annual declaration (IES)	Partnerships	15 July
Periodic VAT Returns	If Annual Turnover > or = 650.000	monthly until the 10th of the second following month
	If Annual Turnover > 650.000	quarterly, until the 15th of the second following month

**10.  
Double Tax  
Agreements**

Portugal has 78 international tax treaties in force (plus 2 already signed) with foreign countries to avoid double taxation.

Updated: May 2021



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# ROMANIA

## 2021 TAX CARD (in Euros)

### 1. Basis of Taxation

The Romanian fiscal year runs from the 1 January to 31 December. The Romanian tax system is divided into two main categories: company taxation and individual taxation.

Also, there are two fundamental platforms determining liability to tax, commonly known as the source rule and residence rule. The source jurisdiction of taxation means that Romania taxes non-resident individuals and corporations on income arising to them from sources within Romania only. The residence jurisdiction involves the taxation of Romania's resident individuals and corporations on income arising both in foreign countries and Romania itself. Residents of Romania are subject to Romanian tax on their worldwide income.

The Romanian company taxation system known as corporate income tax is applicable to Romanian companies, foreign companies controlled from Romania for their worldwide income but also for foreign companies with income assigned to a permanent establishment in Romania. Also for newly founded Romanian companies or companies below the 1.000.000 euro income/year threshold, there is a special taxation system called a micro-enterprise tax.

The individual taxation for residents consist of income obtained in Romania or world-wide, from professional activity, intellectual property, salary, rental, investment etc.

### 2. Corporate Tax

A Romanian resident company is subject to corporate income tax or micro-enterprise tax, a non-resident company is taxed on its Romanian source income at the same rate as a resident company payer of corporate income tax. The following tax rates apply to companies.

Year	Annual Turnover Threshold	Entities above the Threshold	Entities below the threshold with at least one employee	Entities below the threshold with no employees
2021	1.000.000 EURO	16% on profit	1% on revenue	3% on revenue

### 3. Withholding tax rate (non-treaty)

	Resident Individual/ Corporation	Non-resident with no convention regarding the exchange of information Individual/Corporation
Dividends	5%/NA	5%
Interest	10%/NA	10%/16%
Royalties/know-how	10%/NA	10%/16%
Rents (for moveable property)	NA	NA
Management fees	10%/NA	10%/16%
Technical fees	10%/NA	10%/16%
Directors' fees	10%/NA	10%/16%

### 4. Resident individual taxes rates

The income tax rate applicable to resident individuals is 10% except for dividends for which the tax rate is 5%.

<b>5. Non-resident individual tax rates</b>	The income tax rate applicable to non-resident individuals is the same as for resident individuals.												
<b>6. Value Added Tax</b>	<p>The standard VAT rate is equal to 19% and is to be applied to the tax base for any taxable operation that is not exempt from tax or that is not subject to the reduced rates.</p> <p>The 9% reduced rate is applicable for supplies of medical devices, medicines, food, non-alcoholic drinks, water and agriculture goods and services.</p> <p>The 5% reduced rate is applied to the delivery of books, newspapers, school manuals, admissions to cultural events, museums, concerts, sports events, cinemas and for certain deliveries of houses; hotel, accomodation, restaurant and catering services.</p> <p>Romanian VAT regulation is in accordance with 112/2006/CE VAT Directive.</p>												
<b>7. Inheritance Tax</b>	Inheritance Tax is not applicable if procedures are completed within two years. After this, there is a 1% tax.												
<b>8. Immovable property transfer tax</b>	Immovable property transfer tax is 3% at the value of the property after the deduction of the non-taxable sum of 100.000 euro.												
<b>9. Property tax</b>	<p>Romanian property tax is calculated according to the destination of the property (residential, non-residential or mix destination), year of completion, area and the rank of the town, the building utilities and type. Local administrative councils establish the property tax rates between 0.08% - 0.2% for residential and 0.2% - 1.3% for non-residential properties on the value of the property.</p> <p>Companies must evaluate the value of the property every three years otherwise a 5% tax rate is applied to the value of the property.</p>												
<b>10. Income tax filing deadlines</b>	<table><tr><th colspan="3">Type of form</th></tr><tr><td>Tax Return</td><td>Individuals</td><td>25th May</td></tr><tr><td>Tax Return</td><td>Companies</td><td>25th March</td></tr><tr><td>Tax Return</td><td>Non-profit organisations</td><td>25th February</td></tr></table> <p>* Companies with corporate income tax have annual computation with quarterly prepayments and companies with micro-enterprise tax have quarterly computation and payments.</p>	Type of form			Tax Return	Individuals	25th May	Tax Return	Companies	25th March	Tax Return	Non-profit organisations	25th February
Type of form													
Tax Return	Individuals	25th May											
Tax Return	Companies	25th March											
Tax Return	Non-profit organisations	25th February											
<b>11. Double Tax Agreements</b>	<p>87 double taxation treaties were signed between Romania and other countries in order to eliminate the double taxation. These agreements override domestic legislation where the same income is taxed in both countries.</p> <p><a href="https://static.anaf.ro/static/10/Anaf/AsistentaContribuabili_r/Conventii/Conventii.htm">https://static.anaf.ro/static/10/Anaf/AsistentaContribuabili_r/Conventii/Conventii.htm</a></p>												

# SLOVENIA

## 2021 TAX CARD (in Euros)

### 1. Basis of Taxation

The liability to Slovene income tax is determined by the tax residence status and the source of income. The Slovenian tax residents are taxed on their worldwide income. The tax non-residents are taxed only on income derived in Slovenia (Slovene sourced income).

A company is a resident if its seat or place of effective management is considered in Slovenia. An individual is treated as resident if he fulfils at least one of the criteria laid down by the legislation. This is usually fulfilled if he has his permanent residence or habitual abode (centre of vital interest) in Slovenia or is physically present for at least 183 days in any period in a tax year in Slovenia.

### 2. Corporate Tax

The tax period can be a calendar year or a financial year.

Corporate income tax is levied on the taxable profit at a rate of 19 %.

A special rate of 0 % applies under certain conditions to investment funds, pension funds and insurance undertakings for pension plans. As of January 1st 2013, there is an optional flat-rate taxation regime. In accordance with this flat-rate regime, the tax base is determined on the basis of lump-sum costs accounting for 80 % of income. Tax losses carried forward from previous years may be used only up to 50 % of the tax base.

A research and development (R&D) investment allowance is represented as a deduction from the tax base of 100 % of the amount invested in qualified internal R&D activities and purchase of R&D services. There is also an investment tax allowance – a deduction from the tax base of 40 % of the amount invested in qualified equipment and intangibles. Additional tax allowances are available under certain conditions. Since 1.1.2020, deductions from allowances and tax losses carried forward together can only deduct tax base for 63%. This results in minimum effective tax rate of 7,03%.

Thin cap rules are in force in Slovenia. Interest on loans is not deductible if the loan is received from certain related parties (for example a shareholder who directly or indirectly owns at least 25% of the equity capital or voting rights) and the loan exceeds a debt-to-equity ratio of 4:1 at any time during the tax period. Interest on loans exceeding the 4:1 debt-to-equity ratio is usually deemed to be hidden profit distribution. It is possible to defend tax deductibility of such interest if the taxpayer can demonstrate such a loan would have been granted by an unrelated third party.

### 3. Withholding tax rate (non-treaty)

Taxable Income EUR	Tax Payable EUR
Dividends	15 %
Interest	15 %
Royalties	15 %
know-how	15 %
Lease payments (for real estate located in Slovenia)	15 %
Payments for services by performing artists or athletes, if the recipient of the payments is another person	15 %
Fees paid for advisory services, marketing, market analysis, HR, administrative, IT and legal services, if paid to persons resident outside EU and in a blacklisted country (list published by the Ministry of Finance)	15 %

### 4. Resident individual tax rates

#### Personal income tax brackets for 2021

Taxable income bracket		Total tax on income below bracket	Tax rate on income in bracket
From EUR	To EUR	EUR	Percent
0	8.500	0	16 %
8.500	25.000	1.360	+ 26 % over 8.500
25.000	50.000	5.650	+ 33 % over 25.000
50.000	72.000	13.900	+ 39 % over 50.000
Over 72.000	-	22.480	+ 50 % over 72.000

#### Capital Gains

Taxable Income (capital gains)*	Tax Rate
First 5 years	27,5 %
5-10 years	20 %
10-15 years	15 %
15-20 years	10 %
20+ years	0 %

\* the tax rate depends on the years of ownership

A resident taxpayer may for example claim (under certain conditions) the following tax allowances:

- general allowance of EUR 3.500
- special allowance for dependent family members of EUR 2.436,92 (the allowance is increased for each additional dependent family member);
- tax allowance for voluntary additional pension insurance; etc.

