

INTERNATIONAL COMPARISON

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LLANACONSULTORES



What's in this issue: Impatriates / Expatriates regulation

Antea International Comparison is a quarterly publication that provides you an overview of trends and international tax developments by comparing tax issues in different legislations around the world, that may affect those doing business in multiple locations.

Constant legislative, regulatory, and judicial changes, along with globalization, economic shifts, and operational adjustments, are challenging issues. Now more than ever, in an increasingly globalized world, companies must have a total perspective and awareness of tax issues, and this publication aims to cover key tax topics which should be of interest to businesses operating internationally.

This edition includes numerous country focus pieces, in which it is analyzed the tax and legal considerations involved in moving employees to different jurisdictions around the world.

We hope that you find this publication helpful.

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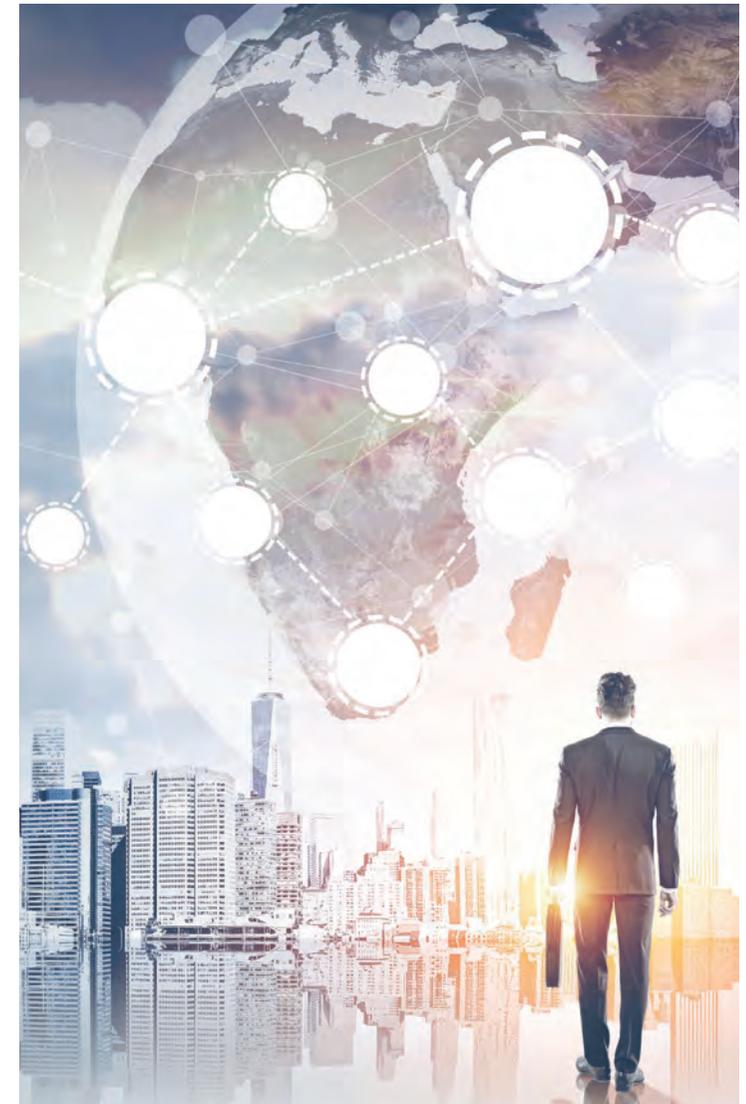
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Argentina

	IMPATRIATE REGIME	EXPATRIATE REGIME
Normal regime	Impatriate staff will be a tax subject only during the first five years in Argentina, contingent upon the topics presented in the Characteristics and rates section.	The expatriate staff continues to pay taxes in Argentina for their income from a worldwide source as long as they are residents. Once you have lost your residence in Argentina, you will only be taxed for the income you obtain in Argentina as a foreign beneficiary.
Characteristics and rates	<p>First six months in Argentina: The employee becomes a foreign beneficiary and is subject to a 17.5% effective withholding on their compensation. Does not apply a return filing.</p> <p>Between six months and five years in Argentina: The employee files a tax return declaring only argentinian source income (does not pay for foreign source income). The taxable income is calculated as if they were permanent staff. This means that there is a progressive scale from a 5% to 35% tax rate.</p> <p>More than 5 years in Argentina: From this point on the employee is considered a resident and as a consequence is a tax subject for both argentinian and foreign source income.</p>	<p>For tax purposes and according to immigration dispositions, the argentinian residence is lost when the subject becomes a permanent resident in a foreign country or when the subject remains outside Argentina for a continuous period of twelve months.</p> <p>As long as the employee is an argentinian resident, it is required to file a tax return and pay for both argentinian and foreign source income. The filer can reckon as a tax credit the foreign income tax (paid in other countries) up to the foreign source income tax amount resulting from the return.</p> <p>Once the argentinian residency is lost, the subject will only pay for argentinian source income by a withholding as a foreign beneficiary. Does not apply a return filing.</p>
Forms	- F-649	- F-711
Other taxes	Individual Property Tax	Individual Property Tax
	During the first 5 years of residence in Argentina, because of an employment relationship, this tax is exclusively on property located in the country, not tax on goods located abroad.	While continuing to be a resident of Argentina, it will be the employee's responsibility to pay, by filing a tax return, for all the assets located in the country and abroad. Once the residence is lost, it will only be taxed by a Substitute Responsible for the goods located in the country.

Austria

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION																								
Residence	<p>The rules determining whether an individual is resident in Austria are based in national law. Natural persons are tax resident if they have either: domicile or habitual abode in Austria.</p> <p>A domicile can be an apartment as well as a room in sub tenancy or a hotel room for permanent use. It is necessary that the domicile can be used. If a person can prove that he/she is less than 70 days a year using the domicile, he/she is not resident regarding Austrian income tax.</p> <p>Habitual abode is defined by the physically presence in Austria, an abode on the same place in Austria or on a voluntary basis is not necessary. There will be unlimited taxation if the habitual abode is more than 6 months. Foreign workers who stay in Austria during the week and just leave for the weekend usually have their habitual abode in Austria. A daily return will not cause a habitual abode.</p> <p>It is possible to split the tax year into periods of Austrian residence and non-residence on the year of arrival and the year of leaving.</p>																									
Special regime	Related expenses can be considered as 20 % of the income, max. €10.000 per year (lump-sum).	Employed tax residents in Austria who perform works abroad and perceive salary income for those works can benefit from a tax exemption of 60 % of the monthly salary under certain conditions. (see below)																								
Tax rate	<p>The income tax bands are as follows:</p> <table> <tr><td>€ 0 - € 11.000</td><td>0 %</td></tr> <tr><td>€ 11.0001 - € 18.000</td><td>25 %</td></tr> <tr><td>€ 18.0001 - € 31.000</td><td>35 %</td></tr> <tr><td>€ 31.0001 - € 60.000</td><td>42 %</td></tr> <tr><td>€ 60.0001 - € 90.000</td><td>48 %</td></tr> <tr><td>More than € 90.000</td><td>50 %</td></tr> </table> <p>Income exceeding € 1.000.000,- a tax rate of 55 % is applied.</p>	€ 0 - € 11.000	0 %	€ 11.0001 - € 18.000	25 %	€ 18.0001 - € 31.000	35 %	€ 31.0001 - € 60.000	42 %	€ 60.0001 - € 90.000	48 %	More than € 90.000	50 %	<p>The income tax bands are as follows:</p> <table> <tr><td>€ 0 - € 11.000</td><td>0 %</td></tr> <tr><td>€ 11.0001 - € 18.000</td><td>25 %</td></tr> <tr><td>€ 18.0001 - € 31.000</td><td>35 %</td></tr> <tr><td>€ 31.0001 - € 60.000</td><td>42 %</td></tr> <tr><td>€ 60.0001 - € 90.000</td><td>48 %</td></tr> <tr><td>More than € 90.000</td><td>50 %</td></tr> </table> <p>Income exceeding € 1.000.000,- a tax rate of 55 % is applied.</p>	€ 0 - € 11.000	0 %	€ 11.0001 - € 18.000	25 %	€ 18.0001 - € 31.000	35 %	€ 31.0001 - € 60.000	42 %	€ 60.0001 - € 90.000	48 %	More than € 90.000	50 %
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Conditions to be met	<p>Individuals who want to apply the special regime need to meet the following criteria:</p> <ul style="list-style-type: none"> • Employment on behalf of a foreign employer in Austria as part of a service contract with an Austrian employer (corporate affiliate) • Temporary employment in Austria (max. 5 years) • employee may not have a domicile in Austria within 10 years • residence abroad is maintained • Austria may tax the income 	<p>Individuals who want to apply the tax exemption need to meet the following criteria:</p> <ul style="list-style-type: none"> • The works must be performed physically abroad, more than 400 km away from the boarder (beeline) • The secondment may not be made to the headquarters of the company or branch • The works abroad may not be permanent (just for a period of time) • The work can be done under aggravating circumstances, only. 																								
Formal requirements	None, the lump-sum may be taken into account by the payroll or by employee tax assessment.	None, tax exemption may be taken into account by the payroll.																								

Austria

Secondments	Should Austria become an expat's place of residence, not only the special regime for impatriates taxation is relevant. With residence in Austria taxation of worldwide income takes place. That includes investment and capital income derived from foreign deposits and bank accounts as well as rental income from properties held globally if not a double tax treaty reduces Austrian taxing rights.
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Bulgaria

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Bulgaria if any of the following conditions is met:</p> <ul style="list-style-type: none"> • They remain in Bulgaria for more than 183 days in any 12-month period (the person is considered resident for the year during which the period of residence in Bulgaria exceeds 183 days. The day of departure and the day of entry into the country are to be considered separately for days of stay in the country.) • The center of their vital interests is in Bulgaria (determined in view of their personal and economic ties to the country, e.g. factors like permanent address in Bulgaria, family employment, possession of property, etc.) • An individual dispatched abroad by the Bulgarian State, by its bodies and / or organizations, by Bulgarian enterprises and by the members of its family, <p>Physical persons are considered tax non-residents if they don't meet the above criteria. Local physical persons considered taxpayers for income earned from sources in the Republic of Bulgaria and abroad. Foreign individuals are only liable for tax on income from sources in Bulgaria. NOTE: The incomes of individuals are taxed only when they are actually received (i.e. accrued but unpaid income is not subject to taxation)</p>	
Special regime	<p>If they don't fall under the criteria above, foreign natural persons owe tax only on their income from a source in Bulgaria.</p> <p>Tax residents in Bulgaria are taxed on their income from sources in Bulgaria and abroad. In this case, they are entitled to a tax deduction for the amount of the foreign tax paid (by the method of tax credit or exemption with progression) on certain rules - according to either a TADT (Treaty for Avoidance of Double Taxation) or the Personal Income Taxation Act (PITA).</p>	<p>Tax residents in Bulgaria are taxed on their income from sources in Bulgaria and abroad. In this case, they are entitled to a tax deduction for the amount of the foreign tax paid (by the method of tax credit or exemption with progression) on certain rules - according to TADT or Persons Income Taxation Act (PITA). In case of tax credit, the amount of the tax paid abroad is deducted from the amount of the Bulgarian personal tax, this deduction being limited to the amount of the Bulgarian tax due on this income. In case of release with progression, the relevant income is excluded from taxation in Bulgaria.</p>

