

# INTERNATIONAL COMPARISON

November 2016



## What's in this issue: Impatriates taxation and basic labour rules

Auren 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 requirements to determine whether an individual is resident in a certain country, the main features and exemptions regarding this point and the different tax rates, relying on income.

We hope you that you find this publication helpful.

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## IMPATRIATES TAXATION and BASIC LABOUR RULES

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# Algeria

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| <b>RESIDENCE</b>     | <p>The rules determining whether an individual is resident in Algeria are based on a combination of factors such as:</p> <ul style="list-style-type: none"> <li>• the number of days the individual is in Algeria ;</li> <li>• if this person has a domicile, residence , head office of his company</li> </ul> <p>Foreigners who, wishing to establish their actual, habitual and permanent residence in Algeria and have been authorized by means of the residence card with a 2 years validity issued by the wilaya of residence are considered residents</p>  |
| <b>MAIN FEATURES</b> | <p>According to Algerian tax laws, the fiscal domicile of the following persons is in Algeria :</p> <ul style="list-style-type: none"> <li>• Foreign nationals who possess housing in Algeria for a period of at least one year</li> <li>• Persons who receive earnings or revenues whose taxation is assigned to Algerian by an international treaty pertaining to double taxation .</li> </ul> <p>For salaried workers, in the case of :</p> <ul style="list-style-type: none"> <li>• A foreign enterprise that does not have a permanent professional establishment in Algeria, but which employs foreign salaried workers, the firm must, when paying taxation salaries and indemnities make a deduction at source at the rate in force for local employees</li> <li>• A company incorporate under Algerian law or a foreign enterprise with permanent facilities in Algeria. The enterprise also makes a deduction at source on the salary of salaried workers, based on the schedule in effect for local salaried workers.</li> </ul> |
| <b>TAX RATE</b>      | <p>The income tax bands are as follows:</p> <p>D'ont exceed 120.000 DZD 0%</p> <p>From 120.001 DZD to 360.000 DZD 20%</p> <p>From 360.001 DZD à 1.440.000 DZD 30%</p> <p>Over 1.440.000 DZD 35%</p> <p>In addition, remuneration in respect of an expertise contract or training lead to applying a 20% reduction.</p> <p>The rate of withholding tax applicable to products of capital stocks or shares and similar income is set at 15% withholding tax, this rate is reduced to 10% for local shareholders dividends.</p> <p>For income from loans, deposits and guarantees, the retention rate is 10%.</p> <p>However, this rate is 50% withholding tax for products anonymous securities or carrier.</p>   |



# Algeria

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| <b>EXEMPTIONS</b>                   | <p>The following income is exempt:</p> <ul style="list-style-type: none"> <li>• Foreign workers governed by a treaty concluded between Algeria and other government or an international body. They are subject to the special rules set by the treaty.</li> <li>• Foreign salaried workers employed by foreign firms operating in Algeria within the framework of the performance of work or services contracts. They are subject to the transfer condition of the contract.</li> <li>• Foreign workers who do not have the status of salaried worker, who are hired for a short time and who are compensated by contract or by fee. They are subject to the transfer condition set by the contract</li> <li>• Foreign works employed as contingent workers and doing transfers for other activities</li> <li>• Foreign workers who are shareholders of firms incorporated under Algerian law which produce goods or perform services</li> </ul> |
| <b>FORMAL REQUIREMENTS</b>          | <p>All individuals with a nationality that is not Algerian or without nationality, are considered foreigners.</p> <p>They must, with regard to their stay, possess a valid travel document and a valid visa, and where appropriate, administrative authorizations.</p> <p>The minimum period of validity required for the above-mentioned travel document is six (6) months.</p> <p>A foreigner must leave the Algerian territory upon the expiration of the validity of his visa or resident card, or the legal duration of the authorized stay on Algerian territory.</p> <p>The foreign resident must return the residence card to the wilaya that issued it .</p>  |
| <b>SPECIAL REQUIREMENTS</b>         | <p>The treatment of the remittance basis on certain types of income is subject to any provisions in the relevant Double Tax Agreement between Algeria and the impatriate's home country.</p>   |
| <b>SOCIAL SECURITY BONIFICATION</b> | <p>A discount for the employer's share and pay instead of 25% of social contribution:</p> <ul style="list-style-type: none"> <li>• 15% for the recruitment of a jobseeker who has already worked.</li> <li>• 5% for the recruitment of a first-time job seeker.</li> <li>• 2.5% for all recruitment in the provinces of the highlands and the south.</li> </ul>  |





# Algeria

## SECOND- MENTS

Foreigners who, wishing to establish their actual, habitation and permanent residence in Algeria and have been authorized by means of the residence card with a Two years validity issued by the wilaya of residence are considered as residents.

Except in the case of reciprocal arrangements, the resident card is required at the age of 18 years.

