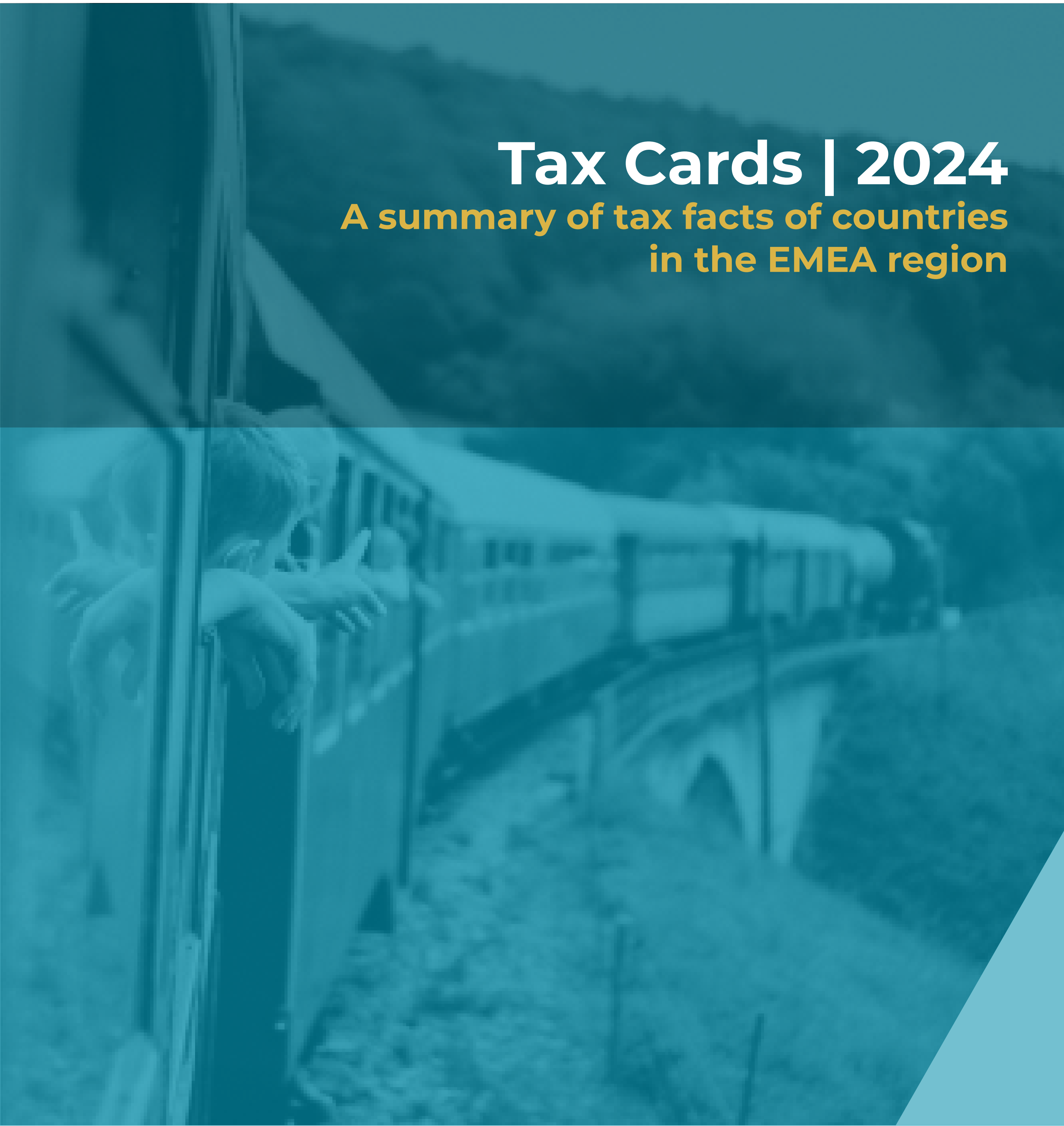
EUROPE, MIDDLE EAST & AFRICA



Tax Cards | 2024

A summary of tax facts of countries in the EMEA region

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AUSTRIA

2024 TAX CARD (IN EUROS)

1. Basis of taxation

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

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

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

2. Corporate tax

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

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

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

- Level of the company: standard corporate income tax (CIT) rate of 23%, regardless of whether profits are retained or distributed.
- Level of the shareholder: withholding tax (WHT) of 23% for corporations and 27,5% for other recipients in case of profit distributions.

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

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

3. Withholding tax rate (non-treaty)

	Resident individual	Non-Resident	
		Individual	Corporation
Dividends	27,5%	27,5%	23%
Interest	0/24/27,5%	0/24/27,5%	
Royalties		20%	20%

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

4. Resident individual

Tax assessment base:
Sum of income.

- Income-related expenses.
- Special expenses
- Extraordinary burdens.
- Tax-free amounts.
- Tax assessment base.

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

Income in EUR	Tax rate
12.816	0%
Above 12.816 up to 20.818	20%
Above 20.818 up to 34.513	30%
Above 34.513 up to 66.612	40%
Above 66.612 up to 99.266	48%
Above 99.266	50%

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

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

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

5. Non-resident individual tax rates

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

6. Goods and services tax

Value-added tax

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

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

**6.
Goods and services tax (cont.)**

The Austrian VAT rates are as follows:

- Regular tax rate: 20%
- Reduced tax rates: 13 % and 10%

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

Tax exemptions

A distinction is made between:

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

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

**7.
Estate duty**

Inheritance and gift tax

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

Real estate transfer tax

There are different types of real estate transfers in Austria:

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

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

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

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

8.
Stamp duty

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

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

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

9.
Property tax

In Austria there is no property tax.

10.
Income tax filing deadlines

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

11.
Double tax agreements

Austria has signed 93 tax treaties with all major trading countries. Some of the treaties provide for elimination or partial elimination of double taxation by a foreign tax credit. Under the majority of treaties, however, double taxation is avoided or partially avoided by an exemption-with-saving clause as to progression. As an exception to the rule, dividends and interest are usually fully taxable with a foreign tax credit.

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

BELGIUM

2024 TAX CARD (IN EUROS)

1. **Basis of taxation**	Income is taxed on a year basis and taxpayers must submit tax returns on a self-assessment basis. Belgium levies taxes which can be categoried as follows: • Taxes on income (income and corporate tax); • Taxes on expenditure (VAT); • Taxes on assets (registration duties, inheritance and gift duties, etc.); • Local taxes (property tax, etc.). The normal Belgian income year runs from 1 January to 31 December. The Belgian taxation system is based on two main principles: • Residence jurisdiction principle: individuals or corporations that are registered as residents of Belgium are subject to Belgian tax on their worldwide income, arising both in Belgium and/or elsewhere. • Source jurisdiction principle: the source jurisdiction of taxation means that Belgium taxes non-resident individuals and corporations on income arising to them from sources within Belgium only.
2. **Corporate tax**	Additional definitions related to the corporate taxation period: **Financial year** is the year in which revenue is arising. **Tax year** is the year in which the revenue is taxed. Revenue arising during the financial year ending on 31 December is following the taxation rules of the next year (tax year = financial year + 1). Revenue arising during the financial year ending before 31 December is following the taxation rules of the year in which the financial year ends, and not the taxation rules of the next year (tax year = financial year). A Belgian resident company and a company that is taxable in Belgium due to the 'Source jurisdiction principle' are subject to Belgian corporate income tax. The following tax rates apply to Belgian companies and establishments of foreign companies for the financial year 2023 (tax year 2024).

2. Corporate tax (cont.)

Table 2.1

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

[1] As from income year 2024 (assessment year 2025):
- annual average personnel: 50.
- Annual turnover (excl. VAT): 11,25M EUR.
- Total of the balance: 6M EUR.

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

[2] Companies not subject to reduced tax rate (TY 2022): Companies not being an SME based on the criteria listed in point 1 above and/or one of the following exclusions is not applicable:
- Company's financial participations is higher than 50% of its capital adjusted with taxed reserves;
- Affiliates that are owned by other companies for 50 or more % of its shares;
- Companies that paid less than 45.000 EUR as a salary to Director during the FY;
- Investment funds and pension funds.

Table 2.2

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

3. Withholding tax rate (non-treaty)

Table 3.1

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

[3] Concerns a tolerance of the Belgian tax authorities.
[4] Applicable in specific cases.
[5] Concerns a specific Belgian tax regime.

4. Resident and non-resident individual tax rates (for Tax Year 2022)

Progressive tax rate

Table 4.1

Taxable Income (TY 2022) EUR	Tax rate
0 - EUR 15.200,00	25%
EUR 15.200 - EUR 26.830	40%
EUR 26.830 - EUR 46.440	45%
EUR 46.440	50%

5.
Value added tax

VAT rates in Belgium are:

- 21% general rule for all goods and services.
- 12% or 6% intermediate or reduced rate.
- 0% for some exceptional goods and services.

Belgium follows the European Intracommunity VAT rules (0% rate on goods exported to other EU countries).

6.
Inheritance tax

Progressive tax rate depending on the following factors:
1. Region in which taxed (Flanders, Wallonia or Brussels).
2. Relatives grade (husband/wife, children, sisters/brothers).

Example: Flanders, straight line (partners, parents or children) relatives:

Table 6.1

Taxable amounts EUR	Tax rate
0 – 50.000	3%
50.000 – 250.000	9%
→250.000	27%

7.
Gift tax

Gift tax rates vary based on the region where the gift is registered. The rates are determined based on the amount of the gift, the relatives grade and the nature of the gifted good (movable or immovable property). The rates can vary (depending on the relatives grade) from 3% up to 40%.

8.
Stamp duty

Stamp duties are levied in only a limited number of cases. Stamp duties are due on transactions relating to public funds, irrespective of their (Belgian or foreign) origin, that are concluded or executed in Belgium (including when the order is given directly or indirectly to a foreign intermediary by a Belgian resident or a legal entity for the account of a seat or establishment thereof in Belgium), to the extent that a professional intermediary intervenes in these transactions. Exemptions for non-residents and others are available.

9.
Registration fees

This has changed as from 1 January 2022:

Purchases and transfers of real estate located in Belgium, including buildings (except new buildings, which are subject to VAT as described above), are subject to registration duty at the rate of 12.5% of the higher of transfer price or fair market value (except in the Flemish Region, where the applicable rate is in principle 12% but where various lower tax rates exist i.e. 3% for the purchase of the one and only home).

If the purchase or transfer of land is subject to VAT, no registration duties will be charged on the purchase or transfer.

In principle, no registration duty is due upon a capital contribution; only a fixed fee of EUR 50 is due.

10.
Property taxes

Property tax is a regional tax that the owner of a property needs to pay every year. The property tax is calculated on the basis of the cadastral income i.e. the deemed rental value attributed to the property by the authorities. Rates generally range between 1,25% and 2,5% depending on the location of the property. Municipal surcharges increase the effective rate to between 18% and 50% or more. In certain instances, the taxpayer may be entitled to reduced property tax.

Resident taxpayers who own real estate abroad must report their foreign property in their Belgian tax return. Since 2021, they must submit a declaration to the Administration of Measurement and Valuations - Cel foreign cadastral income which will determine the deemed rental value of the foreign real estate.

11.
Tax on securities account

As from 26 February 2021: Annual tax on securities accounts (version 2.0) levied at a rate of 0.15% on the average value of the account in excess of 1 million EUR.

12.
Stock exchange tax

The stock exchange tax is a flat-rate tax that is due on transactions (i.e. purchases and sales) of stocks and bonds as well as on redemptions of capitalisation shares of collective investment vehicles that are executed by Belgian residents through Belgian or non-Belgian financial intermediaries. The tax rates vary from 0.12% to 1.32% depending on the type of transaction. The tax is automatically withheld at source in case the transaction occurs through a Belgian financial institution. Otherwise, in case the foreign bank does not comply with its withholding and reporting obligation, it is the beneficiary's responsibility to report the transaction and pay the tax.

13.
Income tax filing deadlines

Types of Form		Deadlines*
Tax Return	Individuals	30 June
Tax Return	Companies	6 months after the end of the financial year
Management fees	NA	NA
Technical fees	NA	NA
Directors' fees	NA	NA

*Various extensions are available for filing.

14.
Double tax agreements

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

An overview of these treaties can be found: https://financien.belgium.be/nl/particulieren/internationaal/internationale_akkoorde.

CYPRUS

2024 TAX CARD (IN EUROS)

1. Basis of taxation

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

- Taxes on income (income tax and corporation tax).
- Taxes on expenditure (VAT).
- Stamp duty.
- Property tax (transfer fees).
- Capital gains tax is imposed only on gains from the sale of immovable property situated in Cyprus (or sale of shares in companies owning immovable property situated in Cyprus).

2. Corporate tax

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

3. Withholding tax rate (non-treaty)

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

4. Resident individual tax rates

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

5. Non resident individual tax rates

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

6.
Value added tax

VAT is levied at a rate of 19% (Reduced taxes apply to certain goods and services). Businesses have to register if the annual turnover is expected to exceed EUR 15.600.

7.
Estate duty

Cyprus does not have death or estate taxes.

8.
Stamp duty

Stamp duty is payable on any document relating to assets in Cyprus or any matter which shall take place in Cyprus, irrespective of the place of the creation of the document.

Rates are as follows:

For amounts up to EUR 5.000	Nil
For amounts from EUR 5.001- EUR 170.000	0,15%
For amounts over EUR 170.000	0,2% with maximum amount payable EUR 20.000

9.
Property tax

Immovable property tax was abolished in Cyprus from 1 January 2017. Immovable property transfer fees are payable by the buyer on the purchase of immovable property as follows:

Value of property EUR	Transfer fees
Up to EUR 85.430	1,5%
EUR 85.431-EUR 170.860	2,5%
Over EUR 170.860	4%

10.
Income tax filing deadlines

Types of Form		Deadlines
Tax Return	Individuals	31 July of the following year
Tax Return	Companies	15 months from the tax year end

11.
Double tax agreements

Cyprus has signed 68 such treaties.
For information for each country, please visit: https://mof.gov.cy/en/taxation-investment-policy/double-taxation-agreements/double-taxation-treeties.

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CZECH REPUBLIC

2024 TAX CARD (IN CZECH CROWNS)

1. Basis of taxation

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

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

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

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

2. Corporate tax

The Czech Republic has a flat corporate tax of 21%.