Bulgaria

	Foreign citizens could be exempt from social security contributions in Bulgaria or the contributions paid in Bulgaria could be recognized in their home country under applicable social security treaties.	These tax benefits are granted by submitting an annual tax return, to which must be attached the relevant documents and a certificate of paid tax / taxable income abroad.
Tax rate	<p>A general flat tax rate of 10% on the taxable income is applicable.</p> <p>Taxable income includes:</p> <ul style="list-style-type: none"> • Employment income; • Income from other business activities; • Income from rent or any other granting of the use of rights or property; • Income from the transfer of rights or property; <p>Dividends (payable by Bulgarian companies to foreign natural persons and dividends payable by both Bulgarian and foreign companies to local tax residents) and liquidation shares (final tax type) of 5%, as well as 15% sole trader tax.</p> <p>Interest on term deposit accounts (final tax type) - 10% shall be accrued by the relevant bank by the end of the month following the month.</p>	<p>A general flat tax rate of 10% on the taxable income is applicable.</p> <p>If the individual resides for less than 183 days in the foreign country, he is still considered to be a tax resident of Bulgaria, so the above tax rate is applied.</p> <p>The income from abroad is filled in in Annex 9 of the annual tax return under Art. 50 of PITA. There are the earnings received and the advance deducted abroad. In Bulgaria, all income is taxed at a flat rate of 10%, while in some countries in the world there is an exemption minimum and a progressive tax scale - higher earnings are taxed at a higher rate.</p>
Conditions to be met	<p>Grounds for application of Treaty for Avoidance of Double Taxation (TADT)</p> <p>Following the occurrence of a tax liability for income from a source in the country, the foreign person certifies to the revenue authority that:</p> <ol style="list-style-type: none"> 1. is a resident of the State within the meaning of the relevant TADT; 2. is the owner of income from a source in Bulgaria; 3. does not have a permanent establishment or a fixed base on the territory of the Republic of Bulgaria with which the respective income is effectively connected (are declared by the foreign person); 4. the special requirements for the application of the TADT or individual provisions thereof with regard to persons defined in the TADT itself are met; 	<p>Bulgarian legislation provides that individuals can be exempt from the payment of health insurance contributions to Bulgaria for the period of residence abroad.</p> <p>This happens as follows:</p> <ul style="list-style-type: none"> • to be Bulgarian citizens, • to be obliged to pay for their health insurance; • to reside abroad for more than 183 days in one calendar year. <p>An important condition for exemption from the payment of health insurance contributions is filing an application at the NRA's office at a permanent address.</p>

Bulgaria

<p>Formal requirements</p>	<p>The claim is issued under Art. 137, para 1 of the Tax and Social Security Procedure Code to comply with the requirements, mentioned above.</p> <ul style="list-style-type: none"> • The circumstances under Point 1 from above are certified by the foreign tax administration; • The circumstances under Point 2 from above are declared by the foreign person; • The circumstances under Point 4 from above shall be certified by official documents, including extracts from public registers. When such documents are not issued, other written evidence is admissible. These circumstances cannot be certified by declarations. <p>The Claim should be filled for a tax relief under the tax treaty between Bulgaria and the country of origin of the individual.</p> <p>The request and the documents attached thereto shall be filed at the territorial directorate of NRA of the payer's registration of the income or in the directorate where it is subject to registration.</p>	<p>In order to recover health insurance rights upon return to Bulgaria, another application is submitted to the NRA for returning to the country. In addition, they should present documents proving that they have been abroad for more than 183 days in a calendar year.</p> <p>Such documents may be, for example:</p> <ul style="list-style-type: none"> • a copy of a foreign passport; • a certificate from the District Police Directorate; • a document issued by a competent authority of the country concerned, accompanied by a correct translation by a sworn translator in Bulgarian as well as others. <p><= It is also possible to apply for tax relief under a Treaty for Avoidance of Double Taxation.</p> <ul style="list-style-type: none"> • Stamps on passports when travelling outside the European Union. • Boarding passes, which specify the destination, date and person travelling. • Hotel bills or copies of rental contracts, which must identify the guest or lessee, even if the Spanish company is paying for the accommodation. • Copy of credit or debit card statements used during the allocation. • Certificate issued by the Spanish company paying the salary income, which states: identification of the posted worker, country of posting, project and identification of the company benefiting from the work, quantification of the days that the worker has been allocated.
<p>Secondments</p>	<p>If an individual is posted abroad for a short period of time (up to 2 years), he should continue to be insured in the country of origin. At the same time, income earned while traveling abroad may be taxed in the host country.</p> <p>When posted abroad by your company, you may not have to pay tax in the country where you work on the income you earn during your posting if:</p> <ul style="list-style-type: none"> • spend abroad less than 6 months a year • the salary is paid directly by your employer (at home country) rather than by a branch or other company owned by your employer in the country where you work. 	<p>If an individual is posted abroad for a short period of time (up to 2 years), he should continue to be insured in the country of origin. At the same time, income earned while traveling abroad may be taxed in the host country.</p> <p>When posted abroad by your company, you may not have to pay tax in the country where you work on the income you earn during your posting if:</p> <ul style="list-style-type: none"> • spend abroad less than 6 months a year • the salary is paid directly by your employer (at home country) rather than by a branch or other company owned by your employer in the country where you work.



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Chile

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Any person domiciled or resident in Chile, will pay taxes on their income from any source, whether the source of income is located within Chile or outside it. Non-residents in Chile will be subject to tax on their income whose source is within the country.</p> <p>Individuals are considered residents of Chile if they remain in the country for more than six months in a calendar year, or more than six months in total, within two consecutive tax years. On the other hand, the address is the real residence or presumably accompanied, in the spirit of staying in it.</p> <p>The mere lack of absence or lack of residence in the country, is not causal to determine the loss of domicile in Chile. This will apply with respect to persons who are absent from the country, retaining the main seat of their business in Chile, either individually or through partnerships.</p>	
Special regime	<p>Foreigners who acquire domicile or residence in Chile, during the first 3 years counted from entering the country, only pay income tax for their income from Chilean source, after this term, they will pay taxes in Chile for the income of world source .</p> <p>For these purposes, incomes from a Chilean source will be considered, those that come from goods located in the country or from activities developed in it.</p>	<p>There is no special regime. To the extent that people maintain their domicile or residence in Chile, they must pay taxes in the country for their income of national and foreign origin.</p> <p>Taxes paid abroad, for their income originated outside the country, can be credited against the tax that must be paid in Chile.</p>
Tax rate	<p>Dependent work income is taxed with the Second Category Single Tax, which is monthly, with a progressive rate scale: 4% (monthly taxable income higher than 960 USD) up to a rate of 35% (monthly taxable income higher than \$ 8,500 USD)</p> <p>This tax is withheld by the employer in Chile.</p> <p>Independent labor income and other income obtained as dividends and interest are taxed with the complementary global tax, of an annual nature, with a progressive rate of 4% (annual taxable income of more than 11,520 USD) to 35% (taxable income). annual exceeding 102,000 USD).</p>	
Conditions to be met	<p>There are no conditions to enter the special regime; it applies to any foreigner who acquires domicile or residence in Chile.</p> <p>However, they may request an extension, in order to extend the term to continue paying taxes in Chile exclusively for their income obtained in the country (maximum 3 years term).</p>	Does not apply
Formal requirements	<p>To request the extension, the foreigner must make a formal request before the Regional Director of the Internal Revenue Service, before the end of the three years term.</p> <p>The Internal Revenue Service will grant the extension as long as it is demonstrated the lack of desire to settle in Chile.</p>	Does not apply
Secondments	<p>Individuals who apply special regime may not qualify as for the status of tax residents for the application of a Double Taxation agreement purposes.</p>	Does not apply



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Croatia

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Croatia if any of the following conditions is met:</p> <ul style="list-style-type: none"> • They remain in Croatia for more than 183 days during a calendar year. Sporadic absences are included, except those where the tax residency in another country is proven. In the case of countries or territories labelled as tax havens, the Tax Administration can demand proof of stay in that tax haven over a period of 183 days in the calendar year. • They situate the main base or center of their activities or economic activities, directly or indirectly, in Croatia. <p>Also, it is presumed, that a taxpayer has their usual place of residence in Croatia when his/her not legally separated spouse and his/her underage dependent children are usually resident in Croatia.</p> <p>A natural person will be considered as either resident or not resident during a calendar year, as a change of residence does not imply an interruption of the taxable period.</p>	
Tax rate	<p>Progressive tax rates:</p> <ul style="list-style-type: none"> • 24% for income up to HRK 360,000 • 36% for income above HRK 360,000 <p>Dividends, interests and capital gains: 12%</p>	Same as for Impatriates
Conditions to be met	Tax residency in Croatia	Tax residency in Croatia
Formal requirements	Same for both Impatriates and expatriates	Same for both Impatriates and expatriates



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Cyprus

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents of Cyprus if any of the following conditions is met:</p> <p>The 183-day rule:</p> <ul style="list-style-type: none"> • They have physical presence in Cyprus exceeding 183 days during a calendar year (considered tax year). If an individual is not physically present in Cyprus for 183 days, then he/she will be considered to be a non-Cyprus tax resident in that calendar year. <p>The 60-day rule:</p> <ul style="list-style-type: none"> • The tax residency rules have been amended as of 2017 and the 60-day rule applies where all the following conditions are met: • The individual stays in Cyprus for at least 60 days during calendar year (considered tax year). • Maintains a permanent home in Cyprus (it could be owned or rented). • Is employed in Cyprus and/or exercises business and/or holds an office with a Tax resident Company during the calendar year (considered tax year). <p>If during that calendar year the individual's employment or the holding of an office with a Tax resident Company is terminated, then he/she is not considered as a tax resident.</p> <p>In addition, the days spend in Cyprus should be calculated in the following way:</p> <ul style="list-style-type: none"> • As soon as you depart from the Republic it is considered to be a day outside Cyprus. • The day you arrive in Cyprus is considered to be a day in the Republic. • When you arrive in the Republic and depart on the same day it is considered as a day in the Republic. • As soon as you depart from Cyprus and you return on the same day it is considered as a day outside Cyprus. 	

Cyprus

<p>Special regime</p>	<p>A tax resident individual from Cyprus, irrespective of his/her domicile status, is always subject to income tax on his/her worldwide income. This is though subject to exceptions. In tax resident individual who is nondomiciled in Cyprus is exempt from tax on dividend and interest income.</p> <p>Domicile is considered the fathers domicile of the domicile of choice. A non-domicile individual is considered to be a Cyprus tax resident if he has been in Cyprus for at least 17 years out of the last 20 years prior to the relevant tax year.</p> <p>Domiciled tax resident individual</p> <table border="1"> <thead> <tr> <th>Type of Income</th> <th>Income Tax</th> <th>SDC</th> </tr> </thead> <tbody> <tr> <td>Dividends</td> <td>Exempt</td> <td>Taxable -17%</td> </tr> <tr> <td>Interest</td> <td>Exempt</td> <td>Taxable -30%</td> </tr> </tbody> </table> <p>Non-Domiciled tax resident individual</p> <table border="1"> <tbody> <tr> <td>Dividends</td> <td>Exempt</td> <td>Exempt</td> </tr> <tr> <td>Interest</td> <td>Exempt</td> <td>Exempt</td> </tr> </tbody> </table>	Type of Income	Income Tax	SDC	Dividends	Exempt	Taxable -17%	Interest	Exempt	Taxable -30%	Dividends	Exempt	Exempt	Interest	Exempt	Exempt	<p>Tax residents in Cyprus have 100% exemption on remuneration for salaries rendered outside Cyprus for more than 90 days in one calendar year to a non- Cyprus resident employer.</p> <p>Individuals who are employed in Cyprus with an annual income in excess of €100.000 will be eligible for an exemption from taxation of 50% of their income for a period of 10 years, beginning from the year the employment started.</p> <p>Individuals who are employed in Cyprus and were not tax resident in Cyprus prior to commencing such employment, will be eligible for an exemption from taxation of 20% of their income or €8.550 (whichever is lower) from any employment which is exercised in Cyprus in that year.</p> <p>An employee is not taxed on reimbursements for actual business travel and any entertainment expenses. However, reimbursements for travel between home and work as well as other benefits in kind may be taxable.</p>											
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<p>Tax rate</p>	<p>Source Rates</p> <table border="1"> <tbody> <tr> <td>• Dividends</td> <td>17%</td> </tr> <tr> <td>• Interest income</td> <td>30%</td> </tr> <tr> <td>• Interest received by an individual from Government Savings Certificates and Government Bonds</td> <td>3%</td> </tr> <tr> <td>• Interest earned by an approved provident fund</td> <td>3%</td> </tr> <tr> <td>• Interest earned by the Social Insurance Fund</td> <td>3%</td> </tr> <tr> <td>• Rental income less 25%</td> <td>3%</td> </tr> </tbody> </table>	• Dividends	17%	• Interest income	30%	• Interest received by an individual from Government Savings Certificates and Government Bonds	3%	• Interest earned by an approved provident fund	3%	• Interest earned by the Social Insurance Fund	3%	• Rental income less 25%	3%	<p>Personal Income Tax Rates</p> <table border="1"> <thead> <tr> <th>Annual income</th> <th>Tax rate</th> </tr> </thead> <tbody> <tr> <td>In between €0 and €19500</td> <td>0%</td> </tr> <tr> <td>In between €19500 and €28000</td> <td>20%</td> </tr> <tr> <td>In between €28000 and €36300</td> <td>25%</td> </tr> <tr> <td>In between €36300 and €60000</td> <td>30%</td> </tr> <tr> <td>In excess of €60000</td> <td>35%</td> </tr> <tr> <td>Corporate Tax</td> <td>12.5%</td> </tr> </tbody> </table>	Annual income	Tax rate	In between €0 and €19500	0%	In between €19500 and €28000	20%	In between €28000 and €36300	25%	In between €36300 and €60000	30%	In excess of €60000	35%	Corporate Tax	12.5%
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Cyprus

