

# **CORPORATE TAX STATISTICS**

## **Statutory Corporate Tax Rate Explanatory Annex for Non-OECD Jurisdictions**

(Annex applicable for statutory corporate tax rates from 2000-2020)

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## BULGARIA

At the beginning of the reference period 2000 - 2018, in 2000 and 2001 a progressive tax schedule with two brackets was applicable as follows:

	Taxable profit < BGN 50 000	Taxable profit ≥ BGN 50 000
2000	20%	25%
2001	15%	20%

In the corporate income tax rates table, the top bracket percentage is reported. Since 2002 a flat tax rate is applied.

Up to 2002 the payers of corporate income tax were obliged to pay a local corporate income tax to municipalities. A uniform sub-central government corporate income tax rate of 10% was applied in the years between 1998 and 2002. The overall effective tax rate was calculated as follows:

$ETR = 10\% \text{ (municipality tax)} * 100 + (100 - 10\% \text{ (municipality tax)} * 100) * (\text{central tax rate } \%)$  ,

e.g. in 2002  $ETR = 10\% * 100 + (100 - 10\% * 100) * 15\% = 23.5\%$  .

In 2003 the CIT for municipalities was abolished and the statutory central tax rate has been gradually reduced from 23.5% to 10% in 2007.

### **Other special corporate income taxes under the Corporate Income Tax Act:**

#### **1. Withholding Tax on Income from Dividend and Shares in Liquidation Surplus**

Dividends and shares in a liquidation surplus received by non-resident legal persons (with certain exceptions) and resident legal persons are subject to a final withholding tax at a rate of 5%.

#### **2. Withholding Tax on Income of Non-resident Legal Persons**

Non-resident legal persons are obliged to pay a final withholding tax at a rate of 10% on the following type of incomes from sources inside the country:

- incomes from financial assets issued by resident legal persons, the Bulgarian State and the municipalities;
- any interest payments, including interest within payments under a financial lease contract;
- any income from rent or other provision for use of movable or immovable property;
- any copyright and license royalties;
- any technical assistance fees;
- any payments received under franchising agreements and factoring contracts;
- any income from rent or other provision for use of immovable property, including an undivided interest in immovable property, situated in the country;
- any income from disposition of immovable property, including an undivided interest in or a limited right in rem to immovable property, situated in the country;
- penalties and indemnities of any kind, excluding benefits under insurance policies.

#### **3. Tax on Expenses**

Corporate income tax payers are obliged to pay tax at a rate of 10% on the following expenses:

- any business entertainment expenses;
- any expenses on fringe benefits provided in kind to factory and office workers and to persons hired under a management and control contracts (hired persons); the expenses on fringe benefits provided in kind shall furthermore include: (a) the expenses on contributions (premiums) for supplementary voluntary social insurance and for voluntary health insurance and for life assurances; (b) the expenses on food vouchers;
- the expenses in kind associated with own assets, leased assets and/or assets provided for use, provided for personal use and/or associated with use of staff, by factory workers, office workers and persons hired under management and control contracts (hired persons), as well as by persons performing work in person.

#### **4. Tax on Additional Expenses of National Representatives**

The National Assembly of the Republic of Bulgaria is imposed to pay tax at a rate of 10% on the additional expenses of the National Representatives.

#### **5. Tax on Gambling Activity of Games where the Bet Consists in the Charge for Telephone or Another Electronic Communication Service**

The organizers of games of chance where the bet consists in the charge for a telephone or another electronic communication service are liable, instead of corporation tax, to an alternative final tax in respect of their gambling activity. The tax basis of assessment is the increase in the charge for the telephone or another electronic communication service. The tax rate is 15%.

#### **6. Tax on Gambling Activity of Games on Gambling Machines and Games at a Gambling Casino**

The organisers of games on gambling machines and games at a gambling casino, except of the games organised online, are liable, instead of corporation tax, to a tax on their gambling activity which is final. The amount of the tax on gambling activity is assessed in respect of the devices entered in the certificate of granted license and operated as follows:

- in respect of a gambling machine at a gambling hall and a gambling casino, respectively, each player's place at such a machine: BGN 500 per quarter;
- in respect of a roulette at a casino per gambling table: BGN 22,000 per quarter for each gambling table;
- in respect of any other gambling equipment at a casino: BGN 5,000 per quarter for each gambling equipment.