3. Withholding tax rate (non-treaty)

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

4. Residential individual tax rates

Personal Income Tax rate:
The Czech Republic has a progressive income tax rate 15 and 23%. Social security and health insurance contributions are paid by both the employer and the employee on employment income at the following rates:
(see below)

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

5. **Goods and services tax**	**VAT Registration and Deregistration Thresholds:** • VAT Registration: CZK 1,000,000 • VAT Deregistration: turnover ←CZK 1,000,000 **VAT rates:** • Standard rate: 21% • Reduced rate: 15% • Super Reduced rate: 10% **VAT Return Filing Periods:** • Turnover ←CZK 10,000,000 Monthly or quarterly (optional) • Turnover → CZK 10,000,000 Monthly **VAT Return Filing and Payment Deadlines:** • 25th day of the following month **Filing Periods and Deadlines – other returns:** • EC Sales Lists (Goods) – Filing Periods: * Quarterly VAT payer: Monthly * Monthly VAT payer Monthly • EC Sales Lists (Services) – Filing Periods: * Quarterly VAT payer: Quarterly * Monthly VAT payer: Monthly • EC Sales Lists – Filing deadlines: * Paper returns: N/A * Electronic returns: 25 days from the period end **VAT Control Statement – Filing Periods:** • Quarterly VAT payer * Monthly (legal person) * Quarterly (individual person) • Monthly VAT payer: Monthly **VAT Control Statement – Filing deadlines:** • Paper returns: N/A • Electronic returns: 25 days from the period end
6. **Road tax**	Road tax is generally payable by the operator of a vehicle registered in the Czech Republic. The tax rate varies from CZK 1,200 to CZK 4,200 in the case of passenger vehicles and from CZK 1,800 to CZK 50,400 in the case of other vehicles.
7. **Estate tax**	Estate duty is not applicable in the Czech Republic.
8. **Stamp duty**	Stamp duty is not applicable in the Czech Republic.

9.
Real estate tax and property transfer tax

Real Estate Tax:
The tax on buildings is based on the area of land occupied. The rates range from CZK 2 to 10 for buildings. Increased rates apply in certain circumstances. Real estate tax on agricultural land is 0.75% of the deemed value. Special rates apply for forests, lakes and ponds. For other types of land, the tax is based on the area; the rate is CZK 2 per square meters for building land, CZK 5 per square meters for improved land surface used for business and CZK 0.20 per square meters in other cases. Real estate tax is deductible for corporate income tax purposes.There is no real estate transfer tax in the Czech Republic.

10.
Energy taxes

Energy taxes apply to natural gas and other gases, electricity and solid fuels. Only supplies of these products delivered within the Czech Republic are subject to energy taxes. There is a wide range of exemptions (e.g. for energy used in metallurgic or mineralogical processes). In order to claim an exemption, approval needs to be obtained from the customs authority.

11.
Consumption taxes

Excise tax is imposed on entities that produce or import certain goods, including hydrocarbon fuels and lubricants, alcohol and spirits, beer, wine and tobacco products. The tax is based on the number of goods expressed in specific units and tax may be levied only once on particular goods.

12.
Income tax filing deadlines

Types of Form		Deadlines
Tax Return	Individuals	30 June*
Tax Return	Companies	Until 6* months from ending of the financial year

*In the case that the tax return is filed by the tax advisor (based on the Power of Attorney) or the corporation is obliged to have a statutory financial audit, the deadlines are prolonged.

13.
Double tax agreements

Country	WHT (%)		
	Dividends %	Interest %*	Royalties %
Resident Corporations	15	0	0
Resident Individuals	15	0	0
Non-resident corporations and individuals:			
Non treaty	15/35	15/35	15/35

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DENMARK

2024 TAX CARD (In Danish Krone)

1.
Basis of taxation

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

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

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

2.
Corporate tax

Companies are subject to tax on all income and are only allowed deductions on expenses that are related to the operations of the company. The corporate tax rate is 22% of the tax base reduced by tax loss. Limitations apply if the tax loss is above EUR 1.073.825 (2012 figure).

According to Danish tax law, a territoriality principle prevails with respect to PEs and real estate located abroad. Hence, a Danish company is not taxed on its worldwide income. Instead, income from a PE outside Denmark or from real estate located abroad is excluded from taxable income. Non-resident companies are taxed only on profits from income sourced in Denmark.

A corporation is a resident in Denmark for tax purposes if it is incorporated in Denmark and registered in the Companies Register as having a Danish place of business. Further, foreign companies having their actual place of management in Denmark are also tax residents in Denmark. The actual place of management is typically the place where the management decisions concerning the company's day-to-day operations are made.

Non-resident companies are liable to tax in Denmark on business profits derived through a PE in Denmark. The existence of a PE is determined according to Danish tax law, which makes either a reference to a specific DTT or to a text similar to Article 5 of the Organization for Economic Co-operation and Development (OECD) Model Convention.

Mandatory Danish tax consolidation

A mandatory tax consolidation regime obligates all Danish resident companies and Danish branches that are members of the same Danish or international group to file a joint group tax return. The definition of a group generally corresponds with the definition of a group for accounting purposes. The tax consolidated income is equal to the sum of the taxable income of each individual Danish company and Danish branches of foreign companies that are a member of the consolidated group.

2. Corporate tax (cont.)	Companies included in a mandatory tax consolidation are jointly and severally liable for the payment of corporate taxes. Withholding taxes (WHTs) on dividends, interest, and royalty payments are also covered by the joint and several liability. **Elective cross-border tax consolidation** A non-Danish subsidiary may be included as a member of a Danish tax grouping, provided that the group includes all group companies and branches in the Danish tax grouping. In effect, this all-or-nothing provision rules out the possibility for major international groups to have their Danish subgroup file a Danish group tax return that includes only certain hand-picked (typically loss-making), foreign group members. Losses deducted in an elective cross-border tax consolidation will be recaptured either fully or to a limited extent. If a general cross-border tax consolidation is established, it will be binding for ten years. **Transfer pricing** Danish transfer pricing rules apply to transactions between related parties (e.g., inter-group transactions), whether the transactions are made between residents or non-residents. The rules apply when a company or person directly or indirectly controls more than 50% ownership of the share capital or more than 50% of the voting power of an entity. Transactions with PEs are also considered subject to the rules, whether domestic or foreign. There are extensive rules concerning documenting transactions between related parties. **Thin capitalization and interest relief limitations** Danish resident companies and Danish branches of foreign companies are subject to three sets of restrictions, each of which may seriously limit or disallow Danish tax deductions for financing costs. Specific rules apply.
3. Withholding tax rate (non- treaty)	**Dividends** Dividends paid to a parent company in another EU member state or a state with which Denmark has a DTT are exempt from WHT, provided that the shares qualify as subsidiary shares (and the taxation should be reduced or eliminated according to the DTT or EU Parent-Subsidiary Directive). The same applies for dividends paid on group shares (that are not also subsidiary shares, i.e., holdings below 10%), provided that the recipient company is resident within the EU/EEA. However, the dividends may not be exempt from WHT if they are regarded as a redistribution of tax-exempt dividends that the Danish company has received from a foreign subsidiary where the Danish company cannot be regarded as the beneficial owner. If the portfolio shareholder (shareholding below 10%) is situated in a country with which Denmark has a tax information exchange agreement (TIEA), the tax rate on the dividend is reduced to, e.g., 15% and the difference between the higher WHT rate (27%) and the lower WHT rate may be reclaimed. The reduced rate does not apply if the shareholder is resident outside the European Union and together with related entities owns more than 10% of the capital in the Danish distributing company.

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

Interest

Interest is generally not subject to WHT unless paid to a foreign group member company that is tax resident outside the European Union and outside any of the states with which Denmark has concluded a tax treaty. In this situation, interest WHT is levied at 22%. Certain other exemptions apply, mainly relating to CFC taxation.

For recipients resident in countries within the European Union with which Denmark does not have a tax treaty, it is a condition that the paying company and the recipient company are associated as defined in the EU Interest/Royalty Directive.

Royalties

Royalties are subject to a 22% WHT. In most cases, the WHT rate can be reduced in accordance with the tax treaty applicable to the payee. Also, the EU Interest/Royalty Directive may provide an exemption from WHT if the paying company and the recipient company are associated as defined in the EU Interest/Royalty Directive.

Treaty WHT rates

Recipient	WHT (%)			
	Dividends %		Interest %*	Royalties %
	Qualifying companies (1a+b)	Others	(%)	(%)
Resident corporations	0	22 (10)	22 (10)	22 (10)
Resident individuals		27/42 (10)	(10)	(10)
Non-treaty (4):				
Non-resident corporations	27 (11)	27 (11)	22 (3, 5, 9)	22 (5, 9)
Non-resident individuals		27 (11)	0	22 (9)
Treaty:				
Argentina	0 (1a)	15	0	3/5/10/15 (7)
Australia	0 (1a)	15	0	10
Austria	0 (1a+b)	15	0	0
Azerbaijan	10 (12)	15	10	14 (12)
Bangladesh	0 (1a)	15	0	10
Belgium	0 (1a+b)	15	0	0
Brazil	0 (1a)	25	0	15/25 (7, 9)
Bulgaria	0 (1a+b)	15	0	0
Canada	0 (1a)	15	0	0/10 (7)
Chile	0 (1a)	15	0	5/15 (7)
China, People's Republic of	0 (1a)	10	0	10
Croatia	0 (1a)	10	0	10

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

Treaty WHT rates

Recipient	WHT (%)			
	Dividends %		Interest %*	Royalties %
	Qualifying companies (1a+b)	Others	(%)	(%)
Cyprus	0 (1a+b)	15	0	0
Czech Republic	0 (1a+b)	15	0	5
Egypt	0 (1a)	20	0	20
Estonia	0 (1a+b)	15	0	5/10 (7)
Faroe Islands	0 (1a)	15	0	0
Finland	0 (1a+b)	15	0	0
Georgia	0 (1a)	10	0	0
Germany	0 (1a+b)	15	0	0
Ghana, Republic of	0 (1a+b)	5/15 (13)	0	8
Greece	0 (1a+b)	18	0	5
Greenland	0 (1a)	15	0	10
Hungary	0 (1a+b)	15	0	0
Iceland	0 (1a+b)	15	0	0
India	0 (1a)	25	0	20
Indonesia	0 (1a)	25	0	15
Ireland, Republic of	0 (1a+b)	15	0	0
Israel	0 (1a)	15	0	10
Italy	0 (1a+b)	15	0	5
Jamaica	0 (1a)	15	0	10
Japan	0 (1a)	15/20	15/20	20
Kenya	0 (1a)	28	0	20
Korea, Republic of	0 (1a)	15	0	10/15 (7)
Kuwait	0 (1a)	15	0	10
Kyrgyzstan	0 (1a)	15	0	0
Latvia	0 (1a+b)	15	0	5/10 (7)
Lithuania	0 (1a+b)	15	0	5/10 (7)
Luxembourg	0 (1a+b)	15	0	0
North Macedonia	0 (1a)	15	0	10
Malaysia	0 (1a)	0	0	0
Malta	0 (1a+b)	15	0	0
Mexico	0 (1a)	15	0	10
Morocco	0 (1a)	25	0	10
Netherlands	0 (1a+b)	15	0	0
New Zealand	0 (1a)	15	0	10
Norway	0 (1a+b)	15	0	0
Pakistan	0 (1a)	15	0	12

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

Recipient	WHT (%)			
	Dividends %		Interest %*	Royalties %
	Qualifying companies (1a+b)	Others	(%)	(%)
Philippines	0 (1a)	15	0	15
Poland	0 (1a+b)	15	0	5
Portugal	0 (1a+b)	10	0	10
Romania	0 (1a+b)	15	0	4
Russia	0 (1a)	10	0	0
Serbia (6)	0 (1a)	15	0	10
Singapore	0 (1a)	10	0	10
Slovakia	0 (1a+b)	15	0	5
Slovenia	0 (1a+b)	15	0	5
South Africa	0 (1a)	15	0	0
Sri Lanka	0 (1a)	15	0	10
Sweden	0 (1a+b)	15	0	0
Switzerland	0 (1a)	15	0	0
Taiwan	0 (1a)	10	0	10
Tanzania	0 (1a)	15	0	20
Thailand	0 (1a)	10	0	5/15 (7)
Trinidad and Tobago	0 (1a)	20	0	15
Tunisia	0 (1a)	15	0	15
Turkey	0 (1a)	20	0	10
Uganda	0 (1a)	15	0	10

Country	Dividends %			Interest %*	Royalties %
Country	General (%)	Parent-Subsidiary		(%)	(%)
Ukraine	0 (1a)	15	0	10	0
United Kingdom	0 (1a+b)	25	0	0	5
United States	0 (1a)	15	0	0	0/5
Venezuela	0 (1a)	15	0	5/10 (8)	0
Vietnam	0 (1a)	15	0	15	0
Zambia	0 (1a)	15	0	15	6

Notes

1. Denmark does not operate a system of WHT on dividends when the parent company holds:
    a. at least 10% of the share capital of the distributing Danish company, provided the receiving company is resident in an EU/EEA member state or a state with which Denmark has entered into an agreement on the exchange of information, and that the parent company is subject to tax without exemption in that state (subsidiary shares), and that Denmark is obligated to reduce or waive taxation according to the Parent/Subsidiary Directive or a DTT, or
    b. less than 10% of the share capital in the distributing company, provided the receiving company is an EU/EEA-resident, the distributing and the receiving company are affiliated companies (group shares), and that Denmark would have been obligated to reduce or waive taxation according to the Parent/Subsidiary Directive or a DTT.
2. Interest is generally not subject to WHT unless paid to a foreign group member company that is tax resident outside of the European Union and outside of any of the states with which Denmark has concluded a tax treaty.

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

3. Exemptions apply if the receiving company is directly or indirectly controlled by a Danish parent company or if the receiving company is controlled by a company resident in a state with which Denmark has a double tax convention and that company may be subject to CFC taxation. Finally, an exemption applies if the receiving company establishes that the foreign taxation of interest is not less than three-quarters of the Danish corporate taxation and that the interest is not paid to another foreign company subject to taxation that is less than three-quarters of the Danish corporate taxation.
4. Denmark has terminated its treaty with Spain and France with effect from 1 January 2009. The termination means that each country will tax the relevant income according to its domestic tax rules. Companies in Spain and France receiving dividends from a Danish company may, however, qualify for tax-exempt dividends since they are EU member states.
5. The EU Interest/Royalty Directive may provide an exemption from WHT if the payee is an immediate parent, sister, or subsidiary company resident in the European Union.
6. Serbia has succeeded in the treaty between Denmark and Yugoslavia.
7. Different rates apply depending on the characteristics of the assets on which royalty is paid.
8. The 10% rate is applicable for royalties, whereas the 5% rate is applicable to fees for technical support.
9. The WHT rate is 25% for interest and royalties that are accrued or paid before 1 March 2015.
10. Dividends, interest, and royalties received by a company resident in Denmark are included in the taxable income and taxed in accordance with the current tax rate for companies (22%). It is possible to get credit for foreign taxes on the received dividends, interest, or royalties.
11. As of 1 July 2016, the tax rate on dividends distributed from a Danish company to foreign corporate shareholders is 22%. For dividends distributed from Danish companies to shareholders situated in the EU/EEA, the tax rate has been reduced retrospectively and applies to dividends distributed on 1 January 2007 or later.
12. It is a requirement for the 10% WHT rate to apply on dividend payments that the parent company holds at least 20% of the shares in the subsidiary and that the investment in the subsidiary amounts to EUR 1 million. The 14% WHT rate applies if the royalty is paid for the use of a patent (license), design, secret formula, etc., or information about industrial, commercial, or scientific experiences.