<p>Conditions to be met</p>	<p>Individuals who want to apply for tax residency in the Republic need to meet the following criteria:</p> <ul style="list-style-type: none"> do not reside in any other single state for a period exceeding 183 days combined, are not tax resident in any other state, reside in Cyprus for at least 60 days depending on the criteria and if those criteria are met, have other defined Cyprus bonds 	<p>Individuals who want to apply for the tax exemption need to meet the following criteria:</p> <ul style="list-style-type: none"> The works must be performed physically abroad and from residents outside the Republic. The works must be performed for a non-resident entity. Is employed in Cyprus and/or exercises business and/or holds an office with a Tax resident Company during the calendar year (considered tax year).
<p>Formal requirements</p>	<p>Taxpayers must file a special Income tax return: Form IR1. Withholding tax is declared in Form IR4 and Form IR7.</p>	<p>Once taxpayers apply for the tax exemption, they must keep all records of their trips abroad out of the Republic, such as:</p> <ul style="list-style-type: none"> Boarding passes, that state the destination, the date and the person travelling. Stamps from the airport on the passport when travelling outside the European Union. Hotel bills or copies of rental contracts, which must specify the guest or the person renting the house. Credit or debit card statements. Documents from the government for any payments and payroll.



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Ecuador

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Ecuador if any of the following conditions is met:</p> <ul style="list-style-type: none"> • They remain in Ecuador for more than 183 days during a calendar year. • They remain in Ecuador for more than 183 days, consecutive or not, in a period of twelve months within two calendar years. The sporadic absences are included, except those where the tax residency in another country is proven. In the case of countries or territories labelled as tax havens or lower tax jurisdictions, the individual must prove that he/she has remained in that country or jurisdiction at least 183 calendar days, consecutive or not, in the corresponding calendar year. <p>In the event that an Ecuadorian tax resident later accredits his/her tax residence in a tax haven or lower taxation jurisdiction, he/she will maintain the status of tax resident in Ecuador, during the four following tax periods, unless he/she proves that he/she has remained in that country or jurisdiction at least 183 calendar days, consecutive or not, in the tax year.</p> <ul style="list-style-type: none"> • They situate the main base or center of their activities or economic activities, directly or indirectly, in Ecuador. <p>It is presumed, that a taxpayer has their main base or center of their activities or economic activities in Ecuador when he/she has obtained, in the last twelve months, directly or indirectly, the highest value of income in Ecuador than any other country, valued at the average exchange rate of the term.</p> <p>Likewise, individuals will be considered to have the main base or center of their activities or economic activities in Ecuador when the greatest value of his assets is in Ecuador;</p> <ul style="list-style-type: none"> • They do not remain in any other country or jurisdiction more than 183 calendar days, consecutive or not, in the calendar year and their closest family ties keep them in Ecuador. 	
Special regime	Individuals with tax residence in Ecuador, tax their taxable income, this means that from taxed incomes are deducted the deductible expenses and then the income tax rate for individuals is applied to this value.	Non-resident individuals are taxed by the gross income (without deductions) through a withholding agent who makes the payment from Ecuador, with a 25% withholding.
Tax rate	<p>General tax rates:</p> <p>From 0 USD to 11.310 USD 0 0%</p> <p>11.310 USD to 14.410 USD 0 5%</p> <p>14.410 USD to 18.010 USD 155 10%</p> <p>18.010 USD to 21.630 USD 515 12%</p> <p>21.630 USD to 43.250 USD 949 15%</p> <p>43.250 USD to 64.860 USD 4.193 20%</p> <p>64.860 USD to 86.480 USD 8.513 25%</p> <p>86.480 USD to 115.290 USD 13.920 30%</p> <p>115.290 USD onwards 22.563 35%</p>	<p>Table of income tax on the sale of shares:</p> <p>From to % total</p> <p>- 20000 0%</p> <p>20001 to 40000 2%</p> <p>40001 to 80000 4%</p> <p>80001 to 160000 6%</p> <p>160001 to 320000 8%</p> <p>320001 onwards 10%</p>

Ecuador

		<p>Legacy inheritance table and donations: Year 2019 – In USD dollars Excess Tax Fraction % Tax Basic Up to Fraction Basic Fraction Surplus 0 to 72.060 0 0% 72.060 to 144.120 0 5% 144.120 to 288.240 3.603 10% 288.240 to 432.390 18.015 15% 432.390 to 576.530 39.637 20% 576.530 to 720.650 68.465 25% 720.650 to 864.750 104.495 30% 864.750 onwards 147.727 35%</p> <p>Raffles and lottery prizes: The organizers of lotteries, raffles, bets and similar, with the exception of those organized by the Welfare Board of Guayaquil and “Fe y Alegría”, will have to pay the one-time fee for companies on their profits, the beneficiaries will pay the single tax of 15%, on the value of each prize received in cash or in kind that exceeds a basic fraction not taxed Income Tax for individuals and undivided estates, the organizers must act as withholding agents for this tax.</p>
Conditions to be met	Provided that any of the aforementioned conditions is fulfilled, individuals will be considered as residents in Ecuador, and will be taxed on their worldwide income.	If the conditions of permanence in the country (183 days) or the main nucleus of economic activities or family ties are not met, an individual is subject to the regime of taxation of non-residents for income received from an Ecuadorian source.
Formal requirements	People who are under the relationship of dependence with employers in Ecuador, will present Form 107. Persons who carry out business activities or provide services without employment, will present the form 102 of income tax of individuals.	The withholding agent will issue a voucher of the withheld values for income tax in the percentages foreseen in the Law or the Agreement to avoid Double Taxation.



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Germany

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Germany differentiates between unlimited and limited liability of individuals for tax purposes. Individuals are considered to be subject to unlimited liability for German income tax in case they are German tax residents. Such is the case if one of the following conditions is met:</p> <ul style="list-style-type: none"> • Residence: An individual, who has a permanent home (“dwelling”) available to him in Germany is considered to be a German resident for tax purposes. The degree of permanence is paramount: A home is only permanent if the individual has the home available to him at all times continuously rather than just for occasional use. That being said, there are in principle no qualitative minimum standards as to what kind of arrangement may constitute a home. A very simple arrangement such as a small rented and furnished room is sufficient to constitute a permanent home. It is not necessary to be the legal owner of the home; a renting arrangement is sufficient. A person may have permanent homes available to him in various countries, i.e. it is possible to have multiple permanent homes. • Place of habitual abode: An individual, is considered to have his place of habitual abode in Germany if he is present in Germany under circumstances indicating that his stay in Germany is not merely temporary. Stays in Germany exceeding 6 months indicate that the place of habitual abode is in Germany. Short term interruptions such as vacation etc. do typically not impact the classification as place of habitual abode. <p>In case an individual is subject to unlimited income tax liability, he – in principle – has to pay tax on his entire worldwide income including income derived from activities abroad. Depending on the relevant double taxation agreement (DTA), double taxation on such income can typically be eliminated.</p> <p>In case an individual is not subject to unlimited income tax liability in Germany, it is still possible for this individual to be liable to German income tax on certain income, which has a relevant link to Germany, e.g. income earned from employment exercised in Germany, etc.</p> <p>In case an individual, that – among other criteria - has been subject to unlimited income tax liability in Germany for at least 5 years and has significant economic interests in Germany, moves to a foreign tax haven, this individual will be subject to the so-called extended limited tax liability in Germany for the 10 years following the end of his unlimited liability to income tax in Germany. The extended limited tax liability has as a consequence that certain types of income are still subject to German income tax, § 2 Foreign Tax Code (FTC). This way, German fiscal authorities want to limit the tax impact of individuals leaving Germany for tax reasons.</p> <p>For purposes of this brochure, German expatriates will be considered to be subject to unlimited income tax liability in Germany without significant economic interests in Germany, which would trigger the extended limited tax liability according to § 2 FTC, and non-German impatriates will be considered to be subject to limited income tax liability.</p>	

Germany

Special regime	<p>Fictional unlimited tax liability: Non-German impatriates, who are EU citizens and subject to limited tax liability in Germany, may under certain conditions opt for being treated as subject to unlimited tax liability in Germany according to § 1 III German Tax Code (GTC) (Fictional unlimited tax liability). The fictional unlimited tax liability has the advantage that certain expenses associated with the individual situation of the respective person can be taken into account when determining the tax burden of this person. Normally, these would not be taken into account if the person was only subject to limited tax liability.</p> <p>Voluntary tax return (Antragsveranlagung): In case an impatriate earns income from employment in Germany, the German employers will deduct the income tax from the gross salary and pay the tax to German fiscal authorities. Normally, a tax return does not have to be filed under such circumstances. However, EUR and EWR citizens can – for income derived from employment – file an income tax return in Germany and hence decrease the tax burden (Antragsveranlagung, § 50 II 2 Nr. 4 lit. b GTC). Non-EUR/EWR citizens do not have this option.</p>	<p>Cross-border commuter: In some cases, German expatriates, who are employed by foreign employers while retaining their status as being subject to unlimited tax liability in Germany, may be treated as cross-border commuter (“Grenzgänger”). I.e. even though a Grenzgänger derives income from a foreign employer, which would normally be subject to tax in the state of origin of this income, the German expatriate may then tax the income from the foreign employer in Germany.</p> <p>The option and criteria for a cross-border commuter “Grenzgänger” are defined in the individual Double Tax Agreement (DTA) that Germany has concluded with a number of neighbouring countries such as Switzerland and Austria.</p>
Tax rate	For income derived from employment: Depending on yearly income. That means Germany has no fixed percentage for the tax calculation. Germany uses a tax table. Income derived from capital such as interest, dividends, etc.: Typically 25%	For income derived from employment: Depending on yearly income. That means Germany has no fixed percentage for the tax calculation. Germany uses a tax table. Income derived from capital such as interest, dividends, etc.: Typically 25%
Conditions to be met	<p>Conditions to be met for fictional unlimited tax liability § 1 III GTC:</p> <ul style="list-style-type: none"> • At least 90% of the individual’s income are subject to German income tax OR • The individual’s foreign income does not exceed 9.168,00 EUR (2019: the amount changes regularly) • The amount of the individual’s income subject to foreign tax has to be certified by the relevant foreign tax authority. <p>Conditions to be met for Antragsveranlagung § 50 II 2 Nr. 4 lit. b GTC</p> <ul style="list-style-type: none"> • Individual has to be citizen of a EU or EWR State <p>Permanent residence or place of habitual abode in EU or EWR State.</p>	<p>Conditions to be met to be categorized as cross border commuter “Grenzgänger”:</p> <p>Conditions depend on specific DTA, such as the regular (daily) commute from the permanent home to the work place in Germany.</p>