#### **7. Tax on the Income of the Public-Financed Enterprises**

The public-financed enterprises are obliged to pay an alternative tax at a rate of 3% on their income from any commercial transactions, as well as from rent of movable and immovable property. The tax rate for municipalities is 2%. Any public-financed scientific research enterprise, public higher school, state-owned and municipal school included in the pre-school and school education system is allowed to retain 50 per cent of the tax on income [due therefrom] in respect of the economic activity thereof as is directly related or auxiliary to the implementation of the core activity thereof.

## **CÔTE D'IVOIRE**

1. Le système de taxation des bénéfices des entreprises est unitaire et central; de sorte qu'il n'existe pas d'impôt sur les bénéfices des entreprises au niveau infranational. Les autorités locales n'ont pas non plus la possibilité d'adopter un taux additionnel d'impôt sur les bénéfices des entreprises exerçant dans leurs limites territoriales
2. Il n'existe pas non plus de surtaxe applicable aux bénéfices des entreprises dans la système fiscal de la Côte d'Ivoire.
3. Toutefois, il existe un taux particulier d'impôt sur les bénéfices applicables aux bénéfices des entreprises exerçant dans le domaine de la téléphonie (mobile et fixe) et des TIC (plus spécifiquement les FAI) qui est fixé à 30%. Ce taux est appliqué en raison du secteur d'activité et est le même tant au niveau national qu'au niveau infranational.

## CHINA (PEOPLES REPUBLIC OF)

1. There is no surtaxes in corporate income tax regime.
2. Sub-central government does not have the legislative power for corporate income tax. However, under the article 29, section 4 of Corporate Income Tax Law, the authorities of ethnic autonomous areas are entitled to determine the reduction or exemption of their shared proportion(40%) of the corporate income tax they received from local enterprises.

## CROATIA

Since 1 January 2017 general corporate tax rate is reduced from 20% to 18%.

Also, since 1 January 2017 in force is special corporate tax rate at the level of 12% for small corporate tax payers with annual revenues up to 3 million KUNA (400.000 EUR).

## GABON

### **I. Les taux d'imposition en matière d'Impôt sur les sociétés au Gabon**

L'article 16 du Code Général des Impôts (CGI) fixe les différents taux auxquels les bénéfices des sociétés sont soumis. Les taux en vigueur sont les suivants :

- **30 %**, taux de droit commun, c'est-à-dire les entreprises qui ne sont pas expressément visées par les deux taux ci-dessous ;
- **35%**, pour les entreprises du secteur pétrolier et minier ;
- **25%**, pour les personnes morales suivantes :
  - les sociétés détentrices de titres de propriété intellectuelle ;
  - la Banque Gabonaise de Développement ;
  - les entreprises de promotions immobilières agréées pour l'aménagement des terrains à bâtir en zone urbaine et pour la construction de logement socio-économiques ;
  - les établissements publics ;
  - les associations et collectivités sans but lucratif visées à l'article 5 alinéas 8 et 9 ;

- les entreprises du secteur touristique agréées conjointement par le Ministre chargé du tourisme et le Ministre en charge des finances.

## **II. Etat des recettes en IS (2010-2016, en milliards de FCFA)**

	2010	2011	2012	2013	2014	2015	2016
<b>IS hors pétrole</b>	<b>267.787</b>	<b>462.773</b>	<b>391.382</b>	<b>408.167</b>	<b>435.054</b>	<b>468.281</b>	<b>298.389</b>

**NB :** les montants des recettes sur la période indiquée dans le tableau ci-dessus ne tient pas compte des recettes des sociétés pétrolières. En revanche, les recettes réalisées par les entreprises du secteur minier ont été prises en compte.

## **III. Les avantages fiscaux concédés en matière d'IS**

### **1. Les mesures de droit commun**

Sont exonérées d'IS et du Minimum de Perception pendant une période de deux ans :

- ✓ Les entreprises nouvellement immatriculées ;
- ✓ Les entreprises nouvelles au sens de l'article 194 du CGI. Il s'agit notamment des entreprises existantes qui développent une nouvelle activité.