Dividends, interest and rental income received by a resident individual are subject to a 27,5% withholding tax.

Social security contributions are generally mandatory in Slovenia if natural persons perform their work in Slovenia.

<b>5. Non-resident individual tax rates</b>	<p>Non-residents individual tax rates are identical to the tax rates for residents. Non-residents are only liable for taxation on income derived in Slovenia (Slovene sourced income).</p>
<b>6. Goods and Services tax</b>	<p>The Value Added Tax is levied in Slovenia:</p> <ol style="list-style-type: none"> <li>1. on supplies of goods and services for consideration performed on the territory of Slovenia by taxable persons,</li> <li>2. on intra-Community acquisitions of goods for consideration from other EU Member States,</li> <li>3. on import of goods.</li> </ol> <p>The standard VAT rate is 22 %. The reduced rate of 9,5 % is applied for certain goods (for example foodstuffs, books, etc.) and services. Some goods and services are VAT exempt (for example financial services). From 1.1.2020 super reduced rate of 5% is applied for sale of books, newspapers and periodicals (in accordance with EU VAT Directive).</p> <p>If the taxable turnover within the last 12 calendar months exceeds the registration threshold of 50.000 EUR, VAT registration is mandatory. It is possible to identify for VAT purposes on a voluntary basis. VAT registration is mandatory for foreign taxable persons performing taxable supplies on the territory of Slovenia.</p>
<b>7. Estate duty</b>	<p>Inheritance (and gift) tax is applicable in cases of transfer of property. The tax is levied progressively, depending on the value of the property and the recipient's relationship with the deceased/donor.</p>
<b>8. Stamp duty</b>	<p>Slovenia does not have stamp duties.</p>
<b>9. Property tax</b>	<p>The Slovenian property tax system currently consists of two types of taxation on possession or use of real estate. One is property tax and the other is a duty called "charge for the use of building land".</p> <p>Property tax is levied on property owners or real estate beneficiaries, whereby the obligation and/or tax base depends on the type and size of the real estate. Property tax is levied at progressive rates and there are wide-ranging exceptions stipulated by the legislation.</p> <p>The charge for the use of building land is assessed on an annual basis and depends on various circumstances. The tax rates are determined by local municipalities. The person liable for payment of the charge is the owner or tenant of the real estate property.</p> <p>The property tax system will most likely undergo drastic changes over the next years as the introduction of new legislation has been in the making for the past few years.</p>

10. Income tax filing deadlines			
	Types of Form		Deadlines*
	Income Tax Return	Individuals	<p>For income from employment and certain other types of income, residents receive a preliminary tax calculation automatically, whereby there is no further filing obligation if the calculation is correct. If it is not received until the stipulated deadline, the natural person must submit an annual tax return until the end of July.</p> <p>For capital gains, the deadline for submission of the tax return is the end of February.</p>
	Income Tax Return	Companies	The tax return must be submitted within three months after the end of the tax year.
*other filing deadlines are applicable for different types of income			
11. Double Tax Agreements	Slovenia has concluded 59 tax treaties for avoidance of double taxation. Slovenia also signed the Multilateral Instrument (the MLI) on June 7th, 2017, which entered into force on July 1st, 2018.		

# SPAIN

## 2021 TAX CARD (In Euros)

### 1. Basis of Taxation

Spanish taxes can be classified by as follows:

#### A. Direct taxes.

- On Incomes: Corporate income tax, Personal income tax and Non-resident income tax.
- On assets: Wealth tax and inheritance and gift tax (affecting only individuals).

#### B. Indirect taxes:

- Valued Add Tax (VAT)
- Transfer tax and stamp tax
- Excise tax
- Customs duties on imports

**Tax residence in Spain.** A company is deemed to be resident in Spain for tax purposes if it meets any of the following conditions: it was incorporated under Spanish Law, its registered office is located in Spain, and its place of effective management is in Spain. An individual will have his residence in Spain as long as he stays physically in Spain more than 183 days in one year calendar.

**Non-resident in Spain.** A company will contribute in Spain to its incomes received through a permanent establishment besides the assets located in Spain, as well as individuals.

### 2. Corporate Tax

The regulation is basically contained in Corporate Tax Law 27/2014, of November 27.

The tax period can not exceed 12 months, and the tax will file after the next six months following the end of its financial year. Commonly, the financial year takes from January 1st until December 31st.

The tax principles for allocating revenues and expenses to determine taxable income generally coincide with accounting principles. In this regard, the method generally applicable for recognizing revenue and expenses is the accrual method. The law contains an exhaustive list of non-deductible expenses.

There are some tax incentives for small and medium-size companies which invoice less than €10 million, regarding the depreciation of its assets and if they increase their reserves. The general tax rate is 25%. There are some special rates applicable to certain entities such as collective investments institutions (1%), certain cooperatives (20%), non-profit organizations complying with Law 49/2002 (10%), credit institutions (30%), etc.

There are some tax credits applicable to encourage certain activities:

- Research and development and technological innovation.
- Investment in cinematographic production.
- Creation of employment.
- Creating jobs for disabled workers

## 2. Corporate Tax (cont.)

Concerning the tax credit to avoid international double taxation, there are two types of credit.

- a. **Legal.** When taxpayers include in the gross tax base income obtained in another country, they will deduct the lesser of the following two figures, the amount paid abroad in an identical tax or the amount of tax that would be payable in Spain.
- b. **Economic.** When dividends or shares in profit included in the gross tax base are paid by a company non-resident in Spain, the deduction will be the tax paid by the non-resident entity.

## 3. Withholding tax rate (non-treaty)

	Resident Individual/Corporation	Non-Resident Individual/Corporation
Dividends	19%	19%
Interest	19%	19%
Capital gain		19%
Capital gain (real estate)	0%	3%
Royalties	19%	24%
Rents	21%	24%
Salaries	0-45%	24%
Pensions	0-45%	8-40%
Business	0-45%	24%

Intra-European regulations, as well as numerous international tax treaties, can significantly reduce or eliminate the withholding taxes indicated above.

## 4. Resident individual tax rates

The taxpayers subject to personal income tax are taxed on their entire worldwide income, including the income of foreign entities. There is the possibility of being taxed as an individual or jointly (as a family unit). The tax is structured in two types of bases, integrated by different kinds of incomes. The positive balance will be the result of adding and offsetting the capital gains and losses.

- a. General tax base. Salary income, income and imputation from real estate, some of the incomes movable capital from entities related to the taxpayer, incomes from business activities, imputation of real estate and some capital gains and losses.
- b. Saving tax base. Incomes derived from an entity due to the status of the partner or shareholder, income from movable capital derived from the transfer of own funds, the monetary return or payment in kind on capitalization transactions and life or disability insurance contracts and some capital gains and losses.

The Law establishes numerous items from exempt income such as salary earned during the time spent by the employee working abroad. There are reductions in the base in order to adapt the tax to the personal and family situation of the taxpayer.

- a. Taxpayer allowance: € 5,550 annually (increased for persons over 65 years)
- b. Allowance for descendants: € 2,400 for the first, € 2,700 for the second, €4,000 for the third, € 4,500 for fourth and subsequent.
- c. Allowance of ascendants: € 1,150 annually.
- d. Allowance for disability: depending on the grade of disability €3,000 or €9,000.