The foreign employee receives a residence permit whose validity cannot exceed that of the document authorizing them to work.

The delivery of the residence card shall be subject to the payment by the recipient of a stamp duty set by the Finance Act.

A resident card valid for ten (10) years may be issued to a foreign national who has resided in Algeria for a continuous and legal for a period of 7 (Seven) years or more, with his/her children who have reached the age of 18 years.

The renewal of the residence permit may be granted for students and foreign workers employed on the basis of legally required documents.

Any foreigner wishing to reside in Algeria and engage in gainful employment, may receive a residence permit only if they hold on of the following documents :

- 1- Work permit;
- 2- A temporary work permit;
- 3- A statement of employment of foreign workers for foreigners not subject to work permit.

Any foreigner who wishes to extend his stay in Algeria, beyond the duration of the visa, in order to establish habitual residence should apply for a residence card, 15 days before the expiry of the visa.

A foreign resident who is absent from the Algerian territory for a continues period of one year, ceases to be a resident.

The residence card may be withdrawn at any time from its holder if it has definitively been established that he has ceased to fulfill any of the requirements for the award.

The residence card may be withdrawn from a foreign resident whose activities are considered by authorities as being contrary to public morals and tranquility or prejudicial to national interests or that led to a conviction for acts in connection with such activities.

In this case, the expulsion of the alien is immediate upon completion of the appropriate administrative or judicial procedures.



# Algeria

## OTHER CONSIDERATIONS

1) Any person who, under the law of Algeria, is liable to tax therein by reason of his domicile, residence, place of incorporation, place of management or any other criterion of a similar nature and also includes that State and that any political subdivision or local authority.

However, this expression does not include persons who are liable to tax in that State only of income from sources in that State or capital situated therein.

2) Also an individual is a resident of both Contracting States, his status shall be determined as follows:

- a) shall be deemed to be a resident only of the State where it has a permanent home, if he has a home permanent home in both States, it is considered a resident only of the State with which his personal and economic ties are closer (center of vital interests);
- b) if the State in which he has his center of vital interests cannot be determined, or if he has not a permanent home in any States, it is considered a resident only of the State in which her habitual abode;
- c) if the individual has an habitual abode in both States or if not habitual abode in any of them, it is considered a resident only of the State of which he is a national;
- d) if that person is a national of both States or if it has the nationality of any of them, the competent authorities of the Contracting States settle the question by mutual agreement.

3) Where, under the paragraph 1 a person other than a person individual is a resident of both Contracting States, it is considered be a resident only of the State in which its place of effective management is situated.



# Argentina

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| <b>NORMAL REGIME</b>                  | Impatriate staff will be a special tax subject only during the first five years in Argentina, contingent upon the topics presented in the Main Features section.  |
| <b>MAIN FEATURES</b>                  | <p><b>First six months in Argentina:</b> 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 9% to 35% tax rate.</p> <p><b>More than 5 years in Argentina:</b> 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> |
| <b>FORMAL REQUIREMENTS</b>            | The employer must prepare an annual form F 649 with the liquidation of income tax, the general and personal deductions and withholdings made.   |
| <b>OTHER TAXES</b>                    | <p><b>Individual Property Tax</b></p> <p>For the first five years of residence in Argentina by proved labor reasons, the inpatriate worker is taxed only on the property located in the country.</p> <p>After the fifth year the subject is taxed on all their assets located in the country and abroad.</p>  |
| <b>RECIPROCITY IN SOCIAL SECURITY</b> | <p>Argentina must deposit the pension contributions established by this country and not to do any formalities (as we report in International Conventions ANSeS), then the claim must be done in the country to which the employee belongs, and they claim remission of funds to the Federal Administration of Public Revenue Argentina.-</p> <p>However, there are reciprocity agreements with Chile; Uruguay; Brazil; Spain; France, among others, and in many countries (such as Brazil), if you want to use the basis of reciprocity must denounce in the country, who give certain documents to deliver to the employer and the Argentine AFIP.-</p>  |