### **2. Les avantages spécifiques (selon le secteur d'activité)**

#### **A. Secteur du tourisme**

Les entreprises hôtelières de tourisme qui présentent un nouvel investissement d'un montant minimum de **300.000.000 FCFA HT** bénéficient d'une exonération de l'IS pendant les trois (3) premières années de leur activité.

Au terme de cette période, l'IS est diminué du crédit d'impôt correspondant à 5% du montant hors taxes de l'investissement pendant une période de 5 ans, pour les investissements touristiques inférieurs à **300.000.000 FCFA** agréés par le Ministre chargé du tourisme et le Ministre chargé des Finances.

#### **B- secteur de l'habitat**

- ✓ Les entreprises agréées pour l'aménagement des terrains urbains destinés à l'habitat social sont exonérées de l'IS pendant la durée de réalisation du projet d'investissement.
- ✓ Le taux d'IS est réduit à 25% au lieu de 30% pour les entreprises de promotion immobilière, agréées pour l'aménagement des terrains à bâtir en zone urbaine et pour la construction de logements socio-économiques ;
- ✓ Les bénéfices réalisés par les entreprises agréées pour l'aménagement des terrains urbains destinés à l'habitat social et pour la construction de logements socio-économiques et d'unités industrielles de fabrication des matériaux et autres intrants servant à la réalisation du volet construction de logements sociaux, sont exclus de la base imposable pour la détermination de l'IRPP, pendant la durée de réalisation du projet d'investissement.

#### **C- secteur du ciment**

Les sociétés qui investissent dans l'industrie du ciment et procèdent à l'exploitation de toutes matières premières intervenant dans la production du ciment bénéficient :

- ✓ d'une exonération de tous impôts et taxes liés au projet pendant la phase d'investissement;

- ✓ d'une exonération d'IS jusqu'à la septième (7) année après l'entrée en production ou le début de l'exploitation;
- ✓ sur la base imposable à l'IS, d'une déductibilité des intérêts d'emprunts destinés au financement du projet, sans limitation;
- ✓ d'une exonération du paiement d'IS, sur les plus-values réalisées à l'occasion de la première cession d'action qui suit le début de la production;
- ✓ d'une exonération de TVA pour l'acquisition des matériaux nécessaires à la production du ciment jusqu'à la septième (7) année après l'entrée en production ou le début de l'exploitation;
- ✓ d'un remboursement de la TVA grevant les éléments nécessaires à leur activité y compris les produits pétroliers notamment les carburants et lubrifiants, utilisés pour alimenter les installations fixes;
- ✓ d'une réduction de 50% pour le paiement de la Contribution des patentes.

### **E- secteur agricole**

La loi accorde une **exonération permanente de l'IS** aux sociétés coopératives de production, de transformation, conservation et vente de produits agricoles, ainsi qu'à leurs unions, de même qu'aux syndicats agricoles et les coopératives d'approvisionnement et d'achat.

Le Code Agricole (CA) élargit le nombre de bénéficiaires de cette exonération aux :

- ✓ mutuelles d'épargne et de crédit, les syndicats, les associations et les caisses de crédit agricole ;
- ✓ sociétés ou organismes chargés du développement rural et reconnus d'utilité publique ;
- ✓ petites et moyennes entreprises agricoles ;

**Exonération de l'IS pendant les cinq premières années** d'activités pour les exploitants agricoles qui réalisent un investissement de 150 millions de FCFA et qui emploient au minimum 30 gabonais, pour l'ensemble des activités de production, de transformation, de vente locale et d'exportation des produits agricoles. Au terme de cette période, le taux d'IS est fixé à 25% pendant les dix (10) années suivantes. Au-delà des dix ans ci-dessus, le droit commun s'applique.

**Exonération d'IS pendant les trois premières années** de leur activité pour les entreprises d'exportation des produits de l'agriculture, de l'élevage et de la transformation.

### **F- secteur du bois**

#### **1- Les entreprises concernées**

Bénéficiaire de ce régime fiscal dérogatoire, les industries de transformation du bois, lesquelles couvrent les opérations de construction, de montage de l'usine, ainsi que celles relatives à l'exploitation de l'usine pendant une période de cinq (5) ans, à compter de la première importation des intrants nécessaires à ladite construction.