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India

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>An individual is said to be Tax Resident in India in any previous year, if he satisfies one of the following conditions:</p> <p>i) He is in India for 182 days or more; OR</p> <p>ii) Having within the four years preceding that year been in India for 365 days or more and is in India for 60 days*or more in that previous year.</p> <p>An Individual would be considered Resident and Ordinarily Resident (ROR) in a year if he satisfies one of the two conditions mentioned above along with the both conditions mentioned below-</p> <ul style="list-style-type: none"> • He has been a resident of India in at least 2 out of 10 years immediately previous years AND • He has been in India for at least 730 days in 7 immediately preceding years. <p>Therefore, if any individual fails to satisfy even one of the above conditions, he would be considered as Resident but not ordinarily resident (RNOR).</p> <p>* The test of 60 days shall be replaced with 182 days for an expatriate individual if he/she:</p> <ul style="list-style-type: none"> • Being a citizen of India leaves India during the previous year for purposes of employment; OR • As a member of crew of an Indian ship leaves India during the previous year for purposes of employment; OR • Being a citizen of India or person of Indian origin and being outside India comes on a visit to India during the previous year. <p>Resident individual qualifies as Resident but ordinarily residents (ROR) are taxed on worldwide income. However, NR and NOR are generally taxed only on Indian-sourced income.</p>	
Tax rate	<p>Progressive tax scale: if taxable income > 250 thousands then @ 5%-30% (>1 million).</p> <p>Additional: Surcharge (10% of Income tax if Income >5 million < 10 million, 15 % if income > 10 million) Health and Education Cess (4% of Income Tax +surcharge, if applicable)</p>	
Special regime	<p>Short-stay exemption: Remuneration received by a foreigner as an employee of a foreign enterprise for services rendered in India is not subject to Indian income tax.</p> <p>Tax free Non-monetary perquisites: Exemption from grossing up income tax liability with respect to taxes borne by an employer on the non-monetary perquisites provided to employees.</p>	<p>Allowances and perquisites paid or provided abroad by the Government to a citizen of India for rendering service outside India are fully exempt.</p>

India

Conditions to be met	Conditions to be satisfied to avail " short-stay exemption " are as follows: i) The foreign enterprise is not engaged in any trade or business in India; ii) The foreigner is not present in India for more than 90 days in that year; and iii) The remuneration is not liable to be deducted in computing the employer's taxable income in India.	XXXX
Formal requirements	i) At the time of arrival in India and if his income is taxable in India, the person needs to apply for PAN. ii) Expats who have a visa which is valid for more than 180 days (and/or those who intend to stay in India for more than 180 days) will need to register with the Foreigners' Regional Registration Office (FRRO) within 14 days of arrival to receive a residential permit. iii) Every person who is not domiciled in India and who visits India in connection with business, profession, or employment and who derives income from any source in India, is required to, prior to their departure, intimate the tax authorities about their departure in Form 30A along with other relevant documents so to obtain a No Objection Certificate.	Every person who is domiciled in India, at the time of their departure from India, shall furnish Form 30C to the income tax authorities, which shall inter-alia, include the following: i) their PAN ii) purpose of their visit outside India iii) the estimated period of their stay outside India.
Secondments	Employed under Indian entity, the expatriate would be taxable on the salary income earned in India. However, if he becomes ROR in India then global income would be taxable in India. Also, relevant DTAA could also be checked to avail treaty benefits to either eliminate taxation in one of the countries or avail credit of taxes paid in the country of residence.	Generally, outbound expatriate would qualify as non-resident in India under the domestic law during such term based upon his stay outside India. In such cases, salary for the period for which services are rendered abroad would not be taxable in India.



Valuecent

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Israel

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Tax residence for a foreign resident is determined by means of the guidelines of the Convention for the avoidance of Double Taxation with the State of origin of the individual.</p> <p>The main conditions as follows:</p> <ul style="list-style-type: none"> • If he has a fixed base available for him in Israel. • If he stayed in Israel for more than 183 days in a period of 12 months. <p>In this case, the taxable income is only for the work performed in Israel or that can be attributed to the fixed base in Israel.</p>	<p>Individuals are considered to be tax residents in Israel if any of the following conditions are met:</p> <ul style="list-style-type: none"> • If he stayed in Israel during the tax year 183 days or more. • If he stayed in Israel in the tax year for 30 days or more and the total period of his stay in Israel during the tax year and in the preceding two years is 425 days or more. • An individual whose center of life is in Israel (There are guidelines for determining the center of life).
Special regime	<ul style="list-style-type: none"> • Foreign residents perform work in Israel are entitled to one tax credit point. • In certain sectors, a foreign resident may be entitled to credit points as an Israeli resident, up to 2.25 credit points. • Females are entitled to another 0.5 points. • Credit point value is 2,616 per year (as of 2019). • In certain sectors, additional tax benefits are granted for employees in the same sector, such as athletes, journalists, experts. <p><i>*There are special tax benefits for new immigrants applicable for a period of up to 10 years from the date of arrival in Israel (For further information, please contact us)</i></p>	<p>Tax residents in Israel who has earned income abroad for whom a foreign tax has been paid:</p> <ul style="list-style-type: none"> • The guiding principle is that credit for foreign tax paid on foreign income from a certain source will be given against Israeli tax that applies to income from that source. • The credit amount is limited (according to a formula determined by the Tax Authority). • The amount in which the tax charged abroad exceeds these limits (the "credit surplus") may be utilized as a tax credit on income from the same source during the next five tax years.
Tax rate	<p>Personal Income Tax rates: 10% to 50%</p> <p>Dividends, interests and capital gains: 25% to 30%</p>	<p>Personal Income Tax rates: 10% to 50%</p> <p>Dividends, interests and capital gains: 25% to 30%</p>
Conditions to be met	<p>Individuals who want to apply the special regime need to meet the following criteria:</p> <ul style="list-style-type: none"> • His stay in Israel is legally permitted • The individuals must have a suitable work permit from the Ministry of Interior in Israel. • The assignment to Israel needs to be a consequence of employment. 	<p>Individuals who want to apply for credit of foreign tax need to meet the following criteria:</p> <ul style="list-style-type: none"> • The individual must meet the definition of a resident of Israel for tax purposes in the tax year for which the credit is requested. • The works must be performed physically abroad. • The payment must be "tax"; That is, payment imposed by the government, which is not a voluntary payment. • The payment must be final. • The tax is paid to the tax authorities of a country outside of Israel.

Israel

Formal requirements	The special regime is given automatically. The employer will reduce the value of the credit points from the tax deducted from the salary.	<p>There is no special communication or request, but taxpayers that apply for credit of foreign tax must keep all records of their allocation abroad, such as:</p> <ul style="list-style-type: none"> • Certificate issued by the foreign company paying the salary income, which states: identification of the posted worker, country of posting, project, and identification of the company benefiting from the work, quantification of the days that the worker has been allocated, total income and tax payment. • The income report submitted to the tax authority in the foreign country, detailing the total income classified by type of income and the tax paid. • Approvals of withholding tax made by foreign authorities/clients, together with an official document of the foreign tax authorities.
Secondments		<ul style="list-style-type: none"> • No credit will be granted for tax-exempt income in Israel. • Fines or other punitive payments shall not be considered foreign tax. • Interest paid in respect of foreign tax debts shall not be considered tax. • No credit will be granted on tax paid abroad in contravention of the ordinance of the Convention for the Avoidance of Double Taxation.



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Italy

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Italy if one of the three requirements is met for most of the tax period (ie 183 days, even non-continuous, 184 in the case of a leap year):</p> <ul style="list-style-type: none"> • entry in municipal registers of the resident population; • domicile in the territory of the State, pursuant to Article 43 paragraph 1 of the Civil Code (the place where it has established the principal place of business and interests: The Tax Agency's Circulars/Resolutions has identified some elements that can be considered "significant" indicators of maintaining an effective and stable connection with the Italian territory: - availability of a permanent home; - presence of the family; - accreditation of own proceeds wherever achieved; - possession of property including real estate; - participation in business meetings; - ownership of corporate offices; - sustaining hotel expenses; - membership in clubs; - organization of its activities and of its commitments, including international ones, directly or through subjects operating in the Italian territory), • residence in the territory of the State, pursuant to Article 43 paragraph 2 of the Civil Code (the residence of a person is in the place of his usual residence). <p>The situation is different when the transfer is carried out in a State or territory identified by the black list of the countries with privileged taxation of the Ministerial Decree. 4.5.1999 (so called tax heavens). Article 2, paragraph 2 bis of the Italian Income Tax Code contains in fact a relative legal presumption that determines the continuity of the existence of tax residence in Italy of the person who has moved to a black list country unless he is able to provide the contrary proof: there is therefore an inversion of the burden of proof on the tax payer.</p>	
Special regime	<p>BENEFITS FOR INDIVIDUALS WHO MOVE THEIR RESIDENCE TO ITALY:</p> <ul style="list-style-type: none"> • Professors and researches: 6-year EXEMPTION of 90% of self-employment or employee income generated in Italy. The duration of the benefit is extended to 8, 11 or 13 years under specific conditions (number of minor children and purchase of residential real estate unit in Italy), • Impatriate workers: 5-year EXEMPTION of 70% (90% if the residence is transferred to one of the Italian southern regions) of self-employment or employee income generated in Italy. The duration of the benefit is extended for a further 5 years under specific conditions (number of minor children and purchase of residential real estate unit in Italy). • New residents: 15-year substitute tax on income generated abroad: €100,000 per year (25,000 for each family member) 	<p>Tax residents in Italy who perform works abroad and perceive salary income for those works cannot benefit of tax exemption and are taxed normally. In case the worker is resident in Italy but works for more than 183 days abroad the taxation can be carried out on the base of a Conventional salary/wage established on annual basis by the Minister of labour and welfare. Generally the Conventional salary/wage is lower than the actual salary.</p>
Tax rate	<p>General tax rate: progressive taxation for income brackets</p> <p>Up to an income of Eur 15.000, tax rate 23%</p> <p>From Eur 15.000 up to 28.000, tax rate 27%</p>	<p>Personal Income Tax rates.</p> <p>Dividends, interests and capital gains: 26%</p>

Italy

	<p>From Eur 28.000 up to 55.000, tax rate 38%</p> <p>From Eur 55.000 up to 75.000, tax rate 41%</p> <p>From Eu 75.000 onwards: 43%</p> <p>In addition there are additional taxes for Municipality (max 0,8%) and Region (max 3,24%) decided by any Municipality and Region</p> <p>Dividends, interests and capital gains: 26%</p>	
<p>Conditions to be met</p>	<p>Individuals who want to apply the special regime need to meet the following criteria:</p> <p>Professors and researches:</p> <ul style="list-style-type: none"> • have been resident abroad, not occasionally • holding university degree or equivalent qualification • having carried out documented research and course activities abroad for at least two consecutive years, at public or private research centers or universities • acquiring the tax residence in Italy • carry out teaching or research in Italy <p>Impatriate workers</p> <p>The favorable tax regime for “impatriate” workers applies:</p> <ol style="list-style-type: none"> 1. to the citizens of the European Union indicated in article 2, paragraph 1, of law no. 238/2010 (eligible categories have been identified taking into account specific scientific and professional experiences and qualifications by Decree of the Minister of Economy and Finance of May 26, 2016) 2. to citizens of non-EU countries, with whom there is a double taxation agreement or an agreement on the exchange of information for tax purposes. <p>The following requirements must jointly be made:</p> <ul style="list-style-type: none"> • holding a degree • have worked as an employee, selfemployed or as business abroad for 24 months, or have studied abroad for 24 months and have obtained an academic qualification • acquiring tax residence in Italy • working as employee or self-employed in Italy <p>The tax incentive for “impatriate” workers also applies to all other workers who move their tax residence to Italy when the certain conditions are met.</p> <ul style="list-style-type: none"> • acquiring tax residence in Italy • not having been resident in Italy in the 2 tax periods prior to the moving and commit to stay for at least 2 years • working mainly within the Italian territory. 	<p>The use of the Conventional wage/salary is permitted only if the worker continues to be tax resident in Italy and works for more than 183 days abroad. To benefit of the Conventional wage/salary is necessary that the activity of employee is performed abroad on a continuous basis and as the exclusive object of the employment relationship.</p>

