

Tax Cards | 2024

A summary of tax facts of countries
in the Central and South America region



Tax Cards | 2024

Index

Chile	03
Colombia	11
Dominican Republic	17
Ecuador	25
Guatemala	31
Mexico	35
Panama	41
Peru	46
Venezuela	52

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CHILE

Tax Card 2024

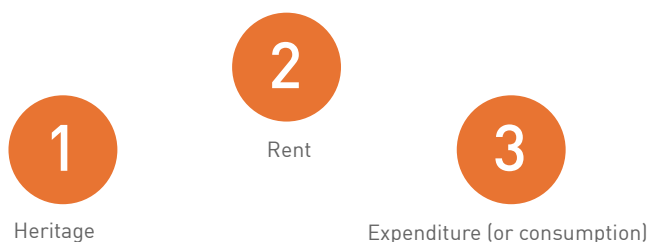
1. Main taxes in Chile

All taxes in Chile are levied at the national level, which means that there are no provincial or regional taxes, unlike elsewhere in the region.

The main sources of tax revenue are:

- Corporate income tax and personal income tax.
- Value added tax (VAT).
- Customs duties.
- Stamp tax.
- Municipal Licenses.
- Mining Royalties.
- Green Tax.
- In addition, the Chilean tax system includes a real estate tax, an inheritance and gift tax, and other minor taxes.

Each citizen pays taxes in relation to his or her economic power. This is based on three parameters or indicators.



In general terms, the Theory of Contributive Capacity states: **Those should pay more who:**

- Have more
- Earn more
- Consume more

The Chilean tax system is relatively simple, which applies equally to local companies and foreign investors.

2. Tax authority

The Internal Revenue Service (SII- Servicio de Impuestos Internos) is the tax authority in charge of the application and administrative control of Chilean taxes and tax provisions.

The General Treasury of the Republic (TGR- Tesorería General de la República) is the institution in charge of the custody, collection and remittance of fiscal funds from taxes, among others.

3. Income tax

As a general rule, individuals and entities domiciled or resident in Chile are subject to income tax on their worldwide source income. The income tax requirement in Chile is based on two elements: the place of residence of the taxpayer and the source of the income.

3. Income tax (cont.)

Individuals or legal entities, resident or domiciled abroad, pay taxes only on their Chilean source income, that is, income derived from assets located in Chile from activities carried out in Chile.

Foreigners established in Chile are only taxed on their Chilean source income during the first three years of residence. After this period, they are subject to taxation in Chile on their worldwide income. This last period may be extended.

Income tax is determined annually on income obtained within the period from January 1 to December 31 of each year, which must be declared and paid in April of the following calendar year.

4. Tax domicile and residence

Regarding individuals, a person is considered domiciled in Chile if he/she resides in Chile, with the real or presumed intention to remain in the country. Any person who remains in Chile, uninterruptedly or not, for a period or periods that in total exceed 183 days (6 months approx.), within any 12-month period. With respect to legal entities, companies incorporated in the country are considered residents for the purpose.

Taxes

Income tax is levied on different types of income through different taxes:

- Capital income (business income) is subject to the First Category Tax.
- Labor income (remunerations) is subject to the Second Category Tax.
- Income obtained by a person domiciled or resident in Chile is subject to Global Complementary Tax.
- Income obtained in Chile by a non-resident is subject to Withholding or Additional.

Taxpayers in Chile are classified as First or Second Category taxpayers according to the type of income they obtain. According to the Income Tax Law, which distinguishes two categories:

- First Category:** Income from capital and from commercial, industrial, mining and other companies.
- Second Category:** Income from work.

a. First Category Taxpayers:

This tax is levied on individuals and legal entities, for their income from the exercise of a business activity, leaving the income from the capital of commercial, industrial, mining and other companies affected.

Established in the "Income Tax Law" (LIR), the General regime has a single tax rate of 27% (since January 2018), except for taxpayers who opt for the "Pro-SME Regime" (article 14, letter D LIR), to whom a rate of 25% will be applied. This regime will be applicable only to companies with annual sales of less than 75,000 Unidades de Fomento, being the regime applicable by default, unless the SII is informed about the election of the general regime.

Currently, there is also a transitory reduction of the established LIR rate, for those companies under the regime contemplated in N° 3 of letter D) of Article 14 of the LIR: a rate of 10% applicable to income received or accrued during the year 2023 and 12.50% for those of 2024.

4. Tax domicile and residence (cont.)

It is determined on the basis of the net income obtained, i.e., on the income accrued or received, deducting the expenses from the taxable income. In order for expenses to be accepted for tax purposes, in a company that declares on an effective income basis, they must meet a series of requirements, including being a "necessary expense to generate the income". The tax is declared annually in April of each year for all income taxable income.

The tax is levied on the effective income determined for accounting purposes, except for some taxpayers in the agricultural, mining and transportation sectors, which may be taxed on the basis of presumed income.

The First Category Tax paid by the company is reduced as a "credit", in accordance with the mechanism established for the preparation of the Taxable Profits Fund (also known as "FUT"), of the Global Complementary or Additional Taxes that affect the owners, partners or shareholders of the companies or corporations, for the profits withdrawn (in cash or in kind) or for the dividends distributed.

State-owned companies must pay, in addition to the First Category Tax, a special tax of 40% on the profits obtained.

b. Second Category Taxpayers: are those who obtain income from their work.

The Second Category Tax is levied on income from dependent work (such as wages, salaries, per diems, bonuses, participations, pensions, representation expenses, or fees), except those from foreign sources, which are obtained as income from the exercise of liberal professions, lucrative occupation, etc. They are classified by the Income Law as Second Category income, applying a tax different from that indicated for the First Category, and with its own calculation procedures.

It is a monthly declaration and liquidation tax, which is withheld and paid to the Treasury by the employer or payer of the income. The calculation of this tax is made on labor remunerations, deducting previously the payments corresponding to health and social security.

Independent Second Category Tax: income from the exercise of liberal professions or any other lucrative profession or occupation not included in the first category or not subject to Single Second Category Tax, income obtained by brokers who are individuals and whose income comes exclusively from their work or personal activities, without using capital, and income obtained by professional partnerships that provide exclusively professional services and consulting, will be taxed with Global Complementary Tax or Additional Tax (final taxes), depending on whether they are domiciled or resident in Chile or not. These persons are subject to a withholding or provisional payment of 10% of the gross income at the time of receiving it. This withholding is deducted as a credit of the personal taxes indicated above, being able to request the refund of the excess resulting from the annual liquidation practiced, in the cases that correspond according to the Law.

In 2019, the mandatory contribution of workers who issue fee slips began, incorporating them to the social protection regimes and granting them the same coverage as those who work as employees.

By law, as of January 1, 2024, the withholding tax on fee slips increases from 13.00% to 13.75%.

5. Global complementary tax

The Global Complementary Tax is a personal, global, progressive and complementary tax that is determined and paid once a year by individuals with domicile or residence in Chile on income received in the First or Second Category. It affects taxpayers whose overall net income exceeds 13.5 UTA.

The rate increases progressively as the taxable income increases. It is applied, collected and paid annually, in April of the year following the year in which the income is obtained. The rates and brackets are the same as for the Second Category Tax, but on an annual basis.

For its determination, persons receiving dividends, together with such income, must include in the taxable base, an amount equivalent to the First Category Tax that affected such income. On this base, the Global Complementary Tax rate scale must be applied to determine the tax to be paid.

The taxpayer is entitled to deduct as a credit, the First Category Tax paid by the company and which was included in such calculation.

6. Additional tax

The Additional Tax is applied to individuals or legal entities, who have no residence or domicile in Chile, when the income is available to the person residing abroad, from Chile.

It is applied at a general rate of 35% and operates in general on the basis of attributed income, withdrawals, distributions or remittances of income abroad, which are of Chilean source.

Lower rates are applied for some types of income:

Dividends and remittances: 35% rate Dividends distributed by corporations, joint stock companies and limited partnerships incorporated in Chile.

Shares or rights: Rate 35% Income derived from the alienation of shares or social rights. They may be subject to First Category Tax as a single tax.

Trademarks and patents: Rate 30% Amounts paid for the use, enjoyment or exploitation of trademarks, patents, formulas, and other similar benefits.

Invention patents: Rate 15% Amounts paid for the use, enjoyment or exploitation of invention patents, utility models, industrial designs and drawings, layout-designs or topographies of integrated circuits, and new plant varieties. In cases qualified by law, the rate may be 30%.

Computer programs: Rate 15% Amounts paid for the use, enjoyment or exploitation of computer programs, understood as the set of instructions to be used directly or indirectly in a computer or processor, to carry out or obtain a certain process or result, contained in a support. In the cases qualified by law, the rate may be 30%.

Film and television: Rate 20% Payments abroad to foreign producers or distributors for materials to be exhibited through film and television projections.

Publishing rights: Rate 15% Amounts paid for the use of publishing rights or book copyrights.

Interest: General rate. 35% - Rate 4% For interest paid to foreign banks or financial institutions that comply with the requirements established by law.

7. Additional tax (cont.)	<p><u>Services rendered abroad:</u> Rate 35% Remuneration for services rendered abroad.</p> <p><u>Engineering work abroad:</u> Rate 15% Amounts paid for engineering or technical work and for those professional or technical services rendered by a person or entity knowledgeable in a science or technique through a consultancy, report or plan, rendered in Chile or abroad.</p> <p><u>Scientific, cultural or sports activities:</u> Rate 20% Remunerations derived exclusively from the work of foreign individuals who have developed scientific, cultural or sports activities in Chile / Rate 22% Insurance premiums contracted with companies not established in Chile / Rate 2% for reinsurance / Rate 5% Maritime freights from or to Chilean ports carried out by foreign companies / Rate 20% Rental, sublease and chartering of foreign vessels / Rate 35% Rental of capital goods (a rate of 5% is presumed for each installment).</p> <p>This tax is accrued in the year in which the income is attributed, withdrawn or distributed by the company. Taxpayers subject to this tax are entitled to a credit equivalent to the First Category Tax paid/ or percentage paid, by the companies on the income attributed, withdrawn or distributed, depending on the tax regime for which the company has opted.</p> <p>To avoid double taxation, Chilean law generally allows taxpayers to use amounts paid abroad due to foreign laws or regulations (including taxes) as tax deductions for local income tax purposes. In the latter case, double taxation avoidance treaties with treaty countries must be considered.</p>
7. Value added tax (VAT)	<p>The Value Added Tax has a fixed rate of 19% and is levied on the amount of transfers of goods and services for consideration and other agreements on movable and immovable property, on a "habitual" basis. In the latter case, the habitual nature is presumed with respect to sales pertaining to the line of business of a company. This tax is levied on the taxable base of sales and services, which is established by the respective law. In practice it has few exemptions, the most relevant being the one that benefits exports.</p>
8. Import taxes (foreign trade)	<p>Import taxes are subject to an ad valorem duty that varies according to the type of merchandise, with an average of around 6%. It is calculated on their CIF value (cost, insurance and freight). VAT (19%) is then levied on the CIF value, plus the ad valorem duty, followed by any other excise duty.</p> <p>In some cases, depending on the nature of the goods, e.g. luxury goods, alcoholic beverages and others, excise duty is required.</p> <p>Used goods, in cases where their importation is authorized, pay an additional surcharge of 3% on their CIF value, (the seller is responsible for transportation and insurance to the port of destination), in addition to the taxes to which they are subject, depending on their nature.</p> <p>In the case of goods originating in a country with which Chile has signed a trade agreement, the ad valorem duty may be free or subject to a percentage reduction. Chile adopts the Harmonized System of Classification.</p> <p>Virtually all imports are subject to a most favored nation (MFN) duty of 6% ad valorem.</p> <p>The entity in charge of controlling these operations and the payment and collection of taxes on foreign trade is the National Customs Service.</p>

9. Tax on sumptuary products	<p>The first sale or import, habitual or not, of articles considered by the Law as sumptuary products pay an additional tax at a rate of 15% on the value at which they are sold.</p> <p>The law considers as “sumptuary”; articles of gold, platinum and ivory; jewelry and precious stones; fine furs; carpets, tapestries and any other article of similar nature, qualified as fine by the SII; self-propelled house-rolling vehicles; caviar preserves and substitutes; air or compressed gas weapons, their accessories and projectiles, except those for underwater hunting. Pyrotechnics, such as fireworks, firecrackers and the like, shall pay a 50% tax.</p> <p>In the case of gold, platinum and ivory objects; jewelry and precious stones; and fine furs, they are subject to the same 15% rate for subsequent sales, applying the same general rules of the Value Added Tax.</p> <p>Law 21.420, establishes an annual tax rate of 2% on the current market price (PCP):</p> <ul style="list-style-type: none"> • Helicopters PCP higher or equal 122UTA • Aircraft PCP greater than or equal to 122UTA • Yachts PCP greater than or equal to 122UTA • Automobiles PCP greater or equal 62UTA
10. Tax on alcoholic beverages, non-alcoholic beverages, and similar products	<p>The sale or importation of alcoholic beverages, non-alcoholic beverages and similar products pay an additional tax, at the rate indicated in each case, which is applied on the same taxable base of VAT.</p> <p>Rates in force for this tax:</p> <ol style="list-style-type: none"> Natural or artificial non-alcoholic beverages, energizing or hypertonic, syrups and in general any other product that substitutes them or that serves to prepare similar beverages, and mineral or thermal waters to which coloring, flavor or sweeteners have been added, Rate of 10%. <p>In the case that the indicated species present a nutritional composition of high sugar content, a rate of 18%.</p> Liquors, piscos, whiskey, brandies, and distilled spirits, including liqueurs or flavored wines similar to vermouth, at a rate of 31.5%. Wines intended for consumption, including aerated wines, sparkling wines or champagne, fortified or sunny wines, chichas and ciders intended for consumption, whatever their container, beers and other alcoholic beverages, whatever their type, quality or denomination, Rate of 20.5%.
11. Tobacco tax	<p>Cigars pay a tax of 52.6% on their sale price to the consumer, including taxes.</p> <p>Manufactured tobacco, whether in strands, tablets, pastes or ropes, granulated, chopped or pulverized, pays 59.7%, on its sale price to the consumer, including tax.</p>