# Argentina

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| <b>SUPERVISED</b>           | The framework in one or another system depend on the country where the contracting company resides. If the contracting company is Argentina, if certifies compliance with the requirements of Art. 4 of Law 24,241, may request the exception of pension contributions and contributions in this country, although there is reciprocity agreement social security with the country from which the employee comes (there is none with the United States). If the contracting company is foreign, the reciprocity agreement social security shall apply to the country to which it belongs, whenever one has been concluded.   |
| <b>OTHER CONSIDERATIONS</b> | <p><b>Social Work:</b> The above exception is not applicable to the case of employer and employee contributions to the relevant Social Work, even in cases where the foreign worker had health coverage in their country of origin, as the case that the employee suffer any contingency in the Republic it should be covered by the Social Work to which it belongs according to the activity it carried out. This is not a case of overlapping of contributions (the country of origin and those of Argentina) because they may only use the services we provide coverage of this country during their stay in it.</p> <p><b>(B) National Employment Fund:</b> Funding to the fund is mandatory and impersonal, ie the employer must also make the above payment beyond the fact that the foreign employee never avail himself of the Fund for the unemployed. Said contribution is based on that we would not be in the presence of an unemployment insurance aimed at a precise and determined worker but against a contribution to help ease the contingency of unemployment in general. This obligation is rooted in the principle of solidarity governing institutes of social security in this country, ie the employer contributes to a common fund, which provides for every worker who has in dependent independently of one of them gets to benefit or not with the aforementioned contribution made to the Fund.</p> <p><b>(C) Family allowances:</b> In this case the worker shall receive their allocation him because of the specific situation affecting income (child birth, education, etc.). For these particular cases, the law does not prescribe any exception attentive to the contingency to be covered and which is expressly protected by local regulations.</p> <p><b>(D) Risk Insurance Labour Law Occupational Hazards</b> is widely comprehensive in terms of the subjects who reached the hedge, expressly includes not only private workers as employees but also extends to a group of much more extensive such as workers: self-employed workers bound by non-labor relationships, domestic workers, volunteer firefighters and expands the</p> |





# Argentina

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|                      | <p>range of coverage also to those employees that can only be considered dependents for “assimilation” (homeworkers and punished) workers. As the standard notice has tried to include as many people as possible, which is why an express exception is made as to the obligation on the giver of work for the payment of the required fees for each person dependency relationship holds responsible.</p>   |
| <b>RESIDENCE</b>     | <p>The rules determining whether an individual is resident in Austria are based:</p> <p>regarding national law</p> <ul style="list-style-type: none"> <li>• domicile</li> <li>• habitual abode</li> </ul> <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> |
| <b>MAIN FEATURES</b> | <p>Individuals resident in Austria are taxed on an unlimited basis (world wide income regarding national law). Individuals not resident in Austria are taxed on a limited basis – tax on Austrian based income. An amount of € 9.000,- is added to the tax base regarding limited taxation. That is because any tax-exempt income (breadline) should be taken into account by the state of residence. As the tax exempt income in Austria is € 11.000,- an income up to € 2.000,- remains tax free. Income related expenses may be deducted.</p> <p>Individuals who are not resident in Austria but resident in EU/EWR and receive their main income in Austria (90 % Austrian income or less than € 11.000,- foreign income) can elect to be taxed on an unlimited basis. The advantage is that the addition of € 9.000,- is not applied and still the Austrian based income is taxed, only.</p>  |



# Argentina

|                              |  |      |              |     |   |                    |      |   |                    |      |   |                    |      |   |                    |      |           |          |      |
|------------------------------|--|------|--------------|-----|---|--------------------|------|---|--------------------|------|---|--------------------|------|---|--------------------|------|-----------|----------|------|
| <b>TAX RATE</b>              | <p>The income tax bands are as follows:</p> <table><tr><td>€</td><td>0 - € 11.000</td><td>0 %</td></tr><tr><td>€</td><td>11.0001 - € 18.000</td><td>25 %</td></tr><tr><td>€</td><td>18.0001 - € 31.000</td><td>35 %</td></tr><tr><td>€</td><td>31.0001 - € 60.000</td><td>42 %</td></tr><tr><td>€</td><td>60.0001 - € 90.000</td><td>48 %</td></tr><tr><td>More than</td><td>€ 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 % |
| €                            | 0 - € 11.000   | 0 %  |              |     |   |                    |      |   |                    |      |   |                    |      |   |                    |      |           |          |      |
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| <b>EXEMPTIONS</b>            | <p>The following income is exempt from income tax:</p> <ul style="list-style-type: none"><li>• Scholarships</li><li>• lottery winnings</li><li>• Some earnings because of need for help</li><li>• Some social security and child benefits.</li><li>• Aid payments to boost art, science, research and development</li><li>• Special payments for the employee (€1.000,- for child care p.a., € 300 p.a. for pension in the future, etc.)</li></ul>   |      |              |     |   |                    |      |   |                    |      |   |                    |      |   |                    |      |           |          |      |
| <b>FORMAL RE-QUIREMENTS</b>  | <p>Formal requirements depend on the nationality of the individual arriving in Austria. EU/EWR residents do not have to meet as many requirements as third country nationals. EU/EWR members: just need a "Anmeldebescheinigung" (Confirmation of course registration) if they want to stay for more than 3 months in Austria</p> <p>Third country nationals: need a residence title for specific purposes and a work permit. Important residence titles are "Rot-Weiß-Rot-(Plus-) Karte", "Blaue-Karte-EU". After 5 years meeting all requirements regarding integration a residence title "Daueraufenthalt-EU" may be issued. This title is valid unlimited.</p> |      |              |     |   |                    |      |   |                    |      |   |                    |      |   |                    |      |           |          |      |
| <b>SPECIAL RE-QUIREMENTS</b> | <p>Since September 2016 there is a new regulation regarding moving in of sportsmen, artists and scientists. This regulation offers advantages regarding tax base and tax rate and can be applied if the individuals meets certain requirements.</p>  |      |              |     |   |                    |      |   |                    |      |   |                    |      |   |                    |      |           |          |      |