The 5% WHT rate applies if the parent company holds at least 10% of the shares in the subsidiary, or if the parent company is an institutional investor (specific types of institutional investors are mentioned in the treaty). In any other case, the 15% WHT rate applies.

4. Resident individual tax rates

An individual may be taxed in Denmark as having full tax liability to Denmark, as having limited tax liability to Denmark, or according to special expatriate rules or rules regarding workforce hire.

Individuals who are residents in Denmark are subject to full tax liability (i.e. liable to tax on their worldwide income unless the individual is considered to be tax resident in another country according to a double taxation treaty [DTT]).

An individual who is fully tax resident in Denmark will, as a main rule, be taxed according to the ordinary tax scheme by up to 52.07% (55.90% including AM tax, which is also income tax for DTT purposes) in 2022. A number of deductions are applicable; consequently, the effective tax rate is lower in most cases.

An individual not fully tax liable may have limited tax liability to Denmark. Limited tax liability is restricted to income from Danish sources, listed in the Danish Tax at Source Act, section 2, including:

- Salary for work performed in Denmark paid by or on behalf of an employer with a legal venue in Denmark.
- Salary for work performed in Denmark where the stay exceeds 183 days within 12 months.
- Certain other types of personal income, including directors' fees, pension distributions, and social security benefits.
- Remuneration covered by the special rules on hiring out personnel.
- Income arising from a business enterprise with a permanent establishment (PE.)
- Income from property located in Denmark.
- Dividends from Danish Companies.
- Royalty income from Denmark.

4. Resident individual tax rates (cont.)

- Remuneration for advisory assistance, under certain circumstances.
- An individual with limited tax liability to Denmark will, as a main rule, be taxed by up to 52.07% (55.90%, including AM tax) on income from sources in Denmark in 2022.

Personal income tax rates

Generally, individuals are subject to national income tax, municipal tax, labour market tax, and church tax (all described below).

When assessing the tax under the ordinary scheme, the following types of income apply:

- Personal income (salary, benefits in kind, self-employment income, pension income, etc.).
- Capital income (interest income, interest expenses, net taxable capital gain, etc.).
- Taxable income (personal income added to capital income and adjusted for certain itemized deductions).
- Share income (dividends, capital gains on shares).
- Property value (value of property situated in Denmark or abroad).

The different types of income are subject to different taxes and are consequently taxed at different rates. This also means that the value of a deduction differs depending on which income the deduction can be made.

The tax rates are as follows:

Taxes (2022)	Income basis	Tax rate (%)
State taxes:		
Bottom tax	Personal income	12.10
Top tax	Personal income	15.00
Local taxes:		
Municipal tax (average)	Taxable income	24.982
Labour market tax	Personal income	8.00
Share tax:		
DKK 0 to 57,200	Share income	27.00
More than DKK 57,200	Share income	42.00

Note that tax bands and local taxes may be adjusted annually. Altogether, the marginal tax rate cannot exceed 52.07% (2022). However, labour market tax, share tax, property value tax, and church tax are not compromised by this rule. Net capital income is taxed at a rate of up to 42% (in 2022). Negative net capital income and other allowances may be deducted but not with full effect.

5. Non-resident individual tax rates

Non-residents may be limited to tax liability to Denmark, if they have income from Danish sources, e.g., work in Denmark, have other business income from Denmark, dividend income, board member fees, own property, etc.

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

Special expatriate scheme

According to the special expatriate tax regime, expatriates who are employed in Denmark and scientists assigned to Denmark may be able to apply for a flat tax rate of 27% on their gross salary for up to 84 months. Several conditions must be met, including that the guaranteed monthly salary, before deduction of deductible employee pension contributions, must be at least DKK 70,400 (2022) in average in the calendar year. Special rules apply for researchers. The 27% tax rate is calculated on cash salary, employer-provided telephone/internet, the taxable value of employer-provided company cars, and employer paid taxable health insurance. All other income is taxed in accordance with normal rules. No deductions are allowed against the flat rate taxed income. The employee's stay in Denmark may be longer; however, after the 84-month period, the employee's income is taxed at ordinary rates.

As the labour market tax also applies, the combined tax rate is 32.84% each year during the 84-month period.

Workforce hire scheme

The workforce hire scheme is a separate Danish limited tax liability. The concept of 'workforce hire' implies that the employee continues to be formally employed by the employer in the home country, but is hired out to a company in Denmark as the host country under terms similar to a normal employment relationship. The company in Denmark is therefore deemed to be the employer for tax purposes in order to be covered by the workforce hire rules. First and foremost, it must be possible to substantiate that the company in Denmark (the deemed employer) is also responsible for the work performed by the employee. Also, work performed as part of the activity of the Danish company may be seen as workforce hire due to a recent change of the rules concerning workforce hire. Employees who are hired by a Danish company under a workforce hire arrangement are taxed in Denmark at a flat rate of 30% of the gross remuneration, etc. No deductions are allowed. Labour market tax should be paid as well. This gives a combined tax rate of 35.6%. The workforce hire rules only apply to employees who are not liable to either ordinary limited tax liability or full tax liability in Denmark. Consequently, if their stay in Denmark is expected to exceed six consecutive months or 183 days within any 12-month period, it is not possible to use the workforce hire rules. The six-month period is not interrupted by stays abroad due to holiday, etc. However, the period will be interrupted if the stay abroad involves a work assignment.

Note that there is a particular focus from the tax authorities on the workforce hire rules and compliance in general.

6. **Goods and services tax**	**Value-added tax** The standard rate is 25%. Some goods and services are VAT exempt (for example insurance services, medical services, financial services, and cultural services). There is a registration duty for VAT purposes. If the taxable turnover is not expected to exceed DKK 50.000, the business is not obliged to charge VAT. There are registration thresholds for distance sales. The Danish threshold is EUR 35.000. VAT returns and payments have to be done monthly or quarterly depending on the annual amount of VAT. **Energy taxes** Danish companies must pay environmental taxes, which were introduced to reduce companies' energy consumption, discharges of fluids with an environmental impact, and emissions. These taxes are paid to the companies that provide the energy, who then pay the taxes to the Danish tax authorities. Most of the environmental tax rates are regulated every year. In general, almost all VAT-registered companies in Denmark can obtain a reimbursement of some of the environmental taxes on energy (also called energy taxes). The size of the reimbursement of the energy taxes depends on the type of energy used and to what extent the companies can deduct VAT.
7. **Estate duty**	Inheritance left by a Danish resident is, in general, subject to Danish estate tax regardless of the country of residence of the beneficiary. Inheritance received by a Danish resident from an individual who was not resident in Denmark prior to death is not subject to Danish estate tax except if the inheritance consists of property located in Denmark or of assets related to a PE in Denmark. However, if an estate is settled before a Danish court, the entire inheritance will become taxable in Denmark, regardless of the country of residence of the deceased and the heirs. Estate tax amounts to 15% and is levied on the part of the assets that falls to the deceased's children and descendants, stepchildren and their descendants, parents, or cohabitant during the last two years of one's life. Inheritance and insurance payments that fall to the deceased's spouse are exempt from estate tax. Inheritance received by any other relatives than the above-mentioned is subject to a supplementary estate tax of 25% of the value of the asset after deduction of the first 15%. The taxes are not levied on the first EUR 41,945 (in 2022) of the estate.
8. **Stamp duty**	In general, stamp duty primarily occurs in connection with the registration of rights regarding property and land. Furthermore, insurance documents are liable to stamp duty if the risk is situated in Denmark. Stamp tax is payable on a few documents, such as a deed of transfer of real estate (EUR 222 plus 0.6% of the transfer sum). There is no stamp duty on transfers of shares.
9. **Property tax**	Owners of non-residential property must pay land tax annually. The land tax rate is set by the municipalities and must be between 1.6% and 3.4% of the value of the land. Municipalities may also levy a special coverage charge on certain non-residential properties at a maximum of 1% of the value of the property minus the value of the land and minus a property value threshold of EUR 6,711. Land tax and cover charges are deductible from CIT.

10. Income tax filing deadlines

Individuals

The tax authorities automatically issue a tax assessment in March the year after the income year. The taxpayer should review the assessment and correct any mistakes and add any missing items before 1 May. In the case of income not automatically reported by employer, banks, etc. (e.g., foreign income), a tax return must be filed by 1 July at the latest.

Filing beyond this date will cause penalties. Tax assessments and filing of a tax return are done electronically in Denmark. Preliminary taxes will be included in the annual tax assessment, and this will result in either tax refund, tax due, or equal balance.

Married couples are taxed jointly, however, they must prepare separate tax returns. The filing date of spousal tax returns is the same, the latest date applies.

Types of form	Taxpayer	Deadlines (of the following year)
Tax return	Residential individual	Between 1 May to 1 July
Tax return	Non-residential individual	1 July
Tax return	Companies	Varies depending on income year – 6 months after end of the financial year

Companies

Danish corporate taxpayers are taxed on an annual basis. Corporate taxpayers may choose a tax year that is different from the calendar year. Tax returns are completed based on financial accounts with adjustments for tax. Tax returns should be filed no later than six months following the end of the accounting year. Tax returns must be filed digitally. Companies can file the tax return themselves or grant their auditor/tax advisors access to file the tax return on their behalf.

11. Double tax agreements

International tax treaties have been put in place to prevent tax treaties which were signed with foreign countries to avoid double taxation.

For information for each country, please visit: https://www.skm.dk/love/internationalt/dobbeltbeskatningsoverenskomster.

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FRANCE

2024 TAX CARD (IN EUROS)

1. Basis of taxation

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

The main taxes levied in France can be divided into four categories:
- taxes on income (income tax and corporation tax).
- taxes on expenditure (VAT,....).
- taxes on assets (registration duties, inheritance and gifts duties, real estate wealth tax (IFI) ...).
- direct local taxes (property tax, residence tax, ...).

2. Corporate tax

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

Standard rate: 25% (from 2022)
Reduced rate:15% up to a profit of EUR 42,500 for small and medium size companies, owned directly or indirectly by at least 75% of individuals.

Corporation taxpayers whose turnover exceed EUR 7,63 M are liable to a social contribution of 3.3% of the corporation tax minus EUR 763,000.

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

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

3. Withholding tax rate (non-treaty)

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

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

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

4.
Residential individual tax rates

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

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

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

The portion of taxable income (one part)	Rate
For the portion under EUR 11,294	0%
For the portion over EUR 11,295 and less than or equal to EUR 28,797	11%
For the portion over EUR 28,798 and less than or equal to EUR 82,341	30%
For the portion over EUR 82,342 and less than or equal to EUR 177,106	41%
For the portion over EUR 177,106	45%

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

A system of prepayment of tax by withholding tax on all income from French sources, with annual regularization through the annual income tax return is in place.

In addition, a wealth tax ("Impôt sur la Fortune Immobilière" - IFI), is assessed when the value of real estate or similar assets owned exceed EUR 1,300,000.00.

5.
Non-resident individual tax rates

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

6.
Goods and services tax

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

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

The French VAT rates are as follows:

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

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

7.
Estate duty

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

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

Some specific assets benefit from partial or total exemption.
Fixed allowances per beneficiary can be applicable (ex : EUR 100,000 per beneficiary in direct line).

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

Fraction of net taxable part	Rate (%)
Up to EUR 8,072	5%
Between EUR 8,072 and EUR 12,109	10%
Between EUR 12,110 and EUR 15,932	15%
Between EUR 15,933 and EUR 552,324	20%
Between EUR 552,325 and EUR 902,838	30%
Between EUR 902,839 and EUR 1,805,677	40%
Over EUR 1,805,677	45%

8.
Stamp duty

Transfer duties are applicable in France as follows:

Sales of real property:
- **5.80%** (subject to small variations between area).

Transfers of businesses and similar transfers:
- Up to EUR 23,000: 0%
- Between EUR 23,000 and EUR 200,000: 3%
- Over EUR 200,000: 5%

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

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

9. **Property tax**	Property tax is levied on developed land or on undeveloped land situated in France. It's levied annually on owners, except where there is entitlement to permanent exemption or temporary exemption. The tax base is the cadastral income, proportional to the notional rental value regularly updated by the authorities. The tax is payable by the owner of the property at 1 January of the year of taxation. The amount of tax is calculated by multiplying the tax base by the rates voted by each beneficiary local authority for the year in question.
10. **Income tax filing deadlines**	see table below
11. **Double tax agreements**	France has signed 124 tax treaties to avoid double taxation of which 26 are with European countries. For information for each country, please visit : https://www.impots.gouv.fr/portail/les-conventions-internationales

Types of form	Taxpayer	Deadlines (of the following year)
2042	Residential individual	Between 3rd June to 10th June
2042 NR	Non-residential individual	3rd June
2572	Companies	4th May

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This overview is for discussion purposes only and we are not responsible for any action or decision based on this overview. Kindly contact us or one of the AGN country contacts for further advice.

GERMANY

2024 TAX CARD (In Euros)

1. Basis of taxation

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

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

2. Corporate tax/ trade tax

The tax period is the calendar year or financial year.

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

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

Company exit taxation will apply if:

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

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

Germany also has comprehensive TP stipulations.

3. Withholding tax rate (non-treaty)

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

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

4. Resident individual tax rates

Taxable Income (excluding capital gains)	Tax Rate
EUR 0 - EUR 11.604	0%
EUR 11.605 - EUR 66.760	progressive tax rate;starting by 14% up to 42%
EUR 66.761- EUR 277.825	42%
EUR 277.826+	45%

Taxable Income (capital gains)	Tax Rate
EUR 0.00 +	25%*

Taxable Income (dividends)	Tax Rate
EUR 0.00 +	25%*

The taxpayers may claim:
- Social security and health care contributions.
- A flat-rate deduction of EUR 1.200 is available for employed income.
- The tax bonus of a child allowance in the amount of EUR 3.192 per parent per child plus a childcare allowance of EUR 1.464 per parent per child.
- Support to dependent relatives residing in the same residence.
- Special tax calculation if married.

* Flat rate withholding tax.