12. Tax on legal acts (stamps and stamp tax)	<p>The Stamp Tax is a tax levied mainly on documents or acts that show a money credit operation. Its taxable base corresponds to the amount of the capital specified in each document.</p>
13. Double taxation avoidance treaties	<p>Countries in agreement: Argentina, Australia, Austria, Belgium, Brazil, Canada, China, Colombia, Croatia, Czech Republic, Denmark, Ecuador, France, India, Ireland, Italy, Japan, Korea, Malaysia, Mexico, Netherlands, New Zealand, Norway, Paraguay, Peru, Poland, Portugal, Russia, South Africa, Spain, Sweden, Switzerland, Thailand, United Arab Emirates, United Kingdom, United States of America, United States of America and Uruguay.</p> <p>Chile currently has 33 Trade Agreements in force with 65 markets, giving it access to more than 67% of the world's population (equivalent to 88% of the world's GDP). Depending on the degree of international trade dimensions that the trade agreements cover, they are classified into four different categories:</p> <ul style="list-style-type: none"> I. Strategic Partnership Agreements. II. Free Trade Agreements. III. Economic Complementation Agreements. IV. Partial Scope Agreements. <p>I.- Strategic Association Agreements: It is a bilateral agreement of intermediate scope between a free trade agreement and an agreement of partial scope, since in addition to opening markets through tariffs, it may address agreements on other related issues not directly related to trade, such as cooperation in scientific, technological, social and educational matters.</p> <p>II.- Free Trade Agreements: It is a bilateral agreement that seeks to create a free trade zone that guarantees the free circulation of goods, services, and capital, through a harmonization of relevant policies and legal norms. These should ensure comparable or common competitive bases in areas that are not directly commercial, but which may have a highly competitive impact (environment, health and phytosanitary, technical barriers to trade, intellectual property, dispute settlement, legal security, etc.).</p> <p>III.- Economic Complementation Agreements (ECA): This is the name used by Latin American countries in the bilateral agreements they enter into with each other to reciprocally open their merchandise markets, which fall within the legal framework of the Latin American Integration Association (ALADI). The ECAs aim at greater integration objectives of market opening than the partial scope agreements.</p> <p>IV.- Partial Scope Agreements: This is the most basic type of bilateral agreement in tariff matters that seeks to partially free trade in limited lists of products. It is normally conceived as a first stage in a process of greater openness in the long term.</p> <p>* Source: www.sii.cl; www.subrei.cl; www.tgr.cl.</p>



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The information published here is for consultation purposes only. Before taking any action, a contact must be made with a professional.

COLOMBIA

Tax Card 2024 (Colombian Peso)

1. Tax ID – RUT	<p>The “Registro Único Tributario” (RUT), is the process by which natural and legal persons and other subjects of obligations administered by the tax authority (DIAN) and constitutes the unique mechanism to identify, locate and classify to individuals and entities that have the status of taxpayers in Colombia. Abecé Inscripción al RUT (dian.gov.co)</p>
2. General directorate of taxes	<p>The “Dirección de Impuestos y Aduanas Nacionales” (DIAN). is the entity that guarantees the fiscal security of the Colombian State and protect the national public economic order, for which it is in charge of managing and controlling tax, customs, exchange obligations, rights operating and administrative expenses on games of luck and chance.</p>
3. Exchange control regime	<p>The exchange market or regulated currency market in Colombia is made up of all the currencies that must be channeled through the Exchange Market Intermediaries authorized for this purpose or through the compensation mechanisms (Compensation Accounts) and by the currencies that despite being exempt from this obligation, they are channeled voluntarily.</p> <p>The Colombian exchange market is managed solely and exclusively through two legally authorized channels:</p> <ul style="list-style-type: none"> • The channel provided by foreign exchange market intermediaries. • The channel of Compensation accounts registered with the Banco de la República. <p>The currencies that must be channeled through the exchange market are those that originate in:</p> <ul style="list-style-type: none"> • Import and export of goods. • Foreign debt operations entered into by residents of the country, as well as the financial costs inherent to them. • Foreign capital investments in the country, as well as the returns associated with them. • Investments of Colombian capital abroad, as well as the returns associated with them. • Financial investments in issued securities and in assets located abroad, as well as the returns associated with them, except when the investments are made with currencies from operations that must not be channeled through the exchange market. • Guarantees and guarantees in foreign currency. • Derivative operations. <p>The Colombian exchange regime requires compliance with obligations derived from it that require specialist attention. Preguntas frecuentes sobre control cambiario (dian.gov.co)</p>

4. Colombian source income

Article 24 of the Colombian Tax Code expressly contemplates which income is from a national source and which is from a foreign source.

National source income is considered to be income from the exploitation of tangible and intangible assets within the country and the provision of services within its territory, permanently or temporarily, with or without its own establishment. Income from a national source is also those obtained from the sale of tangible and intangible assets, under any title, that are within the country at the time of their sale. Domestic source income includes, but is not limited to, the following:

- a. Capital income from real estate located in the country, such as leases or censuses.
- b. Profits from the sale of real estate located in the country.
- c. Those from personal property that are exploited in the country.
- d. Interest produced by credits owned in the country or economically linked to it. Interest from transitory credits originated in the importation of merchandise and in overdrafts or bank overdrafts are excepted.
- e. Work income such as salaries, commissions, fees, compensation for cultural, artistic, sports and similar activities or for the provision of services by legal persons, when the work or activity is carried out within the country.
- f. Compensation for personal services paid by the Colombian State, regardless of the place where they have been provided.
- g. The benefits or royalties of any nature from the exploitation of all kinds of industrial property, or "Know how", or from the provision of technical assistance services, whether these are provided from abroad or in the country.
- h. Likewise, the benefits or royalties from the literary, artistic and scientific property exploited in the country.
- i. The provision of technical services, whether these are provided from abroad or in the country.
- j. Dividends or shares from Colombian companies domiciled in the country.
- k. Dividends or participations of resident Colombians, that come from foreign companies or entities that, directly or through others, have businesses or investments in Colombia.
- l. The income originated in the life annuity contract if the beneficiaries are residents of the country or if the price of the rent is economically linked to the country.
- m. Profits from the exploitation of farms, mines, natural deposits and forests, located within the national territory.
- n. Profits from the manufacture or industrial transformation of merchandise or raw materials within the country, regardless of the place of sale or disposal.
- o. The income obtained in the exercise of commercial activities within the country.
- p. For the contractor, the total value of the respective contract, in the case of so-called "turnkey" contracts and other contracts for material work.
- q. Reinsurance premiums ceded by Colombian insurance entities to foreign entities.
- r. Income from the sale of goods and/or provision of services by non-residents or entities not domiciled in the country with a significant economic presence in Colombia, in favor of clients and/or users located in the national territory.

5. Corporate income tax

Taxpayer	Rate
National and similar companies, permanent establishments of foreign entities and foreign legal persons with or without residence in the country.	35%
Income obtained by industrial and commercial companies of the State and mixed economy companies of the Departmental, Municipal and District order, in which the participation of the State is greater than 90% that carry out monopolies of luck and chance and of liquors and alcohols.	9%
Insurance and reinsurance entities, stock brokerage firms, agricultural brokerage firms, exchanges of agricultural, agro-industrial or other commodity goods and products, and stock market infrastructure providers that have a taxable income equal to or greater than UVT 120,000.	40%
Publishing companies whose corporate purpose is book publishing.	15%
Hotel entities of theme parks, ecotourism and/or agrotourism, that meet requirements.	15%
Taxpayers whose main economic activity is the generation of electrical energy through water resources, who in the taxable year have a taxable income equal to or greater than 30,000 UVT.	38%
Offshore ZF, industrial users of special permanent free zones, industrial users of special permanent ZF whose main corporate purpose is the refining of fuels derived from petroleum or industrial biofuels; industrial users of services that provide logistics services and operator users.	20%
Occasional income tax rate	15%

6. Income tax on dividends

In Colombia, the dividend tax is generated with the development of a progressive rate, the higher the value of the dividend, the more tax is paid; Likewise, it is necessary to define if the person who will receive the dividend is a resident or non-resident and also to know if the dividend to be received is taxed or not taxed.

As it is a progressive rate that depends on the development of an arithmetic formula, we present some approximate dividend tax rates below:

Person	Taxed	Not taxed
Resident	33%	15%
Non-Resident	38%	20%

7. Withholding income tax (withholding tax)

To establish whether a payment abroad is subject to withholding at source for payments abroad, it is necessary to take into account the following:

- That the payment is made to a company or natural person not resident in Colombia.
- That the payment constitutes a national source income in accordance with the rules established in article 24 of the Tax Code.
- Establish whether the beneficiary's country of residence has signed an agreement to avoid double taxation with Colombia.

Some of the most significant withholding rates for foreign payments are the following:

Concept withholding tax	Rate
Payments or account credits for interest, commissions, fees, royalties, leases, compensation for personal services, or exploitation of all kinds of industrial property or know-how, provision of services, benefits or royalties from literary property, artistic and scientific, exploitation of cinematographic films and exploitation of software.	20%
Payments or account credits for consultancies, technical services and technical assistance, provided by non-residents or non-residents in Colombia.	20%
Payments or account credits for financial returns, made to non-residents or persons not domiciled in the country, originating in credits obtained abroad for a term equal to or greater than one (1) year or for interest or financial costs of the Leasing fee originated in leasing contracts that are entered into directly or through leasing companies with foreign companies without domicile in Colombia.	15%
Payments or credits into account, originated in leasing contracts on ships, helicopters and/or aircraft, as well as their parts that are held directly or through leasing companies, with foreign companies without domicile in Colombia.	1%
Any concept that constitutes taxable income.	35%

8. Tax on capital gains or occasional gains

In Colombia the occasional income tax is applied to the following income:

- Profit on the sale of fixed assets held for two or more years.
- Profits originated in the liquidation of companies.
- Income received by management, legacies, and donations.
- Income from lotteries, prizes, raffles, bets and the like the tax rate for occasional income, national or foreign, has a rate of 15%. Some of these incomes are susceptible to the application of tax exemptions to reduce the tax burden.

9. Personal income tax	<p>The income tax for natural persons has as a generating event the obtaining of income that generates an increase in wealth. In Colombia, the income statement for natural persons is settled depending on the type of income received: income from work, fees, services, commissions, leases, interest, dividends, among other income, must be classified properly to find the taxable base to which it is applied. the corresponding rate will apply.</p> <p>The income tax rate for natural persons is progressive, the more income is generated, the higher tax is paid. The marginal rate starts at 19% up to 39%.</p>
10. Tax residence natural people	<p>For people: Tax residents of the natural persons who remain continuously or discontinuously in the country for more than one hundred eighty-three (183) calendar days, including days of entry and exit from the country, during any period of three hundred sixty-five (365) are considered. consecutive calendar days, in the understanding that, when the permanence continues or discontinues in the country falls on more than one year or taxable period, the person will be considered a resident from the second year or taxable period.</p> <p>For companies: Tax residents are considered legal entities constituted in accordance with Colombian laws and that have material means of management and administration within Colombian territory. A permanent establishment is understood as a fixed place of business located in the country, through which a foreign company, whether it is a corporation or any other foreign entity, or a natural person without residence in Colombia, as the case may be, carries out all or part of its activity.</p>
11. VAT tax	<p>The events generating VAT correspond to:</p> <ol style="list-style-type: none"> The sale of movable and immovable tangible assets, with the exception of those expressly excluded. The sale or assignment of rights over intangible assets, solely associated with industrial property; The provision of services in the national territory, or from abroad, with the exception of those expressly excluded. The importation of tangible assets that have not been expressly excluded. The circulation, sale or operation of games of luck and chance, with the exception of lotteries and games of luck and chance operated exclusively over the Internet. <p>The VAT regime in Colombia classifies income as taxed, exempt, excluded and not taxed, each of these incomes with different tax treatments. The general sales tax rate is 19%.</p>
12. Limitation periods	<p>As a general rule, the prescription of tax obligations in Colombia is 3 years from the filing date. There are some special rules where this period increases or decreases.</p>

13. Treaties to avoid double taxation	Colombia has signed treaties to avoid double taxation with the following countries: Spain, Chile, Switzerland, Canada, India, Korea, Portugal, Czech Republic, United Kingdom, Italy, France, Japan, Ecuador, Peru, Bolivia.
14. List of reportable jurisdictions for the 2022 period	Páginas - Intercambio Internacional de Información (dian.gov.co)



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DOMINICAN REPUBLIC

Tax Card 2024 (Dominican pesos)

1. Legislation, administration and collection

As a general rule, taxation in the Dominican Republic is governed by the Tax Code (Law 11-92) and its amendments, by the regulations for its application and by the rules issued by the General Directorate of Internal Taxes (DGII), the autonomous body responsible for its collection and administration. Law 3489 of 1953 on the Customs Regime and other related laws govern customs tariffs, which are administered and collected by the General Directorate of Customs (DGA).