# Argentina

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|-----------------------------|---|
| <b>SOCIAL SECURITY</b>      | <p>There is no specific bonification for impatriates;<br/>Form A1: if the employee stays not longer than 24 months in Austria, the social security of his country of origin may be kept</p> <p>Austrian social security has to be paid partly by the employer for 2016 21,48% and partly by the employee 18,12%. In addition there are associated employer costs of approximately 8 %. Total employer costs amount up to 31%.</p>   |
| <b>SECONDMENTS</b>          | <p>Formal requirements differ between secondments from an EU/EWR member state and secondments from third countries.</p> <p>Requirements from secondments from a third country may depend on the country, the length of the secondment as of the business.</p> <p>Secondments of individuals from an EU/EWR-Country need to be notified at the Ministry of Finance (form ZKO3). Reason for that is to verify that the individual has the same wage and working conditions as Austrians. To proof that the individual is employed in proper form an A1-form is need as well.</p> <p>BEWARE: All documents have to be existent before starting to work in Austria and have to be on-site. Some of the needed documents are not issued promptly. A lot of deadlines have to be met; if one exceed a term, fines will be issued. Since 2016 very high fines will be stipulated if one does not meet all formal requirements. Fines up to € 10.000,- per person (in case of recurrence EUR 20.000) are possible.</p> <p>Regarding tax one has to consider that Austria sees the employer from an economic point of view. Depending on whether the activity done is an active or a passive one the seconded employee may be taxable in Austria beginning with the first day of working in Austria.</p> |
| <b>OTHER CONSIDERATIONS</b> | <p>More than 90% of all employment relationships are covered by collective bargaining agreements including minimum wages.</p> <p>A specific feature of the Austrian labor law is that it contains a lot of one-sided cogent provisions which cannot be lowered by agreement to the detriment of the employee.</p> <p>Yearly employment salaries are paid out in 14 installments where a collective bargaining agreement is in place (one vacation and one Christmas installment)</p>  |



# Austria

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| <b>RESIDENCE</b>     | <p>The rules determining whether an individual is resident in Austria are based:</p> <p>regarding national law</p> <ul style="list-style-type: none"> <li>• domicile</li> <li>• habitual abode</li> </ul> <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> |
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| <b>SECONDMENTS</b>          | <p>Formal requirements differ between secondments from an EU/EWR member state and secondments from third countries.</p> <p>Requirements from secondments from a third country may depend on the country, the length of the secondment as of the business.</p> <p>Secondments of individuals from an EU/EWR-Country need to be notified at the Ministry of Finance (form ZKO3). Reason for that is to verify that the individual has the same wage and working conditions as Austrians. To proof that the individual is employed in proper form an A1-form is need as well.</p> <p>BEWARE: All documents have to be existent before starting to work in Austria and have to be on-site. Some of the needed documents are not issued promptly. A lot of deadlines have to be met; if one exceed a term, fines will be issued. Since 2016 very high fines will be stipulated if one does not meet all formal requirements. Fines up to € 10.000,- per person (in case of recurrence EUR 20.000) are possible.</p> <p>Regarding tax one has to consider that Austria sees the employer from an economic point of view. Depending on whether the activity done is an active or a passive one the seconded employee may be taxable in Austria beginning with the first day of working in Austria.</p> |
| <b>OTHER CONSIDERATIONS</b> | <p>More than 90% of all employment relationships are covered by collective bargaining agreements including minimum wages.</p> <p>A specific feature of the Austrian labor law is that it contains a lot of one-sided cogent provisions which cannot be lowered by agreement to the detriment of the employee.</p> <p>Yearly employment salaries are paid out in 14 installments where a collective bargaining agreement is in place (one vacation and one Christmas installment)</p>  |