5. Non-resident individual tax rates

The non-resident individual tax rates are the same as the resident individual tax rates. The scope of taxable income is different; there is no tax-free income of EUR 11.604.

The dividend income tax rates are the same.

6. Goods and services tax

The Value Added Tax is levied in Germany:
- on the supply of goods and services where the place of supply is Germany,
- on EU supply of goods for consideration from other EU Member State,
- on the import of goods from outside the European Union.

The standard rate is 19%. The reduced rate of 7% is applied to certain goods (for example certain foods, books, antibiotics and orthopaedic items). Some goods and services are VAT exempt (for example insurance services, financial services).

A tax rate of 0% was introduced in January 1st 2023 for certain deliveries in context with photovoltaic systems. The tax rate of 0% allowes the entrepreneur full input tax deduction.

There is a registration duty for VAT purposes.

If the taxable turnover is not expected to exceed EUR 50,000 and does not exceed EUR 22,000 in the prior year, the business is not obliged to charge VAT. There are registration thresholds for so-called distance selling. The German threshold is EUR 10,000.

7. Estate duty

Germany has the estate tax or the inheritance tax.

8.
Stamp duty

Germany does not have stamp duty.

9.
Property tax

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

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

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

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

10.
Income tax filing deadlines

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

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

11.
Double tax agreements

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

For further detail please view: https://www.bundesfinanzministerium.de/Content/DE/Downloads/BMF_Schreiben/Internationales_Steuerrecht/Allgemeine_Informationen/2024-01-15-stand-DBA-1-januar-2024.pdf?__blob=publicationFile&v=1.

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

For further detail please view: https://www.bzst.de/DE/Privatpersonen/Kapitalertraege/AuslaendischeQuellensteuer/auslaendischequellensteuer_node.html.

12.
Inheritance tax / Gift tax

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

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

12. Inheritance tax / Gift tax (cont.)	Allowances: In the case of unlimited tax liability, the tax exemption is up to EUR 500,000, depending on the family relationship. In the case of limited tax liability, the exemptions are taken into account proportionally, calculated according to the ratio of total income to domestic assets. Tax rates: The applicable tax rates lie between 7% and 50%.

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GREECE

2024 TAX CARD (IN EUROS)

1. Basis of taxation

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

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

The main taxes levied in Greece can be divided into four categories:
- taxes on income (income tax and corporation tax).
- taxes on expenditure (VAT).
- taxes on assets (registration duties, inheritance and gifts duties, real estate) wealth tax (IFI).
- direct local taxes (property tax, residence tax, ...).

2. Corporate tax

The tax period is the calendar year or financial year.
The corporate tax rate is 22%.
The tax loss of the previous year is decreasing the taxable income of the year.

The taxation upon leaving the country (exit tax) will apply if:
- the company or tax resident in Greece moves its assets from Greece to its permanent establishment abroad.
- the company or Greek tax non-resident moves its assets from the Greek permanent establishment to its centre in another country or to its permanent establishment abroad.

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

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

3. Withholding tax rate (non-treaty)

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

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

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

a. is EU resident,
b. has more than 10%, and,
c. for more than two years.

4. Residential individual tax rates (cont.)

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

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

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

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

Taxable Income (dividends)	Tax Rate
0.00 +	5%

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

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

5. Non-resident individual tax rates

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

6. Goods and services tax

The Value Added Tax is levied in Greece:

- On the supply of goods and services for consideration performed in Greece by taxable persons,
- On the Intra-Community supply of goods for consideration from other EU Member State,
- On the imports of goods.

The standard rate is 24%. The reduced rate of 13% is applied to certain goods (for example basic foodstuffs, energy etc). Some goods and services are VAT exempt (for example insurance services, financial services and cultural services). Super reduced rate 6% is applied for medicine and books.

If the taxable turnover within the last 12 calendar months will reach the registration threshold of EUR 10.000 the taxable persons are obligated to register for VAT purposes. The taxable persons which supply real properties have to register for VAT if the legal conditions are met. The voluntary VAT registration is possible.

7. Estate duty

Greece does have the estate tax and the inheritance tax. The tax is charged as follows:

1. For individuals:
   a. Between 1,20 and 13,00 EURO per square meter based on the price of the place.
   b. A supplementary tax is paid, based on the total value of the price.

2. For legal entities:
   a. A tax 0,1% on the value of the property is applied.
   b. A supplementary tax is paid, based on the total value of the price.

8. Stamp duty

Fees are applied based on the type of activity.

9. Property taxes

The real estate tax consists of the land tax, building tax and apartment tax. The persons liable for payment of property tax are the owners of property or in certain cases the property managers.

The tax period is the calendar year. The tax return must be filed by **30 days after the purchase of the property.**

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

The tax for the purchase of the property is amounted to 3% on the value of the land, building or apartment.
The estate tax is mentioned in the previous paragraph (8).
The inheritance tax start from 0% up to 40%.

10. Income tax filing deadlines

Type of form		Deadlines*
Income Tax Return	Individuals	By June 30th in the year following the tax year.
Income Tax Return	Companies	By June 30th in the year following the tax year.

* Various extensions are available for lodgement up to March / April / May / June / September in the year following the tax year.

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

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IRELAND

2024 TAX CARD (In Euros)

1. Basis of taxation	Income is taxed for individuals on a calendar year basis and for corporates based on their accounting period date. Taxpayers are required to submit tax returns on a self-assessment basis. In general terms, residents are taxed on their worldwide income whereas non-residents are taxed on their Irish sourced income. In the case of resident individuals, who are non-Irish domiciled, they may avail of the remittance basis of taxation in respect of non-Irish source investment income and the income derived under a foreign contract of employment where the duties of employment are exercised outside of Ireland. Reliefs are available under Ireland's extensive double tax treaty network. Resident individuals are taxed on capital gains on a worldwide basis. This is with the exception of non-domiciled individuals, who are taxed on gains derived outside Ireland only as the capital is remitted to Ireland. Non-resident individuals are taxed on gains on certain Irish situate assets, such as Irish situate land and buildings and unquoted shares deriving their value from such. In the case of corporates, resident companies are taxed on worldwide income and gains. A corporate not resident in Ireland but carrying on a trade through a branch will be taxable on the trading income from this, and on gains from Irish property. Different rules apply to determine the tax residence of corporates depending on whether they were incorporated pre or post 1 January 2015. For companies incorporated in Ireland after this date, they will be treated as an Irish resident, unless they would be held to be otherwise resident under a tax treaty. There are transitional rules in place for companies incorporated in Ireland before 1 January 2015, and they will also be subject to the standard position from 1 January 2021. Under the transitional rules, the place of residence for such companies will be determined by their place of central management and control. There is an exception to this where there is both a change in ownership and a major change in the nature of the business, and the standard rule will apply from the point of such change. In the case of corporates incorporated outside Ireland, their residence will be determined by their place of management and control.
2. Corporate tax	There are two rates of tax for corporates: • 12.5% for trading income. • 25% for passive/investment income. The lower rate may only apply where a company is actively trading in Ireland, and there have been numerous test cases on the nature of trading. Where it is determined that there is not sufficient trading substance in Ireland, the higher rate would be applied.

2. Corporate tax (cont.)

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

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

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

3. Withholding tax rate (non- treaty)

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

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

4. Resident individual tax rates

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

There are two rates of Income Tax. A standard rate of 20% applies on income up to EUR 42,000 (single), EUR 51,000 (married, one income) and EUR 51,000 plus up to EUR 33,000 (married, two incomes). Income above these thresholds is taxed at 40%.

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

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

5. Non-resident individual tax rates

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

6. Goods and services tax	VAT is a tax on the provision of goods and services by Irish businesses, which is levied regardless of the status of the Irish consumer (i.e. business or private individual). The Irish VAT rates are as follows: • Standard rate: 23% • Reduced rates: 9% and 13.5% • Zero rates with recovery: 0% • Exempt The VAT thresholds in place are EUR 40,000 for the supply of services and EUR 80,000 for the supply of goods. A business may elect to register if they are below these thresholds but are not obliged to do so. A business must register where they make an intra-community acquisition of goods or services regardless of turnover. The threshold for registration where a business makes distance sales of goods to Irish private customers is EUR 41,000. Periodic VAT returns are filed, with the standard basis being bi-monthly. This is reduced to a lesser frequency after a period of time if the liability/repayment is a minor amount.
7. Gift/ inheritance taxes	Capital Acquisitions Tax is a tax payable at the rate of 33% by a beneficiary on the receipt of a gift or inheritance. The tax is levied where the donee or beneficiary is Irish resident, or if the item transferred is Irish situate. There are exceptions where the recipient is not Irish domiciled, in these cases they will not be subject to this tax for the first 5 years of residence. The tax is levied on the amount received, less a threshold determined by the relationship between both parties. These thresholds are: • EUR 335,000 (received by a child). • EUR 32,500 (received by a parent, sibling, niece/nephew, grandparent (or other lineal ascendant), grandchild (or other lineal descendant). • EUR 16,250 (all other persons). All prior benefits received since December 1991 are aggregated in looking at how much of the threshold has expired. An annual EUR 3,000 exemption applies to gifts, this is available multiple times between different parties. Significant reliefs are available for the transfer of certain business or agricultural assets.

8. Stamp duty	**Non-Residential Property:** 7,5%. **Transfer of Shares:** 1% (this does not apply if the consideration is EUR 1,000 or less and it does not form part of a series of transactions). There are reliefs available in certain circumstances in the cases of group restructuring and intragroup transfers.
9. Property tax	A property tax applies on residential property at graduating rates depending on the property value. Residential property is defined as any building or part of a building which is used as, or is suitable for use as a residence. It includes any yard, gardens, driveway or other land associated with the property up to one acre in size. It also includes any other buildings or structures that belong with the residence such as garages and sheds. A person is liable to this tax where they held the property at 1 November in the preceding year. The value of the property for the purposes of the charge was assessed at 1st November 2021. There are a limited number of exemptions available, which relate to a small range of properties.
10. Income tax filing deadlines	For individuals, the return pay and file deadline is 31 October in the year following the return year. There is a requirement to make an advance payment of tax in the current year. For corporates, the return pay and file deadline will depend on their accounting period end, and will be 8 months and 21 days following this, for example, 21 September for a 31 December period. There is a requirement to pay tax in advance one month before the period end (for small companies) and during the 6th month of the period along with one month before the end of the period (for large companies i.e. those with prior period tax liabilities exceeding EUR 200,000).
11. Income tax filing deadlines	Ireland has signed double tax treaties with 76 countries, 74 of these are currently in effect. A list of the agreements can be found at: https://www.revenue.ie/en/tax-professionals/tax-agreements/double-taxation-treaties/index.aspx

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ISRAEL

2024 TAX CARD (In Shekels)

1.
Basis of taxation

Since 2003, every Israeli resident has to pay tax in respect of his/her income that was generated or accrued in Israel and outside of Israel. In contrast, a foreign resident is liable to tax only on income that was produced or accrued in Israel.

A company is a resident if its seat or place of effective management is considered in Israel. An individual is treated as resident if he has his permanent residence or habitual abode, or lives for at least 183 days in each calendar year in Israel, or stayed in Israel at least 30 days in the tax year and a total of 425 days in the last three years.

2.
Corporate tax

The tax period is the calendar year.

The corporate tax rate is 23% of tax base reduced by tax loss.

3.
Withholding tax rate (non-treaty)

	Individual/Corporation
Dividends	25-30%
Interest	15- 20%
Royalties/ know-how	10-47%
Rents (for moveable property)	10-47%
Management fees	10-47%
Directors' fees	As wages

4.
Resident individual tax rates

Taxable Income (excluding capital gains)	Tax Rate
EUR 0.0 - EUR 20,924	10%
EUR 20,924 - EUR 30,028	14%
EUR 30,028 - EUR 48,207	20%
EUR 48,207- EUR 66,982	31%
EUR 66,982 - EUR 139,366	35%
EUR 139,366 - EUR 179,484	47%
EUR 179,484 +	50%

Taxable Income (capital gains)	Tax Rate
0.00 +	25%

Taxable Income (dividends)	Tax Rate
0.00 +	25-30%

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

The non-resident individual tax rates are the same as the resident individual tax rates. The scope of taxable income is different.
The dividend income tax rates are 0-25% (treaty) and 30% (non-treaty).

**6.
Goods and Services tax**

Value Added Tax is levied in Israel:
On the supply of goods and services for consideration performed in Israel by taxable persons.

The standard rate is 17%.
Some goods and services are VAT exempt (for example fruits and vegetables).

**7.
Estate duty**

Israel does not have an estate tax or inheritance tax.

**8.
Stamp duty**

Israel does not have stamp duty.

**9.
Property tax**

Israel does not have a property tax but has real estate purchase tax. This tax rate of 8% in the part of the value up to Nis 1,696,750 is not taxable at all, and thereafter tax brackets of 3.5%, 5%, 8%, 10%. But this benefit is granted only to an Israel resident. Ostensibly, a foreign resident who purchases an apartment in Israel and is the only apartment in Israel is charged at high tax rates.

A foreign resident is entitled to benefit from tax rates on the purchase of his/her only apartment in Israel (even if he/she has an apartment abroad) as long as he/she immigrated to Israel for the first time (or returns after 10 years of residency). With temporary A/1 VISA or temporary residence permit, he/she is entitled to enjoy a purchase tax rate of only 0.5% on the part of the value up to Nis 1,788,285, while the balance of the value- purchase tax at the rate of 5%.

**10.
Income tax filing deadlines**

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

* Various extensions are available for lodgement up to April / May / June / September in the year following the tax year.

**11.
Double tax agreements**

Israel concluded 58 tax treaties to avoid double taxation.

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ITALY

2024 TAX CARD (In Euros)

1. Basis of taxation

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

The main taxes levied in Italy can be divided into four categories:

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

2. Corporate tax

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

The tax period is the calendar year or financial year.

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

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

3. Withholding tax rate (non-treaty)

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

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

4. Resident individual tax rates

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

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

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

4.
Resident individual tax rates (cont.)

Portion of taxable income (one part)	Rate
For the portion under EUR 28.000	23%
For the portion over EUR 28.000 and less than or equal to EUR 50.000	35%
For the portion over EUR 50.000	43%

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

5.
Non-resident individual tax rates

The rules relating to Italian incomes received by persons domiciled outside Italy are in principle the same as for persons domiciled in Italy.

6.
Goods and services tax

Value added tax

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

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

The Italian VAT rates are as follows:
- Standard rate: 22%
- Reduced rates: 4% and 10% and 5%
- Exemption: 0%

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

7.
Estate duty

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

- When the donor or deceased is domiciled in Italy at the time of death: on all the deceased's movable and immovable properties worldwide (with eventual tax credit on foreign property).
- When the donor or deceased is not domiciled in Italy only on movable and immovable properties located in Italy, if the beneficiary is domiciled in Italy.