Italy

	<p>New residents</p> <ul style="list-style-type: none"> • transfer of residence for tax purposes in Italy • residence abroad for at least 9 tax periods during the previous 10 years 	
Formal requirements	<p>Professors, researchers and “impatriates” with income from employment</p> <p>In order to benefit from the tax incentives described above professors, researchers and workers, with income from employment, must submit a written request to the employer.</p> <p>This request, with criminal implications in case of false declarations, must contain:</p> <ul style="list-style-type: none"> • general information (name, surname and date of birth) • tax identification number • indication of the date of return to Italy and the first employment contract in Italy (in case of following recruitments or more employment relationships) • declaration certifying the conditions envisaged by the tax incentives for which application is requested • indication of the current residence in Italy • commitment to promptly communicate any change in residence before the end of the minimum period provided for by the law for which the benefit is requested • declaration certifying that the individual is not simultaneously benefiting from other tax incentives <p>The employer applies the benefit from the pay period following the request and, at the time of the adjustment, from the date of the hiring, by applying the withholding tax on the taxable amount reduced to the percentage of taxable income envisaged by the favorable tax scheme (10% for researchers and professors, 50% for “impatriated” workers), to which the related deductions will be proportionated.</p> <p>If the employer could not grant the benefit, the taxpayer can benefit from it, if the requirements established by law occur, directly in the tax return. In this case, the income from employment should already include the deduction</p> <p>Professors, researchers and “impatriates” with income from selfemployment</p> <p>Self-employed, professors, researchers and “impatriate” workers can benefit from the tax regime directly during the submission of the tax return or, as an alternative, they can benefit from the incentive when applying the withholding tax made by the client on the fees received. In this case, they must submit a written request to their clients containing roughly the same declaration provided for income from employment.</p> <p>New residents</p> <p>Those interested in benefiting from the tax incentive can contact the Italian Revenue Agency for an opinion on the existence of the conditions necessary to benefit from it.</p> <p>The request can be submitted even when the person concerned has not yet moved his/her residence to Italy. However, it is not possible to file the request after having benefitted from the incentive.</p> <p>The request must be submitted to Divisione Contribuenti dell’Agenzia delle Entrate, via Cristoforo Colombo, no. 426 c/d - 00145 Rome.</p>	For the application of conventional salary/wage it is necessary that a specific contract be stipulated that provides for the execution of the service exclusively abroad

Italy

	<p>Among the elements that the taxpayer must indicate in the request for tax ruling are:</p> <ul style="list-style-type: none"> • personal data and, if already available, the tax identification number as well as, if already resident, the address of residence in Italy • identification data of any possible legal representative, including the tax identification number • detailed and specific description of the specific case • indication of the status of non-resident in Italy for at least 9 tax periods during the 10 preceding years • indication of the State or States in which the last residence for tax purposes was registered before the option became effective • indication of States or foreign territories for which the person intends to exercise the right not to apply the substitute tax • indication of the elements necessary for the verification of the conditions to benefit from the tax incentive (checklist). <p>The checklist, whose model is available (with the related instructions) on the website of the Revenue Agency, must be accompanied by supporting documentation. The missed or incomplete compilation of the checklist or the missing or incomplete enclosure of the supporting documents makes the tax ruling inadmissible.</p> <p>When access to the tax regime is also requested for family members, for each of these, the same information must be reported in the request for tax ruling.</p> <p>OUTCOMES OF THE TAX RULING</p> <p>The Revenue Agency shall respond to the request within 120 days of receipt (without prejudice to the possibility of requesting additional documents), notifying its opinion on the occurrence or non-occurrence of the conditions to benefit from the regime.</p> <p>The reply to the tax ruling is not binding for the person who submitted it (and cannot be appealed), while it is binding for the Revenue Agency, limited to the specific case and to the person who submitted the request.</p> <p>HOW TO OPT IN:</p> <p>The option of the substitute tax regime on income generated abroad shall be chosen in the tax return relating to the tax period in which the taxpayer has moved his/her tax residence to Italy or in the tax return for the following tax period.</p>	
Secondments	The individuals who take the residence in Italy as consequence of a secondment agreement are not eligible for special regime and are taxed according to the ordinary tax regime.	Given the requirements of the law, Conventional wages/salaries generally apply in the case of secondment of the worker abroad

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Japan

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individual tax payers are classified into resident tax payers and non-resident tax payers. And resident tax payers are classified into permanent resident and non-permanent resident.</p> <p>Worldwide income is subject to Japanese income tax for permanent resident and income tax paid on foreign source income outside Japan is basically subject to foreign income tax credit.</p> <p>Japanese source income and foreign source income paid in Japan or remitted to Japan are subject to Japanese income tax for non-permanent resident.</p> <p>Only Japanese source income is subject to Japanese income tax for non-resident.</p> <p>Impatriates or expatriates needs to be identified which of above category he/she belongs to for Japanese income tax purposes. Or no distinction is made between impatriates and expatriates by Japanese tax law. Japanese income tax is levied based on above category of residence.</p> <p>An individual who has his/her domicile in Japan is a resident. An individual who has had his/her residence in Japan for one year or more is also a resident.</p> <p>An individual arrived in Japan with intention of living in Japan for more than one year is treated as resident of Japan from the beginning for Japanese income tax purposes.</p>	
Tax rate	<p>Resident tax payers: 5% to 45% of national tax depending on level of taxable income plus 10% of local tax. Special tax for recovery from earthquake is levied on national tax. The tax rate is 2.1% on national tax.</p> <p>Non-resident: 10% to 20% depending on type of income. Special tax for recovery of earthquake is levied on national tax. The tax rate is 2.1% on national tax.</p>	



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Lebanon

	IMPATRIATES TAXATION	EXPATRIATES TAXATION												
Residence	Individuals that resides in Lebanon and has a registered number at the Ministry of Finance is considered as tax resident whereas other individual that is resident in Lebanon but does not have a registered number at the Lebanese Ministry of Finance is treated as a non-resident and is subject to non-resident tax.													
Special regime	Individuals displaced in Lebanon are either taxed as non-residents or as residents whose salaries are directly charged to income tax.													
Tax rate	<p>Revenues earned by non-residents in Lebanon are subject to an effective tax rate of 2.25% of the revenue in the case of revenue from sale of materials and equipment and 7.5% of the revenue in the case of sale of services. The non-resident tax is a WHT.</p> <p>When an expatriate is working in Lebanon they are directly charged income tax deducted from his salary</p> <p>Taxable income LBP:</p> <table border="1"> <tbody> <tr> <td>1 to 6000000</td> <td>2%</td> </tr> <tr> <td>6000001 to 15000000</td> <td>4%</td> </tr> <tr> <td>15000001 to 30000000</td> <td>7%</td> </tr> <tr> <td>30000001 to 60000000</td> <td>11%</td> </tr> <tr> <td>60000001 to 120000000</td> <td>15%</td> </tr> <tr> <td>More than 120000001</td> <td>20%</td> </tr> </tbody> </table> <p>Income tax on distribution of dividends at a rate of 10% of the dividend paid</p> <p>Social security tax 17%</p>	1 to 6000000	2%	6000001 to 15000000	4%	15000001 to 30000000	7%	30000001 to 60000000	11%	60000001 to 120000000	15%	More than 120000001	20%	<p>Not applicable-In some cases and upon agreement between the Lebanese Government and some other countries double taxation can be avoided.</p>
1 to 6000000	2%													
6000001 to 15000000	4%													
15000001 to 30000000	7%													
30000001 to 60000000	11%													
60000001 to 120000000	15%													
More than 120000001	20%													
Conditions to be met	<p>Individuals who want to apply need to meet the following criteria:</p> <ul style="list-style-type: none"> All foreign employees are required to apply for a work permit / visa except those of Syrian Nationality. The expatriates employment contract must take into consideration tax laws in Lebanon. Where the expatriates family /spouse or children relocate to Lebanon relevant visas are necessary. 	Income tax in Lebanon is territorial in general , only profits realized in Lebanon and income derived from activity in Lebanon are subject to the income tax												
Formal requirements	<p>Visa requirements at the General Directorate of the General Security of Lebanon</p> <p>Labour and social security forms</p> <p>Income Tax Forms</p> <p>Salary Tax forms</p>													

Lebanon

Secondments	<p>Foreign employees benefits taxed include: bonuses, overtime, medical insurance, travel allowances and others</p> <p>The exemptions from tax are the transportation fees per day and the family deductions from salaries before tax is applicable:</p> <p>7500000 lbp for each employee 2500000 lbp for his non working wife 500000 lbp for each child up to 5 children</p>
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Malta

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Malta if any of the following conditions is met:</p> <ul style="list-style-type: none"> • They remain in Malta for more than 183 days during a calendar year. The sporadic absences are included, except those where the tax residency in another country is proven. The Tax Administration can demand proof of stay over a period of 183 days in the calendar year, which can be proven by presenting receipts of local shops and restaurants, bank statements, showing purchases in Malta, consumption of Water and electricity in Malta etc. • They have their main adobe or residence in Malta • They have strong links to Malta, such as family members living in Malta, children going to Maltese schools. 	
Special regime	<p>Foreign individuals moving to Malta and acquiring tax residence in Malta, will be subject to tax in Malta ONLY on any income remitted to Malta and/or income arising from Malta. Any other income earned outside Malta, which is not remitted to Malta, is not subject to taxation in Malta.</p> <p>All the individual's salary income earned in Malta will be deemed obtained in Malta.</p> <p>Tax residents in Malta (being expatriates tax resident in Malta or even local Maltese individuals) who perform works abroad and perceive salary income for those works will be subject to 15% tax charge on these overseas income.</p> <p>Highly Qualified persons that will occupy an eligible office can also be eligible to be taxed at 15% on their income. More details can be found on https://ccpsmalta.com/highly-qualified-scheme/</p>	

Malta

Tax rate	The tax rates for any individual tax resident in Malta are as follows:			
	Tax Rates for Basis Year 2019			
	TAX RATES			
	Chargeable Income (€)			
	From	To	Rate	Subtract (€)
	Single Rates			
	0	9,100	0%	0
	9,101	14,500	15%	1,365
	14,501	19,500	25%	2,815
	19,501	60,000	25%	2,725
	60,001	and over	35%	8,725
	Married Rates			
	0	12,700	0%	0
	12,701	21,200	15%	1,905
	21,201	28,700	25%	4,025
28,701	60,000	25%	3,905	
60,001	and over	35%	9,905	
Parent Rates				
0	10,500	0%	0	
10,501	15,800	15%	1,575	
15,801	21,200	25%	3,155	
21,201	60,000	25%	3,050	
60,001	and over	35%	9,050	
<p>No further taxation is incurred on dividends received from a Maltese company</p> <p>Bank Interest and/or interest earned from licensed institution can be subject a final with-holding tax of 15%</p> <p>Sales tax on immovable property is 8% on the higher of the market value or the selling price of the immovable property</p> <p>Capital gains on shares will be taxed in accordance to the above tax brackets</p> <p>The tax rates for any individual non-resident in Malta are as follows:</p> <p>The following tables should be used by taxpayers not residing in Malta for computing the amount of tax on their chargeable income in the respective basis year.</p>				

Malta

Tax Rates - 2008

Chargeable Income (€)

From	To	Rate	Subtract (€)
0	700	0%	0
701	3,100	20%	140
3,101	7,800	30%	450
7,801	and over	35%	840

Tax Rates 2001 - 2007

Chargeable Income (Lm)

From	To	Rate	Subtract (Lm)
0	300	0%	0
301	1,300	20%	60
1,301	3,300	30%	190
3,301	and over	35%	355

Conditions to be met	<p>Individuals who want to apply for a Maltese residence needs to:</p> <ul style="list-style-type: none"> • Either be a self-sufficient person, hence proving that he can self-sustain himself, either through the pensions to be received or through his personal assets • Or through employment with an employer which is established in Malta.
Formal requirements	<p>The formal requirements are:</p> <ul style="list-style-type: none"> • To submit applications to obtain a Maltese residence card • To present the passport • The subject person must either acquire a property in Malta or lease a property in Malta. Such address will be used as his main residence in Malta • Must apply for a Social Security number and Income tax number in Malta • Hence once the residence card is obtain the subject person would need to proof that s/he is paying Social Security contributions and income taxes in Malta

Malta

Secondments	Individuals who will be allocated in Malta for a period of time, and will be paid directly from a Maltese employer, these will be subject to taxation in Malta, i.e. when the employment services are being carried out, then apply the Double Taxation agreement in their home country.
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CCPS Malta
www.ccpsmalta.com