Pour être éligibles aux avantages fiscaux, les entreprises doivent être spécialisées dans les opérations suivantes:

- ✓ la fabrication de placage, contreplaqués et de produits en bois reconstitué ;
- ✓ menuiserie de préfabriqués ;
- ✓ fabrication de contenants et de palettes en bois ;
- ✓ usine de pâte à papier, de papier et de crayon ;
- ✓ fabrication de tout autre produit fini du bois.

Les entreprises ci-dessus doivent en outre avoir un programme d'industrialisation agréé par la commission pour l'industrialisation du secteur forestier.

#### **2- Les avantages concédés**

Les entreprises remplissant les conditions susmentionnées, jouissent :

- ✓ d'une exonération pendant cinq(5) exercices, du minimum de perception et de l'impôt sur les bénéfices ;
- ✓ d'un amortissement dégressif ;
- ✓ de la possibilité de constituer une provision pour le renouvellement des équipements industriels d'usines de transformation pendant la durée du régime ;

## **G- secteur des mines**

### ***1- Les avantages fiscaux concédés en phase de recherche***

Les titulaires de permis de recherche de substances minérales en régime minier et leurs sous-traitants sont exonérés pendant toute la durée de la convention minière, y compris ses renouvellements éventuels, pour les activités spécifiques à la recherche et au développement, des impôts, droits et taxes et redevances suivants :

- ✓ l'impôt sur les sociétés (IS);
- ✓ l'impôt minimum forfaitaire ;

Les exonérations visées ci-dessus ne libèrent notamment pas les assujettis concernés des obligations déclaratives prévues par le Code Général des Impôts. Ces exonérations expirent ou cessent dès la signature de la convention minière d'exploitation.

### ***2- Les avantages fiscaux en phase d'exploitation***

Les titulaires de titres d'exploitation de substances minérales classées en régime minier ainsi que leurs sous-traitants sont exonérés, pour leurs opérations minières sur le territoire national, des impôts suivants :

- ✓ de l'impôt sur les sociétés (IS)
- ✓ de l'impôt minimum forfaitaire pendant les cinq premières années suivant le début de l'exploitation.

## **H- secteur pétrolier**

Le régime de faveur s'applique aux personnes (*contracteur ou sous-traitant*) qui effectuent les activités suivantes :

- ✓ prospection, d'exploitation, d'exploration, de stockage et de transport des hydrocarbures jusqu'au point d'enlèvement ;
- ✓ transformation d'hydrocarbures, d'importation, d'exportation, de transport, de stockage et de distribution de produits pétroliers, gaziers, leurs dérivés, ainsi que la formulation des lubrifiants.

### ***1- Les avantages fiscaux concédés aux contracteurs***

Les contracteurs bénéficient :

- ✓ d'une déduction sur toutes ses dépenses d'exploration, lesquelles sont considérées comme des coûts pétroliers;

### ***2- Les avantages concédés aux sous-traitants pétroliers***

Les entreprises éligibles au régime fiscal simplifié, en l'occurrence les sous-traitants pétroliers bénéficient de :

- ✓ la possibilité de déterminer de façon forfaitaire leur base d'imposition en matière d'IS, base imposable évaluée à (17%) du chiffre d'affaires hors taxes réalisé en matière d'IS et à 14% du chiffre d'affaires hors taxes réalisé en matière d'IRPP ;

Ce RFS est libératoire de toutes impositions sur les bénéfices.

## GUERNSEY

### General description of corporate tax regime

Companies which are resident for tax purposes (i.e. companies which are incorporated in Guernsey [and which have not been granted an exemption, see below], or which are controlled in Guernsey) are taxable on their worldwide income.

Three different rates are applied dependent upon the type of income received, rather than to a company (in the Income Tax (Guernsey) Law, 1975, unless the context otherwise requires, “company” means a body of persons corporate or unincorporated, not being a partnership) as a whole, so that a company might have income taxed at more than one rate:

(position as at 1 January 2018)

1. **Company Higher Rate:** A rate of 20% applies to trading income from conducting activities regulated by the Guernsey Competition and Regulatory Authority (broadly Guernsey utilities such as electricity, post and telecommunications), to companies exploiting the ownership of Guernsey land and buildings in as far as the profits relate to these operations, to the importation and/or supply of hydrocarbon oil or gas in Guernsey, and large retail business carried on in Guernsey where the company has a taxable profit of more than £500,000.
2. **Company Intermediate Rate:** A rate of 10% applies to specified banking business, domestic insurance business, insurance intermediary business and insurance manager business, fund administration business, income from the provision of custody services and income from the provision of investment management individual client services.
3. **Company Standard Rate:** All other income and profits are taxable at the general rate of 0%.