#### 4. Resident individual tax rates (cont.)

The tax rate will depend on which autonomous community is established by the taxpayer, being the same incomes taxed differently between autonomous communities. Nevertheless, an overall average is:

Tax applicable on the General tax base:

Net Taxable Income (Up to )	Gross TA payable	Rest of Net Taxable Income (Up to )	Tax Rate Applicable
-€	-	12.450,00€	19%
12.450,00€	2.365,50€	7.750,00€	24%
20.200,00€	425,50€	15.000,00€	30%
35.200,00€	8.725,50€	24.800,00€	37%
60.000,00€	17.901,50€	240.000,00€	45%
300.000,00€	125.901,50€	Onwards	49%

Tax applicable on the Saving tax base:

Net Taxable Income (Up to )	Gross TA payable	Rest of Net Taxable Income (Up to )	Tax Rate Applicable
€	€	6.000,00€	19%
6.000,00€	1.140,00€	44.000,00€	21%
50.000,00€	10.380,00€	150.000,00€	23%
200.000,00€	44.880,00 €	Onwards	26%

The legislation establishes some kind of tax credits such as double taxation, donations and for investments in the recently formed company.

#### 5. Non-resident individual tax rates

The basic regulation is contained in the Legislative Royal Decree 5/2004, of March 5 and it is determining if non-resident individuals or the entities obtain their incomes through a permanent establishment.

Permanent establishments in Spain are taxed on their net income at the same rate as Spanish companies, in general, 25%.

When the incomes are obtained without a permanent establishment the following rates are applicable:

Type of Income	Rate (Taxpayers resident in another Member State of EU or EEA)	Rate (for other non-residents)
Business activities	19%	24%
Salaries	19%	24%
Dividends and interest	19%	19%
Rent	19%	24%
Capital gain	19%	19%
Royalties	19%	24%

Intra-European regulations, as well as numerous international tax treaties, can significantly reduce or eliminate the withholding taxes indicated above.

## 6. Goods and Services tax

Normally the VAT tax does not entail any cost for traders or professionals as most of them are allowed to deduct the VAT paid in their purchases, consequently the VAT is a cost for the end consumer. Within Spain, VAT is not applicable in

- a. Canary Islands. Canary General Indirect Tax is in force and its general rate is 7%.
- b. Ceuta and Melilla. They charge a different indirect tax for production, services and import.

The taxable transactions are:

- a. Supplies of goods
- b. Supplies of services
- c. Intra-Community acquisitions of goods and services.
- d. Imports of goods.

The VAT rate applicable depends on the kind of goods or services.

- a. The general rate is 21%
- b. A reduced rate of 10% for foodstuffs, water, housing, transportation.
- c. A reduced rate of 4% for goods or services that Law considered as basic needs such as medicine, bread, milk, eggs, books, magazines, etc.

Some transactions exempt from VAT such as educational and medical services, financial and insurance transactions, etc.

## 7. Estate duty

Inheritance and gift tax is applicable only to individuals, residents and non-residents (only for the acquisitions of assets or rights located in Spain). The tax base is formed by the net value of the assets and rights acquired. The Law contemplates a series of reductions, basically for cases of transfers between the closest family's members. The tax is calculated by adjusting a tax scale of progressive rates but the final tax will depend on the autonomous community governments, which have legal power to regulate rates and reductions. The following table is a general scale of rates:

Tax Base ( )	Tax Payable ( )	Remaining Tax Base ( )	Applicable Rate (%)
0		7 993,46	7,65
7 993,46	611,5	7 987,45	8,5
15 980,91	1 290,43	7 987,45	9,35
23 968,36	2 037,26	7 987,45	10,2
31 955,81	2 851,98	7 987,45	11,05
39 943,26	3 734,59	7 987,46	11,9
47 930,72	4 685,10	7 987,45	12,75
55 918,17	5 703,50	7 987,45	13,6
63 905,62	6 789,79	7 987,45	14,45
71 893,07	7 943,98	7 987,45	15,3
79 880,52	9 166,06	39 877,15	16,15
119 757,67	15 606,22	39 877,16	18,7

## 7. Estate duty (cont.)

Tax Base (€)	Tax Payable (€ )	Remaining Tax Base (€)	Applicable Rate (%)
159 634,83	23 063,25	79 754,30	21,25
239 389,13	40 011,04	159 388,41	25,5
398 777,54	80 655,08	398 777,54	29,75
797 555,08	199 291,40	Onwards	34

## 8. Stamp duty

Transfer and stamp tax is basically applied on real property transfers or some companies operations. There are some corporate transactions exempted (company formations, capital increases, business restructuring transactions). The following are the most relevant operations:

OPERATIONS	TAX RATE
Corporate transactions	1%
Transfers of real estate	6%
Certain rights on real estate	1%
Certain mercantile law public deeds	0,50%

The operations taxed by VAT are not subjected by transfer tax. The regulation applicable is also determined by autonomous community consequently they can regulate the tax rate levied.

## 9. Property Tax

The wealth tax is only applicable to individuals. Residents will be taxed for their total assets (located worldwide) and non-residents for their assets in Spain.

The Law explains how to value each kind of asset and establishes a reduction of €300,000 for the habitual residence, and in certain circumstances the assets or rights necessary for the performance of a business or professional activity are exempt, among others. Additionally, there is a general exemption of €700,000 but this amount could be modified by the autonomous community, as well as the following scale of rates:

Net Taxable Income (Up to €)	Tax payable (€ )	Rest of Net Taxable Income (Up to € )	Tax Rate(%)
0,00	0,00	167.129,45	0,2
167.129,45	334,26	167.123,43	0,3
334.252,88	835,63	334.246,87	0,5
668.499,75	2.506,86	668.499,76	0,9
1.336.999,51	8.523,36	1.336.999,50	1,3
2.673.999,01	25.904,35	2.673.999,02	1,7
5.347.998,03	71.362,33	5.347.998,03	2,1
10.695.996,06	183.670,29	Onwards	2,5

## 10. Income tax filing deadlines

Types of forms		Deadlines*
Income Tax Return	Individuals	By June 30th in the year following the tax year
Income Tax Return	Companies (*)	By July 25th in the year following the tax year

\*For companies which its business year starts on the 1st of January until 31th of December. For companies with different financial year, during the first 25 days after the six months since its financial year is over.

## 11. Double Tax Agreements

There 88 treaties in force to avoid double taxation.  
The following table contains the types of retentions that operate as the maximum limit of taxation applicable by the source country to payments in the concept of dividends, interest and royalties.

Country	Dividends %			Interest %*	Royalties %
Country	General [%]	Parent-Subsidiary		[%]	[%]
Albania	10	5/0	10/75.	0/6	0
Andorra	15	5	10	0/5	5
Algeria	15	5	10	0/5	07/14
Argentina	15	10	25	0/12	3/5/10/15
Armenia	10	0	25	5	05/10
Australia	15	15	-	10	10
Austria	15	10	50	5	5
Barbados	5	0	25	0	0
Belgium	15	0	25	0/10	5
Belarus	18	18	-	0	0/5
Bolivia	15	10	25	0/15	0/15
Bosnia y Herzegovina	10	5	20	0/7	7
Brazil	15	10	25	0/10/15	10/15
Bulgaria	15	5	25	0	0
Canada	15	5/0	10/PP	0/10	0/10
Chile	10	5	20	4/5/15	2/10
China	10	10	-	10	6/10
Colombia	5	0	20	0/5/10	10
Cost Rica	12	5	20	0/5	10
Croatia	15	0	25	0	0
Cuba	15	5	25	0/10	0/5
Cyprus	5	0	10	0	0
Czech Republic	15	5	25	0	0/5
Dominican Republic	10	0	75	0/10	10
Ecuador	15	15	-	0/5/10	5/10
Egypt	12	9	25	0/10	12