2. Tax obligations

Tax obligations are established by law and are assigned according to the economic activities declared by the taxpayer, as established in the catalogue of ISIC activities offered by the tax administration. These are automatically activated on the day indicated as the date of commencement of operations or at the time of registration in the National Taxpayer Registry (RNC). Tax obligations may change due to an update of economic activities or registration to a special regime.

3. Territoriality

In principle, the Dominican tax regime is territorial. All Dominican-sourced income is subject to local taxes, regardless of whether the person or entity that generates it is Dominican or foreign. On the other hand, income generated abroad is not subject to tax in the Dominican Republic, except for income from investments and financial gains of persons domiciled or resident in the Dominican Republic.

It is important to note that:

- a. pensions and social security benefits received from abroad;
- b. whereas Dominicans and foreigners who become residents of the Dominican Republic are only subject to the payment of tax on foreign-source financial income from the third year of establishing their residence in the country; and
- c. that persons who obtain their residency as retirees, rentiers or investors are exempt from paying this tax even after the third year of their residency.

For tax purposes, a resident in the Dominican Republic is considered to be any person who stays more than 182 days in a year in the country, either continuously or discontinuously.

4. Filing of affidavits

No later than the 10th day of each month.

Form	Tax	Periodicity	Due date
IR1	Tax on Personal Income	Annually	90 days after closure (31 March)
IR2	Income tax for legal entities	Annually	120 days after closure (30 April)
IT-1	Tax on Transfer of Industrialized goods and services (ITBIS)	Monthly	Form
Tax	Periodicity	Presentation Date	IR1
Personal Income Tax	Annual	90 days after closing (March 31)	IR2

5. Income tax (ISR)

Income Tax for Legal Entities

Legal entities (commercial companies) are required to pay a flat rate of 27% on their net taxable income annually during the tax year.

Determination of Net Taxable Income for Legal Entities

The Tax Code defines net taxable income as gross income reduced by allowable deductions, which represents all the necessary expenses incurred to obtain, maintain and preserve it, such as interest on corporate debts, insurance premiums, depreciation of assets, amortization of intangible assets, donations to charitable institutions (up to 5% of taxable income) and research and experimentation expenses not related to mineral deposits. in accordance with the provisions of Article 287 of the Dominican Tax Code.

Annual Filing of the Income Tax Return of Legal Entities

Companies, Dominican or foreign, that obtain income from Dominican sources must file with the DGII after the end of their fiscal year, a declaration of the net income obtained during that fiscal year within 120 days after the closing date.

January 28

Income Tax for legal entities	Annual
120 days after close (April 30)	IT-1
Tax on the Transfer of Industrialized Goods and Services (ITBIS)	Monthly
No later than the 20th day of each month	IR17
Other withholdings	Monthly

Submissions to the DGII must be supported by the company's financial statements audited by an authorized public accountant (firm).

Advance Payment of Income Tax

The advance ISR consists of one-twelfth of the income tax paid for the previous tax year, which must be paid monthly. These monthly advances are offset against the income tax due for the current tax year.

5. Income tax (ISR) (cont.)	<p>Income Tax for Individuals</p> <p>RD\$79,776.00 plus 25% of the excess of RD\$867,123.01</p> <table border="1"> <thead> <tr> <th>No later than the 10th day of each month</th><th>IR-3</th></tr> </thead> <tbody> <tr> <td>Salaried Withholdings</td><td>Monthly</td></tr> <tr> <td>No later than the 10th day of each month</td><td>15% of the exceeding from RD\$416,220.01</td></tr> <tr> <td>Rents from RD\$624,329.01 to RD\$867,123.00</td><td>RD\$31,216.00 plus 20% of the exceeding from RD\$624,329.01</td></tr> <tr> <td>Rents from RD\$867,123.01</td><td>RD\$79,776.00 plus 25% of the exceeding from RD\$867,123.01</td></tr> </tbody> </table> <p>Individuals must submit their annual return to the DGII before March 31. People whose income comes entirely from their jobs as salaried workers and those with incomes of less than 416,220.01 pesos are exempt from making the declaration. Spouses must file their returns separately.</p>	No later than the 10th day of each month	IR-3	Salaried Withholdings	Monthly	No later than the 10th day of each month	15% of the exceeding from RD\$416,220.01	Rents from RD\$624,329.01 to RD\$867,123.00	RD\$31,216.00 plus 20% of the exceeding from RD\$624,329.01	Rents from RD\$867,123.01	RD\$79,776.00 plus 25% of the exceeding from RD\$867,123.01
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Rents from RD\$867,123.01	RD\$79,776.00 plus 25% of the exceeding from RD\$867,123.01										
6. Capital gains tax	<p>To determine taxable capital gain, it deducts the inflation-adjusted cost of acquisition or production from the sale price or value of an asset. In the case of depreciable goods, the cost of acquisition or production to be considered will be that of their residual value. The rate of this tax is the same as the Income Tax: 27% for legal entities and from 0 to 25% for individuals.</p> <p>Capital gains are calculated in Dominican pesos only.</p>										
7. Tax on transfers of industrialized goods and services (ITBIS)	<p>ITBIS (VAT) is a value-added tax levied on the transfer and import of industrialized goods and the provision of services. The standard ITBIS rate is 18%, which is calculated, for imports, on the cost of the safest imported good, freight and customs taxes; and for services, on their total value. There are some goods with a reduced ITBIS rate of 16% and other goods and services exempt from this tax, such as goods destined for export, some basic foodstuffs, medicines, fuel, fertilizers, books and magazines, financial services, health services, transport services, residential rentals, and electricity, water and garbage collection services.</p> <p>ITBIS (VAT) is added to any invoice for goods and services that are not exempt. It is the obligation of the taxpayer who receives the ITBIS payment to pay it to the DGII within the first 20 days of the month following the month in which the transaction took place.</p> <p>Late payment of ITBIS is sanctioned with surcharges of 10% for the first month or fraction of a month and an additional 4% for each subsequent month or fraction of a month, in addition to 1.10% interest for each month or fraction of a month.</p>										
8. Selective consumption tax (ISC)	<p>The Selective Consumption Tax is levied on the transfer and import of certain goods (motor vehicles, firearms, cigarettes, alcoholic beverages, household appliances and jewelry), as well as the provision or lease of some services (telecommunications services, checks and insurance).</p>										

<p>9. Real estate tax (IPI)</p>	<p>Properties owned by individuals are taxed with the IPI at a rate of 1% per year on their cumulative value, according to government appraisal. The 1% tax is calculated on its value above RD\$9,860,649.00 pesos (approximately US\$173,000), a figure that is adjusted annually for inflation.</p> <p>The IPI is generated at the beginning of the fiscal year, however, it is divided into 2 installments, which must be settled no later than March 11 and the second no later than September 11.</p> <p>The following properties are exempt from the IPI:</p> <ol style="list-style-type: none"> Rural land used for agricultural exploitation; Dwellings whose owner has reached the age of 65, provided that it has not been transferred of ownership in the last 15 years and is the only one owned by its owner; Homes subject to asset tax.
<p>10. Real estate transfers</p>	<p>A real estate transfer is a change in the right of ownership of a property. The tax applicable to these real estate transactions will depend on the event that produces it. Among the types of transfer we cite:</p> <ol style="list-style-type: none"> Prizes: Real estate acquired as a result of competitions and/or sweepstakes. These are subject to the payment of 25% of the value of the property in accordance with the provisions of Law 11-92, Art 309, letter c (modified by Law 253-12, Art 10, letter c). Donation: An act between the living that consists of giving funds or other material goods, generally for reasons of solidarity, affection or charity. The rate of this tax corresponds to the ISR, which since 2015 is 27% based on Law 2569 modified by Law 253-12. Succession: It is the substitution of a deceased person by his successors (testamentary or not) in the set of obligations and rights of which the former was the holder, whose transfer is subject to the payment of Inheritance Tax. The rate is 3% calculated for the estate, after having made the corresponding deductions based on Law 2569, modified by Law 288-04.
<p>11. Asset tax</p>	<p>Taxable assets are understood to be the total value of assets, expressly including real estate listed in Schedule A, not adjusted for inflation and after the depreciation deduction has been applied, as well as amortization and reserves for uncollectible accounts, except for capital investments of other companies, land located in rural areas, real estate by nature of agricultural holdings and advance taxes or advances.</p> <p>The amount assessed for asset tax will be considered a credit against income tax, so that, if the amount assessed for income tax is equal to or greater than the asset tax payable, the obligation to pay the latter will be deemed extinguished.</p> <p>Legal entities or individuals with sole proprietorships must pay a 1% tax on their taxable assets. The first, on the same deadline set for the payment of income tax, and the second, within six months from the due date of the first instalment.</p>

12. Surcharges for late payment and compensatory interest	<p>If you make the payment after the deadline, the default charges include surcharges and interest, as follows:</p> <ol style="list-style-type: none"> 10% late payment surcharge on the value of the tax payable, for the first month or fraction of a month. 4% progressive and indefinite for each subsequent month or fraction of a month; that is, from the second month onwards. 1.10% cumulative indemnity interest on the amount payable, for each month.
13. Withholding at source	<p>The Tax Code establishes the following withholdings at source:</p> <ul style="list-style-type: none"> • Employee payments. Employers must withhold and pay monthly income tax to the DGII on their employees' salaries. • Foreign payments. Payments abroad of taxed income from Dominican sources to non-residents or non-domiciled persons in the country are subject to a withholding, as a single and final payment of the tax corresponding to 27% of such income. There are two exceptions to this rule: <ol style="list-style-type: none"> Payments made to residents of Canada, for which the rate is 18 per cent; (see Agreement between the Dominican Republic and Canada for the avoidance of double taxation). Payments for loans contracted with foreign institutions and payments made by branches domiciled in the Dominican Republic to their parent company abroad, for which the withholding rate is 10 per cent. • Dividends. Dominican-source dividends paid to individuals or legal entities resident or domiciled both in the country and abroad are subject to a 10% withholding tax. • Rentals. Payments of rents or leases to individuals (but not to legal entities) are subject to a 10% withholding tax. • Fees and commissions. Fees, commissions and other remuneration and payments for the provision of services in general, provided by natural persons and not performed in a relationship of dependency, are subject to a 10% withholding tax. • Payments made by the Government to its suppliers are subject to a 5% withholding tax. <p>Anti-Evasion Rule</p> <p>The Tax Code provides that when the legal forms adopted by taxpayers are manifestly inappropriate to reality and this results in a reduction in taxes, the DGII will apply the law without such forms.</p>
14. Transfer pricing rules	<p>The Dominican Republic has established transfer pricing rules according to the guidelines of the Organization for Economic Cooperation and Development (OECD). These rules apply to:</p> <ol style="list-style-type: none"> 1. Commercial or financial transactions entered into between a natural person, legal entity or entity resident in the Dominican Republic and (a) a non-resident related person, 2. A resident relative, or 3. Natural persons, legal entities or entities domiciled, incorporated or located in States or territories with preferential tax regimes, low or no taxation or tax havens.