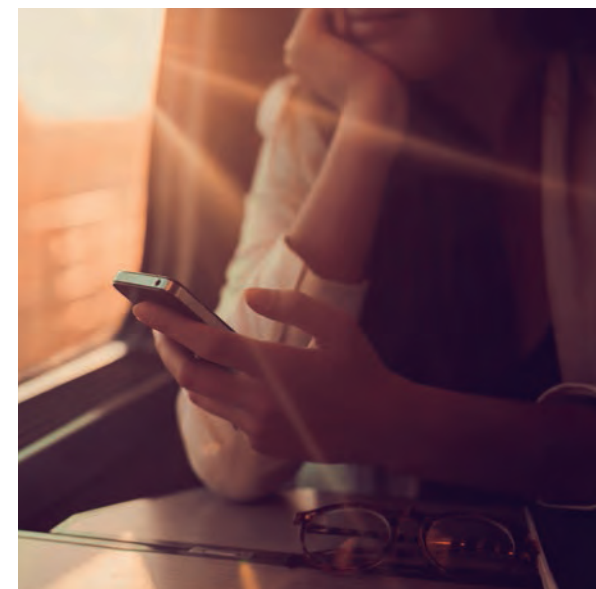
# Brazil

|                         |   |                 |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
|-------------------------|---|-----------------|--|-------------------------|------|-----------------|-----------------|------|--|-----------------------|------|----------|-----------------------|-------|----------|-----------------------|-------|----------|---------------------|-------|-----------|
| <b>RESIDENCE</b>        | It is considered a resident in Brazil the individual:<br>I – that is residing in Brazil permanently;<br>II – that it works in authorities or government offices Brazilian located in abroad;<br>III – that entered in Brazil:<br>a) with a permanent Visa at the date of his entry in Brazil;<br>b) with a temporary Visa:<br>1. to work or to act like doctor scholarship in the Program Plus Doctors in the entered date;<br>2. at the date the individual completed 184 days, consecutives or not, of permanency in Brazil, within 12 months' time;<br>3. at the date of obtention of the permanent visa or of the employment even before complete 184 days, consecutive or not, of permanency in Brazil within 12 months' time;<br>IV – Brazilian that was non-resident n the Brazil and go back to country permanently;<br>V – That exited of the Brazil temporarily or permanently without to deliver the Definitive Country Exiting Statement, during the prior's 12 months consecutives of absence. |                 |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
| <b>MAIN FEATURES</b>    | Individuals who are resident in Brazil but not Brazil domiciled should not deliver the Statement of Annual Adjustment, but the income received of Brazil should be taxed withheld with rate of 15% or 25%.<br><br>Individuals who are resident in Brazil and receives income of abroad: the income is subject to taxation in the monthly payment (carnê-leão).  |                 |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
| <b>INCOME TAX RATE</b>  | The income tax rate annual are as follows:<br><table><tr><td>Calculation Basis (BRL)</td><td>Rate</td><td>Deduction (BRL)</td></tr><tr><td>until 22.499,13</td><td>0,0%</td><td></td></tr><tr><td>22.499,14 - 33.477,72</td><td>7,5%</td><td>1.687,43</td></tr><tr><td>33.477,73 – 44.476,74</td><td>15,0%</td><td>4.198,26</td></tr><tr><td>44.476,75 – 55.373,55</td><td>22,5%</td><td>7.534,02</td></tr><tr><td>More than 55.373,55</td><td>27,5%</td><td>10.302,70</td></tr></table>  |                 |  | Calculation Basis (BRL) | Rate | Deduction (BRL) | until 22.499,13 | 0,0% |  | 22.499,14 - 33.477,72 | 7,5% | 1.687,43 | 33.477,73 – 44.476,74 | 15,0% | 4.198,26 | 44.476,75 – 55.373,55 | 22,5% | 7.534,02 | More than 55.373,55 | 27,5% | 10.302,70 |
| Calculation Basis (BRL) | Rate  | Deduction (BRL) |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
| until 22.499,13         | 0,0%  |                 |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
| 22.499,14 - 33.477,72   | 7,5%  | 1.687,43        |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
| 33.477,73 – 44.476,74   | 15,0%   | 4.198,26        |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
| 44.476,75 – 55.373,55   | 22,5%   | 7.534,02        |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |
| More than 55.373,55     | 27,5%   | 10.302,70       |  |                         |      |                 |                 |      |  |                       |      |          |                       |       |          |                       |       |          |                     |       |           |



# Brazil

|                             |   |
|-----------------------------|---|
| <b>EXEMPTIONS</b>           | <p>The following income is exempt:</p> <ul style="list-style-type: none"> <li>• Scholarships;</li> <li>• Disability pensions;</li> <li>• Lottery winnings, premium bonds;</li> <li>• Insurance premium by die or permanent disability;</li> <li>• Compensation for work rescission or work accident;</li> <li>• Gain in the sale of rights and goods of small value or unique property, gain in the sale of residential property to buy other residential property;</li> <li>• Profits;</li> <li>• Receiving of pension for people over 65 years</li> <li>• Gains by a citizen with actions and operations with gold on the stock exchange, whose monthly amount equal or less than BRL 20.000, for all the shares and the gold, individually.</li> </ul> |
| <b>TYPES OF DECLARATION</b> | <p>The taxpayer will chose between those two types of declaration below:</p> <p>Simplified statement: The taxpayer let go of the deduction provided by law, in exchange of getting a discount of 20% of the taxable income declared in the statement. In this type of declaration the discount is limited to BRL 16.754,34.</p> <p>Complete Statement: The taxpayer who opts for the complete model can throw all deductions required by law, such as payments for education, health and welfare, etc. The deduction can be limited or limitless.</p>   |
| <b>LABOUR RULES</b>         | <p>Most of the rights and duties of employers and employees in Brazil are established in the Brazilian Labour Code (Consolidação da Leis do Trabalho or simply CLT). Labour rights are set forth by federal laws as well as by collective norms (Normas Coletivas de Trabalho), such as collective bargaining agreements ad collective bargaining disputes intermediated by labour unions.</p> <p>General Information:</p> <ul style="list-style-type: none"> <li>• Gains Working period: 44 hours per week</li> <li>• Minimum wage of 880 BRL</li> <li>• Non reduction of salary</li> </ul>  |