# 11. Double Tax Agreements (cont.)

Country	Dividends %			Interest %*	Royalties %
Country	General (%)	Parent-Subsidiary		(%)	(%)
Estonia	15	5	25	0	0
Finland	15	10	25	10	5
France	15	0	10	0/10	0/5
Georgia	10	0	10	0	0
Germany	15	5	10	0	0
Greece	10	5	25	0/8	6
Hong Kong	10	0	25	0/5	5
Hungary	15	5	25	0	0
Iceland	15	5	25	0/5	5
India	15	15	-	0/15	10
Indonesia	15	10	25	0/10	10
Iran	10	5	20	0/7,5	5
Ireland	15	0	25	0	5/8/10
Israel	10	10	-	0/5/10	5/7
Italy	15	15	-	0/12	4/8
Jamaica	10	5	25	0/10	10
Japan	15	10	25	10	10
Kazakhstan	15	5	10	0/10	10
Kyrgyzstan	18	18	-	0	0/5
Korea	15	10	25	10	10
Kuwait	5	0	10	0	5
Latvia	10	5	25	0/5/10	0%
Lithuania	15	5	25	0/10	5/10
Luxemburg	15	10	25	10	10
Macedonia	15	5	10	0/5	5
Malaysia	5	0	5	0/10	5/7 [
Malta	5	0	25	0	0
Morocco	15	10	25	10	5/10
Mexico	10	0	10/FP	0/4,9/10	0/10
Moldova	10	5/0	25/50	0/5	8
Netherlands	15	10/5	50 (o 25+25)	10	6
New Zealand	15	15	-	10	10
Nigeria	10	7,5	10	0/7,5	3,75/7,5
Norway	15	10	25	0/10	5
Oman	10	0	20	0/5	8
Pakistan	10	7,5/5	25/50	0/10	7,5
Panama	10	5/0	40/80 (o FP)	0/5	5

# 11. Double Tax Agreements (cont.)

Country	Dividends %			Interest %*	Royalties %
Country	General [%]	Parent-Subsidiary		[%]	[%]
Philippines	15	10	10	0/10/15	10/15/20
Poland	15	5	25	0	0/10
Portugal	15	10	25	15	5
Romania	15	10	25	10	10
Russia	15	10/5 [	Vol. Investment	0/5	5
Salvador	12	0	50	0/10	10
Saudi Arabia	5	0	25	0/5	8
Senegal	10	10	-	0/10	10
Serbia	10	5	25	0/10	5/10
Singapore	5	0	10	0/5	5
Slovakia	15	5	25	0	0/5
Slovenia	15	5	25	0/5	5
South Africa	15	5	25	0/5	5
Sweden	15	10	50	15	10
Switzerland	15	0	10 (o PP/ Equity)	0	0/5
Tajikistan	18	18	-	0	0/5
Thailand	10	10	-	0/10/15	5/8/15
Trinidad y Tobago	10	5/0	25/50	0/8	5
Tunisia	15	5	50	5/10	10
Turkey	15	5	25	10/15	10
Turkmenistan	18	18	-	0	0/5
Ukraine	18	18	-	0	0/5
United Arab Emirates	15	5	10	0	0
United Kingdom	10	0	10 (o PP)	0	0
Uruguay	5	0	75	0/10	5/10
USA	15	10	25	0/10	5/8/10
Uzbekistan	10	5/0	25	0/5	5
Venezuela	10	0	25	0	5
Vietnam	15	10/7/5	25/50/70	0/10	5/10

# SWEDEN

## 2021 TAX CARD (In Swedish Kronor)

### 1. Basis of Taxation

The Swedish income tax year runs from 1 January to 31 December. There are two fundamental platforms determining liability to Swedish tax, commonly known as the source rule and residence rule.

The source jurisdiction of taxation means that Sweden taxes non-resident individuals and corporations on income arising to them from sources within Sweden only.

The residence jurisdiction involves the taxation of Sweden's resident individuals and corporations on income arising both in foreign countries and Sweden itself. Residents of Sweden are subject to Swedish tax on their worldwide income.

### 2. Corporate Tax

A Swedish resident company is subject to company tax, a non-resident company is taxed on its Swedish source income at the same rate as a resident company if there is a permanent establishment in Sweden. The tax is a flat rate tax with no turnover thresholds. The following tax rates apply to companies for the income year:

Year	Tax
2018	22%
2019	21,4%
2021	20,6%

### 3. Withholding tax rate (non-treated)

	Resident	Non-resident Individual/ Corporation
Dividends	NA	30% /30%
Interest	NA	0%/0%
Royalties/know-how	NA	30-50%/22%
Rents (for moveable property)	NA	NA
Management fees	NA	NA
Technical fees	NA	NA
Directors' fees	NA	NA

### 4 Resident individual taxes rates

Taxable Income SEK	Tax Payable SEK
0 – 596 800	About 31%
596 900 –	52% of excess over 596 900

### 5. Non-resident individual tax rates

Taxable Income SEK	Tax Payable SEK
0 – 596 800	About 31 %
596 900 –	52 % of excess over 596 900

6. Goods and Services tax	VAT is levied at a rate of 25 %,12% or 6%. Entities have to register once turnover reaches 35,000 SEK.																		
7. Estate Duty	Sweden does not have death or estate taxes – various rollovers apply for capital gains tax and stamp duties when assets are passed on after death.																		
8. Stamp duty	Stamp duty is applied. Stamp duty is applied on real property transfers. Rate of duty is 1,5% for individuals and to 4,25% for legal entities.																		
9. Property tax	Property tax is charged on property owners. The rate of property tax varies depending on the use of the building. The tax is charged on an estimated value linked to an estimated market value adjusted every few years.																		
10. Income tax filing deadlines	<table><tr><th>Types of Form</th><th></th><th>Deadlines*</th></tr><tr><td>Tax Return</td><td>Individuals</td><td>2 May</td></tr><tr><td>Tax Return</td><td>Companies</td><td>Varies depending on income year. 6 months after the end.</td></tr><tr><td>Management fees</td><td>NA</td><td>NA</td></tr><tr><td>Technical fees</td><td>NA</td><td>NA</td></tr><tr><td>Directors' fees</td><td>NA</td><td>NA</td></tr></table> <p>*Various extensions are available for lodgement up to June of the following year where the entity is registered as a client of a tax agent. Timing of extension available is dependent upon the type of entity, their size, and if the entity is tax payable for the year.</p>	Types of Form		Deadlines*	Tax Return	Individuals	2 May	Tax Return	Companies	Varies depending on income year. 6 months after the end.	Management fees	NA	NA	Technical fees	NA	NA	Directors' fees	NA	NA
Types of Form		Deadlines*																	
Tax Return	Individuals	2 May																	
Tax Return	Companies	Varies depending on income year. 6 months after the end.																	
Management fees	NA	NA																	
Technical fees	NA	NA																	
Directors' fees	NA	NA																	
11. Double Tax Agreements	137 international tax treaties have been put in place to prevent tax treaties and were signed with foreign countries to avoid double taxation.																		

# SWITZERLAND

## 2021 TAX CARD (In Swiss Francs)

### 1. Basis of Taxation

The Swiss tax system is shaped in three different levels: federal, cantonal and communal taxes. The largest portion is levied by the cantons and municipalities, under their own laws, resulting in an intense tax competition at these two levels.

The liability to Switzerland income tax is determined by the tax residence status and the source of the income. The Swiss resident individuals are subject to income and wealth tax on their worldwide income and wealth (unlimited tax liability). The non-resident individuals are taxed only on the income that arises to them from a Swiss-source.

A company is considered resident if its seat (registered office) or place of effective management is in Switzerland. An individual is considered resident based on several factors, such as the centre of his vital interests or the place of abode (30 days combined with a gainful activity or a stay of 90 days without such activity in each calendar year).

### 2. Corporate Tax

The tax period is the calendar year or financial year.

The corporate income tax flat rate, at the federal level, is 8.5% (effective rate of 7.83% taking in consideration the deductibility of the federal tax). The cantons may set their own rates (same for companies and cooperatives); the communal corporate income taxes are a surcharge on the cantonal taxes. In average the total tax burden depends on the Canton and Municipality and vary from 11.5% to 26%.

The capital gains are part of the business income. There is a participation relief when a minimum of 10% capital is held. The company losses can be carried-forward for 7 tax years, but not carried-back.

### 3. Withholding tax rate (non-treated)

	Individual/Corporation
Dividends	35%
Interest	35% on Swiss bonds and bank deposits 3% on loans secured by immobile property 0% for qualifying interest under EU-Swiss Savings Agreement
Royalties/know-how	No
Management fees	No
Technical fees	No

#### 4. Resident individual tax rates

Taxable Income (progressive)	Tax Rate
Tax is progressive and depends on Canton and Municipality	Rate varies from Canton to Canton. Maximum rate is about 35% and includes Federal, Cantonal and Communal

  

Taxable Income (capital gains)	Tax Rate
If derived from private transactions	Not subject to tax

  

Taxable Income (dividends)	Tax Rate
0.00 +	35%

Certain types of income (for example capital gain, inheritances and gifts) are exempt.