14. Transfer pricing rules (Cont.)	<p>Individuals or legal entities resident in the country must submit to the DGII annually, within 180 days of the closing date of the fiscal year, an informative return of their operations with related persons.</p>
15. Double taxation avoidance treaties	<p>The Dominican Republic has signed and ratified double taxation treaties with Canada in 1977 and with Spain in 2014. The treaty with Canada only refers to income tax and real estate tax; Spain's income tax and capital gains tax only.</p>
16. Foreign account tax compliance act (fatca)	<p>The U.S. Internal Revenue Service (IRS) and the DGII have initiated a process of exchanging financial and tax information in execution of the Foreign Account Tax Compliance Act (FATCA), enacted in the United States in 2010. FACTA requires financial institutions outside the United States to identify U.S. citizens who have accounts opened with them, as well as to inform the IRS of the existence of such accounts.</p> <p>Under the intergovernmental agreement (IGA) between the United States and the Dominican Republic on the execution of FATCA, Dominican financial institutions will report the required information to the DGII, which will be forwarded to the IRS; In addition, the IRS will provide information to the Directorate General of Internal Revenue on the accounts of Dominicans in U.S. banking institutions.</p>
17. Financial transaction tax	<p>The payment of the Tax on the Issuance of Checks and Electronic Transfers 0.0015%, consists of a tax collected by the DGII for each bank transaction carried out and applied said percentage to the amount involved in the transaction.</p>
18. Statute of limitations for tax liability	<p>According to Article 21 of the Dominican Tax Code, the following actions are time-barred after three years:</p> <ol style="list-style-type: none"> The actions of the Treasury to demand the affidavits, challenge those made, require the payment of the tax and carry out the ex officio estimation; Actions for violation of this Code or the Tax Laws; and (c) Actions against the Treasury in the event of a repetition of the tax.
19. Filing and paying taxes	<p>The Filing of Returns and the Payment of Taxes in the Dominican Republic are carried out both digitally through the platform of the General Directorate of Internal Taxes DGII and in the Local Administrations located in each region of the country.</p>

20. Important to know	<ul style="list-style-type: none"> • Keep records of business or professional activities. • Have control of receipts, invoices, or other documents related to your activity. • Control the printing and issuance of Tax Receipts. • In case you do not have operations in a certain period, you must file an Informative Affidavit; that is, in zero and send, in the same way, the data submission formats, also in an informative way, on the established deadlines. • At the time of providing a service, if taxes are withheld, you must request the certification of payment and withholding, for the payment made. • It is the taxpayers' responsibility to validate that all Tax Receipts issued to them by their suppliers of goods and services have been authorized by the Internal Revenue Service. • You must report any modification you make to the RNC (change of address, telephone number, economic activity, temporary cessation or permanent closure or any other).
21. Sources	<ul style="list-style-type: none"> • Law 11-92, Dominican Tax Code. • Law 253-12 on the Strengthening of the State's Collection Capacity for Fiscal Sustainability and Sustainable Development. G.O. No. 10697 of November 13, 2012. • Law 2569 on Inheritance and Gift Taxes, as amended. • Law 3331 establishing an additional tax on real estate transactions. • https://drlawyer.com/espanol/derecho-fiscal/



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ECUADOR

Tax Card 2024

1. Single taxpayer registry (RUC)

It is an instrument whose function is to register and identify taxpayers for tax purposes and provide this information to the Tax Administration.

Once the RUC registration has been completed, taxpayers can issue sales receipts, file the tax return and present the respective tax payment, as well as demand their rights as a taxpayer.

2. Internal rents service

The Internal Revenue Service (SRI) is the institution in charge of collecting taxes at the national level, timely compliance with tax obligations, and combating tax evasion, fraud and avoidance.

3. Exchange control regime

In Ecuador there is no exchange control regime in foreign currency. The legal currency is the dollar.

4. Types of taxpayers

- Natural people.
- Legal persons.

Taxpayers, natural persons, carry out economic activities and may or may not be required to keep accounting. Natural persons declare their taxes under the following regimes:

- General Regime
- Simplified Regime for Entrepreneurs
- Simplified Regime for Popular Businesses

RIMPE - Entrepreneurs	RIMPE - Popular Businesses
Natural and legal persons with annual gross income of up to USD 300,000	Natural persons with annual gross income of up to USD 20,000

General Regime
Natural persons who have not been categorized in the previous regimes.

5. Income tax

To calculate the Income Tax that a taxpayer must pay, the following must be considered: refunds, discounts, costs, expenses and deductions attributable to such income will be subtracted from the total taxable income. This result is called "Tax base".

5. Income tax (cont.)

Additionally, “bancarización” must be considered for the deduction of costs and expenses for Income Tax. Those payments made for amounts greater than USD 1,000.00 and that are not properly banked are not deductible for the determination of Income Tax.

The following income will be considered taxable income for purposes of determining income tax:

- a. Income received from different activities received in Ecuadorian territory.
- b. Those received by Ecuadorians and foreigners for activities carried out abroad, coming from natural persons, from national or foreign companies domiciled in Ecuador, or from entities and organizations of the Ecuadorian public sector.
- c. Profits from the sale of real estate or personal property located in the country.
- d. Profits from the direct or indirect disposal of shares, participations, or other rights representing capital or other rights.
- e. Benefits or royalties of any nature, coming from copyrights, as well as industrial property, such as patents, trademarks, industrial models, trade names and technology transfer.
- f. Profits or dividends distributed by companies incorporated or established in the country.
- g. Those coming from exports are carried out whether they are carried out directly or through special agents, commission agents, branches, subsidiaries, or representatives of any nature.
- h. Interest and other financial returns paid or credited by natural persons, national or foreign.
- i. Those coming from raffles, bets, lotteries and similar, promoted in Ecuador.
- j. The provisions made to cover the payment of employer retirements or eviction that have been used as a deductible expense.
- k. Those coming from inheritances, legacies, donations and discovery of assets located in Ecuador; and,
- l. Any other income received by companies and national or foreign individuals residing in Ecuador, including unjustified capital increases.

The following will be considered exempt income: those who are not subject to paying taxes:

- a. Dividends and profits, calculated after payment of income tax, distributed by national companies resident in Ecuador.
- b. Obtained by state institutions and by public companies regulated by the Organic Law of Public Companies.
- c. Exempted under international conventions.
- d. Those of legally constituted private non-profit institutions.
- e. Interest received by natural persons for their savings deposits paid by entities of the country's financial system.
- f. Those received by the beneficiaries of the Social Security Institute.
- g. Those received by state higher education institutes, covered by the Higher Education Law.
- h. Per travel expenses given to officials and employees of State institutions.
- i. For scholarships to finance studies, specialization or training in higher education institutions.
- j. Obtained by disabled workers, as an eviction bonus and compensation for untimely dismissal.

5. Income tax (cont.)

- k. Also those coming from non-monetary investments made by companies that have signed contracts to provide services for the export and exploitation of hydrocarbons.
- l. Income generated from the occasional sale of real estate.
- m. Those obtained from commercial trusts, as long as they do not develop business activities.
- n. Income and benefits obtained by individuals and companies resident or not in the country, from fixed-term deposits in national financial institutions
- o. Compensation received for insurance, except for those arising from loss of profits.
- p. Interest paid by workers on loans made by the employing company for the worker to acquire shares.
- q. Financial compensation for the living wage.
- r. Transfers direct non-refundable economic benefits.

6. Income tax rate for natural persons

To settle the income tax of natural persons and undivided estates, the rates contained in the income tables corresponding to each fiscal year will be applied to the tax base. Income received or accrued during the year 2023 and 12.50% for those of 2024.

Tax base of income from work in a dependency relationship

It is constituted by taxed income less the value of personal contributions to the Ecuadorian Social Security Institute (IESS), except when these are paid by the employer.

INCOME TAX 2024			
Basic Fraction (USD)	Excess up to (USD)	Excess up to (USD)	Excess Tax (%)
0	11.902	-	0 %
11.902	15.159	-	5 %
15.159	19.682	163	10 %
19.682	26.031	615	12 %
26.031	34.255	1.377	15 %
34.255	45.407	2.611	20 %
45.407	60.450	4.841	25 %
60.450	80.605	8.602	30 %
80.605	107.199	14.648	35 %
107.199	Onwards	23.956	37 %

7. Income tax for companies

To settle the Income Tax in the case of companies, the 25% rate will be applied to the tax base.

- The 25% tax rate will be plus three (3) percentage points when:
 - a. The company has shareholders, partners, participants, constituents, beneficiaries or similar, regarding whose corporate composition said company has failed to comply with its duty to report in accordance with the provisions of this Law; either,
 - b. Within the chain of ownership of the respective rights representing capital, there is a resident owner, established or protected in a tax haven, lower tax jurisdiction or preferential tax regime and the beneficial owner is a tax resident of Ecuador.
- Regular exporting companies, as well as those dedicated to the production of goods, including those in the manufacturing sector, that have 50% or more of a national component and those incoming tourism companies, as determined by the Regulations to this Law, that reinvest their profits in the country, may obtain a reduction of ten (10) percentage points of the income tax rate on the amount reinvested in productive assets.
- Companies that have the status of micro and small businesses, as well as those that have the status of habitual exporters, will have a reduction of three (3) percentage points in the income tax rate. For regular exporters, this rate will be applied whenever employment is maintained or increased in the corresponding fiscal year.
- Taxpayers who are administrators or operators of a Special Economic Development Zone will have an additional reduction of ten (10) percentage points in the income tax rate, which will be applicable for a period of ten (10) years counted from from the end of the period of total exemption from said tax.

8. Deadline for submission

The deadlines for submitting the declaration vary according to the ninth digit of the identification number or RUC, according to the type of taxpayer:

Ninth digit RUC/CEDULA	Deadline for Natural Persons	Deadline for Companies
1	March 10th	April 10th
2	March 12th	April 12th
3	March 14th	April 14th
4	March 16th	April 16th
5	March 18th	April 18th
6	March 20th	April 20th

8. Deadline for submission (cont.)

Ninth digit RUC/CEDULA	Deadline for Natural Persons	Deadline for Companies
7	March 22nd	April 22nd
8	March 24th	April 24th
9	March 26th	April 26th
10	March 28th	April 28th

9. Income tax RIMPE-entrepreneur

- To calculate the tax base, the gross taxable income from the activities covered by this regime will be considered and the returns or discounts will be subtracted; Additionally, generation and/or reversal adjustments due to the application of deferred taxes will be added or subtracted.
- The declaration and payment of Income Tax will be made annually, according to the following table:

Lower limit (USD)	Upper limit (USD)	Tax on the basic fraction	Marginal rate (%)
-	\$ 20.000,00	\$ 60,00	0%
\$ 20.000,00	\$ 50.000,00	\$ 60,00	1%
\$ 50.000,01	\$ 75.000,00	\$ 360,00	1,25%
\$ 75.000,01	\$ 100.000,00	\$ 672,50	1,50%
\$ 100.000,01	\$ 200.000,00	\$ 1.047,50	1,75%
\$ 200.000,01	\$ 300.000,00	\$ 2.797,52	2%

10. Income tax RIMPE – popular business

The declaration and payment of Income Tax will be carried out annually.

INCOME TAX TABLE RIMPE POPULAR BUSINESS		
Fraction basic	Excess until	Tax
0,00	2.500,00	0,00
2.500,01	5.000,00	5,00
5.000,01	10.000,00	15,00
10.000,01	15.000,00	35,00
15.000,01	20.000,00	60,00

11. Foreign exchange outflow tax (ISD)	<p>The generating event of this tax is the transfer, shipment or transfer of foreign currency that is carried out abroad, whether in cash or through the writing of checks, transfers, withdrawals or payments of any nature with the exception of compensations made with or without the intermediation of institutions of the financial system.</p> <p>Additionally, the generating event of this tax is constituted by two types of presumptions:</p> <p>The first related to any payment made from abroad.</p> <p>The second presumption establishes that the ISD is incurred in the case of exports, the tax is presumed to be incurred 6 months after the goods arrive at the port of destination.</p> <p>The foreign currency carried by non-resident foreign citizens at the time of entry into the country is exempt from the payment of ISD, provided that the stay in the country of the natural person does not exceed 90 calendar days and that the amount has been informed to their Entrance to the country.</p> <p>The rate from April 1, 2024 is 5%.</p> <p>Income Tax Tax Credit</p> <p>Payments made for ISD in the importation of raw materials, inputs and capital goods that appear in the list established for this purpose by the Tax Policy Committee may be considered as a tax credit for the payment of Income Tax, of the year in which said payments were made, as well as the four subsequent years.</p>
12. Expiration of tax obligation	<p>Art. 94.- Expiration-The taxes that the law requires determination by the taxpayer, the authority of the administration to determine the tax obligation expires, without requiring a prior pronouncement, in four years from the date on which the declaration was submitted; In the case of the taxable person who has not submitted his declaration, the expiration period will be six years.</p>
13. Treaties to avoid double taxation	<p>Ecuador has signed agreements with the following countries to avoid double taxation: Germany, Argentina, Belarus, Belgium, Brazil, Canada, Chile, China, Korea, United Arab Emirates, Spain, France, Italy, Japan, Mexico, Qatar, Romania, Russia, Singapore, Switzerland, Uruguay.</p>
14. Income tax for inheritances, legacies and donations	<p>Beneficiaries of income from inheritances, legacies, donations, discoveries and any type of act or contract by which free ownership of goods and rights is acquired, will pay the tax, applying to the tax base the rates contained in the income tables, corresponding to each fiscal year.</p>

14. Income tax for inheritances, legacies and donations (cont.)	INCOME TAX 2024			
	Basic Fraction (USD)	Excess up to (USD)	Tax Fraction (USD)	Tax Surplus Fraction [%]
	0	76.558	-	0 %
	76.558	153.115	-	5 %
	153.115	306.231	3.828	10 %
	306.231	459.379	19.139	15 %
	459.379	612.515	42.112	20 %
	612.515	765.630	72.739	25 %
	765.630	918.725	111.018	30 %
	918.725	Onwards	156.946	35 %
15. Single income tax	For the Agricultural sector, the Single income tax for agricultural activities and the single income tax for banana production activities.			



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The information published here is for consultation purposes only. Before taking any action, a contact must be made with a professional.

GUATEMALA

Tax Card 2024 (In US Dollars)

1. Basis of taxation

Income is taxed on territorial basis, in other words, tax is chargeable on income accrued in or derived from Guatemala origin, for Guatemalans and Foreigners. Foreign sourced income is exempt.