In common with many jurisdictions only companies engaged in collective investment (funds) activities may apply for exemption from tax, in which case they are not treated as resident in Guernsey. For more information on exempt companies, see:

<https://www.gov.gg/article/120167/Tax-for-businesses-companies-and-employers>

2008 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2008 - Company Intermediate Rate = 10% - income from banking business

2008 - Company Higher Rate = 20% - income from trading activities regulated by the Office of the Director General of Utility Regulation, income from the ownership of lands and buildings

2009 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2009 - Company Intermediate Rate = 10% - income from banking business

2009 - Company Higher Rate = 20% - income from trading activities regulated by the Office of the Director General of Utility Regulation, income from the ownership of lands and buildings

2010 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2010 - Company Intermediate Rate = 10% - income from banking business

2010 - Company Higher Rate = 20% - income from trading activities regulated by the Office of the Director General of Utility Regulation, income from the ownership of lands and buildings

2011 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2011 - Company Intermediate Rate = 10% - income from banking business

2011 - Company Higher Rate = 20% - income from trading activities regulated by the Office of the Director General of Utility Regulation, income from the ownership of lands and buildings

2012 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2012 - Company Intermediate Rate = 10% - income from banking business

2012 - Company Higher Rate = 20% - income from trading activities regulated by the Guernsey Competition and Regulatory Authority, income from the ownership of lands and buildings

2013 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2013 - Company Intermediate Rate = 10% - income from banking business, income from domestic insurance business, income from fiduciary business, income from insurance intermediary business, income from insurance manager business

2013 - Company Higher Rate = 20% - income from trading activities regulated by the Guernsey Competition and Regulatory Authority, income from the ownership of lands and buildings

2014 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2014 - Company Intermediate Rate = 10% - income from banking business, income from domestic insurance business, income from fiduciary business, income from insurance intermediary business, income from insurance manager business

2014 - Company Higher Rate = 20% - income from trading activities regulated by the Guernsey Competition and Regulatory Authority, income from the ownership of lands and buildings

2015 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2015 - Company Intermediate Rate = 10% - income from banking business, income from domestic insurance business, income from fiduciary business, income from insurance intermediary business, income from insurance manager business, income from the administration of controlled investments

2015 - Company Higher Rate = 20% - income from trading activities regulated by the Guernsey Competition and Regulatory Authority, income from the ownership of lands and buildings

2016 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2016 - Company Intermediate Rate = 10% - income from banking business, income from domestic insurance business, income from fiduciary business, income from insurance intermediary business, income from insurance manager business, income from the administration of controlled investments, income from the provision of custody services

2016 - Company Higher Rate = 20% - income from trading activities regulated by the Guernsey Competition and Regulatory Authority, income from the ownership of lands and buildings, income from gas and hydrocarbons business, income from large retail business

2017 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2017 - Company Intermediate Rate = 10% - income from banking business, income from domestic insurance business, income from fiduciary business, income from insurance intermediary business, income from insurance manager business, income from the administration of controlled investments, income from the provision of custody services

2017 - Company Higher Rate = 20% - income from trading activities regulated by the Guernsey Competition and Regulatory Authority, income from the ownership of lands and buildings, income from gas and hydrocarbons business, income from large retail business

2018 - Company Standard Rate = 0% - income from businesses, offices and employments and other sources

2018 - Company Intermediate Rate = 10% - income from banking business, income from domestic insurance business, income from fiduciary business, income from insurance intermediary business, income from insurance manager business, income from the administration of controlled investments, income from the provision of custody services, income from the provision of investment management individual client services

2018 - Company Higher Rate = 20% - income from trading activities regulated by the Guernsey Competition and Regulatory Authority, income from the ownership of lands and buildings, income from gas and hydrocarbons business, income from large retail business

## INDIA

It is to inform you that there is only Central Government Corporate income tax rates in India. Further, corporate income tax rates are different for domestic companies & foreign companies. This is based on the condition of payment of Dividend distribution tax (those companies paying DDT are domestic companies rest are foreign companies). Also tax rates are different based on turnover of the company. Further, even surcharge levied on corporate income tax rates are different depending upon the total amount of taxation liability.