The taxpayers may claim:

- a tax bonus per dependent child in the amount of CHF 200-250 per month;
- a spouse allowance in the amount of CHF 7'700 per year.

#### 5. Non-resident individual tax rates

The non-resident individual tax rates are in principle the same with the resident individual tax rates. The scope of taxable income is different. The capital gains on sale of shares in resident companies are not subject to federal income tax unless they are derived in the course of a business; the capital gains on sale of immovable property depend on the canton.

#### 6. Goods and Services tax

The Value Added Tax is levied in Switzerland:

- on the supply of goods and services for consideration performed in Switzerland by taxable persons;
- on private use of goods and services;
- on the imports of goods and services for consideration.

The standard rate is 7.7% (8% before 1 January 2018). The reduced rate of 3.7% is applied to certain goods (for example basic foodstuffs, books, antibiotics and orthopaedic items). The reduced rate of 2.5% is applied to certain goods (for example food and beverages - except for alcoholic beverages and services rendered in the hotel or catering sectors; medicines; books and newspapers). Some goods and services are VAT exempt (for example health, social, financial and educational/cultural services).

The taxable persons are obligated to register for VAT purposes when the taxable turnover exceeds, throughout the last 12 calendar months, the registration threshold of CHF 100'000.

Persons liable to customs duty are subject to VAT on the import of goods. The import of services rendered by companies who have their business establishment outside the Swiss territory leads to tax liability if a recipient consumes imported services with a total value exceeding CHF 10'000 annually.

7. Estate duty	Switzerland does have real estate tax, on cantonal or communal level. There is no federal real estate tax. There are also inheritance taxes, but not on direct descendant and not at federal level.																																																
8. Stamp duty	Yes (1% on the issuance of securities above CHF 1 million).																																																
9. Property tax	<p>The real estate are included in the wealth taxation of the individual.</p> <p>Profits realized by selling real estate are subject to real estate gain tax at cantonal level. The tax is due on the realized profit (i.e. selling price minus purchase price and investments).</p> <p>The real estate transfer tax varies from canton to canton and in general, the longer a real estate has been held, the lower the tax is.</p>																																																
10. Income tax filing deadlines	<table><tr><th>Types of forms</th><th></th><th>Deadlines*</th></tr><tr><td>I&amp;W Tax Return</td><td>Individuals</td><td>By April 30th in the year following the tax year</td></tr><tr><td>I&amp;W Tax Return</td><td>Companies</td><td>By June 30th in the year following the tax year</td></tr></table> <p>* It depends on the canton. Various extensions are available.</p>	Types of forms		Deadlines*	I&W Tax Return	Individuals	By April 30th in the year following the tax year	I&W Tax Return	Companies	By June 30th in the year following the tax year																																							
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11. Double Tax Agreements	<p>Switzerland concluded 94 tax treaties to avoid double taxation.</p> <p>Switzerland also signed the Multilateral Instrument (the MLI) on June 7th, 2017.</p> <p>Overview of tax rates under double tax treaties that are applied to dividends, interest income and royalties:</p> <table><tr><th rowspan="3"></th><th colspan="2">Dividends %</th><th>Interest %*</th><th>Royalties %</th></tr><tr><th>Individuals, companies</th><th>Qualifying companies</th><th>(%)</th><th>(%)</th></tr><tr><th>(%)</th><th>(%)</th><th>(%)</th><th>(%)</th></tr><tr><td>Domestic Rates</td><td></td><td></td><td></td><td></td></tr><tr><td>Companies:</td><td>35</td><td>0</td><td>0/3/35</td><td>0</td></tr><tr><td>Individuals:</td><td>35</td><td>N/A</td><td>0/3/35</td><td>0</td></tr><tr><td>Treaty Rates</td><td></td><td></td><td></td><td></td></tr><tr><td>Treaty With:</td><td></td><td></td><td></td><td></td></tr><tr><td>Albania</td><td>15</td><td>5</td><td>0/5</td><td>5</td></tr><tr><td>Algeria</td><td>15</td><td>5</td><td>0/10</td><td>10</td></tr></table>		Dividends %		Interest %*	Royalties %	Individuals, companies	Qualifying companies	(%)	(%)	(%)	(%)	(%)	(%)	Domestic Rates					Companies:	35	0	0/3/35	0	Individuals:	35	N/A	0/3/35	0	Treaty Rates					Treaty With:					Albania	15	5	0/5	5	Algeria	15	5	0/10	10
	Dividends %		Interest %*	Royalties %																																													
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## 11. Double Tax Agreements

Argentina	15	10	12	3/5/10/15
Armenia	15	5	0/10	5
Australia	15	0/5	0/10	5
Austria	15	0	0	0
Azerbaijan	15	5	5/10	5/10
Bangladesh	15	10	0/10	10
Belarus	15	5	5/8	3/5/10
Belgium	15	0	0/10	0
Bulgaria	10	0	0/5	0
Canada	15	5	0/10	0/10
Chile	15	15	5/15	5/10
China (People's Rep.)	10	0/5	10	9
Chinese Taipei	15	10	10	10
Colombia	15	0	0/10	10
Croatia	15	5	5	0
Cyprus	15	0	0	0
Czech Republic	15	0	0	5
Denmark	15	0	0	0
Ecuador	15	15	0/10	10
Egypt	15	5	0/15	12.5
Estonia	10	0	0	0
Faroe Islands	15	0	0	0
Finland	10	0	0	0
France	15	0	0	5
Georgia	10	0	0	0
Germany	15	0	0	0
Ghana	15	5	0/15	8
Greece	15	5	7	5
Hong Kong	10	0	0	3
Hungary	15	0	0	0
Iceland	15	0	0	0/5
India	10	10	0/10	10
Indonesia	15	10	10	10
Iran	15	5	0/10	5
Ireland	15	0	0	0
Israel	15	5	5/10	5
Italy	15	15	12.5	5
Ivory Coast	15	15	15	10
Jamaica	15	10	5/10	10
Japan	15	0/5	0/10	10
Kazakhstan	15	0/5	10	10

## 11. Double Tax Agreements

Kosovo	15	0/5	5	0
Korea (Rep.)	15	5	5/10	5
Kuwait	15	15	10	0/10
Kyrgyzstan	15	5	5	5
Latvia	15	0	15	0/5
Liechtenstein	15	0	0	0
Luxembourg	15	0/5	0/15	0
Malaysia	15	5	10	10
Malta	10	0	0/10	0
Mexico	15	0	5/10	10
Moldova	15	5	0/10	0
Mongolia	15	5	0/10	5
Montenegro	15	5	10	10
Morocco	15	7	10	10
Netherlands	15	0	0	0
New Zealand	15	15	10	10
North Macedonia	15	15	10	10
Norway	15	0	0	0
Oman	15	0/5	0/5	8
Pakistan	20	10	10	10
Peru	15	10	10/15	10/15
Philippines	15	10	10	15
Poland	15	0	0/5	0/5
Portugal	15	0/5	0/10	0/5
Qatar	10/15	5	0	0
Romania	15	0	0/5	10
Russia	15	0/5	0	0
Serbia	15	5	10	10
Singapore	10	5	0/5	5
Slovak Republic	15	0	0/5	0/10
Slovenia	15	0	0/5	0/5
South Africa	15	5	5	0
Spain	15	0	0	0/5
Sri Lanka	15	10	50/10	5/10
Sweden	15	0	0	0
Tajikistan	15	5	10	5
Thailand	15	10	10/15	5/10/15
Trinidad and Tobago	20	10	10	10
Tunisia	10	10	10	10
Turkey	15	5	5/10	10

## 11. Double Tax Agreements

Turkmenistan	15	5	10	10
Ukraine	15	0/5	0/5	5
United Arab Emirates	15	5	0	0
United Kingdom	15	0	0	0
United States	15	5	0	0
Uruguay	15	5	0	0
Uzbekistan	15	5	0/5	5
Venezuela	10	0	5	5
Vietnam	10	7/10	10	10
Zambia	15	0/5	10	5

"This chart is based on information available up to 5.2.2021. Effective date: 1.1.2021."