Morocco

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION																												
Residence	Individuals are considered to be tax residents in Morocco if any of the following conditions is met: <ul style="list-style-type: none"> They remain in Morocco for more than 183 days during a calendar year. The sporadic absences are included, except those where the tax residency in another country is proven. In the case of countries or territories labelled as tax havens, the Tax Administration can demand proof of stay in that tax haven over a period of 183 days in the calendar year. They situate the main base or center of their activities or economic activities, directly or indirectly, in Morocco. 																													
Special regime	Individuals displaced to Morocco can apply a special regime by which they are tax as residents on the tax year but pay his social contribution in their home country. All the individual's salary income will be deemed obtained in Morocco.																													
Tax rate	<table border="1"> <thead> <tr> <th>From (MAD)</th> <th>To (MAD)</th> <th>Rate</th> <th>Deduction</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>28000</td> <td>0</td> <td>0</td> </tr> <tr> <td>28000</td> <td>40000</td> <td>12</td> <td>3360</td> </tr> <tr> <td>40000</td> <td>50000</td> <td>24</td> <td>8160</td> </tr> <tr> <td>50000</td> <td>60000</td> <td>34</td> <td>13160</td> </tr> <tr> <td>60000</td> <td>150000</td> <td>38</td> <td>15560</td> </tr> <tr> <td>150000</td> <td>+</td> <td>40</td> <td>18560</td> </tr> </tbody> </table>	From (MAD)	To (MAD)	Rate	Deduction	0	28000	0	0	28000	40000	12	3360	40000	50000	24	8160	50000	60000	34	13160	60000	150000	38	15560	150000	+	40	18560	Personal Income Tax rates. Dividends, interests and capital gains: 10% to 15%
From (MAD)	To (MAD)	Rate	Deduction																											
0	28000	0	0																											
28000	40000	12	3360																											
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60000	150000	38	15560																											
150000	+	40	18560																											



Fidupartner
www.fidupartner.com

Nigeria

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	Individuals are considered to be tax residents in Nigeria if he/she is in Nigeria for a period or periods amounting to 183 days or more in any twelve-month period commencing in the calendar year and ending either in the same year or the following year.	
Tax rate	Personal tax rate: 1st N300,000 of Taxable Income @ 7% Next N300,000 of Taxable Income @ 11% Next N500,000 of Taxable Income @ 15%	Next N500,000 of Taxable Income @ 19% Next N1,600,000 of Taxable Income @ 21% Taxable Income above N3,200,000 @ 24%
Special regime	Tax residents in Nigeria who perform works in countries that have a double taxation agreement with Nigeria and receive salary income for those works can benefit from a percentage of tax exemption in PIT as contained in the double taxation relief between Nigeria and such country.	
Formal requirements	<ul style="list-style-type: none"> Individuals are required to file their income for the immediate past year using the PIT returns form (Form A) on or before March 31st of every year. Individuals are also required to complete the tax clearance application forms upon successful completion of their PIT filing, to apply for their tax clearance certificates. 	



Taxaide
www.taxaide.com.ng

Panama

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	Individuals are considered to be tax residents in Panama if any of the following conditions is met: <ul style="list-style-type: none"> They remain in Panama for more than 183 days during a calendar year. The sporadic absences are included. They situate the main base or center of their activities or economic activities, directly or indirectly, in Panama. Foreigners individuals who reside in Panama for more than 183 days a year and earn some income in Panama will be taxed at the same rate and in the same proportion as nationals	
Special regime	A special regime is created for the establishment and operation of Multinational Company Headquarters (MCH which must pay a 5% tax on the net taxable income. It is defined as a multinational company that carries out operations from Panama aimed at offering the services defined in this Law to its Head Office or its subsidiaries	

Panama

		or its subsidiaries or associated companies, or that its Parent Company establishes in Panama, hereinafter Business Group. The Venues will always be part of multinational companies with international or regional operations or important in their country of origin.
Tax rate	<p>Up to B.\11,000 tax rate 0% From B.\ 11,000 to B.\ 50,000 tax rate 15% Onwards to B.\ 50,000: 25%.</p> <p>Dividends Paid to holders of bearer shares must pay a 20% tax on dividends</p>	Personal Income Tax rates.
Conditions to be met	<ul style="list-style-type: none"> • Deductions for married couples are \$ 800.00 with your joint tax return. • Mortgage interest paid at the main house can be deducted up to \$ 15,000 annually. • The interest payments on student loans by the taxpayer or the education of dependents in Panama are completely deductible. • Health insurance premiums are deductible. • Contributions to private pension plans up to 10% of annual gross income of a natural person to a maximum of \$ 15,000 per year are deductible. 	No deductions
Formal requirements	Individuals must declare their annual income tax before March 15. Individuals whose only source of income is a simple salary are exempt from making the income tax declaration, since the employer withholds part of each payment for taxes.	Employers are required to withhold income taxes from non-residents who obtain income from any source in Panama. The income tax rate for individuals is used without deductions. However, if the non-resident earns income outside the territory of Panama, but the Panamanian employer wishes to deduct these wages from his income tax, the non-resident will only have half of the total amount paid subject to the withholding tax. . The employer is obliged to pay the tax authorities the amounts withheld within 10 days after payment.
Secondments		<ul style="list-style-type: none"> • Panama continues to negotiate and sign tax treaties with other countries to prevent its citizens investing in Panama from facing taxes on the income of both countries on their Panamanian source income. Basically, a double taxation treaty allows full credit to the income tax of the investor paid to Panama towards any income tax owed in its country of origin based on the income of a Panamanian source. • Income taxes and salaries and other remuneration received by the persons holding a permanent personal visa for the multinational company headquarters (MCH) are considered exempt from income tax insofar as said salaries are paid, assumed and recognized as personnel expenses in the accounting of the MCH company.

Panama

- The holder of a permanent personal visa for the multinational company headquarters (MCH) will be exempt from the payment of import taxes on household goods when they first travel to Panama. In addition, it may request the National Customs Authority of a total tariff exemption (every two years) for the importation of a motor vehicle for personal or family use.



Smalatom
www.smalatom.com

Peru

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Salary taxes	There is no special tax regime for impatriate or expatriates. Individuals are taxed based on their tax residency status. Tax residents are taxed on their worldwide income. Non-tax residents are only taxed on their Peruvian sourced income. Once they acquire tax resident status, foreign citizens are taxed the same as Peruvian residents.	
Residence	Any individual who has lived in Peru for 183 days in a 12-month period is considered a tax resident. The tax resident status is effective on January 1st of the year after that status was acquired.	
Tax rates	<p>Salaries earned in Peru by a non-tax resident are subject to a flat 30% income tax. Tax residents are subject to a progressive income tax that is updated every year. In 2019, the first PEN 29,400 of salary income is exempt. Above that amount, the following brackets apply:</p> <ul style="list-style-type: none"> • Up to PEN 21,000 8% • From PEN 21,001 to 84,000 14% • From PEN 84,001 to 147,000 17% • From PEN 147,001 to 189,000 20% • From PEN 189,001 30% <p>Regardless of the tax resident status, salaries are subject to pension fund withholding averaging 12.8%. Also, the employer pays 9% of monthly salary to the national health system, this amount is not deducted from the salary.</p>	
Formal requirements	The status change from non-tax resident to tax resident does not require any formal registration with the tax authority. In the event of a tax audit, the individual should be ready to provide evidence of having lived in Peru the required number of days.	



Estudio Morales
www.estudiomorales.net

Portugal

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Residence in Portuguese territory for tax purposes may be acquired in any year when the taxable person:</p> <ul style="list-style-type: none"> • Has remained in Portugal more than 183 days, followed or interpolated in any 12-month period beginning or ending in the year in question; or • Having stayed less time, have in Portuguese territory, on 31 December of that year, housing in conditions that make it possible to assume the intention to maintain and occupy it as a habitual residence; or • Be a member of a family, provided that, on 31 December of the year to which the income relates, one of the elements of said family is considered to be resident in Portugal for tax purposes. <p>Furthermore, Portuguese nationals who prove their new residency in a tax haven will continue to hold the condition of taxpayers for Personal Income Tax, during the four following tax periods.</p>	
Special regime	<p>A tax regime for non-habitual residents is in force to attract individuals and investments to Portugal.</p> <p>Under this regime, employment and self-employment income from a Portuguese source, derived from "high value-added activities" earned by non-habitual residents in Portugal will be taxed at lower rates.</p> <p>Additionally, there is a tax exemption for foreign-sourced income, such as, employment income, self-employment income, rental income, interest, dividends as well as other investment income, under certain specific conditions.</p> <p>The regime is applicable for a period of ten consecutive years.</p> <p>-----</p> <p>It is established a new tax regime for former tax residents to encourage the return of emigrants to Portugal.</p> <p>A tax relief is applicable to income earned in the first year of residency after the return to Portugal and in the following four years</p>	<p>Tax relief for expatriates</p> <p>A tax benefit was created for Portuguese resident workers that moves from their normal place of work to work abroad for a period equal to or greater than 90 days, 60 of which necessarily followed.</p> <p>The benefit consists of an exemption from personal income tax (IRS) applicable to the part of the remuneration paid to the employee, by the employer in Portugal, exclusively as compensation for traveling and staying abroad (up to € 10,000).</p> <p>If the employer moves and becomes to be considered as a non-resident taxable person in Portugal are subject to IRS only for the income obtained in Portuguese territory.</p>

Portugal

Tax rate	<p>Non-habitual residents Employment and self-employment income from a Portuguese source taxed at a flat rate of 20%.</p> <p>Under certain conditions foreign-sourced income (such as, employment income, self-employment income, rental income, interest, dividends as well as other investment income will be exempt.</p> <p>Former tax residents The regime establishes a 50% relief from taxation on employment or self-employment income received after their return to Portugal.</p>	The rates to be applied to non-residents vary between 25% and 28% according to the type of income.
Conditions to be met	<p>Non-habitual residents The regime will apply to individuals who become Portuguese tax residents under Portuguese domestic law in a certain year and have not qualified as tax residents in Portugal in any of the previous five years. The right to be taxed as Non-habitual resident has the duration of 10 consecutive years, providing that the requirements to be resident in Portugal are met.</p> <p>Former tax residents The regime will apply to individuals who become Portuguese tax residents under Portuguese domestic law in 2019 or 2020, provided that they:</p> <ul style="list-style-type: none"> • did not qualify as tax residents during the prior three years; • qualified as tax residents in Portugal prior to 31 December 2015; • have their tax situation regularized; • did not apply for the non-habitual residents regime. 	<p>Individuals who want to apply the tax exemption need to meet the following criteria:</p> <ul style="list-style-type: none"> • The work must be performed physically abroad. • The work must be performed for a non-resident entity.
Formal requirements	<p>Registration as a non-habitual resident must be request to the Tax Authorities when registering with a tax resident in Portugal.</p> <p>The former residents must mention in your annual tax declaration your status as a former resident.</p> <p>Also they must submit a statement to the entity paying the income-earning so that they can withholding tax on 50% of the income.</p>	The exemption provided shall be subject to a written agreement between the employee and the employer identifying the destination and the period of travel, the total remuneration to be paid to the employee and the compensation exempt. The employee shall be in possession of a copy of this document.
Secondments	Individuals who apply special regime may not qualify as for the status of tax residents for the application of a Double Taxation agreement purposes.	