Some specific assets benefit from partial or total exemption.
Fixed allowances per beneficiary can be applicable.

Different scales of taxation exist according to the link uniting the deceased to the entitled person:

7.
Estate duty (cont.)

Relationship	Fraction of net taxable part
Spouse and relatives in straight line	between EUR 0 and EUR 1,000,000: 0% over EUR 1,000,000: 4%
Brothers and sisters	between EUR 0 and EUR 100,000: 0% over EUR 100,000: 6%
Relatives up to the fourth degree	6%
Others	8%

Fees are applied but they usually are an insignificant amount.

8.
Stamp duty

Fees are applied but they usually are an insignificant amount.

9.
Property tax

Property tax is levied on developed land or on undeveloped land situated in Italy. It's levied annually on owners, except where there is entitlement to permanent exemption or temporary exemption.

The tax base is the cadastral income, proportional to the notional rental value regularly updated by the authorities.

The tax is payable by the owner of the property at 1 January of the year of taxation.

The amount of tax is calculated by multiplying the tax base by the rates voted by each beneficiary local authority for the year in question.

10.
Income tax filing deadlines

Taxpayer	Deadlines (of the following year)
Residential individual	30 September
Non-residential individual	30 September
Companies	30 September

11.
Double tax agreements

Italy has signed 100 tax treaties to avoid double taxation.

For information for each country, please visit :
https://www.finanze.gov.it/it/Fiscalita-dellUnione-europea-e-internazionale/convenzioni-e-accordi/convenzioni-per-evitare-le-doppie-imposizioni/#:~:text=Le%20Convenzioni%20per%20evitare%20le,sul%20patrimonio%20dei%20rispettivi%20residenti.

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LIECHTENSTEIN

2024 TAX CARD (In Swiss Francs)

1. Basis of taxation

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

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

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

2. Corporate tax

Liechtenstein implemented the global minimum taxation of the OECD/G20 Inclusive Framework on BEPS in accordance with the GloBE model rules as of 1 January 2024. Domestic business entities (legal entities, trusts and partnerships) of a multinational group of companies or a large domestic group are also subject to minimum taxation in accordance with the GloBE model rules for tax years from 2024 onwards, provided that their ultimate parent company has achieved a consolidated annual turnover of at least EUR 750 million in its consolidated financial statements (including deemed consolidation) in at least two of the four preceding financial years.

An effective minimum tax level of 15% is achieved by levying a Liechtenstein Qualified Domestic Minimum Top-up Tax ('QDMTT') and an IIR supplementary tax ('Income Inclusion Rule'). The business units concerned must apply the provisions of the GloBE Act in addition to the Tax Act.

3. Withholding tax rate (non-treaty)

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

There is a withholding tax of 12% on payments for the remuneration of directors.

4. Resident individual tax rates

(for financial years ending 31 December 2023)

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

<table>
<tr><td>5.
Non-resident individual tax rates
(for financial years ending 31 December 2023)</td><td>Tax rate: 4% to 19% on the taxable income (depending on earned income). There are different tax rates for single parents and married couples. A distinction is made between public and private employment as well as frontier workers and non frontier workers, taking into account the respective DTT agreements.</td></tr>
<tr><td>6.
Goods and Services tax</td><td>VAT is levied at a rate of 2.6%, 3.8% and 8.1%. Entities have to register once turnover reaches CHF 100’000.00 (Swiss Francs 250,000 for non-profit entities).

From 1 January 2018, companies domiciled abroad, who render supplies and services, regardless of turnover, must also register for VAT.</td></tr>
<tr><td>7.
Estate duty</td><td>Liechtenstein does not have death or estate taxes.</td></tr>
<tr><td>8.
Stamp duty</td><td>Public limited companies, limited liability companies and companies with shared capital, are the tax subject of the stamp duty. The stamp duty of 1.0% is due for a capital injection with an exemption limit of CHF 1 million. Deposits without a capital increase cannot benefit from the exemption threshold of CHF 1 million.</td></tr>
<tr><td>9.
Property tax</td><td>The seller of a property situated in Liechtenstein has to pay a property profit tax on the property profit. The property profit equals the difference between the sales proceeds and investment costs. The tax rate is 0% to 24%. The recoveries are subject to income tax.</td></tr>
<tr><td>10.
Income tax filing deadlines</td><td>
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*In certain cases, if the provisional tax liability has been settled, an extension of the deadline can be requested.</td></tr>
<tr><td>11.
Double Tax agreements</td><td>Liechtenstein has signed 22 tax treaties to avoid double taxation
For information for each country, please visit:
https://www.llv.li/files/stv/int-uebersicht-dba-tiea-engl.pdf</td></tr>
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NETHERLANDS

2024 TAX CARD (In Euros)

1. Basis of taxation

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

The main Dutch taxes can be divided into four categories:

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

2. Taxes on income

2.1 Personal Income Tax:

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

Box 1 - Living and Working

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

In 2024, there are three tax brackets which operate as follows.

Bracket	Euros	Income tax rate	Social security	Total
1.	EUR 0.0 - EUR 38,098	9.32%	27.65%	36.97%
2.	EUR 38,098 - EUR 75,518	36.97%	-	36.97%
3.	EUR 75,518 +	49.50%	-	49.50%

For pension-age residents (in Dutch: AOW-gerechtigden) the three bands will operate as follows.

Bracket	Euros	Income tax rate	Social security	Total
1.	EUR 0.0 - EUR 38,098	9.32%	9.75%	19.07%
2.	EUR 38,098 - EUR 75,518	36.97%	-	36.97%
3.	EUR 75,518 +	49.50%	-	49.50%

**2.
Taxes on income
(cont.)**

As the overview above shows, in addition to personal income tax, Dutch social security contributions are paid at a rate of 27.65% (up to EUR 38,098 / bracket 1) or 9.75% for pension-age residents.

Box 1 also covers income from the primary residence. The deemed income from the primary residence depends on its value. If certain conditions are met, mortgage interest payments are tax deductible up to 30 years against a tax rate of up to 36.97% (bracket 1 and 2). Mortgages taken out on or after 1 January 2013 must, in principle, be fully repaid within a maximum period of 360 months based on an annuity or linear repayment scheme. If the income from the primary residence is negative (deemed income minus mortgage payments), this loss can be offset against other income covered by Box 1. A capital gain from the sale of a primary residence is not subject to income tax.

Box 1 also covers profits from business activities of individuals (non-corporate entities): sole proprietorship and partnerships. These partnerships are transparent i.e. for tax purposes every partner is considered to have his own one-man business. A substantial part of their profits is exempted from taxation if the conditions are met. The taxable profit can be reduced if there are deductible losses. The losses are initially offset against the profits from the previous 3 years (carry back). If this is not possible, the losses may be offset with future profits (carry forward), which is limited to 9 years. For buildings in business use, for tax purposes it is allowed to depreciate until the Valuation of Immovable Property value (WOZ-waarde). If the investment in such a building was made in the year 2021, 2022 or 2023, for a period of three years it is still allowed to depreciate until 50% of the Valuation of Immovable Property value is reached but only if the building was put into use before 2024.

Box 2 - Substantial Interest

Box 2 includes income and gains from substantial interests in companies. A substantial interest means (options to) 5% or more of the shares or a profit right of 5% or more. In 2024, there are two tax brackets for the taxation of income, i.e. dividends and capital gains, originated from a substantial interest.

Bracket	Euros	Income tax rate
1.	EUR 0.0 - EUR 67,000	24.5%
2.	EUR 67,000 +	33%

Box 3 - Savings and Investments

Box 3 covers income from capital. A flat tax rate of 36% is applicable on deemed income from savings and investments.

Deemed income

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

2. Taxes on income (cont.)

Deemed income 2024:

1. Savings: 1.03%
2. Investments and other assets: 6.04%
3. Liabilities: 2.47%

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

Tax-free capital threshold

The Dutch tax system entitles each resident in the Netherlands to a tax-free capital threshold of EUR 57,000 in 2024 and EUR 114,000 for fiscal partners.

Tax base

So, the tax base in Box 3 = savings/investment amount minus liabilities and tax-free capital.

The liabilities are tax deductible to the amount of the applicable threshold.
In the case of no fiscal partner the threshold is EURO 3,700. In case of fiscal partners it is EURO 7,400.

Calculation deemed income - Example

Example:
No fiscal partner.

Savings	EUR 100,000
Investments	EUR 150,000
Liabilities	EUR 50,000

Step1 - Taxable return

1.	Savings: EUR 100,000 x 1.03%	EUR 1,030
2.	Investments: EUR 150,000 x 6.47%	EUR 9,705 +/+
		EUR 10,735
3.	Liabilities: EUR 50,000 x 2.47%	EUR 1,235 -/-
4.	Taxable return	EUR 9,500

Step 2 – Basis return

1.	Liabilities	EUR 50,000
2.	Threshold (fiscal partners)	EUR 7,400 -/-
3.	Deductible	EUR 42,600
4.	Savings and investments	EUR 250,000
5.	Deductible liabilities	EUR 42,600 -/-
6.	Basis return	EUR 207,40

**2.
Taxes on
income
(cont.)**

Step 3 – Basis Savings and Investments

1.	Basis return (result of step 2)	EUR 207,400
2.	Tax-free capital threshold (fiscal partners)	EUR 114,000 -/-
3.	Basis for savings and investments	EUR 93,400

Step 4 - Share in the Return Basis

Divide the savings and investment basis (result of step 3) by the return basis (result of step 2). Multiply the result by 100. Round to 2 decimal places.

Share in the return basis: (EUR 93,400 ÷ EUR 207,400) × 100 = 45.03%.

Step 5 – Income from savings and investments

Income from saving and investing is the taxable return (result of step 1) multiplied by the percentage of the share in the return base (result of step 4).

Income from savings and investments: EUR 9,500 × 44.03% = 4,182.

Step 6 - Taxation in Box 3

Multiply the tax rate for Box 3 (2024: 36%) by the benefit from savings and investments (result of step 5).

Tax to be paid in Box 3: 36% × EUR 4,182 = EUR 1,505.

2.2 Wage Tax

General

Wage tax is payable by:

- persons resident in the Netherlands receiving a wage or salary from an employer established in the Netherlands for work they are doing or have done;
- persons resident abroad receiving a wage or salary from an employer established in the Netherlands for work they are doing or have done in the Netherlands;
- persons resident abroad who are members of the board of management or the supervisory board of a company established in the Netherlands for work they are doing or have done;
- persons resident abroad receiving a wage or salary from a Dutch public corporation for work they are doing or have done;
- non-residents artists and professional sportsmen who in accordance with an agreement of short duration or pursuance of any short term cause or reason to perform in the Netherlands; except where the Netherlands has not been granted the right to collect taxes under an agreement to prevent double taxation.

2. Taxes on income (cont.)

Advance levy on personal income tax

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

Pensions

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

30% Ruling

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

As of this year (2024) the 30% ruling will be scaled back and capped. The tax-free allowance will be a maximum of EUR 69,900 which will be received if the expatriate has a salary of EUR 233,000 or higher. For new applications the 30% ruling will be scaled back to a 10% ruling over the five-year term during which a 30% ruling can apply: the first 20 months 30%, the second 20 months 20% and the 3rd 20 months 10%. From 1 January 2025 an employee using the 30% ruling can no longer opt for partial foreign taxpayer status. In a number of cases transitional rules apply. For example, the scaling back of 30% ruling to a 10% ruling does not apply if the 30% ruling was applied in the last payroll period of 2023.

2.3 Corporate Income Tax

Tax rates

A private or public limited company (B.V. or N.V.) pays corporate income tax (CIT) on the taxable profit in a single financial year.

2. Taxes on income (cont.)

Bracket	Euros	Corporate Income Tax rate
1.	EUR 0.0 - EUR 200,000	19%
2.	EUR 200,000 +	25.8%

Deductible losses

The taxable profit can be reduced if the company has any deductible losses. The company may offset losses initially against the profit from the preceding financial year (carry back) and subsequently against taxable profits of all following years (carry forward). The latter also applies, in principle, to any loss set-off still available in 2022. However, not all taxable profit is available for loss set-off. Insofar as the taxable profit exceeds EUR 1 million, only 50% is available for loss set-off. For example, for an entity with a taxable profit of EUR 1.8 million, only EUR 1.4 million will be available (EUR 1 million + 50% of EUR 800,000). The unused part of the deductible losses can be used in a later year. This therefore concerns a temporization.

Innovative activities

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

Depreciation on business premises

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

2.4 Withholding Taxes

General

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

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

Participation exemption

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

2. Taxes on income (cont.)

Tax avoidance measure

Within the framework of tackling international tax avoidance, a tax at source was introduced on 1 January 2021 on interest, royalty payments and dividends to affiliated entities in countries with very low taxes, countries on the EU-list of non-cooperative jurisdictions and in certain tax abuse situations.

The rate of this withholding tax is equal to the highest corporate income tax rate (2024: 25.8%).

Low-tax countries are defined as: countries without profit tax or with a tax rate of less than 9%.

3. Taxes on expenditure

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

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

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

The VAT rates in the Netherlands:

• standard rate	21%	(input tax deductible)
• reduced rates:		
a. certain goods and services, as: food, water, repairment of bicycles.	9%	(input tax deductible)
b. certain goods and services, as: export of goods to non-EU countries, international passenger transport.	0%	(input tax deductible)
• exemption: certain goods and services, as: investment gold, real estate, health care, education.		(input tax not deductible)

4. Taxes on assets

4.1 Inheritance Tax

General

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

4. Taxes on assets (cont.)

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

Exemptions

Spouse / partner	Child / grandchild	Sick / disabled child	Parents	All others
EUR 795,156	EUR 25,187	EUR 75,546	EUR 59,643	EUR 2,658

Inheritance tax rates

Value inheritance	Spouse / partner (foster / step)child sick / disabled child	Grandchild further descendants	All others
EUR 0 – EUR 152,368	10%	18%	30%
EUR 152,368 +	20%	36%	40%

4.2 Gift Tax

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

Exemptions

(Foster / step) child	Child in the age of 18 – 40 (one-time donation / free disposable)	Child in the age of 18 – 40 (one-time donation for expensive study)	All others
EUR 6,633	EUR 31,813	EUR 66,268	EUR 2,658

Gift tax rates

The gift tax rates and brackets are the same as for the inheritance tax.

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

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

Transfer tax (real estate)

Transfer tax is levied on the transfer of:

- Property (for example a house, building or land).
- Rights to property (for example building lease).
- Shares in a "real estate legal entity" (B.V., N.V.) or participation in a partnership whose possessions exist mostly of real estate.