Tax Payers Registry

Every person or corporation of any kind, Guatemalan or foreigner, tax contributor responsible of the tax payment must be registered at the Registro Tributario Unificado (RTU).

Tax Authority

In Guatemala the Tax Authority in charge to collect taxes for the Central Government is Superintendencia de Administración Tributaria (SAT).

Exchange Control

In Guatemala there is not an exchange control of foreign currency. The exchange rate for purchase or sale operations of foreign currency is established by the free offer and demand of currencies.

2. Guatemalan source income

Domiciled tax payers are subject to income tax on the all taxable income that they obtain without considering the nationality of the individuals, the place the companies are established and neither the place of the generation of the income.

Non-Domiciled tax payers, such as branches, agencies and other permanent establishments of entities constituted abroad are subject to income tax on the Guatemalan source income.

3. Corporate tax

All income originated in Guatemala is subject to Income Tax. It doesn't matter the nationality of the persons, place of constitution of corporations or the place of establishment of the production source.

All income produced by goods, services, capitals, rights, investment in Guatemala are considered income on Guatemalan basis.

The current corporate tax is 25% over profit of the year. In addition, the distribution of profits (dividends) is subject to a withholding income tax at a 5% tax rate.

The corporate tax rate is applied after deduction from the income, all costs and expenses needed to produce and maintain the source income.

Foreign expenses are deductible if they are fully documented and they have been necessary to produce taxable income.

3. Corporate tax (cont.)

Payments in Advance to Income Tax

Payments in advance can be calculated as follows:

- 8% over total quarterly income considered an estimated profit applying an income tax rate of 25%
- 25% income tax rate over a quarterly net profit.

Monthly Income Tax

Income Tax rate of 5% on a monthly basis up to US \$ 4,000.00 and 7% over the excess.

Solidarity Tax

Solidarity Tax (ISO) is applied over the total amount of assets of income of the previous fiscal year. Tax rate is 1% over the higher amount over that base.

ISO is used as credit against to Income Tax payments in advance and annual Corporate Tax. If ISO is not used in the fiscal year, it could be carried forward for the next three years. The amount of ISO, which was not applied as a fiscal credit after the three years, could be recorded as an expense of the year.

4. Corporate income tax to branches of foreign companies

Any branch, agency or other permanent establishments of foreign companies are considered domiciled in Guatemala, due to the income produced by Guatemalan source.

Net profit produced by foreign companies is subject to a 25% Income Tax as well as Guatemalan companies.

5. Withholding tax rate (non-treaty)

	Resident	Non-resident Individual/Corporation
Interests	10%	10%
Dividends	5%	5%
Ships and plane rent	25%	25%
Royalties/know-how	15%	15%
Technical services	25%	25%

6. Basis of tax residence corporate residence

A company will be considered to be a Guatemala tax resident if the control and management of its business was exercised in Guatemala in the preceding calendar year.

“Control and management” is the making of decisions on strategic matters, such as those on company policy and strategy. The location of the company’s Board of Directors meetings, during which strategic decisions are made, is a key factor in determining where the control and management is exercised. The place of incorporation of a company is not necessarily indicative of the tax residence of a company.

6. Income tax individual residence (cont.)	<table border="1"> <thead> <tr> <th>International activity</th><th>Net profit rate</th></tr> </thead> <tbody> <tr> <td>1. Insurance</td><td>5%</td></tr> <tr> <td>2. Ships and plane rent</td><td>25%</td></tr> <tr> <td>3. Communications</td><td>5%</td></tr> <tr> <td>4. Air Transport</td><td>5%</td></tr> <tr> <td>5. Freights</td><td>5%</td></tr> <tr> <td>6. News and television networking</td><td>3%</td></tr> <tr> <td>7. Movies and digital material</td><td>25%</td></tr> <tr> <td>8. Containers</td><td>25%</td></tr> </tbody> </table> <p>A 25% Income Tax rate will be applied on the net profit determined as mentioned in the last chart.</p>	International activity	Net profit rate	1. Insurance	5%	2. Ships and plane rent	25%	3. Communications	5%	4. Air Transport	5%	5. Freights	5%	6. News and television networking	3%	7. Movies and digital material	25%	8. Containers	25%
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6. News and television networking	3%																		
7. Movies and digital material	25%																		
8. Containers	25%																		
7. Income tax individual residence	<p>An individual would generally be a tax resident of Guatemala if the individual is physically present or exercises an employment in Guatemala for more than 183 days over a 12 month period.</p> <p>In addition, under the qualitative test, a Guatemala citizen or a Guatemala permanent resident with a permanent home in Guatemala will ordinarily be regarded as a Guatemala tax resident, even if the individual has been physically away from Guatemala on a temporary basis, so long as the period of absence is reasonable.</p> <p>Same Income Tax rates are applied to individuals and companies.</p> <p>For individuals employed, Income Tax over salaries is 5% for Annual net Income up to US \$ 40,000.00 and 7% over the excess of US \$ 40,000.00.</p>																		
8. Capital rent tax rates	<p>Capital profit: Over income from rent, and rights over goods. Interest, royalties and capital gains apply at a 10% for Income Tax rate.</p> <p>Dividends and any other profit distribution are subject to a 5% Income Tax rate.</p> <p>Non-Residence Individual Tax Rates</p> <p>The non-residence individual income as employee is subject to 25%.</p>																		
9. Goods and services tax	<p>The current Value Added Tax (VAT) rate is at 12%. It is a requirement to register for VAT for all amount of operations.</p> <p>Also VAT is calculated over services provided in Guatemala by non-residence individuals or companies, construction contract, first sale of a property and goods imports.</p>																		
10. Transactions financial tax	<p>Transactions Financial Tax (IPF) is applied to operations made with bank accounts debit or credit. The IPF rate is 1%.</p>																		

11. Mandatory banking support	<p>According to legal standards, every payment made in the benefit of a corporation or individual above US \$ 4,000.00 must be made through the National Banking System (private authorized banks) using checks, bank deposit notes, wire transfers, credit or debit cards.</p> <p>Any payments made without using the authorized methods of payment will result in non-deductible costs or expenses for Income Tax purposes.</p>
12. Terms for expiration	<p>The right for the Tax Authority to audit the accounting records of corporation or individuals expires after 4 years.</p>
13. Declarations and tax payments	<p>Tax payers calculate their taxes and used digital records and books, as well as tax forms authorized by SAT.</p> <p>Tax declarations are monthly for IVA, quarterly or monthly according to the selected regime for Income Tax and Annual Tax declarations for all tax payers.</p> <p>It is mandatory to present declarations even without tax payments.</p>
14. Stamp duty	<p>For property transfer ranges 3% on second and further purchases. For share transfer, stamp duty is exempt.</p>
15. Property tax	<p>Owner occupied residence property is subject to 9 per thousand tax over the property value, paid quarterly.</p>
16. Double taxation prevention treaties	<p>Guatemala does not sign any treaty with other countries to avoid double taxation.</p>

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MEXICO

Tax Card 2024 (Figures in Mexican Pesos - PsMxs)

1. General aspects

1.a. Unit of Measurement and Update. (UMA)

The UMA is a reference value used to determine some deductions, limits, penalties, and other tax obligations. The UMA in force from 2016 to date is as follows: (PsMxs)

		PERIOD		
From	To	Daily	Monthly	Annual
1-II-2024	31-I-2025	\$108.57	\$3,300.53	\$39,606.36
1-11-2023	31-1-2024	\$103.74	\$3,153.70	\$37,844.40
1-11-2022	31-1-2023	\$96.22	\$2,925.09	\$35,101.08
1-11-2021	31-1-2022	\$89.62	\$2,724.45	\$32,693.40
1-11-2020	31-1-2021	\$86.88	\$2,641.15	\$31,693.80
1-11-2019	31-1-2020	\$84.49	\$2,568.50	\$30,822.50
1-11-2018	31-1-2019	\$80.60	\$2,450.24	\$29,402.88
1-11-2017	31-1-2018	\$75.49	\$2,294.90	\$27,538.80
1-1-2016	31-1-2017	\$73.04	\$2,220.42	\$26,645.04

1.b. Federal Taxpayer Registry. (FTR)

The Legal entities or individuals who should comply with tax obligations in the specific laws must register before the FTR.

From January 1, 2022, the individual who is 18 years old must register before the FTR, even though no taxable activity is carried out.

1.c. Tax Administration

The tax authority in Mexico responsible for administering federal contributions is the Ministry of Finance and Public Credit through the Tax Administration Service.

That authority has the right to review taxpayers within a general period of 5 years following the date on which the fiscal year's return is filed. The period is ten years in certain exceptional cases provided for this purpose.

1.d There is no exchange control in Mexico; there is free foreign exchange trading.

1.e. Foreign Investment

The following activities are reserved exclusively for Mexicans or Mexican companies with a foreigner exclusion clause:

- National ground passenger transport, tourism, and cargo, not including courier and parcel services.
- Development banking institutions in terms of the law of the matter.
- The provision of professional and technical services expressly indicates the applicable legal requirements.

1. General aspects (cont.)

A limit on foreign investment is set as follows:

- a. 10% of the share capital of the cooperative production company.
- b. 49% of share capital in activities such as explosives manufacturing and marketing, fishing, comprehensive port administration, broadcasting, among other activities.

Finally, activities and companies are required in which the share capital share may exceed 49% after the favorable resolution of the respective authority. It also requires the prior authorization of foreign investment more significant than 49% in the case of a company whose total value of its assets exceeds \$18 billion PsMxs.

1.f. Obligations to be fulfilled over the Internet

Taxpayers must pay contributions online using the procedures provided by the relevant authority.

Taxpayers must issue tax receipts for the income they earn through the electronic system authorized by the SAT and must meet applicable requirements. There are additional requirements for donors, airlines, notaries, and foreign trade operations, among others.

Taxpayers who are required to keep their accounting records must do so in electronic software and provide the tax authority with the accounting information every month.

1.g. Tax residence in Mexico

Taxpayer keeps the tax residence in Mexico when:

- a. No information is filed before the tax authority regarding the new tax residence abroad.
- b. The new tax residence is located in a country or territory where the corresponding income is subject to a Preferred Tax Regime.

2. Income tax (IT)

2a. Subjects

The following are subject to the IT:

- a. Legal entities and individuals who are residents in Mexico for tax purposes are subject to IT for all income regardless of the source of wealth from where they come.
- b. A resident abroad's permanent establishment in Mexico is subject to IT on the income attributable to that establishment.
- c. Residents abroad who earn income from a wealth source in Mexico, excluding revenue from the permanent establishment. These include salaries, fees, real estate income, interest, dividends, royalties, technical assistance, etc.

2.b. Legal entities

The Legal entities residing in Mexico pay the IT annually on the tax result at 30%.

2. Income tax (IT) (cont.)

The term Legal entities include the following:

- Corporations.
- Decentralized agencies that predominantly carry out business activities.
- Credit institutions.
- Civil societies and associations.
- The contractual joint venture that performs business activities.

If the legal entity obtained tax profits in any previous five years, it must determine a coefficient based on that income. This coefficient is applied to the current fiscal year's revenue to compute the monthly pre-payment. These pre-payments are made on account of the annual IT.

The legal entity should file the annual return no later than March 31 of the following year to compute the fiscal year's tax.

IT law taxes permanent establishments located in Mexico of residents abroad under the same legal entity tax regime discussed in the preceding paragraphs. Therefore, any business site where business activities are carried out, or independent personal services (branches, agencies, offices, etc.) is considered a permanent establishment.

2.c. Individuals

Various tax regimes are established depending on the type of income received by the individual, such as salaries, business activities, professional services, leasing of real estate, selling of goods, interests, and dividends.

The IT is computed by applying a progressive tariff up to a maximum tax rate of 35% to the tax base.

Individuals must compute the annual IT and file the annual return no later than April 30 of the following year.

2.d. Residents abroad

Miscellaneous income is taxed when obtained from the wealth source in Mexico, such as salaries, fees, use or enjoyment of real estate, disposal of real estate, dividends, interest, royalties, technical assistance, among others, according to the following rates:

Activity	ISR retention rate	Guest reviews
Salaries	Three tax levels apply	At the first Mx\$125,900, they are exempt From Mx\$125,000 to \$1,000,000 taxed at 15% More than \$1,000,000 taxed at 30%
Fees	25% on the gross income	
Members of the Board of directors and other committees	25% on the gross income	
Use of the real estate	25% on the gross income	
Disposal of real estate	25% on the sale price	As an option, it is allowed to apply 35% on the gain obtained, if requirements are complied with.
Disposal of shares	25% on the sale price	As an option, it is allowed to apply 35% on the profit obtained, if requirements are complied with.