# Brazil

|  | <ul style="list-style-type: none"> <li>• Profit sharing</li> <li>• Maternity leave</li> <li>• Overtime compensation</li> <li>• Christmas Bonus</li> <li>• 30 days of vacation, with a 1/3 bonus</li> <li>• Risk premium in the amount of 30% of the agreed remuneration due to exposure of the worker to risks of explosion or fire etc.</li> </ul>  |                         |      |                |    |                     |    |                     |     |
|--|--|-------------------------|------|----------------|----|---------------------|----|---------------------|-----|
| <b>SOCIAL SECURITY PAIED BY WORKER</b>                   | <p>The INSS is a social security that ensure the pension of taxpayer. The rates are the following:</p> <table> <tr> <th>Calculation Basis (BRL)</th><th>Rate</th></tr> <tr> <td>until 1.556,94</td><td>8%</td></tr> <tr> <td>1.556,95 - 2.594,92</td><td>9%</td></tr> <tr> <td>2.594,93 - 5.189,82</td><td>11%</td></tr> </table>  | Calculation Basis (BRL) | Rate | until 1.556,94 | 8% | 1.556,95 - 2.594,92 | 9% | 2.594,93 - 5.189,82 | 11% |
| Calculation Basis (BRL)                                  | Rate   |                         |      |                |    |                     |    |                     |     |
| until 1.556,94   | 8%   |                         |      |                |    |                     |    |                     |     |
| 1.556,95 - 2.594,92                                      | 9%   |                         |      |                |    |                     |    |                     |     |
| 2.594,93 - 5.189,82                                      | 11%  |                         |      |                |    |                     |    |                     |     |
| <b>CONTRIBUTION AND SOCIAL SECURITY PAIED BY COMPANY</b> | <ul style="list-style-type: none"> <li>• 8% FGTS; under the FGTS system the employer shall deposit every month a sum of corresponding 8% of each employee's salary in the previous months.</li> <li>• 20% INSS; employers shall make monthly contributions to the Social Security in the amount equivalent to 20% of its payroll as social security.</li> <li>• 5,8% INSS (Terceiros); composed as contribution for Education 3,1%, SENAC, SESI and SEBRAE 2,7% and</li> <li>• 3% INSS: as contribution for risk of work accidents 3%.</li> <li>• Total estimated Tax and Social Security Impact is 36, 8%.</li> </ul> |                         |      |                |    |                     |    |                     |     |
| <b>TERMINATION OF CONTRACT</b>                           | <p>The termination of an employment without cause should be preceded by a minimum 30 day prior written notice. To such period it shall be added three additional days for each year worked, up to a maximum period of 90 days. Failure by the employer to give such notice shall entitle the dismissed employee to an indemnification. In certain cases the employees are entitled to job stability and cannot be dismissed by the employer, except with cause.</p>  |                         |      |                |    |                     |    |                     |     |



# Bulgary

|                       |   |
|-----------------------|---|
| <b>RESIDENCE</b>      | <p>The rules determining whether an individual is resident in Bulgaria are based on a combination of factors such as:</p> <ul style="list-style-type: none"> <li>• the number of days the individual spends in Bulgaria;</li> <li>• whether they had been Bulgarian resident in previous tax years; and</li> <li>• how many 'ties' they have to Bulgaria</li> </ul> <p>Consequently, individuals coming to Bulgaria can potentially plan the number of days they spend in a given tax year in order to ensure they do not become BG resident (if they so wish).</p>   |
| <b>MAIN FEATURES</b>  | <p>Subject to taxation on the common annual tax base is the income of individuals received from:</p> <ul style="list-style-type: none"> <li>• employment relations;</li> <li>• economic activity other than economic activity as sole proprietor and from other economic activity as per Art. 29a of the PITA;</li> <li>• renting or other leasing of rights or property for consideration;</li> <li>• assignment of rights or property;</li> <li>• other sources.</li> </ul> <p>Note: income from other economic activity as per Art. 29a of the PITA is the income from the economic activity of individuals registered as tobacco growers and farmers, who according to law or at their own discretion are levied under the procedure stipulated for the taxation of sole proprietors' income.</p> |
| <b>TAX RATE</b>       | <p>The tax is assessed by multiplying the common annual tax base by the 10% tax rate.</p> <p>The income from economic activity as a sole proprietor and the income from other economic activity as per Art. 29a of the PITA shall be levied with tax on the annual tax base, at a 15% tax rate.</p>   |
| <b>Taxable Income</b> | <p>Taxable income is the income originating from all sources received by the taxable person during the year of taxation, with the exception of the income that is non-taxable by virtue of law. In those cases where the PITA provides for a deduction of expenses, the expenses determined under the act shall be taken into consideration in determining the taxable income originating from the respective source.</p>   |