For more information for each country, please visit:  
<https://www.estv.admin.ch/estv/de/home/internationales-steuerrecht/fachinformationen/quellensteuer-nach-dba.html>

# TURKEY

## 2021 TAX CARD (In Turkish Liras)

### 1. Basis of Taxation

The Turkish income tax year runs from 1 January to 31 December. There are two fundamental platforms determining liability to Turkish tax, commonly known as the source rule and residence rule.

The source jurisdiction of taxation means that Turkey taxes non-resident individuals and corporations on income arising to them from sources within Turkey only.

The residence jurisdiction involves the taxation of Turkey's resident individuals and corporations on income arising both in foreign countries and Turkey itself. Residents of Turkey are subject to Turkish tax on their worldwide income.

### 2. Corporate Tax

A Turkish resident company is subject to company tax, a non-resident company is taxed on its Turkish source income at the same rate as a resident company. The following tax rates apply to companies for the income year:

Year	Other Corporate Tax Entities
2017-2018	20%
2018-2020	22%
2021 & beyond	20%

### 3. Withholding tax rate (non-treaty)

	Resident	Non-resident Individual/ Corporation
Dividends	15%	15%
Interest	10%	10%
Royalties/know-how	20%	20%
Rents (for moveable property)	20%	20%
Management fees	20%	20%
Technical fees	20%	20%
Directors' fees	20%	20%
Directors' fees	As wages	As wages

### 4. Resident individual tax rates

Taxable Income TRY	Tax Payable TRY
0-24.000 TRY	15%
24.001-53.000 TRY	3.600+ %20 of excess over 24.000
53.001-190.000 TRY	9.400 + %27 of excess over 53.000
190.001-650.000 TRY	46.390 + %35 of excess over 190.000
over 650.000 + TRY	207.390 + %40

<b>5. Non-resident individual tax rates</b>	<table><tr><th>Taxable Income TRY</th><th>Tax Payable TRY</th></tr><tr><td>0-24.000 TR</td><td>15%</td></tr><tr><td>24.001-53.000 TRY</td><td>3.600+%20 of excess over 24.000</td></tr><tr><td>53.001-190.000 TRY</td><td>9.400 + %27 of excess over 53.000</td></tr><tr><td>190.001-650.000 TRY</td><td>46.390 + %35 of excess over 190.000</td></tr><tr><td>over 650.000 + TRY</td><td>207.390 + %40</td></tr></table>	Taxable Income TRY	Tax Payable TRY	0-24.000 TR	15%	24.001-53.000 TRY	3.600+%20 of excess over 24.000	53.001-190.000 TRY	9.400 + %27 of excess over 53.000	190.001-650.000 TRY	46.390 + %35 of excess over 190.000	over 650.000 + TRY	207.390 + %40
Taxable Income TRY	Tax Payable TRY												
0-24.000 TR	15%												
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53.001-190.000 TRY	9.400 + %27 of excess over 53.000												
190.001-650.000 TRY	46.390 + %35 of excess over 190.000												
over 650.000 + TRY	207.390 + %40												
<b>6. Stamp duty</b>	<p>Stamp duty is applied on a case by case basis. Stamp duty is mainly applied to real property transfers or some transfers of shares/units where the Company/ Trust in which shares/units are being transferred holds real property or prepared contract and all official documents which are recognised by official authorities.</p> <p>Rates of duty vary between 0,00189 to 0,00948 of the related amount. In any case, it can not exceed TRY 3.534.679 for 2021</p>												
<b>7. Property tax</b>	<p>Real estate tax is a municipal tax levied on the value of Turkish real property (land and buildings). The applicable tax rate varies depending on the classification of the property.</p> <p>Residential premises and land are taxed at 0.1% of their value. The tax rate is 0.1% for land in general, 0.2% for buildings, and 0.3% for building sites or vacant land allocated for construction purposes.</p> <p>These rates are applied twice for the metropolitan municipality</p>												
<b>8. Valuable House Tax</b>	<p>According to the related provisions of the Real Estate Tax Law, the Tax will apply to houses worth at least TRY 5,227,000. Houses worth less will not be taxed.</p> <p>The Tax is based on the taxable value of a house, which is determined according to the Real Estate Tax Law. Overall, the Tax rate is 3‰ (three per mille) for houses with a value between TRY 5,227,000 and TRY 7,841,000, 6‰ (six per mille) for houses with a value between TRY 7,841,001 and TRY 10,455,000 and 1% for houses with a value of more than TRY 10,455,001.</p> <p>Taxpayers who own only one residential property within the borders of Turkey do not have to pay any Tax, no matter how high the value of this property is.</p> <p>Those who have more than one house within the scope of the Tax do not have to pay Tax on the house with the lowest value. Taxpayers who have more than one house must notify the competent tax office of their least valuable property by means of the “Notice of exempt least valuable property of persons having more than one residential property (including those with usufructuary rights)” before the end of the 20th day of February each year for the houses they own which meet the threshold for the previous year.</p>												
<b>9. Income tax filing deadlines</b>	<table><tr><th>Types of Form</th><th></th><th>Deadlines*</th></tr><tr><td>Tax Return</td><td>Individuals</td><td>31 March</td></tr><tr><td>Tax Return</td><td>Companies</td><td>30 April</td></tr></table> <p>Tax payers can set a special accounting period if tax authority approve the related application.</p>	Types of Form		Deadlines*	Tax Return	Individuals	31 March	Tax Return	Companies	30 April			
Types of Form		Deadlines*											
Tax Return	Individuals	31 March											
Tax Return	Companies	30 April											

**10.  
Double tax  
agreements**

There are approximately 89 DTA applied which contain almost all income issues without VAT.

# UKRAINE

## 2021 TAX CARD (In Ukrainian Hryvnas)

### 1. Basis of Taxation

The Ukrainian income tax year runs from 1 January to 31 December. Tax-residents individuals and corporations are taxed on their worldwide income (with the possibility to deduct Ukrainian income tax for income taxes paid abroad). There are two fundamental types of taxation for companies – taxation of the profit (income tax) and gross turnover taxation (simple tax). Simple tax can be used by companies with a yearly gross income under 5 000 000 hryvnas, with additional restriction to provide some types of activities (financial, banking, provider services etc).

### 2. Corporate Tax

Corporation tax is a tax, in principle payable annually, on all profits generated in Ukraine by companies and other legal entities.

A Ukrainian resident company is subject to company tax, a non-resident company is taxed on its Ukrainian source income at the rate of 15% unless double taxation treaty is used to avoid non-resident income taxation in Ukraine. Ukrainian resident companies pay 18% tax from its profits.

Small-business companies (with a yearly gross income under 7 000 000 UAH) can use simple-tax, which is 5% from gross income (without VAT) or 3% from gross income for VAT-payers. For VAT-payers gross-income limit (7 000 000 UAH) does not include VAT.

### 3. Withholding tax rate (non-treaty)

Type of Income	Resident individuals	Non-resident Individual/Corporation	
Dividends	19.5%	19.5%	15%
Interest	19.5%	19.5%	15%
Royalties/know-how	19.5%	19.5%	15%
Rents (for moveable property)	19.5%	19.5%	15%
Management fees	19.5%	19.5%	15%
Technical fees	19.5%	19.5%	15%
Directors' fees	19.5%	19.5%	15%

Numerous international tax double-taxation treaties concluded between Ukraine and other countries can significantly reduce or eliminate the withholding taxes indicated above. For some of them, the amount of withholding tax rate can be reduced to zero, to get non-resident tax, the income in a country of its residence.

### 4. Resident individual tax rates

In Ukraine, personal income tax is in principle a comprehensive tax levied on an individual's total income in a given year. For different types of income (i.e. salary, dividends, profit from operation with corporate rights etc.) monthly-period taxation, or a yearly-taxation is stipulated.