2. Income tax (IT) (cont.)

Activity	ISR retention rate	Guest reviews
Dividends	10% on the gross income	
Interests	Various rates according to various law assumptions (4.9%, 10%, 15%, 21% and 35% on the gross income)	
Royalties	Various rates according to multiple cases of law (1%, 5% and 25% on the gross income)	
Technical Assistance	25% on the gross income	

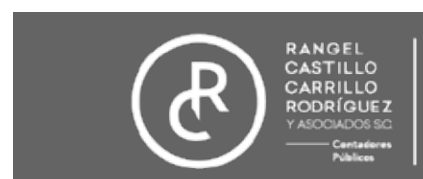
On this issue, Mexico has signed with several countries the corresponding agreements to avoid double taxation and tax evasion.

If we take into account the provisions of the agreement signed with the United States of America (USA), the applicable rates are as follows:

Income received by the resident abroad	Withholding tax in Mexico under U.S. deal	Guest reviews
Salaries	Three tax levels apply	At the first Mx\$125,900, they are exempt From Mx\$125,000 to \$1,000,000 taxed at 15% More than \$1,000,000 taxed at 30%.
Fees	No retention	There is withholding when you have a fixed base in Mexico.
Advisors	25%	
Leasing of real estate	25%	Option: Cause tax at the rate of 30% on a net basis. It becomes mandatory for the following years.
Disposal of real estate	25% on the sale price	As an option, it is allowed to apply 35% on the gain obtained.
Disposal of shares	25% on the sale price	As an option, it is allowed to apply 35% on the profit obtained if you have a legal representative in Mexico. This option is not applicable if the income of the resident abroad is subject to a preferential tax regime or resides in a country with a territorial taxation system. This tax regime of 25% or 35% applies if the resident abroad has a direct or indirect share capital stock for 12 months before selling at least 25% of that capital. If a resident abroad has a percentage less than 25% in that period, such disposal of shares is not taxed in Mexico.
Dividends	5% or 10%	The 5% rate is withheld when the actual beneficiary of the dividend directly owns at least 10% of the company's voting shares that pay the dividends in Mexico. The 10% rate applies in other cases.

2. Income tax (IT) (cont.)			
	Income received by the resident abroad	Withholding tax in Mexico under U.S. deal	Guest reviews
	Interests	Various rates according to multiple assumptions (4.9%, 10%, and 15%)	
3. Value added tax (VAT)	Royalties	10%	
	3.a. Subjects and object		
	Legal entities and individuals are subject to this tax if they perform the following activities:		
	<ul style="list-style-type: none">• Disposal of goods.• Providing independent services.• Leasing of goods.• Import of goods and services.• Providing digital services by residents abroad.		
	Certain activities are exempt from tax, such as:		
	<ul style="list-style-type: none">• Disposal of the land, constructions attached to land either intended or used for residential purposes, books, etc.• Educational services, terrestrial public transportation of individuals, and specific interests, among other activities.• Leasing of constructions attached to land used for residential purposes, farms used for agricultural or livestock purposes.• Import of goods whose disposal in Mexico is exempt from tax.		
	3.b. Tax rates.		
	The general rate is 16%.		
	A special rate of 0% applies to specific activities such as disposal of patented medicines and products destined as food, specific machinery used in agricultural activities, some services provided to farmers, exporters, etc.		
	A decree (which is in force from January 1, 2019, until December 31, 2024, establishes a tax incentive for taxpayers engaged in specific activities in premises or establishments within Mexico's northern border region. The incentive is to reduce the general rate from 16% to 8%.		
	3.c. Payment of tax		
	Taxpayers should pay the tax each month. No annual return should be filed.		
	The amount payable is (or the balance in favor is) determined by subtracting from the tax collected to customers the tax paid to suppliers.		
	The tax paid to suppliers must meet specific requirements.		

4. Tax on financial transactions	There is no tax on financial transactions.
5. Tax banking obligation	All taxpayers' bank accounts may be subject to tax reviews for control purposes.
6. Prescription	The tax credit is prescribed within five years.
7. Property tax	The tax on the acquisition of real estate is not a federal tax but a state or municipal tax and is paid, as the name implies, by the person who buys the property. Therefore, the applicable rate differs depending on the state or municipality where the real estate is located.



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PANAMA

Tax Card 2024 (in Balboas)

1. Tax payer registry	<p>Any natural or legal person must register in the RUC Single Taxpayer Registry, it is the number that each taxpayer uses to be able to pay taxes.</p> <p>The tax identification number is a key that allows the taxpayer to access online services such as: sending of affidavits, payments, corrections, verification of account statements, issuing peace and salvo, authorizing other taxpayers among others.</p> <p>https://etax2.mef.gob.pa/etax2web/Login.aspx</p>
2. General directorate of income	<p>The General Directorate of Income (DGI) is in charge of collecting taxes at the national level.</p>
3. Foreign currency control regime	<p>In Panama there is not a foreign currency exchange control regime.</p>
4. Panamanian source income	<p>The taxable income that occurs, from any source, within the territory of the Republic of Panama is subject to this tax, regardless of the place where it is received.</p> <p>The following shall be considered taxable income produced within the territory of the Republic of Panama:</p> <ol style="list-style-type: none"> Income from personal work when it consists of salaries and other remuneration that the State pays to its diplomatic or consular representatives or to other people to whom it entrusts the performance of functions outside the country. That from personal work paid with salaries, salaries, representation expenses or other remuneration in money or in kind that is paid to workers or people hired by reason of the exercise of their profession or trade. The income obtained by international transport companies in the part that corresponds to freight, tickets, loads and other services whose origin or final destination is the Republic of Panama, regardless of the place of incorporation or domicile. Income derived from freight, tickets and services to passengers or cargo in transit in the territory of the Republic of Panama are not considered taxable income. <p>The income derived from maritime passages and other services will not be considered taxable income produced within the territory of the Republic of Panama when they are obtained by international companies operating cruise ships that have their base as a cruise port or home port of the Republic of Panama.</p>

4. Panamanian source income (cont.)

- d. The totality of the net income received from the provision of the international telecommunications service, by telecommunications companies established in the country; and,
- e. Received by natural or legal persons whose domicile is outside the Republic of Panama as a result of any service or act, documented or not, that benefits natural or legal persons, national or foreign, located within the Republic of Panama, which includes, but is not limited to fees and income from copyrights, royalties, key rights, factory or trademarks, invention patents, know-how, technological and scientific knowledge, industrial or commercial secrets, insofar as said services affect the production of income from a Panamanian source or its conservation and its expenditure has been considered as deductible expenses by the person who received them. However, all income from Panamanian source, paid or accredited, by entities public law, be these from the Central Government, autonomous entities, in which the State owns 51% or more of its shares, entities not taxpayers of income tax and / or taxpayers who are in loss, to a person natural or legal non-resident in the Republic of Panama, is subject to the tax and consequently is subject to the withholding referred to in this rule.

5. Corporate income tax

General Tax Rate	25%
Companies in which the State has a shareholding greater than forty percent (40%) of the shares	30%
Presume Income	
Legal persons whose taxable income exceeds one million five hundred thousand balboas (B / 1,500,000.00) annually	They will pay as Income Tax the greater amount that results between: 1. The net taxable income calculated by the method established in this title, or 2. The net taxable income resulting from applying four point sixty-seven percent (4.67%) to the total taxable income.

6. Tax on dividends (Complementary Tax)

Any legal entity that requires the notice of operations is obliged to withhold the tax on dividend of 10% of the sums distributed to its shareholders or partners of subsidiary companies, when these are from Panamanian source and of 5% when it comes to foreign source, foreign or export income.

Same tax treatment, but 5% will have the income from international maritime trade, the interests that are recognized as a result of savings accounts, installments or of any kind that are maintained in banks established in the Republic of Panama. In addition, 5% will be taxed on the amounts received or accrued by people abroad as royalties from people living in the Colon Free Zone.

Bearer shares are taxed 20% on the same resulting balance used on the basis of 5% and 10% respectively.

Companies that are constituted as foreign branches that are extensions of foreign entities pay 10% of 100% of the net taxable income.

7. Withholding income tax	<p>Payments abroad from legal entities will be subject to 25% calculated on the 50% of the total credited remittances.</p>								
8. Deadline for submission and payments	<p>Presentation of the declarations and payment of the tax caused.</p> <table border="1" data-bbox="421 398 1457 495"> <tr> <td>Individuals</td><td>March 15</td></tr> <tr> <td>Corporations</td><td>March 31</td></tr> </table> <p>A one-month extension is granted for filing. Additionally, the estimated income tax must be paid in three tax periods such as June, September and December.</p>	Individuals	March 15	Corporations	March 31				
Individuals	March 15								
Corporations	March 31								
9. Capital gains	<p>Sale of shares is subject to a 10%. Buyer is obligate to withhold 5% of the sale price which can be considered the final tax.</p> <p>Sale of personal property the rate is 10%.</p> <p>Sale of real estate 10%, if it is an activity that is not within the ordinary course of business, the taxpayer will have the obligation to pay a sum equivalent to 3% of the total value of the sale or the cadastral value, whichever is greater, as an advance on income tax, but when 3% is greater than the application of 10% of the profit, a refund of the tax may be requested.</p>								
10. Income tax rates for individuals	<table border="1" data-bbox="421 1084 1457 1294"> <thead> <tr> <th>If the taxable income is:</th><th>The tax rate is:</th></tr> </thead> <tbody> <tr> <td>Up to B/.11,000.00</td><td>0%</td></tr> <tr> <td>From B/.11,000.00 to B/.50,000.00</td><td>15% for the excess from B/.11,000.00 to B/.50,000.00</td></tr> <tr> <td>Over to B/.50,000.00</td><td>It will pay B/.5,850.00 for the first B/.50,000.00 and a 25% over the excess of B/.50,000.00</td></tr> </tbody> </table>	If the taxable income is:	The tax rate is:	Up to B/.11,000.00	0%	From B/.11,000.00 to B/.50,000.00	15% for the excess from B/.11,000.00 to B/.50,000.00	Over to B/.50,000.00	It will pay B/.5,850.00 for the first B/.50,000.00 and a 25% over the excess of B/.50,000.00
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11. Tax residence	<p><u>Individuals</u></p> <p>Individuals who remain in the national territory for more than one hundred eighty-three (183) consecutive or alternate days in a fiscal year or in the immediately preceding year are considered tax residents of the Republic of Panama. Likewise, those individuals who have established their permanent home in the territory of the Republic of Panama will be considered tax residents of the Republic of Panama.</p> <p><u>Corporations/Companies</u></p> <p>Companies/Corporations constituted in accordance with the laws of the Republic of Panama and that have material means of direction and administration within Panamanian territory are considered tax residents of the Republic of Panama.</p> <p>Companies/Corporations incorporated abroad that have material means of management and administration within Panamanian territory and that are duly registered in the Public Registry are also considered tax residents of the Republic of Panama.</p>								

12. Tax on commercial and industrial patents (capital tax)

The capital tax of the company will be 2% with a minimum of one hundred balboas (B / .100.00) and a maximum of sixty thousand balboas (B / . 60,000.00). Individuals and Companies with invested capital less than ten thousand balboas (B / .10 000.00) are exempt.

Companies established in the Colon Free Zone, Free Zones, Panama Pacifico Special Economic Area will pay half a percent (0.5%) annually on the capital of the company with a minimum of one hundred balboas (B / . 100.00) and a maximum of fifty thousand balboas (B / . 50,000.00).

13. Value added tax (VAT)

Valued added tax, for local puproses named Impuesto de Transferencia de Bienes Corporales Muebles y Servicios (I.T.B.M.S.) will cause as follows:

1. Carrying out works with or without delivery of materials.
2. Intermediation in general.
3. The personal use by the owner, partners, directors, legal representatives, dignitaries or shareholders of the company, of the services provided by it.
4. The leasing of real estate and personal property or any other convention or act that implies or has the purpose of giving the use or enjoyment of the property.
5. Services of a personal nature provided in a dependency relationship are those performed by those who are included in article 62 of the Labor Code; the activity of directors, managers and administrators of entities with or without legal status; and the activity carried out by the employees of the Central Government, autonomous and semi-autonomous entities, decentralized and municipal entities.
6. Public shows, events, seminars, conferences, talks, presentations of artistic or musical groups, artists, singers, concert performers, sports professionals and professionals in general, not free, that are held within the territory of the Republic of Panama. Sporting events carried out by non-profit organizations recognized by the Panamanian Institute of Sports are excepted from the above.
7. Local and international passenger air transport. Seventy-five percent (75%) of the sums collected for ITBMS from local and international passenger air transport will be remitted to the Panama Tourism Authority.
8. The hosting service or public accommodation. The totality of the sums collected for ITBMS from room service in all tourist types of lodging or accommodation will be remitted to the Tourism Authority of Panama.
9. The commissions charged for the transfers of negotiable documents and titles and securities in general, the commission payments generated by banking and / or financial services provided by the entities legally authorized to provide this type of services, as well as the commissions or remuneration charged by people engaged in real estate and personal property brokerage. The commissions charged on the credit facilities granted by financial institutions to natural and legal persons and not domiciled in Panama are excluded from the payment of this tax.

14. Prescription terms

Income tax	7 years
Withholding income tax	15 years
Value added tax	5 years

As of January 1, 2021, the prescription of direct and indirect taxes will be five years.