Romania

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Romania if any of the following conditions is met:</p> <ul style="list-style-type: none"> • They remain in Romania for more than 183 days during a calendar year. The sporadic absences are included, except those where the tax residency in another country is proven. In the case of countries or territories labelled as tax havens, the Tax Administration can demand proof of stay in that tax haven over a period of 183 days in the calendar year. • They situate the main base or center of their activities or economic activities, directly or indirectly, in Romania. <p>Also, it is presumed, that a taxpayer has their usual place of residence in Romania when his/her not legally separated spouse and his/her underage dependent children are usually resident in Romania.</p> <p>A natural person will be considered as either resident or not resident during a calendar year, as a change of residence does not imply an interruption of the taxable period.</p>	
Tax rate	<p>General tax rate: 10%</p> <p>Dividends: 5%</p>	<p>Personal Income Tax rates. 10%</p> <p>Dividends: 5%</p>



Eurofast Global
www.eurofast.eu

Russia

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals physically present in Russia for at least 183 days in any 12-month period are treated as Russian tax residents. For this purpose, any 12-month period is taken into account, including one that began in one calendar year and continues in another calendar year. The final status is determined at the end of calendar year.</p> <p>Pursuant to Russian tax legislation, personal income tax is payable by Russian tax resident individuals on their worldwide income and by non-resident individuals on Russian income sources only.</p>	
Special regime/ Tax deductions	<p>There are several special regimes for individuals:</p> <ul style="list-style-type: none"> • Simplified Tax System (USN) with two types of tax bases: income and income with costs deducted • Presumptive Tax System (ENVD) – limited list of activities (retail, services for individuals, advertising services, etc.) <p>Both regimes are only for those who register as Individual Entrepreneurs.</p> <ul style="list-style-type: none"> • A special tax regime for the self-employed, the Tax on Professional Income, has come into effect in Moscow, Moscow Area, Kaluzhkaya Oblast, and Tatarstan. The self-employed are individuals (only Russian and EAEU citizens) not employing any persons with incomes of less than RUB 2.4 mln per year. Application is necessary for this regime. 	
	<p>Generally, personal expenses cannot be deducted. Russian residents can claim a tax refund on their medical and educational expenses, capital gains (apartments, cars, etc.), and expenditures to acquire or construct an apartment or house.</p> <p>Individual Entrepreneurs on the usual regime can deduct his/her actual expenses when properly documented, or alternatively 20% of income.</p> <p>If a Russian tax resident receives income which can be taxed in foreign country, the tax paid in the foreign country can be offset against tax payable by the resident in Russia if there is a Double Tax Treaty between the countries.</p>	<p>Generally, personal expenses cannot be deducted.</p> <p>Individual Entrepreneurs on the usual regime can deduct his/her actual expenses when properly documented, or alternatively 20% of income.</p>
Tax rate	<p>Personal Income Tax rate: 13%</p> <p>Simplified Tax System: 6% of income, or 15 % of income with costs deducted</p> <p>Presumptive Tax System: 15 % of fixed amount</p> <p>Self-employed: 6% when selling goods or providing services to legal entities, 4% to individuals</p> <p>Dividends, interests and capital gains: 13%</p>	<p>Personal Income Tax rate: 30%</p> <p>OR 13% from employment income of:</p> <ul style="list-style-type: none"> • Highly Qualified Specialists (HQS) • EAEU citizens • Foreign nationals from visa-free regime countries (CIS citizens) <p>Simplified Tax System: 6% of income, or 15 % of income with costs deducted</p> <p>Presumptive Tax System: 15 % of fixed amount</p> <p>Self-employed (EAEU citizens only): 6% when selling goods or providing services to legal entities, 4% to individuals</p> <p>Dividends, interests and capital gains: 0-30%</p>

Russia

<p>Conditions to be met</p>	<p>No specific conditions for obtaining an offset against tax paid in another country. Generally the procedure is as follows: The offset can be claimed in tax returns submitted up to 3 years after completion of a tax year in which the income was received. The tax return should stipulate the amount of tax paid in a foreign country which is subject to offset against Russian personal income tax. This amount should not exceed the amount of tax payable in Russia. Documents supporting the amounts of received income and paid tax authorized by the appropriate authority in a foreign country with notarized translation into Russian should be attached to the tax return.</p>	<p>Obtaining a reduced tax rate:</p> <ul style="list-style-type: none"> • HQS: a salary must be not less than RUB 167,000 per month • Foreign nationals from visa-free regime countries: tax has to be paid by individuals in advance, then they receive a document confirming the amount of tax paid.
<p>Formal requirements</p>	<p>A Russian entity has to provide the 3-NDFL tax return to the tax authorities no later than April 30 of the year following the year in which the income was received for individual received income (worldwide or Russian income, depending on residency status) which has not been declared. The deadline for the tax payment is July 15. Withholding tax is declared by Russian entities in 6-NDFL (on a quarterly basis) and 2-NDFL (on an annual basis). Simplified Tax System: no later than April 30 of the following year. Presumptive Tax System: 20th day of the first month of the forthcoming quarter. The self-employed need to report monthly via a special mobile application "My tax".</p>	
<p>Secondments</p>	<p>Remuneration for work performed abroad has to be declared by an individual personally. A Russian entity is not considered as a tax agent and should not withhold the tax.</p>	<p>Remuneration receivable by such an individual for work / services performed aboard should not be taxed in Russia.</p>



Schneider Group
www.schneider-group.com

Serbia

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Serbia if any of the following conditions is met:</p> <ul style="list-style-type: none"> • a natural person has resident in the territory of the Republic of Serbia or a “business and life interest center” • a natural person who resides on the territory of the Republic of Serbia, either permanently or with interruptions, 183 days or more, for a period of 12 months beginning or ending in a specific tax year. • who has spent on the territory of the Republic of Serbia in a marital or extra-marital relationship with a citizen of the Republic of Serbia or a foreigner who has been granted permanent residence for at least three years on an approved temporary stay on the basis of family reunification. 	
Tax rate	<p>Individual who earned income in 2018 over 2,470,644 rsd are obliged to submit a tax return for the annual income tax on citizens.</p> <p>The annual income tax is payable on taxable income at the rate of:</p> <ul style="list-style-type: none"> • 10% - for the amount of taxable income up to six times the average annual salary - 4,941,288 rsd • 15% - on the difference between the amount exceeding 4,941,288 rsd and that amount 	<p>Personal Income Tax rates.</p>
Formal requirements	<p>REGISTRATION OF PLACE OF STAY(white card) OBTAINING A RESIDENCE PERMIT OBTAINING A WORK PERMIT</p>	



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www.eurofast.eu

Spain

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Spain if any of the following conditions is met:</p> <ul style="list-style-type: none"> • They remain in Spain for more than 183 days during a calendar year. The sporadic absences are included, except those where the tax residency in another country is proven. In the case of countries or territories labelled as tax havens, the Tax Administration can demand proof of stay in that tax haven over a period of 183 days in the calendar year. • They situate the main base or center of their activities or economic activities, directly or indirectly, in Spain. <p>Also, it is presumed, that a taxpayer has their usual place of residence in Spain when his/her not legally separated spouse and his/her underage dependent children are usually resident in Spain.</p> <p>Furthermore, Spanish nationals who prove their new residency in a tax haven will continue to hold the condition of taxpayers for Personal Income Tax, during the four following tax periods.</p> <p>A natural person will be considered as either resident or not resident during a calendar year, as a change of residence does not imply an interruption of the taxable period.</p>	
Special regime	<p>Individuals displaced to Spain can apply a special regime by which they are tax as non-residents on the tax year they acquire their tax residence in Spain and to the following five years.</p> <p>All the individual's salary income will be deemed obtained in Spain.</p>	<p>Tax residents in Spain who perform works abroad and perceive salary income for those works can benefit from a tax exemption in PIT up to 60.100 euros. This tax exemption cannot be applied to partners, administrators or self-employed external collaborators with whom there is no relation of dependence.</p>
Tax rate	<p>General tax rate: 24% From 600.000 Euros onwards: 45%. Dividends, interests and capital gains: 19% to 23%</p>	<p>Personal Income Tax rates. Dividends, interests and capital gains: 19% to 23%</p>
Conditions to be met	<p>Individuals who want to apply the special regime need to meet the following criteria:</p> <ul style="list-style-type: none"> • They must not have been tax residents in Spain during the 10 previous tax periods. • The assignment to Spain needs to be a consequence of an employment contract (except professional athletes) or as a director of a non-related company. • Income obtained in Spain must not be considered to be obtained through a permanent establishment located in Spain. 	<p>Individuals who want to apply the tax exemption need to meet the following criteria:</p> <ul style="list-style-type: none"> • The works must be performed physically abroad. • The works must be performed for a non-resident entity. • If the recipient of the work is a related party or a company belonging to the same group as the Spanish company, the law establishes some particularities. • The works must be performed in another country where there is a tax of an identical or similar nature to the PIT. This requirement will be deemed to be met when the country or territory where the work is performed has signed with Spain a tax treaty containing an exchange of information clause.

Spain

Formal requirements	<p>Opting for, declining or exclusion from the Special Regime: Form 147, within six months from the entry in Spain.</p> <p>Taxpayers who apply the Special Regime must file a special Income tax return: Form 151.</p> <p>Withholding tax is declared in Form 216 and Form 296.</p>	<p>There is no special communication or request, but taxpayers that apply the tax exemption must keep all records of their allocation abroad, such as:</p> <ul style="list-style-type: none"> • Stamps on passports when travelling outside the European Union. • Boarding passes, which specify the destination, date and person travelling. • Hotel bills or copies of rental contracts, which must identify the guest or lessee, even if the Spanish company is paying for the accommodation. • Copy of credit or debit card statements used during the allocation. • Certificate issued by the Spanish company paying the salary income, which states: identification of the posted worker, country of posting, project and identification of the company benefiting from the work, quantification of the days that the worker has been allocated.
Secondments	<p>Individuals who apply special regime may not qualify as for the status of tax residents for the application of a Double Taxation agreement purposes.</p>	<p>Tax exemption is incompatible with the excess regime contemplated in Spanish PIT law. If due to the employee's allocation abroad (for more than 9 months) he/she receives salary wages greater than what he/she would have received if he/she was working in Spain, the company and the employee will have to choose whether to apply tax exemption or excess regime.</p>



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United Kingdom

	IMPATRIATES TAXATION (I.E. UK RESIDENT BUT NOT UK DOMICILE)	EXPATRIATES TAXATION (I.E. UK DOMICILE BUT NOT UK RESIDENT)
Residence	<p>The Statutory Residence Test ("SRT") determines if an individual is UK or non-UK resident for a tax year. The SRT takes into account the number of days the individual spends in the UK and other factors that connect them to the UK.</p> <p>The SRT consists of the parts:</p> <ol style="list-style-type: none"> 1. The Automatic Overseas Tests – Comprises of three tests and if any of these are met then individual is automatically non-UK resident for the tax year. If none are met then then the following tests are considered. 2. The Automatic Residence Tests – Comprises of three tests and if any of these are met then the individual is automatically UK resident in the year. If none are met then then the following test is considered. 3. The Sufficient Ties Test – If the above tests do not apply then this final test will determine the residency status of the individual. The first step is to determine how many "ties" the individual has with the UK. The "ties" are as follows: Family tie; Accommodation tie; Work tie; UK presence tie; Country tie. <p>Once the number of "ties" is identified and the number of days the individual spent in the UK during the tax year, a table is referred to and their tax residence is determined.</p>	
Tax implications	<p>If an individual is UK resident they are taxed on their worldwide income and gains on an arising basis.</p> <p>Double tax relief in the form of credit relief or through exemptions may be available but it will depend on the relevant Double Tax Treaty ("DTT").</p>	<p>If an individual is non-UK resident they are only subject to UK income tax on income arising from UK situs assets.</p> <p>Generally speaking, non-UK residents are also not subject to UK capital gains tax ("CGT") on the disposal of assets however there are exceptions to this rule (see below).</p>
Tax rate	<p>Personal tax rates</p> <p>Non-savings and interest: 20%, 40% and 45%</p> <p>Dividends: 7.5% and 32.5%, 38.1%.</p>	<p>Capital Gains Tax ("CGT") rates</p> <p>Residential property gains: 18% and 28%</p> <p>Other gains: 10% and 18%</p>
Formal requirements	<p>If the individual has worldwide income or gains to declare to the UK authorities then he may need to complete a personal tax return ("SA100").</p>	<p>If the individual has UK income to declare to the UK authorities then he may need to complete a SA100.</p>