4. Taxes on assets (cont.)	There are two tax rates for transfer tax. The tax rate of 2% applies to (main) private residences and associated appurtenances. The tax rate of 10.4% applies to all other property. A buyer of a first home in the age of 18 to 35 is exempt from transfer tax if the purchase price of the home does not exceed 510,000 euros.
5. Tax agreements / double taxation (avoidance) decree	To avoid income or capital being taxed more than once, the Netherlands has concluded tax treaties with a considerable number of countries. In the event the Netherlands has not concluded a tax treaty with the country concerned, the Double Taxation (Avoidance) Decree (2001) applies. Application of this Decree will also result in the avoidance of double taxation. Tax treaties do not include any rules for the levy of national insurance contributions. Other (international) rules apply to this. With regard to the avoidance of double inheritance and gift tax, separate tax treaties have been concluded. If, in a certain case, there is no such tax treaty, application of the Double Taxation (Avoidance) Decree may prevent double taxation.

POLAND

2024 TAX CARD (In POLISH ZLOTYS)

1. **Basis of taxation**	Income taxes: • Tax-residents individuals and corporations are taxed on their worldwide income; • Non-residents individuals and corporations are taxed on their Polish income; • The standard income tax year runs from January 1 to December 31. However, the tax year of corporations matches their statutory year. Other main taxes are VAT, inheritance and gifts tax (estate duty), stamp duty and real estate local tax.
2. **Corporate tax**	Polish resident companies are taxed on their worldwide income. Non-resident companies are taxed on certain income sourced in Poland. The following tax rates apply to companies: • 19% - standard flat rate. • 9% - flat rate for companies where gross sales in the current year did not exceed EUR 2,0 million and their gross sales in the previous year did not exceed EUR 2,0 million; 9% rate doesn't apply to capital gains. Income obtained from qualified intellectual property rights might be taxed on special terms with a 5% rate (so-called IP Box). There is special way of taxation of income from real estate (excluding some residential buildings which are being rented within public social schemes) which initial book value exceeds PLN 10 million (so-called minimum income tax). Owners of such estate have to pay a tax of 0,035% in excess of above PLN 10 million of book value of real estate per month. Generally, excluding some kinds of agricultural production, farming is not subject to income tax. There is a special agricultural tax for farming activities. Apart from the corporate income tax, financial institutions in Poland also pay special tax based on the value of assets. Since 2019, as the result of the implementation of EU Anti-Tax Avoidance Directive (2016/1164), a special tax on income from unrealized gains is in force in Poland (so-called exit tax). It is applicable in case of transferring of assets abroad or changing of tax residence. The tax rate is 19%. As of January 1, 2022, entities that in the tax year: 1. Incurred a loss from a source of income other than capital gains, or 2. Achieved taxable income in the amount of not more than 1% of the total turnover (other than from capital gains): a. are obliged to pay an additional tax liability in the amount of 10% of the tax base (so-called minimum corporate income tax).

3.
Withholding tax rate (non-treaty)

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

4.
Resident individual tax rates

Taxable Income (PLN)	Tax Payable (PLN)
PLN 0 – PLN 30,000	Nil
PLN 30,000 - PLN 120,000	17% minus the tax reduction in the amount of PLN 5,100; 12% Income tax for the income exceeding 30.000 PLN yearly.
PLN 120,000 and over	PLN 10,800 + 32% of excess over PLN 120,000 yearly. PLN 10,800 + 32% of excess over PLN 120,000.

Individuals under 26 years with annual incomes not exceeding PLN 85.528 pay no income tax.

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

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

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

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

5.
Non-resident individual tax rates

Taxable Income (PLN)	Tax Payable (PLN)
PLN 0 – PLN 30.000	Nil
PLN 30,000 – PLN 120,000	17% minus the tax reduction in the amount of PLN 5,100.
PLN 120,000 and over	PLN 15,300 + 32% of excess over PLN 120,000.

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

6.
Goods and services tax

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

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

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

7.
Estate duty

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

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

8.
Stamp duty

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

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

9.
Property tax

Real property tax is levied by the local authorities. It is based either on the area of land/building or their value in the tax books, depending on the kind of property.

If taxation is based on the value of a property, the tax rate is 2%. If taxation is based on the area of land/building, the tax rates vary from 1,15 PLN/m2 to 33,15 PLN/m2 per year, depending on the kind of property and its use.

10.
Income tax filing deadlines

Types of Form		Deadlines
Annual Income Tax Return	Individuals	30 April
Annual Income Tax Return	Companies	The end of the third month following the tax year.
Annual Income Tax Return	Partnerships	Only joint-stock partnership is obliged to file an income tax return by the end of the third month following the tax year. Other partnerships are tax transparent and don't file income tax returns.

TPR – C – Transfer pricing information – until 30 September.

11.
Double Tax Agreements

There are 91 tax treaties signed by Poland with foreign countries regarding avoidance of double taxation.

Poland also signed and ratified Multilateral Instrument to Modify Bilateral Tax Treaties (so-called MLI Convention). Poland notified 47 tax treaties to be covered by the MLI Convention.

Updated
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PORTUGAL

2024 TAX CARD (In Euros)

1.
Basis of taxation

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

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

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

2.
Corporate tax

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

For a PME (small and medium-sized company) and Small Mid Caps the tax rate applicable until EUR 50.000 of profit is 17% and 21% for remaining profit.

Deduction of tax losses

Since 2023 the carry forward of tax losses are not subject to time limitation. On the other hand, the deduction of tax losses is now to 65% of the taxable profit.

This rule is applicable to the deduction of tax losses against taxable profit of tax years starting on or after 1 January 2023 and previous tax losses which period for deduction was still running in 2023. Exception: tax losses assessed in tax years prior to 1 January 2023 in which there was a situation as described in Article 6 no. 1 of the special regime applicable to deferred income tax assets - "Regime especial aplicável aos ativos por impostos diferidos" or "REAID".

3.
Withholding tax rate (non-treaty)

		Non-resident Individual	
	Resident Individual	With International Tax Treaties	Standard
Dividends	28%[a]	5%-15%	28%
Interest	28%	5%- 15%	28%
Royalties/know-how	16.5%	5%-15%	25%
Rents	25%	-	25%
Capital Gains	28%	-	28%
Management fees	NA	NA	NA
Technical fees	NA	NA	NA
Directors' fees	NA	NA	NA

(a) If individual opts to include dividends in income tax statement only consider 50% of income.

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

	Resident Corporations		Non-resident Corporations		
	Standard	Participation Exemption (1)	With International Tax Treaties	Standard	Participation Exemption (1)
Dividends	25%	0%	5% - 15%	25%	0%
Interest	25%	0% (2)	5% - 15%	25% 35% for offshores	0% (2)
Royalties/ know-how	25%	0% (3)	5% - 15%	25%	0% (3)
Rents	25%	-	-	25%	-
Capital Gains	21%	0% (5)	-	-	0% (4)
Management fees	NA	NA	NA	NA	NA
Technical fees	NA	NA	NA	NA	NA
Directors' fees	NA	NA	NA	NA	NA

(1) Tax exemption: shareholding → or = 10% and owned more than 1 year.
(2) Under the directive 2003/49/CEE.
(3) Under the directive 2003/49/CEE.
(4) Only if the foreign shareholder is not resident in a tax haven country and if the total assets of Portuguese company have no more than 50% of buildings.
(5) If total assets of Portuguese company have no more than 50% of buildings.

4. Resident individual tax rates

(1 January - 31 December 2024)

Taxable Income	Tax Payable	
	Standard	Average
EUR 0 – EUR 7.703	13.25%	13.25%
EUR 7.703 – EUR 11.623	18%	14,85%
EUR 11.623 – EUR 16.472	23%	17,25%
EUR 16.472 – EUR 21.321	26%	19.24%
EUR 21.321 – EUR 27.146	32.75%	22.14%
EUR 27.146 – EUR 39.791	37%	26.86%
EUR 39.791 – EUR 51.997	43.50%	30.77%
EUR 51.997 – EUR 81.199	45%	35.89%
EUR 81.199 and over	48%	-

Additional Solidarity Tax Rate	
Plus 80.000 until 250.000	2.5%
Plus 250.000	5%

5. Value added tax

VAT Rates		
Standard Rate	23%	16% in Azores and 22% in Madeira
Reduced Rate	13%	9% in Azores and 12% in Madeira
Super Reduced Rate	6%	4% in Azores and 5% in Madeira

5. Value added tax (cont.)	If the distance selling to individuals exceed the threshold (EUR 35.000 of annual turnover), the company must obtain a Portuguese VAT number and charge the Portuguese VAT.
6. Inheritance Tax	The inheritance tax rate, named as stamp tax, is fixed on 10% over the total amount of assets. Spouse, children or ascendants are tax exempt. Heirs must present before tax authorities a list of the inherited assets.
7. Stamp duty	Stamp duty is due on acts, contracts, documents, titles, books, papers and other facts foreseen in the General Table, which occur in Portugal and are not subject or exempt from VAT. Onerous acquisition or donation of property (0,8%), letting or sub letting (10%), use of credit (0,04%-0,6%), consumer's credit (0,141%-1,76%), interest (4%), commission for given guarantees (3%), free transfers of crypto assets (10%), other commission for financial services (4%), are some examples where stamp duty is applied.

8.
Property tax and Property transfer tax

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

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

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

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

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

9.
Income tax filing deadlines

Types of Form		Deadlines*
Tax Return	Individuals	30 June
Tax Return	Companies	31 May (exceptionally the date of submission of the 2023 CIT return was extended due to 15 July 2024, without any penalties)
Tax Return	Partnerships (Special Tax Regime of Group Taxation - RETGS)	31 May
Annual declaration (IES)	Companies	15 July
Annual declaration (IES)	Partnerships	15 July
Periodic VAT Returns	If Annual Turnover > or = EUR 650.000	Monthly, until the 10th of the second following month
	If Annual Turnover < EUR 650.000	Quarterly, until the 20th of the second following month

10.
Double tax agreements

Portugal has 78 international tax treaties in force (plus 1 already signed) with foreign countries to avoid double taxation.

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ROMANIA

2024 TAX CARD (in Euros)

1. Basis of taxation

The Romanian fiscal year usually runs from the 1 January to 31 December, but a modified fiscal year is also acceptable for businesses to better align with their operations cycles.

The Romanian tax system is divided into two main categories: company taxation and individual taxation.

Also, there are the two fundamental principles in determining liability to tax, commonly known as the source rule and residence rule. Resident taxpayers are subject to tax in Romania on all their income, on a worldwide basis, whether it comes from the domestic source or a foreign source. Non resident taxpayers are taxed only on income arising from within the state.

2. Corporate tax

Romania imposes a flat income tax of 16% on the profits earned by corporations, both residents and non-resident.

Romania has also implemented measures to encourage investment and economic growth, like the exempted reinvested profit or reductions of up to 15% of tax for increased capital value of the company. Still, some of the major corporations that reach a EUR 50m revenue threshold are imposed a minimum tax of 1% on their revenue, if the 16% profit tax is lower. Credit institutions have the minimum 2% on their revenues and some of the companies carrying out activities in the oil and natural gas sectors have a minimum 0,5% tax on their revenues.

Starting 2024, Romania has also transposed the EU Global Minimum Tax Directive that introduces minimum effective taxation of 15% for large multinational or domestic groups with annual revenues of at least EUR 750m in at least two of the last four fiscal years.

For micro-enterprises, there is a simplified taxation system, with 1% tax on revenues until they reach a EUR 60.000 revenue threshold and 3% tax on revenues until they reach a EUR 500.000 revenue threshold, with some sectors excluded. The threshold is calculated taking into account all partner enterprises in Romania. Shareholders that have a participation of more than 25% can only have one micro-enterprise with the reduced taxation.

Year	Annual turnover threshold (EUR)	Entities above the threshold	Entities below the threshold with at least one employee
2024	500.000	16% on profit	1%/3% on revenue

3. Withholding tax rate (non-treaty)

	Resident Individual/ Corporation	Non-resident with no convention regarding the exchange of information Individual/Corporation
Dividends	8%/NA	8%
Interest	10%/NA	10%/16%
Royalties/know-how	10%/NA	10%/16%
Rents (for moveable property)	NA	NA
Management fees	10%/NA	10%/16%
Technical fees	10%/NA	10%/16%
Directors' fees	10%/NA	10%/16%

4. Resident individual taxes rates

The income tax rate applicable to resident individuals is 10% except for dividends for which the tax rate is 8%.

5. Non-resident individual tax rates

The income tax rate applicable to non-resident individuals is the same as for resident individuals.

6. Value added tax

The standard VAT rate is equal to 19% and is to be applied to the tax base for any taxable operation that is not exempt from tax or that is not subject to the reduced rates.

The 9% reduced rate is applicable for supplies of medical devices, medicines, food, non-alcoholic drinks, water and agriculture goods, hotel accommodation, restaurant and catering services, solar panels, certain deliveries of houses and others.

The 5% reduced rate is applied to the delivery of books, newspapers, school manuals, admissions to castles, museums, monuments, zoological and botanical gardens.

Romanian VAT regulation is in accordance with 112/2006/CE VAT Directive.

7. Inheritance tax

Inheritance Tax is not applicable if procedures are completed within two years. After this, there is a 1% tax.

8. Immovable property transfer tax

Immovable property transfer tax is 3% for constructions and lands, held for a period of up to 3 years or 1% for the ones held for more than 3 years. No tax is owed in case of donation between relatives up to the 3rd degree as well as between spouses.

9.
Property tax

Romanian property tax is calculated according to the destination of the property (residential, non-residential or mix destination), year of completion, area and the rank of the town, the building utilities and type. Local administrative councils establish the property tax rates between 0.08% - 0.2% for residential and 0.2% -1.3% for non-residential properties on the value of the property. Companies must evaluate the value of the property every five years otherwise a 5% tax rate is applied to the value of the property.

10.
Income tax filing deadlines

Type of form		
Tax Return	Individuals	25th May
Tax Return	Companies	25th March
Tax Return	Non-profit organisations	25th February

* For corporate income tax arising in fiscal years 2021-2025 tax filing and payment deadlines were postponed to 25th June of the following year.

11.
Double tax agreements

87 double taxation treaties were signed between Romania and other countries in order to eliminate the double taxation. These agreements override domestic legislation where the same income is taxed in both countries.
https://static.anaf.ro/static/10/Anaf/AsistentaContribuabili_r/Conventii/Conventii.htm

In January 2022, Romania deposited its instrument of ratification for the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting which entered into force on 1 June 2022.