15. Double taxation treaties	Panama has signed treaties to avoid double taxation with: Barbados, South Korea, United Arab Emirates, Spain, France, Ireland, Italy, Israel, Luxembourg, Mexico, Netherlands, Portugal, Qatar, United Kingdom, Czech Republic, Singapore, and Vietnam.
16. Reportable jurisdictions for 2022	https://www.gacetaoficial.gob.pa/pdfTemp/29993_B/103656.pdf
17. Tax procedure code	As of June 4, 2024, the Tax Procedure Code enters into force, although some articles are currently in force.



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PERU

Tax Card 2024 (In Soles)

1. Tax unit (UIT)

Tax Unit is a reference value used to determine the tax bases, deductions, limits, penalties and other tax obligations. For the year 2024, Tax Unit has been established at 5,150 Soles (US \$ 1,355 at an exchange rate of S / 3.80 per US \$ 1).

Tax Payer Registry (RUC)

Any natural or legal person, undivided succession, de facto partnership or other collective entity, whether Peruvian or foreign, domiciled or not, that is a taxpayer or responsible for taxes that are administered by the tax authority, must be registered with the Tax Payer Registry.

Tax Authority

The National Superintendency of Customs and Tax Administration (SUNAT) is the tax authority in Peru in charge of collecting taxes from the Central Government.

Exchange Control Regime

In Peru there is not a foreign currency exchange control regime. The exchange rate for the purchase and sale of foreign currency is determined by the supply and demand of said currency.

Register for Foreign Investment

Any foreign investment made in Peru is automatically authorized. After the investment is made, it must be registered with the Agency for the Promotion of Private Investment in Peru (PROINVERSION).

2. Peruvian source income

All of the taxable income obtained by taxpayers who consider themselves domiciled in the country are subject to Income Tax, without taking into account the nationality of the natural persons, the place of incorporation of the legal entities, or the location of the source producer.

In the case of taxpayers not domiciled in the country, of branches, agencies or other permanent establishments of sole proprietorships, companies and entities of any nature constituted abroad, the tax falls only on income taxed from Peruvian sources.

3. Corporate income tax

Companies domiciled in the country are subject to Income Tax for their worldwide source income. This definition includes branches of foreign companies duly registered in Peru.

Corporate Income Tax rate is 29.5%. On the other hand, the distribution of profits to shareholders is subject to a 5% withholding income tax.

3. Corporate income tax (cont.)

This additional tax must be withheld and paid by the domiciled legal person making the distribution, unless the shareholder is another legal person domiciled in Peru, in which case no withholding shall be made.

Corporate Income Tax Payments in Advance

Companies must make monthly payments on account (advances) of Income Tax. The amount of the monthly payment on account is the greater of applying the following:

- One point five percent (1.5%) of the net income for the month.
- Dividing the income tax calculated for the previous year by the total net income for the same year; and then apply the coefficient determined on the net income obtained each month.

Temporary Tax on Net Assets (ITAN)

ITAN is applied on the value of the net assets consigned in the balance sheet as of December 31 of the previous year. The tax rate is 0.4% on the excess of S / 1'000,000 (US \$ 263,158 at an exchange rate of S / 3.80 per US \$ 1).

ITAN paid is used as a credit against the payments on account and regularization of the corporate income tax. If it is not applied in its entirety, its return must be requested.

4. Income tax for non- domiciled entities

Non-domiciled entities are subject to income tax for their Peruvian source income, as follows:

Payment type	Income tax rate
1. Interest from external credits (with certain requirements).	4.99%
2. Interest paid abroad by multi-operating companies established in Peru such as banking companies and financial companies established in Peru as a result of the use of their credit lines abroad in the country.	4.99%
3. Income from the rental of ships and aircraft.	10%
4. Royalties.	30%
5. Dividends.	5%
6. Technical assistance (with certain requirements).	15%
7. Income from sale of securities carried out within of the country.	5%
8. Income from sale of securities carried out outside of the country.	30%
9. Interests from bonds and other debt instruments, deposits made in accordance with Law 26702, General Law of the Financial System.	5%
10. Other income.	30%

Net income for the purposes of withholding income tax to non-domiciled companies is defined as follows:

- All the amounts paid or accrued corresponding to other income of the third category.
- The amount that results from deducting the recovery of the invested capital in cases of disposal of assets or rights and the depreciation in cases of exploitation of assets that suffer wear and tear, upon submission of a request to the Tax Administration.

This definition of net income is not applicable to cases of presumption of income, which is indicated below.

5. Income tax for not domiciled entities according to their international activities

Peruvian Income Tax Law establishes a presumption for non-domiciled companies that carry out part of their operations in the country equivalent to the following percentages of their gross income:

Types of international activities	% of peruvian source income
1. Insurance	7%
2. Aircraft rental	60%
3. Ship Rental	80%
4. Telecommunications services	5%
5. Air transport	1%
6. Maritime Transport	2%
7. News supply or informational material	10%
8. Distribution of films or similar	20%
9. Container supply	15%
10. Conveyance of transport containers	80%
11. Transfer of television broadcasting rights	20%

On above net income obtained by, a 30% Income Tax rate will be applied.

6. Thin capitalization rules

It is established that the interests paid are not deductible for Income Tax purposes when the debt exceeds three times the equity of the domiciled companies.

The thin capitalization rule will be applied as follows:

Tax regime applicable to			
2018	2018	2019	2021
Debts contracted and / renewed until 13.09.2018 only with linked entities	Debts contracted and / renewed until 14.09.2018 with linked entities and not linked entities	Debts contracted and / renewed until 14.09.2018 with linked entities and not linked entities	Debts contracted and / renewed that they maintain with linked and not linked entities
Applicable until 31.12.2020	Applicable from 14.09.2018 to 31.12.2018	Applicable from 01.01.2019 to 31.12.2020	Applicable from 01.01.2021 in advance
Limit 3 times equity	Limit 3 times equity	Limit 3 times equity	Limit 30% of EBITDA

To do this, net interest should be understood as the amount of interest expense that exceeds the amount of interest income, computable to determine net income. Likewise, it is established that EBITDA is the net income after offsetting losses plus net interest, depreciation and amortization.

7. Income tax for individuals

An individual can be considered as domiciled or not domiciled. It is considered domiciled if it remains in Peru for more than one hundred and eighty-three calendar days during any twelve-month period. Any change in your domicile status will be effective as of January 1 of the following year.

7. Income tax for individuals (cont.)	<p>For tax purposes, a domiciled natural person is subject to Income Tax for their worldwide source income. In the case of a non-domiciled natural person, only income tax is affected on their Peruvian source income.</p>
8. Income tax rates for individuals	<p>The income produced by the lease, sublease and transfer of goods (first category); as well as, the income obtained from interest, royalties and capital gains (second category) are subject to Income Tax with a rate of 6.25% applicable on their net capital income.</p> <p>Dividends and any other form of profit distribution are subject to Income Tax at a rate of 5%.</p> <p>Income derived from independent work (Fourth Category) and dependent work (Fifth Category) obtained by individuals domiciled in the country are subject to Income Tax according to a progressive scale between 8% and 30%.</p> <p>In the case of individuals not domiciled in the country who receive income from independent and / or dependent work, a fixed rate of 30% will be applied.</p>
9. Value added tax (VAT)	<p>Sale of goods and services in Peru are subject to VAT. The tax rate is 18%. This tax is called as IGV in Peru and IVA (VAT) in other countries.</p> <p>Services rendered by non-domiciled entities used in Peru are subject to VAT.</p>
10. Excise tax (ISC)	<p>The sale at the producer and importer level of certain goods, such as gasoline, motor vehicles, alcoholic beverages, mineral waters, beers, cigarettes, among others, is taxed with the ISC. The rates of said tax are set according to the type of product. Gambling and betting are also subject to this tax.</p>
11. Financial transaction tax (ITF)	<p>ITF is applied on the majority of transactions made in the accounts of the Peruvian banking system (credits or debits), regardless of the amount of the operation. The tax rate is 0.005%. ITF paid is deductible as an expense for Income Tax purposes for both, legal entities and individuals.</p> <p>Banking Regime</p> <p>Any payment that is made in favor of a company or individual and that is greater than US \$ 500 or S / 2,000 Soles must be made through the National Financial System. For this, means of payment such as checks, bank deposits, transfers, credit or debit cards, among others, must be used.</p> <p>In case payments are made without using any of the means of payment indicated above, they will not give the right to deduct expenses, costs or credits in the determination of Income Tax.</p> <p>In the case of money loans, regardless of the amount, it must be made using one of the aforementioned means of payment.</p>

12. Prescription terms

The action of the Tax Administration to determine the tax obligation; as well as, the action to demand payment and apply sanctions prescribes:

- Four years as a general term;
- Six years for those who have not submitted the sworn statements required by law; and,
- Ten years when the withholding or collection agent has not paid the taxes withheld or received.
- The action to request or effect compensation; as well as, to request the refund, prescribes after four years.

13. Tax filing deadlines and tax payments

Taxes filing deadlines is in function of the last digit of the taxpayer number (Tax ID). Tax filings can be monthly, such as VAT, or annual, such as income tax.

Deadline in case of the annual income tax return for Companies is from March 25 to April 11 of each year.

In case of Individuals, deadline of the 2023 annual income tax return is from May 27 to June 11 2024.

14. Double taxation treaties

Peru has signed treaties to avoid double taxation with some countries. The list of treaties signed to date is as follows:

Country	Income tax rate applied to		
	Dividends	Interests	Royalties
Chile (1)	10%/15%	15%	15%
Canada (1)	10%/15%	15%	15%
Brazil (1)	10%/15%	15%	15%
Mexico (1)	10%/15%	15%	15%
South Korea (1)	10%	15%	15%
Portugal (1)	10%/15%	10%/15%	15%
Switzerland (1)	10%/15%	10%/15%	15%
Japan (2)	10%/15%	10%/15%	15%
Bolivia (2)	Agreement CAN		
Colombia (2)	Agreement CAN		
Ecuador (2)	Agreement CAN		

In the case of business benefits:

(1) Income tax is paid in the country where the income is recognized.

(2) Income tax is paid in the country where the expense is recognized.

**15.
Main Changes
in force from
2024**

The main fiscal changes in fore from January 1st, 2024, are the following:

Extended Deadline for Annual Income Tax

According to Law N° 31940, Tax Authorities extends the period for the annual sworn declaration and payment of the 2023 annual income tax, giving individuals and Micro and Little Entities (MYPES) until June to comply with their obligations. The calendar for filing the income tax return is organized according to the last digit of the taxpayer number, and it is from May 27 to June 11 2024.

End of the use of the Libor rate in money loans

As of January 1, Legislative Decree No. 1545 marks the end of the use of the Libor rate and adopts the monthly average market lending rate (TAM).

End of the exemption from income tax on capital gains of the Lima Stock Exchange

This exoneration ended in 2023, since Congress did not extend the measure. Therefore, these capital gains will be subject to income tax from January 1, 2024.

Sincere the tax rate for interests for undue or improper payments

According to Law N° 31962, Tax Authorities eliminated the differentiation that was made with respect to the interest rate to be applied:

- i. for undue or excessive payments that result as a consequence of any document issued by Sunat through which payment of a tax debt is required; and,
- ii. improper or excess payment that is not included in the case indicated in the prior point.

In this way, the default interest rate (TIM) will be applied in all cases, which is currently 0.9% monthly.

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VENEZUELA

Tax Cards 2024 (In BsS)

1. Tax unit

The Tax Unit is a measure that normalizes and keeps updated, year after year, the amounts specified in the Venezuelan tax laws and tax regulations, which are expressed in direct proportionality (even in fraction and / or percentage) to the current value of said Unit. Tax. The value of the Tax Unit in Venezuela is BsS 9. It was born from the need to save material and human resources in the publication up to date with the inflation present in the country^[1].

Tax Information Registry (RIF)

The RIF corresponds to an identification number for all natural persons and companies that carry out some economic activity on a permanent or occasional basis, or who are holders of goods or rights for which they must pay taxes.

Every new company that is founded and wants to start operating is first registered in the RIF, at which time it is assigned the identification number with which it can operate and invoice.

Tax administration

The Integrated National Service of Customs and Tax Administration (SENIAT) is the executing body of the national tax administration of Venezuela.

Free Currency Convertibility

There is a system of free currency convertibility, where banks can operate with currencies due to the free supply and demand of currencies, the Central Bank of Venezuela publishes the official currency rate according to market interaction.

Registration of Foreign Investment

Siex, as an essential body of the integrated public sector system, is in charge of implementing the policies aimed at granting the registration of foreign investment, technology import contracts, company qualification and national investor credential.

2. Venezuelan source income

Any natural or legal person, resident or domiciled in the Bolivarian Republic of Venezuela, as well as natural or legal persons domiciled or residing abroad who have a permanent establishment or a fixed base in the country, may credit against the tax that according to this Law corresponds to them to pay, the income tax that they have paid abroad for the enrichment of extraterritorial source for which they are obliged to pay tax in the terms of this Law.

[1] Yucra M., Janet (February 3, 2016). "UT rises annually since it was created in 1994" (html). Notitarde Newspaper. Archived from the original on February 5, 2016. Accessed on December 4, 2018

2. Venezuelan source income (cont.)

For the purposes of the planned accreditation, it is considered income tax that is levied on all income or income elements, including taxes on profits derived from the sale of movable or immovable property, and taxes on salaries and wages, as well as taxes on capital gains. In case of doubt, the Tax Administration must determine the nature of the creditable tax.