United Kingdom

<p>Special regimes</p>	<p style="text-align: center;">REMITTANCE BASIS</p> <p>Broadly speaking a person's "Domicile" is the country in which the person has his "permanent or natural" home or where they have the closest ties. There are special rules for non-UK domicile individuals. For example, an individual who is resident in the UK but is non-UK domiciled has the option of applying the Remittance Basis for a particular tax year. Broadly, this means foreign income and gains (i.e. generated outside the UK) will be taxed in the UK only if they are "remitted" to the UK (i.e. brought, used or enjoyed in the UK).</p> <p>However there are some implications to consider before claiming the remittance basis. For instance, no personal allowance or capital gains exemption is available if the Remittance Basis is claimed. Also the Remittance Basis Charge applies to long term residents who claim the remittance basis. A £30,000 charge applies if they have been resident for 7 of the previous 9 years or a £60,000 charge applies if they have been resident for at least 12 of the previous 14 tax years.</p> <p>Any individual who has been resident for at least 15 of the last 20 years will be treated as "deemed" UK domicile and will not be able to claim the Remittance Basis.</p> <p>Where unremitted foreign income and gains total less than £2,000 in a tax year, the remittance basis will apply automatically, with the personal allowance and CGT annual exemption being available and with no Remittance Basis Charge.</p> <p>The remittance basis must be claimed on the individuals' SA100.</p>	<p style="text-align: center;">CAPITAL LOSS ELECTION</p> <p>Where an individual claims the Remittance Basis and makes a capital loss on the disposal of a foreign asset, the usual implication is that no relief can be claimed for the capital loss.</p> <p>However it is possible for the individual to make an irrevocable one-off election to obtain UK CGT relief on the foreign loss. The election has to be made within 4 years of the first year in which the Remittance Basis was claimed.</p> <p>Where the election is made, special rules apply to the deduction of UK and foreign capital losses. The allowable capital losses are deducted against gains in the following order:</p> <ol style="list-style-type: none"> (1) Remitted foreign gains (2) Unremitted foreign gains (3) Any other gains e.g. UK gains <p>Broadly if an individual has foreign capital losses and no UK capital losses then it might be sensible to make the election, however care should be taken as the election is irrevocable so it will last forever and hence an individual's future plans may change over time which can create additional tax implications.</p>	<p style="text-align: center;">TEMPORARY NON-RESIDENT</p> <p>When a UK resident individual becomes non-UK resident for a period of less than 5 full tax years, the "temporary non-resident" rules may apply.</p> <p>Broadly this means that any disposals which occurred during the period in which the individual was non-resident, will become subject to UK CGT in the year in which the individual becomes UK resident again. However, rules introduced in 2015 state that these capital gains only applies to the extent that the proceeds are remitted to the UK.</p> <p>These rules only apply to assets owned on the day of departure from the UK.</p>	<p style="text-align: center;">NON-RESIDENT CAPITAL GAINS TAX</p> <p>When UK property or land is disposed of by non-resident individuals, an element of the capital gain is subject to UK CGT. Any disposals of a UK residential property must be declared on a Non-Residence Capital Gains Tax ("NRCGT") return 30 days after the disposal. The CGT should be paid by the 30 day deadline or if the individual completes a SA100 then the CGT can be paid on 31st January following the tax year of disposal.</p>
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United Kingdom

<p>Inheritance tax?</p>	<p>Where an individual is not UK domiciled and not “deemed domiciled” in the UK (broadly where they have been UK resident for more than 15 out of the last 20 years), the individual is only liable to UK inheritance tax (“IHT”) in respect of their UK assets. Their foreign assets are “excluded property” and outside the scope of UK IHT.</p> <p>Please note that were an individual holds shares in an overseas company which in turn holds UK residential property, the shares would be regarded as UK assets for IHT purposes. At the moment overseas companies which hold UK commercial property do not fall into the UK IHT however this may change in the future.</p> <p>Where assets pass from a UK domiciled individual to their spouse or civil partner who is not UK domiciled, the spousal exemption is limited to £325,000. The non-domiciled spouse/civil partner can make an election to be treated as UK domiciled for IHT purposes. Depending on the exact facts this may be sensible.</p>	<p>Where an individual is UK domiciled or “deemed domiciled” in the UK they will be subject to UK IHT on their worldwide assets in the event of their death.</p> <p>Assets passing between spouses or civil partners are generally exempt from UK IHT.</p>
<p>Secondments</p>	<p>Any duties performed in the UK are subject to UK income tax. Many DTTs allow for credit relief, but usually the place and performance of the duties takes precedence.</p> <p>Normally UK income tax is deducted at source through a Pay As You Earn (“PAYE”) scheme. UK National Insurance (i.e. social security) is also due unless the employee presents a certificate from their local tax authorities in the country they wish to make contributions to. In the EU the certificate is called an “A1 form”.</p>	<p>If the duties are performed outside the UK and the employee is no longer a UK resident then no UK income tax is due on the income.</p>



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Ukraine

	IMPATRIATES WITH TAX RESIDENCY	UKRAINIAN EXPATRIATES
Residence	<p>Individuals are considered to be tax residents in Ukraine under a general rule - if they reside in Ukraine.</p> <p>If an individual has a place of residence in a foreign country as well, he/she will continue to hold the condition of taxpayer in Ukraine if such individual has a permanent place of residence in Ukraine.</p> <p>If the person has a permanent place of residence in a foreign country as well, he/she is treated as a resident of Ukraine if they have closer personal or economic relations (center of vital interests) in Ukraine.</p> <p>If the state in which the individual has the center of vital interests cannot be defined, or if the individual has no permanent residence in any one state, he/she is treated as a resident if stays in Ukraine for not less than 183 days (including a day of arrival and departure) during the period or periods of the tax year.</p> <p>A sufficient (but not exclusive) condition for determining the location of the center of vital interests of an individual is the place of permanent residence of his/her family members or his/her registration as a business entity.</p> <p>A sufficient basis for identification of a person as a resident is their independent identification of the territory of Ukraine as the main place of residence in the manner prescribed by the Tax Code of Ukraine, or such person's registration as a self-employed person.</p>	
Taxes and rates	<p>PIT – personal income tax is 18% MT – military tax is 1.5 %</p> <p>UST – unified social tax of 22% (consolidated insurance payment in Ukraine, the maximum base for UST charging is approximately EUR 2000)</p>	
Residence	<p>A foreigner will acquire the status of a tax resident in Ukraine in accordance with the requirements of tax legislation, if:</p> <ul style="list-style-type: none"> • he/she is staying in Ukraine for at least 183 days during the period or periods of the tax year • or they have closer personal or economic relations (center of vital interests) in Ukraine. • A sufficient (but not exclusive) condition for determining the location of the center of vital interests of an individual is the place of permanent residence of his/her family members or his/her registration as a business entity. 	<p>Citizens of Ukraine who work abroad under an international contract and are employed as citizens of Ukraine, in accordance with the legislation of the country of a Foreign Employer, as well as persons sent to Ukraine on a business trip by a Foreign Employer, shall pay personal income tax and military tax in Ukraine.</p>
Source of taxation	<p>Provisions of the International Treaty of Ukraine shall be applied in one of the following ways:</p> <ul style="list-style-type: none"> • tax exemption for the income with its source of origin within Ukraine, • tax rate reduction • or by returning the difference between the amount of tax paid and the amount that a non-resident must pay according to the International Treaty of Ukraine. <p>All of the following conditions must be met to enable the application of the international double taxation agreements concluded by Ukraine with respect to exemption from taxation of income of non-residents with the source of their origin in Ukraine:</p>	<p>In order to be eligible for application of the international double taxation agreements concluded by Ukraine with respect to taxation of individuals of Ukraine, the citizens who receive income outside Ukraine must confirm the status of a tax resident of Ukraine (provide a Certificate-confirmation of the status of a tax resident of Ukraine).</p> <p>To be eligible for crediting of taxes and duties paid outside Ukraine, a taxpayer must obtain a tax certificate on the amount of paid taxes and duties, as well as on the tax assessment base and/or object of taxation, from the government agency of the country, where such foreign income (profit) is obtained, authorized to charge such tax.</p>

Ukraine

	<p>a) a recipient stays in Ukraine for a period or periods not exceeding in the aggregate 183 days in any twelve-month period; and</p> <p>b) the remuneration is paid by an employer or on behalf of an employer who is not a resident of Ukraine; and</p> <p>c) costs related to the payment of remuneration are not borne by a permanent representative office or a permanent base which the employer has in Ukraine.</p>	<p>The specified certificate is subject to legalization in the country, the relevant Foreign Diplomatic Agency of Ukraine, unless otherwise provided by applicable international agreements of Ukraine.</p> <p>Ukraine has double taxation conventions with more than 70 countries.</p>
Taxation	<p>Income from sources within Ukraine that is accrued (paid, granted) to non-residents shall be taxed according to the rules and rates established for residents.</p> <p>Personal income tax rate is 18%.</p> <p>Military tax is 1.5 %.</p> <p>The amount of wages of a non-resident shall be charged with UST, the rate of the unified social tax for general type of employers is 22 %.</p> <p>Dividends: PIT makes 5, or 9, or 18% and MT - 1.5%.</p> <p>Royalties, other passive income: PIT - 18%, and MT -1.5%</p>	<p>Income is taxed at the rate of 18% and with the military tax at the rate of 1.5%.</p> <p>If a taxpayer has no supporting documents on the amounts of taxes paid abroad, the amount of tax shall be calculated from the total amount of income received.</p> <p>Income received by an individual outside Ukraine shall not be the basis for unified social tax charge (22%). At the same time, citizens of Ukraine, working abroad, have the right to voluntary payment of UST, in the case of a contract on voluntary participation in compulsory state pension insurance.</p>
Reporting	<p>By the results of the fiscal year in which a foreigner acquired the status of a resident of Ukraine, he/she shall file an annual tax return till May 01, where he/she shall list the income with a source of origin in Ukraine and any foreign revenues.</p> <p>The tax period is a calendar year.</p> <p>Document title: Property Status and Income Tax Return with Appendices.</p>	<p>The Tax Return shall be submitted until May 01 of the year following the reporting year.</p> <p>Therefore, a tax payer receiving foreign income shall include the amount of the income into the total annual taxable income and submit a tax return on the results of the reporting tax year, as well as to pay the charged PIT and MT from such income. Document title: Property Status and Income Tax Return with Appendices.</p>
Formal requirements	<p>Documents confirming the legal basis of a foreigner's stay in Ukraine include:</p> <p>a permanent residence permit; or</p> <p>a temporary residence permit for a period of 1 month to 1 year</p> <p>a taxpayer card (tax number of a taxpayer)</p>	<p>Reference-confirmation of the status of a tax resident of Ukraine is issued to confirm that a person is a tax payer in Ukraine and is a resident of Ukraine in the understanding of the international double taxation agreement concluded by Ukraine (government of Ukraine) with a relevant state.</p>

Uruguay

	IMPATRIATES TAXATION (INBOUND EXPATRIATES)	EXPATRIATES TAXATION
Residence	<p>Individuals are considered to be tax residents in Uruguay if any of the following conditions is met:</p> <ul style="list-style-type: none"> • They remain in Uruguay for more than 183 days during a calendar year. The sporadic absences are included, except those where the tax residency in another country is proven. • They situate the main base or center of their activities or economic activities, directly or indirectly, in Uruguay. <p>Also, it is presumed, that a taxpayer has their usual place of residence in Uruguay when his/her not legally separated spouse and his/her underage dependent children are usually resident in Uruguay, or if has real estate investments over USD 1.800.000.-</p> <p>A natural person will be considered as either resident or not resident during a calendar year, as a change of residence does not imply an interruption of the taxable period.</p>	
Special regime & Tax rate	<p>Individuals:</p> <ul style="list-style-type: none"> • Displaced to Uruguay that work at Free Zones can apply a special regime by which they are considered as non-residents. This implies being subject to Non-Resident tax (12% rate) instead of Resident tax (progressive rates up to 36%). Also, they will not have social security coverage. • Who can prove to be tax residents can choose to be subject to Non-Resident tax for the first five years. This implies a tax exemption to abroad capital gains instead of the 12% general tax rate. 	<p>Tax residents who perform works abroad for companies abroad and perceive salary income for those works are not subject to taxes in Uruguay.</p>
Conditions to be met	<p>Individuals who want to apply the special regime need to meet the following criteria:</p> <ul style="list-style-type: none"> • For those who are displaced to Uruguay and work at Free Zones, they must not be Uruguayan Citizens. • For those who became tax residents and benefit from the tax exemption to abroad capital gains for the first five years, there is no condition. 	
Formal requirements	<p>For request the tax residency: Form 5202.</p>	



Auren Uruguay
www.auren.com



Mallorca, 260 àtic • 08008 Barcelona • Tel.: + 34 93 215 59 89 • Fax: + 34 93 487 28 76 • Email: info@antea-int.com