# Bulgary

|                           |  |
|---------------------------|--|
| <b>Non-Taxable Income</b> | <p>The following income is exempt:</p> <ol style="list-style-type: none"><li>1. the income received during the year of taxation from the sale or exchange of:<ol style="list-style-type: none"><li>a) one immovable housing property, provided that more than three years have passed between the date of its acquisition and the date of the sale or exchange;</li><li>b) up to two pieces of immovable property, or agricultural property and forest land plots regardless of the number thereof, providing that the time elapsed between the date of acquisition and the date of sale or purchase is more than 5 years;</li></ol></li><li>2. the income originating from sale or exchange of movable property, with the exception of the following:<ol style="list-style-type: none"><li>a) road, air and water means of transport, providing that the time elapsed between the date of acquisition and the date of sale or purchase is less than 1 year;</li><li>b) works of art, objects for collections and antiquities;</li><li>c) stocks, shares, compensatory instruments, investment bonds and other financial assets, as well as the income originating from trade in foreign currency;</li><li>d) movable property delivered to persons having the right to perform collection, transportation, utilization or disposal of waste in accordance with the Waste Management Act;</li></ol></li><li>3. the income originating from disposition of financial instruments in the sense of § 1, Item 1 of the Additional Provisions;</li><li>4. the profit, or any other source of the commercial company's equity, which has been distributed in the form of new stocks and shares, as well as the profit, or any other source of equity, which has been distributed in the form of increase of the par value of current stocks and shares;</li><li>5. persons' income originating from compensation in accordance with a statutory instrument, this being compensation for the sale or exchange of the compensatory instruments and investment bonds received as compensation;</li><li>6. the income from mandatory insurance in Bulgaria or abroad;</li><li>7. the income from additional voluntary insurance, this income being received after acquiring the right to additional pension; the income originating from the investment of technical reserves received under insurance contracts; the income originating from investment of the assets of the additional pension insurance funds distributed among the individual accounts of the insured persons;</li></ol> |
|---------------------------|--|



# Bulgary

8. interest and discount from Bulgarian State bonds, municipal and corporative bonds, as well as from other such-like bonds, issued according to the legislation of another Member State of the European Union, or of a state – party to the Agreement on the European Economic Area;
10. interest on receivables established through the courts, these receivables not being subject to taxation, and the adjudged compensation for court costs;
11. the adjudged compensation and other payments in the cases of medium and grievous bodily injury, occupational disease or death;
12. compensation for forcible expropriation of property for the needs of the State and the municipalities;
13. compensation for pecuniary and non-pecuniary damages, with the exception of the compensation for loss of profit;
14. insurance indemnities in those cases where an insurance event has occurred;
15. social insurance benefits and aids received on the grounds of the Integration of People With Disabilities Act, the Child Protection Act, the Family Allowances Act, or on the grounds of another statutory instrument, as well as the unemployment compensations and benefits received by virtue of a statutory instrument;
16. the aids from social activity organizations established under the law, and from not-for-profit legal entities registered for the purpose of carrying out activities for the public benefit;
17. the amounts received on the grounds of the Family Allowances Act, as well as the amounts for maintenance received by the persons authorized thereof under the provisions of the Family Code;
18. the scholarships awarded to natural persons for their training within the country and abroad;
19. those pecuniary amounts and gifts which have been received on the grounds of a statutory instrument by donors of blood, blood components and biological products for humane purposes;
20. those pecuniary amounts and objects which have been received from participation in gambling games within the meaning of the Gambling Act;
21. those pecuniary amounts and objects which have been received from participation in games other than the ones referred to in item 20 in which the winnings are determined randomly;