The amount of creditable tax, from foreign sources referred to in this article, may not exceed the amount resulting from applying the rates established in Title III of this Law to the total global net enrichment for the year in question, in the proportion that the net enrichment from a foreign source represents the total of said global net enrichment.

In the case of enrichment taxed with proportional taxes in the terms established in this Law, the amount of the creditable tax may not exceed the income tax that would have been paid in the Bolivarian Republic of Venezuela for these enrichments.

For the purposes of determining the amount of tax actually paid abroad creditable in the terms established in this article, the exchange rate in force for the moment in which the tax is paid abroad must be applied, calculated in accordance with the provided for in the Law of the Central Bank of Venezuela.

3. Corporate income tax

Companies (called legal entities for tax purposes) domiciled in the country are subject to Income Tax for their worldwide source income. The Corporate Income Tax rate is settled according to the rates established in the Income Tax Law, legal persons are taxed by Rate N ° 1 and N ° 3, which are listed below (fractions expressed in Tax Units T.U):

RATE No. 1

- 1) For the fraction included up to 1,000.00 T.U 6.00%
- 2) For the fraction that exceeds 1,000.00 to 1,500.00 T.U 9.00%
- 3) For the fraction that exceeds 1,500.00 to 2,000.00 T.U 12.00%
- 4) For the fraction that exceeds 2,000.00 to 2,500.00 T.U 16.00%
- 5) For the fraction that exceeds 2,500.00 to 3,000.00 T.U 20.00%
- 6) For the fraction that exceeds 3,000.00 to 4,000.00 T.U 24.00%
- 7) For the fraction that exceeds 4,000.00 to 6,000.00 T.U 29.00%
- 8) For the fraction that exceeds 6,000.00 T.U 34.00%

Rate N ° 3

- a. Proportional rate of sixty percent (60%) for the enrichments obtained by national state companies that are dedicated to the exploitation of hydrocarbons and related activities.
- b. Proportional rate of fifty percent (50%) for enrichments Savings and social security institutions, savings, pension and retirement funds for the enrichments they obtain in the performance of their own activities. Likewise, cooperative societies when they operate under the general conditions set by the National Executive.

3. Corporate income tax (cont.)	<p>Payments on Account of Income Tax</p> <p>Natural or legal persons must make advances or payments on account, according to the following parameters:</p> <ol style="list-style-type: none"> By withholding at source; derived from purchasing operations or provision of services, executed. For Dividends in shares, issued by the paying company to natural or legal persons, the proportional tax levied on the dividend in the terms of this Chapter, will be subject to an advance of the tax of one (1%) on the total value of the Dividend decreed corresponding tax settlements. By Estimated Return: applies to those taxpayers who, within the year immediately prior to the current fiscal year, have obtained net enrichments of more than 1,500 tax units (1,500 TU), submit an estimated return of their enrichments corresponding to the current taxable year, to the purposes of determining and paying advance taxes, all in accordance with the rules, conditions, terms and forms established by the Regulations.
4. Corporate income tax of branches of foreign legal persons	<p>For income tax purposes, branches, agencies or other permanent establishments of foreign companies are considered domiciled, due to the income produced in the Bolivarian Republic of Venezuela.</p> <p>The net income obtained by branches of foreign companies is subject to tax in the same way as national companies; In other words, the tax is affected by rate No. 1.</p>
5. Income tax for non- domiciled companies	<p>Any natural or legal person, resident or domiciled in the Bolivarian Republic of Venezuela, will pay taxes on their income of any origin, whether the cause or source of income is located within the country or outside it. Natural or legal persons not resident or not domiciled in the Bolivarian Republic of Venezuela will be subject to the tax established in this Law provided that the source or cause of their enrichments is or occurs within the country, even when they do not have a permanent establishment or fixed base. in the Bolivarian Republic of Venezuela. Natural or legal persons domiciled or residing abroad who have a permanent establishment or a fixed base in the country, will be taxed exclusively on the income of national or foreign source attributable to said permanent establishment or fixed base.</p>
6. Income tax for companies not domiciled due to their international activities	<p>The Income Tax Law establishes a presumption for non-domiciled companies that carry out part of their operations in the country. The law considers that non-domiciled companies obtain Venezuelan source income equivalent to the following percentages of their Gross Income:</p>

6. Income tax for companies not domiciled due to their international activities (cont.)

International activity	Base for the calculation of ISR
1. Producers of films abroad and similar for the cinema or television.	25%
2. International news agencies.	15%
3. Agencies or international transport companies incorporated and domiciled abroad or incorporated abroad and domiciled in the Bolivarian Republic of Venezuela.	15%
4. The net enrichments of the taxpayers that from abroad remit to the country consignment goods will be twenty-five percent (25%) of its income 25%.	25%
5. The enrichments of insurance or reinsurance companies not domiciled in the country, will be made up of thirty percent (30%) of their net income caused in the country, when there is no tax exemption for similar Venezuelan companies.	30%
6. The enrichments of insurance or reinsurance companies not domiciled in the country, will be constituted by thirty percent (30%) of their net income caused in the country, when there is no tax exemption for similar Venezuelan companies.	30%
7. Non-commercial professional activities will be constituted by ninety percent (90%) of their, without prejudice to the provided in article 41 of this Law.	90%
8. Transportation between the Bolivarian Republic of Venezuela and abroad and vice versa, obtained by virtue of travel.	10% of half of Gross Income
9. Technical assistance.	50%
10. Technological Services.	30%
11. Technical assistance contracts served from abroad.	25%
12. Contracts for technological services served from abroad.	75%
13. Royalties and other similar participations.	90%

On said net income obtained by the corresponding rates will be applied.

7. Under-capitalization

DOES NOT APPLY.

8. Income tax for natural persons

Definition of domiciled

For the purposes of Income Tax, a natural person can be considered as domiciled or not domiciled. A natural person is considered domiciled if he or she remains in the Bolivarian Republic of Venezuela for more than one hundred and eighty-three calendar days during any period of twelve months.

9. Income tax rates for natural persons

The annual net global enrichment obtained by the taxpayers will be taxed, unless otherwise provided, based on the following rate expressed in tax units (T.U):

9. Income tax rates for natural persons (cont.)	<p>RATE No. 1</p> <p>1) For the fraction included up to 1,000.00 TU 6.00%</p> <p>2) For the fraction that exceeds 1,000.00 to 1,500.00 TU 9.00%</p> <p>3) For the fraction that exceeds 1,500.00 to 2,000.00 TU 12.00%</p> <p>4) For the fraction that exceeds 2,000.00 to 2,500.00 TU 16.00%</p> <p>5) For the fraction that exceeds 2,500.00 to 3,000.00 TU 20.00%</p> <p>6) For the fraction that exceeds 3,000.00 to 4,000.00 TU 24.00%</p> <p>7) For the fraction that exceeds 4,000.00 to 6,000.00 TU 29.00%</p> <p>8) For the fraction that exceeds 6,000.00 TU 34.00%</p> <p>In the cases of enrichment obtained by natural persons not resident in the country, the tax will be thirty-four percent (34%).</p>
10. Value added tax	<p>The sale of goods and the provision of services in Venezuela are subject to the Value Added Tax (VAT). The rate is 16% of the sale value or the value of the service provided. The value of the sale or the service provided.</p>
11. Consumption tax	<p>The sale at the producer and importer level of certain goods, such as beer, cigarettes, among others, is subject to the Tax determined by laws for each item. The rates of the aforementioned tax are fixed according to the type of product. Gambling and betting are also subject to this tax.</p>
12. Tax on large financial transactions	<p>The Tax on Large Financial Transactions (IGTF) applies to debits made in the accounts of the Banking banking system, for those companies considered by the National Integrated Service of Customs and Tax Administration (SENIAT), as special taxpayers. The rate for transactions generated in national currency is 2% while the rate for transactions in foreign currency is 3%. The ITF paid is not deductible as an expense for Income Tax purposes for legal persons considered as special taxpayers.</p>
13. Limitation periods	<p>The action of the Tax Administration to determine the tax obligation; as well as, the action to demand payment and apply sanctions prescribes:</p> <p>The tax obligation and its accessories prescribe after four (4) years. This term will be six (6) years when the taxpayer or responsible party does not comply with the obligation to register in the pertinent records.</p>
14. Presentation of tax returns and payment	<p>Taxpayers carry out the self-determination of taxes which are informed before the fiscal portal www.seniat.gob.ve, there are calendars published by the fiscal entity which are determined through the Tax Information Registry (RIF).</p> <p>There are nature taxes, weekly, monthly, quarterly and annually. The declarations must be presented through the different web portals and then make payments to the authorized banking entities.</p>

15. Treaties to avoid double taxation

The Bolivarian Republic of Venezuela has signed some countries treaties to avoid double taxation. The list of the treaties signed to date is as follows:

Country	Official bulletin	Year	Notes
Germany	36266	1997	Total exemption method
Austria	38958	2007	-----
Barbados	5507-Extraordinary	2000	Limited Imputation Method
Belarus	39095	2009	-----
Belgium	5269-Extraordinary	1998	Total exemption method
Brazil	38344	2005	-----
Canada	37927	2004	-----
China	38089	2004	-----
Korea	38598	2004	-----
Cuba	38086	2004	-----
Denmark	37219	2001	Limited Imputation Method
United Araba Emirates	39686	2011	-----
Spain	37913	2004	-----
United States	5427-Extraordinary	2000	-----
France	4635-Extraordinary	1993	-----
Indonesia	37659	2005	Limited Imputation Method
Iran	38344	1993	-----
Italy	4580-Extraordinary	2005	Total exemption method
Kuwait	38347	2005	-----
Malasia	38842	2008	-----
Mexico	5273-Extraordinary	1998	Limited Imputation Method
Norway	5265-Extraordinary	1998	-----
The Netherlands	5180-Extraordinary	1997	Total exemption method
Portugal	5180-Extraordinary	1997	Limited Imputation Method
Qatar	38796	2007	-----
Unite Kingdom	5218-Extraordinary	1998	Limited Imputation Method

**15.
Treaties to
avoid double
taxation
(cont.)**

Czech Republic	5180-Extraordinary	1997	Limited Imputation Method
Russia	5822-Extraordinary	2006	----- -----
Sweden	5274-Extraordinary	1988	Total exemption method
Switzerland	5192-Extraordinary	1997	----- -----
Trinidad and Tobago	5180-Extraordinary	1997	Limited Imputation Method
Vietnam	3913	2009	----- -----

Source: Own elaboration based on the National Integrated System of Customs and Tax Administration (SENIAT).

**16.
Tax on large
wealth**

The Large Wealth Tax, the main formal and material aspects of this Law, this tax is applicable to natural and legal persons qualified as special taxable subjects whose assets have a value equal to or greater than one hundred and fifty million tax units (150,000,000 U.T.), which is equivalent to Bs. 1,350,000,000, that is, about USD 37,500,000. The tax rate is 0.25% of the tax base, as long as your assets are equal to or greater than this amount.

**17.
Other special
contributions
or
contributions**

In the Bolivarian Republic of Venezuela there are other contributions or contributions set by law, to which the legal entities that carry out economic activity can configure as taxpayers of these, the most important are the following:

- (a) Organic Law of Science, Technology and Innovation.
- (b) Organic Law of Sport, Physical Activity and Physical Education.

Detail of special contributions:

- (a) Organic Law of Science, Technology and Innovation.

Private and public legal or economic entities, domiciled or not in the Bolivarian Republic of Venezuela, that carry out economic activities in the national territory and have obtained annual gross income of more than 100,000 U.T., in the immediately preceding fiscal year. The percentage is determined according to the following criteria:

1. Two percent (2%) when the economic activity is one of those contemplated in the Law for the Control of Casinos, Bingo Rooms and Slot Machines, and all those related to the industry and trade of ethyl alcohol, species alcoholic and tobacco.
2. One percent (1%) in the case of private capital companies when the economic activity is one of those contemplated in the Organic Law of Hydrocarbons and in the Organic Law of Gaseous Hydrocarbons, and includes mining exploitation, its processing and distribution.
3. Zero point five percent (0.5%) in the case of public capital companies when the economic activity is one of those contemplated in the Organic Law of Hydrocarbons and in the Organic Law of Gaseous Hydrocarbons, and includes mining exploitation, its processing and distribution.
4. Zero point five percent (0.5%) in the case of any other economic activity.

**17.
Other special
contributions
or
contributions
(cont.)**

This special contribution must be paid during the first semester after the close of the fiscal year.

(b) Organic Law of Sport, Physical Activity and Physical Education.

Companies or other public or private organizations that carry out economic activities in the country for profit must contribute to the National Fund for the Development of Sports, Physical Activity and Physical Education, the equivalent of 1% of their Net Profit or Accounting Profit, when it exceeds twenty thousand Tax Units (20,000 TU). This special contribution must be paid within one hundred and twenty (120) continuous days at the end of the taxable year of the taxpayer.

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