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SPAIN

2024 TAX CARD (In Euros)

1. Basis of taxation	Spanish taxes can be classified as follows: **A. Direct taxes.** • On Incomes: Corporate income tax, Personal income tax and Non-resident income tax. • On assets: Wealth tax and inheritance and inheritance gift tax (affecting only individuals). **B. Indirect taxes:** • Valued Add Tax (VAT). • Transfer tax and stamp tax. • Excise tax. • Customs duties on imports. • Tax on insurance premiums. **Tax residence in Spain.** A company is deemed to be resident in Spain for tax purposes if it meets any of the following conditions: it was incorporated under Spanish Law, its registered office is located in Spain, and its place of effective management is in Spain. An individual will have his/her residence in Spain as long as he/she stays physically in Spain more than 183 days in one calendar year. **Non-resident in Spain.** A company will contribute in Spain to its incomes received through a permanent establishment besides the assets located in Spain, as well as individuals.
2. Corporate tax	The regulation is basically contained in Corporate Tax Law 27/2014, of November 27 and in Royal Decree 634/2015, of July 10, 2015, approving the Corporate Income Tax Regulations. The tax period can not exceed 12 months, and the tax will file after the next six months following the end of its financial year. Commonly, the financial year runs from January 1st until December 31st. The tax principles for allocating revenues and expenses to determine taxable income generally coincide with accounting principles. In this regard, the method generally applicable for recognizing revenue and expenses is the accrual method. The law contains an exhaustive list of non-deductible expenses. The are some tax incentives for small and medium-size companies which invoice less than EUR10 million, regarding the depreciation of its assets and if they increase their reserves. The general tax rate is 25%. There are some special rates applicable to certain entities such as collective investments institutions (1%), certain cooperatives (20%), non-profit organizations complying with Law 49/2002 (10%), credit institutions (30%), etc. There are some tax credits applicable to encourage certain activities: • Research and development and technological innovation. • Investment in cinematographic production. • Creation of employment. • Creating jobs for disabled workers.

2. Corporate tax (cont.)

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

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

If the company belongs to a group of companies, and the net turnover of the group exceeds EUR 1M, it is not eligible for this reduction.

3. Withholding tax rate (non-treaty)

	Resident Individual/Corporation	Non-Resident Individual/Corporation
Dividends	19%	19%
Interest	19%	19%
Capital gain		19%
Capital gain (real estate)	0%	3%
Royalties	19%	24%
Rents	21%	24%
Salaries	0-47%	24%
Pensions	0-15,59%	8-40%
Business	0-47%	24%

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

4. Resident individual tax rates

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

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

The law establishes numerous items from exempt income such as salary earned during the time spent by the employee working abroad.

There are reductions in the base in order to adapt the tax to the personal and family situation of the taxpayer.

a. Taxpayer allowance: EUR 5,550 annually (increased for persons over 65 years).

4.
Resident individual tax rates (cont.)

b. Allowance for descendants: EUR 2,400 for the first, EUR 2,700 for the second, EUR 4,000 for the third, EUR 4,500 for fourth and subsequent.
c. Allowance of ascendants: EUR 1,150 annually.
d. Allowance for disability: depending on the grade of disability EUR 3,000 or EUR 9,000.

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

Tax applicable on the General tax base:

Net Taxable Income (Up to)	Gross TA payable	Rest of Net Taxable Income (Up to)	Tax Rate Applicable
-	-	EUR 12.450,00	19%
EUR 12.450,00	EUR 2.365,50	EUR 7.750,00	24%
EUR 20.200,00	EUR 4.225,50	EUR 15.000,00	30%
EUR 35.200,00	EUR 8.725,50	EUR 24.800,00	37%
EUR 60.000,00	EUR 17.901,50	EUR 240.000,00	45%
EUR 300.000,00	EUR 125.901,50	Onwards	47%

Tax applicable on the Saving tax base:

Net Taxable Income (Up to)	Gross TA payable	Rest of Net Taxable Income (Up to)	Tax Rate Applicable
		EUR 6.000,00	19%
EUR 6.000,00	EUR 1.140,00	EUR 44.000,00	21%
EUR 50.000,00	EUR 10.380,00	EUR 150.000,00	23%
EUR 200.000,00	EUR 44.880,00	EUR 100.000,00	27%
EUR 300.000,00	EUR 71.880,00	Onwards	28%

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

5.
Non-resident individual tax rates

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

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

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

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

6. Goods and services tax

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

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

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

The taxable transactions are:
a. Supplies of goods.
b. Supplies of services.
c. Intra-Community acquisitions of goods and services.
d. Imports of goods.

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

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

7. Estate duty

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

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

7.
Estate duty (cont.)

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

8.
Stamp duty

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

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

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

9.
Property tax

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

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

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

For 2023 and 2024, a temporary regulation was enacted at the state level to tax large fortunes: Assets between 3 and 5 million euros: 1.7%; assets between 5 and 10 million euros: 2.1%; assets over 10 million euros: 3.5%. For this reason, many autonomous communities suspended or presented modifications to their property taxes for the duration of this exceptional tax.

10.
Income tax filing deadlines

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

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

11.
Double tax agreements

There are 93 double taxation treaties concerning 96 countries and the Hong Kong Special Administration.

Azerbaijan, Cape Verde, Qatar and Denmark, have their own treaties, and the former USSR countries (Kyrgyzstan, Turkmenistan, Tajikistan and Ukraine) still don't have their own treaties but are governed by the treaty for the former USSR.

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

Country	Dividends %			Interest %*	Royalties %
Country	General (%)	Parent-Subsidiary		(%)	(%)
Albania	10	5/0	10/75.	0/6	0
Andorra	15	5	10	0/5	5
Algeria	15	5	10	0/5	07/14
Argentina	15	10	25	0/12	3/5/10/15
Armenia	10	0	25	5	05/10
Australia	15	15	-	10	10
Austria	15	10	50	5	5
Barbados	5	0	25	0	0
Belgium	15	0	25	0/10	5
Belarus	18	18	-	0	0/5
Bolivia	15	10	25	0/15	0/15
Bosnia y Herzegovina	10	5	20	0/7	7
Brazil	15	10	25	0/10/15	10/15
Bulgaria	15	5	25	0	0
Canada	15	5/0	10/PP	0/10	0/10
Chile	10	5	20	4/5/15	2/10
China	10	10	-	10	6/10
Colombia	5	0	20	0/5/10	10
Costa Rica	12	5	20	0/5	10
Croatia	15	0	25	0	0

11. Double tax agreements (cont.)

Country	Dividends %			Interest %*	Royalties %
Country	General (%)	Parent-Subsidiary		(%)	(%)
Cuba	15	5	25	0/10	0/5
Cyprus	5	0	10	0	0
Czech Republic	15	5	25	0	0/5
Dominican Republic	10	0	75	0/10	10
Ecuador	15	15	-	0/5/10	5/10
Egypt	12	9	25	0/10	12
El Salvador	12	0	50	0/10	10
Estonia	15	5	25	0	0
Finland	15	10	25	10	5
France	15	0	10	0/10	0/5
Georgia	10	0	10	0	0
Germany	15	5	10	0	0
Greece	10	5	25	0/8	6
Hong Kong	10	0	25	0/5	5
Hungary	15	5	25	0	0
Iceland	15	5	25	0/5	5
India	15	15	-	0/15	10
Indonesia	15	10	25	0/10	10
Iran	10	5	20	0/7,5	5
Ireland	15	0	25	0	5/8/10
Israel	10	10	-	0/5/10	5/7
Italy	15	15	-	0/12	4/8
Jamaica	10	5	25	0/10	10
Japan	15	10	25	10	10
Kazakhstan	15	5	10	0/10	10
Kyrgyzstan	18	18	-	0	0/5
Kuwait	5	0	10	0	5
Latvia	10	5	25	0/5/10	0%
Lithuania	15	5	25	0/10	5/10
Luxemburg	15	10	25	10	10
North Macedonia	15	5	10	0/5	5
Malaysia	5	0	5	0/10	5/7 [
Malta	5	0	25	0	0
Morocco	15	10	25	10	5/10
Mexico	10	0	10/FP	0/4,9/10	0/10
Moldova	10	5/0	25/50	0/5	8

11.
Double tax agreements (cont.)

Country	Dividends %			Interest %*	Royalties %
Country	General (%)	Parent-Subsidiary		(%)	(%)
Netherlands	15	10/5	50 (o 25+25)	10	6
New Zealand	15	15	-	10	10
Nigeria	10	7,5	10	0/7,5	3,75/7,5
Norway	15	10	25	0/10	5
Oman	10	0	20	0/5	8
Pakistan	10	7,5/5	25/50	0/10	7,5
Panama	10	5/0	40/80 (o FP)	0/5	5
Philippines	15	10	10	0/10/15	10/15/20
Poland	15	5	25	0	0/10
Portugal	15	10	25	15	5
Romania	15	10	25	10	10
Russia	15	10/5 [	Vol. Investment	0/5	5
Saudi Arabia	5	0	25	0/5	8
Senegal	10	10	-	0/10	10
Serbia	10	5	25	0/10	5/10
Singapore	5	0	10	0/5	5
Slovakia	15	5	25	0	0/5
Slovenia	15	5	25	0/5	5
South Africa	15	5	25	0/5	5
South Korea	15	10	25	10	10
Sweden	15	10	50	15	10
Switzerland	15	0	10 (o PP/ Equity)	0	0/5
Tajikistan	18	18	-	0	0/5
Thailand	10	10	-	0/10/15	5/8/15
Trinidad y Tobago	10	5/0	25/50	0/8	5
Tunisia	15	5	50	5/10	10
Turkey	15	5	25	10/15	10
Turkmenistan	18	18	-	0	0/5
Ukraine	18	18	-	0	0/5
United Arab Emirates	15	5	10	0	0
United Kingdom	10	0	10 (o PP)	0	0
Uruguay	5	0	75	0/10	5/10
USA	15	10	25	0/10	5/8/10

11.
Double tax agreements (cont.)

Country	Dividends %			Interest %*	Royalties %
Country	General (%)	Parent-Subsidiary		(%)	(%)
Uzbekistan	10	5/0	25	0/5	5
Venezuela	10	0	25	0	5
Vietnam	15	10/7/5	25/50/70	0/10	5/10

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SWEDEN

2024 TAX CARD (In Swedish Krona)

1. Basis of taxation

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

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

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

2. Corporate tax

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

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

3. Withholding tax rate (non-treated)

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

4 Resident individual taxes rates

Taxable Income SEK	Tax Payable SEK
0 – 598 500	About 31%
598 500 –	52% of excess over 598 500

5. Non-resident individual tax rates

Taxable Income SEK	Tax Payable SEK
0 – 598 500	About 31 %
598 500 –	52 % of excess over 598 500

6. Goods and Services tax	VAT is levied at a rate of 25%,12% or 6%. Entities have to register once turnover reaches 80,000 SEK.
7. Estate Duty	Sweden does not have death or estate taxes – various rollovers apply for capital gains tax and stamp duties when assets are passed on after death.
8. Stamp duty	Stamp duty is applied. Stamp duty is applied on real property transfers. Rate of duty is 1,5% for individuals and to 4,25% for legal entities.
9. Property tax	Property tax is charged on property owners. The rate of property tax varies depending on the use of the building. The tax is charged on an estimated value linked to an estimated market value adjusted every few years.
10. Income tax filing deadlines	See table below
11. Double tax agreements	137 international tax treaties have been put in place to prevent tax treaties and were signed with foreign countries to avoid double taxation.

Types of Form		Deadlines*
Tax Return	Individuals	2 May
Tax Return	Companies	Varies depending on income year. 6 months after the end.
Management fees	NA	NA
Technical fees	NA	NA
Directors' fees	NA	NA

*Various extensions are available for lodgement up to June of the following year where the entity is registered as a client of a tax agent. Timing of extension available is dependent upon the type of entity, their size, and if the entity is tax payable for the year.

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SWITZERLAND

2024 TAX CARD (In Swiss Francs)

1. Basis of taxation

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

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

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

2. Corporate tax

The tax period is the calendar year or financial year.

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

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

3. Withholding tax rate (non-treaty)

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

4.
Resident individual tax rates

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

Taxable Income (capital gains)	Tax Rate
In principle nil (private wealth) Ordinarily taxed if commercial wealth	Not subject to tax if capital gains are deriving from private's wealth transactions.

Taxable Income (dividends)	Tax Rate
Dividends are taxable at 70% if the participation represent at least 10% of the share capital	Rate varies from Canton to Canton. Maximum rate is about 35% and includes Federal, Cantonal and Communal. Effective rate 24.50%.

Certain types of income (for example private capital gains, inheritances, and gifts for beneficiaries in direct line and spouse) are exempt.

The taxpayers may claim:
- A tax bonus per dependent child in the amount of CHF 200-250 per month.
- A spouse allowance in the amount of CHF 7,700 per year.

5.
Non-resident individual tax rates

The non-resident individual tax rates are in principle the same with the resident individual tax rates. The scope of taxable income is different.

The capital gains on sale of shares in resident companies are not subject to federal income tax unless they are derived in the course of a business; the capital gains on sale of immovable property depend on the canton.

6.
Goods and services tax

The Value Added Tax is levied in Switzerland:
- on the supply of goods and services for consideration performed in Switzerland by taxable persons;
- on private use of goods and services;
- on the imports of goods and services for consideration.

The VAT rates applied until 31.12.2023 and those in force from 1.1.2024 are summarised in the table below:

Types of VAT rate	Until 31.12.2023	From 01.01.204
Standard VAT rate	7.7%	8.1%
Reduced rate	2.5%	2.6%
Special rate	3.7%	3.8%

As can be seen from the table above, the standard VAT rate from 1 January 2018 until 31 December 2023 is 7.7% (8% before 1 January 2018). The reduced rate of 3.7% is applied to certain goods (for example basic foodstuffs, books, antibiotics and orthopaedic items). The reduced rate of 2.5% is applied to certain goods (for example food and beverages - except for alcoholic beverages and services rendered in the hotel or catering sectors; medicines; books and newspapers). Some goods and services are VAT exempt (for example health, social, financial and educational/cultural services).

From 1 January 2024, VAT rates increased as follows:

- The standard VAT rate from 1 January 2024 is 8.1% instead of 7.7%;
- The special rate applied to certain goods and on services in the hotel sector increases from 3.7% to 3.8%;
- The reduced rate goes from 2.5% to 2.6%.

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

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

7.
Estate duty

Switzerland does have real estate tax, on cantonal or communal level. There is no federal real estate tax. There are also inheritance taxes, but not on direct descendant and not at federal level.

8.
Stamp duty

Yes (1% on the issuance of securities above CHF 1 million).

9.
Property tax

The real estate are included in the wealth taxation of the individual.

Profits realized by selling real estate are subject to real estate gain tax at cantonal level. The tax is due on the realized profit (i.e. selling price minus purchase price and investments).