## INDONESIA

- Final income tax rate of 1% is imposed on enterprises with annual gross turnover of not more than IDR 4.8 billion. This provision is ruled under Government Regulation No. 46 of 2013.
- Under Article 31E of Law No. 36 of 2008 concerning Income Tax Law, enterprises with annual turnover of not more than IDR 50 billion are entitled to a tax rate discount of 50% which is imposed proportionally on taxable income on the part of gross turnover up to IDR 4.8 billion. This regulation is valid starting 2009.
- Public companies are entitled to a tax discount of 5% off the standard rate, but only if they satisfy the following requirements:
  - a. companies satisfy a minimum listing requirement of 40% of total shares;
  - b. the 40% of total shares, as stated on point a, are owned by not less than 300 parties;
  - c. each party, as stated on point b, holds not more than 5% of company total shares; and
  - d. provisions as stated on a, b, and c, satisfy minimum holding period of 183 days within 1 fiscal year;

This regulation is valid starting 2013. This facility is granted under Government Regulation No. 77 of 2013

## ISLE OF MAN

For tax years up to and including 2005/06, the applicable income tax rate payable by companies in the Isle of Man was based on their residence and source of income as shown in the table below:

Income tax rates	00/01	01/02	02/03	03/04	04/05	05/06
Lower rate for resident trading companies	14%	12%	10%	10%	10%	10%
Standard rate for resident trading companies	20%	18%	15%	15%	15%	15%
Higher rate for resident companies on all other income	20%	18%	18%	18%	18%	18%
Standard rate for all non-resident companies	20%	18%	18%	18%	18%	18%

In addition to the above, the Isle of Man also operated a number of special company regimes (eg. Exempt Companies, Exempt Insurance Companies, Exempt Managed Banks, International Companies, Non-Resident Company Duty) and companies qualifying for these regimes were exempt from income tax. All special regimes ceased, and the companies that had qualified for them, reverted to being normal Isle of Man resident companies from 6 April 2007.

From 2006/07 onwards, the standard rate of income tax for all companies, resident or non-resident, has been 0%. The standard rate generally applies to all forms of income received by companies except:

- Licensed banks, which are taxed at 10% on income from their banking business;
- Income derived from mining and quarrying, landfill, property development, commercial property letting and rental income in the Isle of Man which was taxed at 10% until 6 April 2015 when the rate increased to 20%;
- Companies carrying on retail business in the Isle of Man and which have taxable income of more than £500,000 from such business became subject to the 10% rate of tax with effect from 6 April 2013; and
- Trading companies subject to the standard 0% rate that have elected to pay tax at 10%.

Income tax rates	06/07 to 12/13	13/14	14/15	15/16	16/17	17/18
Standard rate for all resident and non-resident companies	0%	0%	0%	0%	0%	0%
Banking business income	10%	10%	10%	10%	10%	10%
Land and property income from Isle of Man sources	10%	10%	10%	20%	20%	20%
Retail business - profits above £500,000	-	10%	10%	10%	10%	10%

## JAMAICA

### **Corporate Income Tax (CIT)**

Effective 2013, the standard rates of the tax on profits are 33.3% for regulated entities (excluding life insurance companies) and 25% for unregulated entities. Building societies are taxed at a rate of 30%. Effective from the 2015 tax year, life insurance companies are taxed at a rate of 25%.

Unregulated companies are taxed at a rate of 25%, and regulated companies (excluding life insurance companies) are taxed at a rate of 33.3%. An unregulated company is a company that is not a regulated company. A regulated company is a company that is regulated by any of the following:

- Financial Services Commission
- Office of Utilities Regulation
- Bank of Jamaica
- The minister with responsibility for finance

Remittances overseas by branches of foreign companies are subject to branch remittance tax at a rate of 33.3%. This rate may be different if a double tax treaty is in place.