Residents pay two types of tax from the non-commercial income

- Income tax with a rate of 18%
- Military tax with a rate of 1.5%

<b>4. Resident individual tax rates (cont.)</b>	<p>Two taxes mentioned above shall be paid from all taxed income of a physical person-resident.</p> <p>For such types income as salary, payment for provision of work and services under the contract, in addition social security tax is paid. Social security tax 22% is payed by employer himself, without any tax withholding from employee's income. For individual private entrepreneur, social security tax is paid by the person himself, with a minimum rate of 22% from the minimum monthly salary (in 2021 – an amount of 1320 UAH). Special tax rate of 5% and 9% are provided for some types of income (dividends, dividends from non-residents)</p>
<b>5. Non-resident individual tax rates</b>	<p>Non-residents individual tax rates are identical to the tax rates for residents. Unless double-taxation rules are applied, non-resident's income is taxed at the same rate as a Ukrainian resident individual.</p>
<b>6. VAT Tax</b>	<p>VAT is levied at a rate of 20%. Entities have to register once turnover reaches 1 000 000 UAH within last 12 months. Rate of 14% is applied to agricultural goods. Rate of 7% is applied to pharmacy goods. 0% rate is applied to international shipping services, export of goods from Ukraine.</p> <p>Non-resident suppliers and platform operators which import goods in Ukraine pay VAT during the goods customs clearance. Tax code stipulates number of operation which are not VAT - taxed if the place of their provision is not a Ukraine territory. As well – different types of services upon non-resident requests are not VAT-taxed, according to the provisions of the Tax code.</p>
<b>7. Estate tax</b>	<p>Estate duty is not paid in Ukraine. Although, operation with real estate is taxed with a rate of 1% by Pension duty.</p>
<b>8. Stamp duty</b>	<p>Stamp duty is not paid in Ukraine. Although state duty is provided as an official payment for provision of some administrative or state services, official payment for notary certification etc. It's amount varies depending on the type of operation according to the special State duty law.</p>
<b>9. Property tax</b>	<p>In Ukraine three different types of property taxes are present:</p> <ul style="list-style-type: none"> <li>• Real estate tax (the base of taxation is real estate area. Tax amount is stated by every city or settlement with its maximum rate of 1.5% of minimal salary per 1 square meter).</li> <li>• Land tax (the base of taxation is land area. Land tax is applied at a percentage rates from a land pecuniary valuation (basic tax rate is 1%) or land areas (tax rate depends on land localization).</li> <li>• Vehicle tax for luxury vehicles (the vehicles which market price exceeds 375 minimal salaries (2 250 000 UAH in 2021) are taxed in amount of 25 000 UAH per year).</li> </ul>

10. Income tax filing deadlines			
11. Double Tax Agreements	The Ukraine has signed 74 international tax treaties have been put in place to prevent tax treaties were signed with foreign countries to avoid double taxation.		



Updated: May 2021

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# UNITED KINGDOM

## 2021 TAX CARD (IN GBP)

### 1. Basis of Taxation

Income is taxed on an annual basis and taxpayers are required to submit tax returns on a self-assessment basis. Subject to bilateral tax treaties, residents are taxed on their worldwide income whereas non-residents are taxed on their UK income.

The main taxes in the UK are as follows:

- taxes on income (income tax, national insurance and corporation tax)
- Sales tax (VAT)
- Capital taxes
- Property Taxes
- Inheritance Tax

### 2. Corporate Tax

The rate of corporation tax on profits other than ring fence profits is 19% for both large and small companies.

Year to	31.3.2021	31.3.2022
Corporation Tax rate	19%	19%
Research & Development Relief (R&D)	31.3.2021	31.3.2022
SME enhanced expenditure deductions scheme*	130%	130%
Large company R&D Expenditure Credit (RDEC) scheme**	13%	13%

\*Additional deduction for qualifying R&D

\*\*Taxable expenditure credit for qualifying R&D

SMEs that make losses can surrender the deduction to HMRC in exchange for a payment of 14.5% of the loss

Main Capital Allowances		
Plant & Machinery		
Expenditure 1.4.21 – 31.3.23 (companies only)		130%
- Super deduction (main pool expenditure)		
- First-year allowance (special rate pool)		50%
Annual Investment Allowance (AIA)		
Expenditure 1.1.19 – 31.12.21	£1,000,000	100%
Expenditure from 1.1.22	£200,000	100%
Other rates		
Energy/water efficient equipment		100%
Writing down allowance: General pool (reducing balance)		18%
Writing down allowance: Special rate pool (reducing balance)		6%
** The special rate pool includes long life assets, integral plant in buildings, thermal insulation		
Structures & Buildings allowance		3%

Income tax is paid by individuals on monies earned from employment, self employment, pensions, rental income, Trust income.

Please note, separate income tax rates apply to Scotland.

The personal allowances and rates are as follows:

Income tax		
Allowances	2020/21	2020/21
Personal Allowance (PA)*	£12,500	£12,500
Marriage Allowance**	£1,250	£1,250
Blind Person's Allowance	£2,500	£2,500
Rent A Room Relief***	£7,500	£7,500
Trading Income***	£1,000	£1,000
Property Income***	£1,000	£1,000

\*PA will be withdrawn at £1 for every £2 by which "adjusted income" exceeds £100,000. There will therefore be no allowance given if adjusted income is above £125,140 (2020/21: £125,000)

\*\*Part of the PA that is transferable to a spouse or civil partner who is not a higher or top rate taxpayer.

\*\*\*If gross income exceeds it, the limit may be deducted instead of actual expenses

Rate Bands	2020/21	2020/21
Basic Rate Band (BRB)	£37,500	£37,500
Higher Rate Band (HRB)	£37,501 – £150,000	£37,501 – £150,000
Additional rate	Over £150,000	Over £150,000
Personal Savings Allowance (PSA)		
Basic Rate Taxpayer	£1,000	£1,000
Higher Rate Taxpayer	£500	£500
Dividend Allowance	£2,000	£2,000

BRB (Scotland: intermediate rate band) and additional rate threshold are increased by a person's pension contributions (up to a permitted limit) and Gift Aid donations.

Tax Rates	2020/21 & 2021/22		
Rates differ for General/ Savings/Dividend Income	G	S	D
Basic Rate	20%	20%	7.5%
Higher Rate	40%	40%	32.5%
Additional rate	45%	45%	38.1%

General income (salary, pensions, business profits, rent) usually uses personal allowances, basic rate and high rate bands before savings income (interest). Scottish taxpayers are taxed at different rates on general income (see below).

To the extent that savings income falls in the first £5,000 of the basic rate band, it is taxed at nil rather than 20%.

The PSA taxes interest at nil, where it would otherwise be taxable at 20% or 40%.

Dividends are normally taxed as the "top slice" of income. The DA taxes the first £2,000 of dividend income at nil, rather than the rate that would otherwise apply.

### 3. Income Tax (cont.)

### 3. Income Tax (cont.)

Income Tax – Scotland	2020/21		2021/22	
	Band	Rate	Band	Rate
Starter Rate	£2,085	19%	£2,097	19%
Basic Rate	£2,086-£12,658	20%	£2,098-£12,726	20%
Intermediate Rate	£12,659-£30,930	21%	£12,727-£31,092	21%
Higher Rate	£30,931-£150,000	41%	£31,093 -£150,000	41%
Top Rate	Over £150,000	46%	Over £150,000	46%

The Scottish rates and bands do not apply for savings and dividend income which are taxed at normal UK rates.

Remittance basis charge		
For non-UK domiciled individuals who have been UK resident in at least	2020/21	2021/22
7 of the preceding 9 tax years	£30,000	£30,000
12 of the preceding 14 tax years	£60,000	£60,000
15 of the preceding 20 tax years	Deemed to be UK domiciled	

### 4. Goods and Services tax

#### Value-added tax (“VAT”)

VAT is a tax on consumer expenditure and applies to goods and services supplied in the UK.

Liability to VAT is determined by the type of the transactions or products concerned, regardless of the personal situation of the liable person or customer.

VAT is borne by the end-user since it is included in the sale price of products or services. Each intermediary (manufacturer, retailer, etc.) collects the tax provided by the customer and pays it to the UK Tax Authorities (HMRC). Deductions are available for VAT incurred on businesses expenditure.