The real estate transfer tax varies from canton to canton and in general, the longer a real estate has been held, the lower the tax is.

10.
Income tax filing deadlines

Types of forms		Deadlines*
I&W Tax Return	Individuals	By April 30th in the year following the tax year
I&W Tax Return	Companies	By June 30th in the year following the tax year

* It depends on the canton. Various extensions are available.

11.
Double tax agreements

Switzerland concluded over 100 tax treaties to avoid double taxation.

Switzerland also signed the Multilateral Instrument (the MLI) on June 7th, 2017.

Overview of tax rates under double tax treaties that are applied to dividends, interest income and royalties, as of 1.1.2024 can be found at the following link on the website of the Federal Tax Administration: https://www.sif.admin.ch/sif/en/home/bilateral-relations/tax-agreements/double-taxation-agreements.html.

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UNITED KINGDOM

2024 TAX CARD (IN GBP)

1. Basis of taxation

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

The main taxes in the UK are as follows:

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

2. Corporate tax

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

Corporation Tax		
Year to	31.3.2024	31.3.2025
Main rate (all profits)	N/A	N/A
Main rate (profits above £250,000)	25%	25%
Small profits rate (profits up to £50,000)	19%	19%
Marginal relief band (MRB)	£50k - £250k	£50k - £250k
Fraction in MRB (effective marginal rate)	3/200 (26.5%)	3/200 (26.5%)
Research & Development Relief (R&D)	Accounting periods beginning on or after 1 April 2024	
R&D Expenditure (RDEC) scheme*	20%	
R&D-intensive SMEs enhanced expenditure scheme**	86%	

* Taxable expenditure for qualifying R&D.
** Additional deduction for qualifying R&D. R&D-intensive companies are those that have R&D expenditure constituting at least 30% of total tax-deductible P&L expenses plus capitalies R&D costs. Loss-making R&D intensive companies can claim a payable credit rate 14.5% from HMRC in exchange for their losses (capped at £20,000 plus 4 x [PAYE & NIC]).

Main Capital Allowances		
Plant & Machinery (Companies only)		
Year to	31.3.2024	31.3.2025
- First-year allowance (main pool)	100%	100%
- First-year allowance (special rate pool)	50%	50%
Annual Investment Allowance (AIA)		
Expenditure of up to £1m	100%	100%
Writing down allowance: General pool (reducing balance)	18%	
Writing down allowance: Special rate pool (reducing balance)	6%	

2. Corporation tax (cont.)

Motocar Purchases	From 1.4.21 (CO2 g/km)	Allowance
New cars only	Nil	100%
In general pool	Up to 50	18%
In special rate pool	Above 50	6%
Structures & Buildings allowance – Fixed deduction p.a.		3%

3. Income tax

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

Please note, separate income tax rates apply to Scotland.

The personal allowances and rates are as follows:

Income tax		
Allowances	**2023/24**	**2024/25**
Personal Allowance (PA)*	£12,570	£12,570
Marriage Allowance**	£1,260	£1,260
Blind Person's Allowance	£2,870	£3,070
Rent A Room Relief***	£7,500	£7,500
Trading Income***	£1,000	£1,000
Property Income***	£1,000	£1,000

*PA will be withdrawn at £1 for every £2 by which "adjusted income" exceeds £100,000. There will therefore be no allowance given if adjusted income is above £125,140.
**Part of the PA that is transferable to a spouse or civil partner who is not a higher or top rate taxpayer.
***If gross income exceeds it, the limit may be deducted instead of actual expenses.

Rate Bands	2023/24	2024/25
Basic Rate Band (BRB)	£37,700	£37,700
Higher Rate Band (HRB)	£37,701 – 125,140	£37,701 – 125,140
Additional rate	Over £125,140	Over £125,140
Personal Savings Allowance (PSA)		
Basic Rate Taxpayer	£1,000	£1,000
Higher Rate Taxpayer	£500	£500
Dividend Allowance	£2,000	£500

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

Tax Rates	2023/24			2024/25		
Rates differ for General/ Savings/Dividend Income	G	S	D	G	S	D
Basic Rate	20%	20%	8.75%	20%	20%	8.75%
Higher Rate	40%	40%	33.75%	40%	40%	33.75%
Additional rate	45%	45%	39.35%	45%	45%	39.35%

3. Income tax (cont.)

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

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

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

Dividends are normally taxed as the “top slice” of income. The DA taxes the first £500 of dividend income at nil, rather than the rate that would otherwise apply.

Income Tax rates and Bands – Scotland	2023/24		2024/2025	
	Band	Rate	Band	Rate
Starter Rate	£2,162	19%	£2,306	19%
Basic Rate	£2,163 - £13,118	20%	£2,307 - £13,991	20%
Intermediate Rate	£13,119-£31,092	21%	£13,992 - £31,092	21%
Higher Rate	£31,093-£125,140	42%	£31,093 - £62,430	42%
Advanced rate	N/A	N/A	£62,431 - £125,140	45%
Top Rate	Over £125,140	47%	Over £125,140	48%

Savings and dividend income which are taxed at normal UK rates.
* Assumes individuals are in receipt of the standard personal allowance of £12,570.
** Those earning more than £100,000 will see their personal allowance reduce by £1 for every £2 earned over £100,000.

High Income Child Benefit Charge (HIBC)
1% of child benefit for each £200 (2023/24: £100) of adjusted net income between £60,000 and £80,000 (2023/24: £50,000 and £60,000).

Remittance basis charge		
For non-UK domiciled individuals who have been UK resident in at least.	**2023/24**	**2024/25**
7 of the preceding 9 tax years.	£30,000	£30,000
12 of the preceding 14 tax years.	£60,000	£60,000
15 of the preceding 20 tax years.	Deemed to be UK domiciled	

Pensions

Registered Pensions	2023/24	2024/25
Annual Allowance (AA) *	£60,000	£60,000
Annual relievable pension inputs are higher of earning (capped at AA) or £3,600. * Usually tapered down, to a minimum of £10,000, when adjusted income exceeds £260,000. The maximum tax-free pension lump sum is £268,275 unless a higher amount is “protected”.		
State pension (per week)	**2023/24**	**2024/25**
Old state penion	£156.20	£169.50
New state pension	£203.85	£221.20

3.
Income tax (cont.)

Annual Investment Limits

	2023/24	2024/25
Individual Savings Account (ISA)		
- Overall limit	£20,000	£20,000
- Lifetime ISA	£4,000	£4,000
Junior ISA	£9,000	£9,000
EIS – 30% relief	£2,000,000	£2,000,000
Seed EIS (SEIS) – 50% relief	£200,000	£200,000
Venture Capital Trust (VCT) – 30% relief	£200,000	£200,000

4.
Goods and services tax

Value-added tax (“VAT”)

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

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

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

The UK VAT rates are as follows:

Standard rate (1/6 of VAT-inclusive price)	20%
Reduced rate (1/21 of VAT-inclusive price)	5%
Zero rate	0%

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

VAT exemptions exist for taxable persons with low turnover.

Businesses and organizations are required to be registered for VAT in the UK if their taxable turnover in a 12-month period exceeds £90,000 or there is an expectation that turnover will exceed £90,000 in the next 30 days. Voluntary VAT registration is available for businesses and organizations with taxable turnover below the threshold level.

VAT Threshold Increase		
	Pre 1.4.2024	**From 1.4.2024**
Registration level - Taxable turnover	£85,000 p.a.	£90,000 p.a.
Deregistration level - Taxable turnover	£83,000 p.a.	£88,000 p.a.

5. Inheritance tax

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

There is no Inheritance Tax to pay if either:

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

If the estate's value is below the threshold you'll still need to report it to HMRC. If a home is gifted to children (including adopted, foster or stepchildren) or grandchildren the threshold can increase to £450,000.

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

Inheritance Tax	2023/24	2024/25
Nil rate band (NRB)*	£325,000	£325,000
NRB Residential enhancement (RNRB)**	£175,000	£175,000
Tax Rate on death***	40%	40%
Tax Rate on lifetime transfers to most trusts	20%	20%

*Up to 100% of the proportion of a deceased spouse's/civil partner's unused NRB and RNRB band may be claimed in increment the current NRB and RNRB when the survivor dies.
**RNRB is available for transfer of a main residence to direct descendants. It tapers away at the rate of £1 for every £2 of estate value above £2m.
***Rate reduced to 36% if at least 10% of the relevant estate is left to charity. Unlimited exemption for transfers between spouses/civil partners, except if UK domiciled transferor and foreign domiciled transferee, where maximum exemption £325,000.

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

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

6. Land taxes

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

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

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

6. Land taxes

Annual Tax on Enveloped Dwellings (ATED)		
Property value	Annual charge to	
	31.3.2024	31.3.2025
£0.5m - £1m	£4,150	£4,400
£1m - £2m	£8,450	£9,000
£2m - £5m	£28,650	£30,550
£5m - £10m	£67,050	£71,500
£10m - £20m	£134,550	£143,550
Over £20m	£269,450	£287,500

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

Residential Property (1st Property only)

SDLT – England & Ni		LBTT Scotland		LTT - Wales	
£000	Rate on Band	£000	Rate on Band	£000	Rate on Band
Up to 250	Nil	Up to 145	Nil	Up to 225	Nil
250-925	5%	145-250	2%	225-400	6%
925-1,500	10%	250-325	5%	400-750	7.5%
Over 1,500	12%	325-750	10%	750-1,500	10%
		Over 750	12%	Over 1,500	12%

A supplement of 3% (SDLT) or 6% (LBTT) of the total purchase price applies where an additional residential property is purchased for more than £40,000 (unless replacing a main residence). It is also payable by all corporate purchasers.

For SDLT:

- Since 22.11.17, first time buyers purchasing a property of up to £625,000 pay a nil rate on the first £425,000 of purchase price;
- A 2% supplement applies where property is bought by a non-UK resident.
- A rate of 15% may apply to the total purchase price where the property is valued above £500,000 and purchased by a "non-natural person" (eg a company).
- For LBTT, first time buyer relief nil rate band to £175,000.

Non-residential or mixed-use property

SDLT – England & Ni		LBTT Scotland		LTT - Wales	
£000	Rate on Band	£000	Rate on Band	£000	Rate on Band
Up to 150	Nil	Up to 150	Nil	Up to 225	Nil
150-250	2%	150-250	1%	225-250	1%
Over 250	5%	Over 250	5%	250-1,000	5%
				Over 1,000	6%

7. National insurance

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

National Insurance Contributions (NIC)		
Class 1 (Employees)	**Employee**	**Employer**
Main NIC rate	8%	13.8%
No NIC on first (from 6.7.22)	£242 per week	£175 per week
Main rate* charge up to	£967 per week	No limit
2% rate on earnings above	£967 per week	N/A
Employment allowances per business	N/A	£5,000

*Nil rate of employer NIC on earnings up to £967 per week for employees aged under 21, apprentices aged under 25 and ex-armed forces personnel in their first twelve months of civilian employment.
**Some businesses do not qualify, including certain sole director companies and employers who have employer's Class 1 NIC liability of £100,000 or more for 2023/24. Employer contributions (at 13.8%) are also due on most taxable benefits (Class 1A) and on tax paid on an employee's behalf under a PAYE settlement agreement (Class 1B).

Class 2 (Self Employed)	
Flat rate per week if profits below £6,725 (voluntary)	£3.45
Class 3 (Voluntary)	
Class 3: Flat rate per week	£17.45
Class 4 (Self Employed)	
On profits £12,570 - £50,270	6%
On profits over £50,270	2%

Employees with earnings above £123 per week and self-employed with annual profits over £6,725 (or who pay voluntary Class 2 constributions) can access entitlement to contributory benefits.

8. Vehicle Benefits

Cars: Taxable benefit: List price of car multiplied by chargeable percentage.

CO2 (g/km)	Electric Range miles	2024/25 & 2023/24 (%)
0	N/A	2
1 – 50	> 130	2
1 - 50	70 – 129	5
1 - 50	40 – 69	8
1 - 50	30 – 39	12
1 - 50	< 30	14
51 - 54	N/A	15

Then a further 1% for each 5 g/km CO2 emissions, up to a maximum of 37%.
Diesel cars that are not RDE2 standard suffer a 4% supplement on the above figures but are still capped at 37%.

Vans: Chargeable value of £3,960 (2023/24: £3,960) if private use is more than home-to-work. Zero-emission vans charged at £Nil (2023/24: Nil).

Fuel: Employer provides fuel for private motoring in an employer-owed car: CO2-based percentage from above table multiplied by £27,800 (2023/24: £27,800).
Van: £757 (2023/24: £757).
Employee contributions do not reduce taxable figures unless all private fuel is paid for by the employee (in which case there is no benefit charge).

8. Vehicle Benefits (cont.)

Tax Free Mileage Allowances

Employee's own transport	Per business mile
Cars first 10,000 miles	45p
Cars over 10,000 miles	25p
Business passengers	5p
Motorcycles	24p
Bicycles	20p

9. Key dates & filing deadlines

Tax	Deadline	Year
Income Tax Self Assessment		
1st payment on account	31 January	2025
2nd payment on account	31 July	2025
Balancing Payment	31 January	2026
Capital Gains Tax*	31 January	2026
*A CGT return is due within 60 days of completion of sale of any UK land and buildings by a non-resident and sale of UK residential property with a tax liability by a UK resident. Any CGT payable is also due within 60 days.		
Other payment dates		
Class 1A NIC	19 July	2025
Class 1B NIC	19 October	2025
Other payment dates		
Corporation Tax is due 9 months and 1 day from the end of the accounting period, unless a "large" company paying by quarterly instalments.		
2023/24 Filing deadlines		
Issue P60s to employees	31 May 2024	
P11D, P11D(b)	6 July 2024	
Self-Assessment Tax Return (SATR) paper version	31 October 2024	
Online SATR if outstanding tax to be included in 2022/23 PAYE code	30 December 2024	
Online SATR	31 January 2025	

10. Double tax agreements

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

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

11. Capital tax

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

11. Capital tax (cont.)

Capital Gains Tax		
Annual exempt amount	**2023/24**	**2024/25**
Individuals, estates	£6,000	£3,000
Most trusts	£3,000	£1,500
Tax Rate		
Individual up to basic rate limit (BRL)		
- Residential property and carried interest	18%	18%
- Other assets	10%	10%
Individual above BRL, trusts and estates		
- Residential property	28%	24%
- Carried interest	28%	28%
- Other assets	20%	20%
Business Asset Disposal Relief (BADR)**	10%	10%

*Individuals are taxed at 18%/28% on gains on residential property and receipts of carried interest. Trusts and estates are taxed at 28% in these circumstances.
**BADR is available on qualifying gains up to a lifetime of £1m.

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