### **Withholding Tax Regime (%)**

Dividends 15/33.3 (b)

Interest 33.3 (c)

Royalties 33.3 (d)

Management Fees 33.3 (d)

Insurance Premiums 15 (e)

(b) The dividend withholding tax is a tax imposed on payments to nonresidents (the rate may be reduced by double tax treaties). Tax is required to be deducted from dividend payments made by a Jamaican resident to a Jamaican resident shareholder at a rate of 15%, unless the Jamaican shareholder is a company that holds more than 25% of the voting rights of the distributing company. In such cases, the dividends may be paid without deduction of tax.

(c) This rate applies to interest paid to nonresident companies. Special rules apply to interest paid by prescribed persons (as defined). The withholding tax rates may be reduced under tax treaties. The recipients of the payments include the payments in taxable income reported on their annual income tax returns, and they may credit the tax against their annual income tax.

(d) This is a final tax imposed on payments to both residents and nonresidents. The withholding tax rate may be reduced under tax treaties.

(e) This withholding tax applies to all insurance premiums paid by residents to nonresidents. However, the withholding tax does not apply if a Jamaican resident insurance company pays the premium to an entity that meets all of the following conditions:

- It is not a connected company.
- It is in the business of writing contracts of reinsurance in the international market.
- It is not acting on behalf of a captive insurance company.

## **JERSEY**

The standard rate of company income tax in Jersey has been set at 0% since 2009.

A rate of 10% applies to the profits of financial services companies (defined in Article 123D of the Income Tax (Jersey) Law 1961).

A rate of 20% applies to the profits of utility companies (defined in Article 123C(3)). In addition, the 20% rate also applies to profits arising from the importation and supply of hydrocarbon oil, and from the letting and development of land and buildings in Jersey. With effect from 2018, large corporate retailers (defined in Article 123I) with profits of greater than £500,000 are liable to tax at rates of up to 20%.

## **LIBERIA**

There are two different corporate income tax rates being administered in Liberia aside from the regular rate quote in the matrix:

- a. A 30% CIT rate is applied for renewable and non-renewable natural resource sectors.
- b. A 15% CIT rate is applied for rich projection projects.

## **MALTA**

### Malta's Imputation System

All companies are subject to income tax in Malta at a rate of 35%. There is no separate system of corporation tax, and a company is subject to tax in much the same way as an individual. The only difference is in the applicable rates as for companies there is a flat rate of 35%, while for individuals, progressive rates apply with the maximum rate being 35%. A full imputation system is applicable which means that dividends paid by a company carry a tax credit equivalent to the tax paid by the company on its profits out of which the dividends are distributed. This system applies to both resident and non-resident shareholders that declare such income. Where a shareholder opts not to declare such income, the 35% charged at the company level becomes final. Where a shareholder opts to declare the dividend, such a shareholder is taxed on the gross dividend at the applicable tax rates, but is entitled to deduct the tax credit attached to the dividend against the total income tax liability. Individual shareholders of companies are entitled to tax refunds when their marginal tax on the dividend is less than the tax paid by the distributing company.

## **SEYCHELLES**

For the respective years 2000 up to 2006, the rates of tax payable by the owner of a business in respect of the taxable income of a business are;

- (a) 0% on the first SR 24,000 of taxable income
- (b) 25% on the next SR 24,000 of taxable income
- (c) 30% on the next SR 48,000 of taxable income
- (d) 40% on the remainder

For the respective years 2007 up to 2009 the rates for corporate income tax were as follows;

- (i) 0% on the first SR 250,000 of taxable income and
- (ii) 40% on the remainder

For the respective years 2010 up to 2012 the rates for corporate income tax were as follows;

- (i) 25% on the first SR 1,000,000 of taxable income and
- (ii) 33% on the remainder

For the respective years 2013 to date, i.e 2018, the rates for corporate income tax were as follows;

- (i) 25% on the first SR 1,000,000 of taxable income and
- (ii) 30% on the remainder

For those respective years (2013 - 2018) in the case of telecommunication service providers, banks, insurance companies, alcohol and tobacco manufacturers

the rates for business tax in respect of taxable income are as follows;

- (i) 25% on the first SR 1,000,000 of taxable income and
- (ii) 33% on the remainder

For the years 2013 onwards, a small business with a turnover of less than SR 1,000,000 shall be subject to presumptive tax.

The presumptive tax payable by a small business is 1.5% on the annual turnover.

Companies (Special Licenses) registered under the Companies (Special Licenses) Act 2003 in respect of its global taxable income is 1.5%.