The UK VAT rates are as follows:

Remittance basis charge	
Standard rate (1/6 of VAT-inclusive price)	20%
Reduced rate (1/21 of VAT-inclusive price)	5%
Tourism & hospitality sector up to 30.9.21	5%
Tourism & hospitality sector 1.10.21 – 31.3.22	12.5%
Zero rate	0%

VAT returns and payments have to be done on a quarterly basis, although businesses who receive refunds of VAT can elect to use monthly returns.

VAT exemptions exist for taxable persons with low turnover.

Businesses and organizations are required to be registered for VAT in the UK if their taxable turnover in a 12-month period exceeds £85,000 or there is an expectation that turnover will exceed £85,000 in the next 30 days. Voluntary VAT registration is available for businesses and organizations with taxable turnover below the threshold level.

## 5. Inheritance Tax

Inheritance Tax is a tax on the estate (the property, money and possessions) of someone who's died.

There is no Inheritance Tax to pay if either:

- the value of the estate is below £325,000; or
- All assets above £325,000 are left to a spouse, civil partner, a charity or a community amateur sports club.

If the estate's value is below the threshold, you'll still need to report it to HMRC.

If a home is gifted to children (including adopted, foster or stepchildren) or grandchildren the threshold can increase to £450,000.

If a person is married or in a civil partnership and an estate is worth less than the above the threshold, any unused threshold can be added to the partner's threshold one partner dies. This means their threshold can be as much as £900,000.

Inheritance Tax	2020/21	2020/21
Nil rate band (NRB)*	£325,000	£325,000
NRB Residential enhancement**	£150,000	£175,000
Tax Rate on death***	40%	40%
Tax Rate on lifetime transfers to most trusts	20%	20%

\*Up to 100% of the proportion of a deceased spouse's/civil partner's unused NRB and RNRB band may be claimed in increment the current NRB and RNRB when the survivor dies.

\*\*RNRB is available for transfer of a main residence to direct descendants. It tapers away at the rate of £1 for every £2 of estate value above £2m.

\*\*\*Rate reduced to 36% if at least 10% of the relevant estate is left to charity. Unlimited exemption for transfers between spouses/civil partners, except if UK domiciled transferor and foreign domiciled transferee, where maximum exemption £325,000.

Reduced tax charge on gifts within 7 years of death					
Years before death	0-3	3-4	4-5	5-6	6-7
% of full death tax charge payable	100%	80%	60%	40%	20%

Annual exemptions for lifetime gifts include £3,000 per donor and £250 per recipient.

## 6. Land Taxes

Property taxes have been devolved in the UK so different land taxes are applied for sales of land in different areas of the UK.

Stamp Duty Land Tax applies to England & Northern Ireland.  
Land & Buildings Transaction Tax (LBTT) applies to Scotland.  
Land Transaction Tax ("LTT") applies to Wales.

An Annual Tax on Enveloped Dwellings (ATED) also applies to certain properties owned by a corporate structure.

## 6. Land Taxes (cont.)

### Annual Tax on Enveloped Dwellings (ATED)

ATED applies to residential properties valued at more than £0.5m owned by a corporate structure, unless for a qualifying purposes

Property value	Annual charge to	
	31.3.2021	31.3.2022
£0.5m - £1m	£3,700	£3,700
£1m - £2m	£7,500	£7,500
£2m - £5m	£25,200	£25,300
£5m - £10m	£58,850	£59,100
£10m - £20m	£118,050	£118,600
Over £20m	£236,250	£237,400

### Stamp Duty Land Tax (SDLT), Land & Building Transaction Tax (LBTT) and Land Transaction Tax (LTT)

#### Residential Property (1st Property only)

SDLT – England & Ni		LBTT Scotland		LTT - Wales	
£000	Rate on Band	£000	Rate on Band	£000	Rate on Band
Up to 125	Nil	Up to 145	Nil	Up to 180	Nil
125-250	2%	145-250	2%	180-250	3.5%
250-925	5%	250-325	5%	250-400	5%
925-1,500	10%	325-750	10%	400-750	7.5%
Over 1500	12%	Over 750	12%	750-1500	10%
				Over 1500	12%

LTT replaced SDLT in Wales from 1 April 2018

A supplement of 3% of the total purchases price applies for all three taxes where an additional residential property is purchased for more than £40,000 (unless replacing a main residence). It is also payable by all corporate purchasers.

For SDLT:

- From 22.11.17, first-time buyers purchasing a property of up to £500,000 pay a nil rate on the first £300,000 of the purchase price;
- A rate of 15% may apply to the total of the purchase price where the property is valued above £500,000 and purchased by a "non-natural person" (eg a company).

For LBTT:

First-time buyer relief increases the nil rate band to £175,000

#### Non-residential or mixed-use property

SDLT – England & Ni		LBTT Scotland		LTT - Wales	
£000	Rate on Band	£000	Rate on Band	£000	Rate on Band
Up to 150	Nil	Up to 150	Nil	Up to 150	Nil
150-250	2%	150-250	1%	150-250	1%
Over 250	5%	Over 250	5%	250-1000	5%
				Over 1000	6%

## 7. National Insurance

National insurance contributions are paid by UK workers (and employers) to fund certain state benefits.

National Insurance Contributions (NIC)		
Class 1 (Employees)	Employee	Employer
Main NIC rate	12%	13.8%
No NIC on first	£184 per week	£169 per week
Main rate* charge up to	£967 per week	No limit
2% rate on earnings above	£967 per week	N/A
Employment allowances per business	N/A	£4,000
<p>*Nil rate of employer NIC for employees under the age of 21 and apprentices under 25, up to £967pw.</p> <p>**Some businesses do not qualify, including certain sole director companies and employers who have employer's Class 1 NIC liability of £100,000 or more for 2020/21. Employer contributions (at 13.8% are also due on most taxable benefits (Class 1A) and on tax paid on an employee's behalf under a PAYE settlement agreement (Class 1B).</p>		
Class 2 (Self Employed)		
Flat rate per week		£3.05
Small profits threshold		£6,475
Class 3 (Voluntary)		
Class 3: Flat rate per week		£15.30
Class 4 (Self Employed)		
On profits £9,500 - £50,000		9%
On profits over £50,000		2%

## 8. Key Dates & Filing Deadlines

Tax	Deadline	Year
Income Tax Self Assessment		
1st payment on account	31 January	2021
2nd payment on account	31 July	2021
Balancing Payment	31 January	2022
Capital Gains Tax*	31 January	2022
*Non-residents with gains on UK residential property must pay CGT within 30 days of disposal unless already filing a self-assessment tax return		
Other payment dates		
Class 1A NIC	19 July	2021
Class 1B NIC	19 October	2021

## 8. Key Dates & Filing Deadlines (cont.)

Tax	Deadline	Year
Corporation Tax is due 9 months and 1 day from the end of the accounting period, unless a "large" company paying by quarterly instalments		
<b>2019/20 Filing deadlines</b>		
Issue P60s to employees	31 May 2021	
P11D, P11D(b)	6 July 2021	
Self-Assessment Tax Return (SATR) paper version	31 October 2021	
Online SATR if outstanding tax to be included in 2022/23 PAYE code	30 December 2021	
Online SATR	31 January 2022	

## 9. Double Tax Agreements

The United Kingdom has double taxation treaties with many countries to ensure that people do not pay tax twice on the same income.

For information on the UK's double taxable agreements, please visit: <https://www.gov.uk/government/collections/tax-treaties>

## 10. Capital Tax

Capital Gains is a tax on the profit when a person sells (or 'dispose of') an asset that has increased in value. The "gains" taxed, not the amount of money received, however there are some exemptions.

Capital Gains Tax		
Annual exempt amount	2020/21	2021/22
Individuals, estates	£12,300	£12,300
Most trusts	£6,150	£6,150
Tax Rate		
Individual (to basic rate limit)*	10%	10%
Individual (above basic rate limit)*	20%	20%
Entrepreneurs' Relief (ER)**	10%	10%
Trusts, estates*	20%	20%
Investors' Relief (IR)**	10%	10%

\*Individuals are taxed at 18%/28% on gains on residential property and receipts of carried interest. Trusts and estates are taxed at 28% in these circumstances.

\*\*Lifetime limit of £10m of qualifying gains. Various conditions apply.

**Chiene+Tait**  
CHARTERED ACCOUNTANTS

Updated: May 2021

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