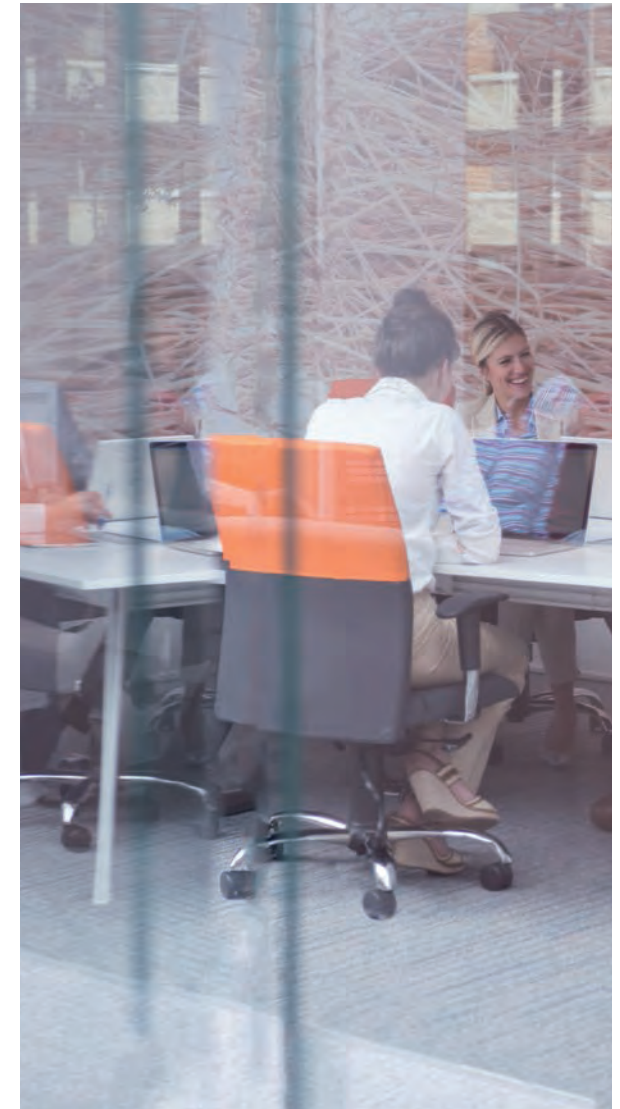
# Bulgary

|                             |   |
|-----------------------------|---|
|                             | <p>22. the State and national awards granted to authors in the field of culture and sportsmen, the awards granted to winners in competitions under programmes and projects which are either wholly or partially financed by the "Culture" National Fund, as well as the granted state pecuniary awards for special merits for the state and the nation;</p> <p>23. the amounts for business travelling and accommodation allowances received under relationships other than employment ones, providing that they are at the expense of the assignor and that has been evidenced through documents in accordance with the operative legislation, as well as the daily allowances, providing that they do not exceed the double amount of those for persons under employment relationships;</p> <p>24. the income originating from rent, lease or any other granting of the use of agricultural land for consideration;</p> <p>25. the remuneration of: the members of the staff of diplomatic missions in accordance with Vienna Convention on diplomatic relationships; the members of consulates in accordance with Vienna Convention on consular relationships; the staff of inter-State and intergovernmental organizations in accordance with the international treaty concluded with the respective organization, and the members of the families of the said persons, inasmuch as the respective international treaty provides for that;</p> <p>26. the income originating from the sale or exchange of property acquired by right of succession or legacy, as well as property that has been restituted in accordance with the procedure set forth in a statutory instrument;</p> <p>27. consumer dividends from cooperative societies established under the Cooperatives Act.</p> <p>28. the funds, received on EU "Erasmus +" programme in the area of education, training, youth and sport.</p> <p>29. the income from activity of taxi transport of passengers, carried out by natural persons - drivers on behalf of a registered carrier, but at their expense, if the tax for taxi transport of passengers as per the Local Taxes And Fees Act on the vehicle, with which the activity is performed, has been paid.</p> |
| <b>FORMAL RE-QUIREMENTS</b> | When an individual arrives in BG their employer should file a special declaration with the Labour authorities.  |



# Bulgary

|                                     |   |
|-------------------------------------|---|
| <b>SOCIAL SECURITY BONIFICATION</b> | No specific bonification.   |
| <b>SECOND-MENTS</b>                 | Attention! Non-resident individuals, who are considered for taxation purposes resident individuals of EU member-states or countries, which are party to the Agreement on the European Economic Area, are entitled to choose to recalculate the final income tax pursuant to Art. 37 of the PITA. The choice shall be exercised by submitting an annual tax return pursuant to Art. 50 of the PITA, whereas the tax return includes all other income that are subject to declaring by the non-resident individual. |



# Cyprus

| <b>RESIDENCE</b>     | <p>The rules determining whether an individual is resident in the Cyprus are based on a combination of factors.</p> <p>An individual is tax resident in Cyprus if he/she spends in Cyprus more than 183 days in any one year. Days in and out of Cyprus are calculated as follows:</p> <ul style="list-style-type: none"> <li>the day of departure from Cyprus counts as a day of residence outside Cyprus.</li> <li>the day of arrival in Cyprus counts as a day of residence in Cyprus.</li> <li>arrival and departure from Cyprus in the same day counts as one day of residence in Cyprus.</li> </ul>  |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
|----------------------|--|--------|----------|------------|----|-----------------|-----|-----------------|-----|-----------------|-----|------------------|-----|
| <b>MAIN FEATURES</b> | <p>EU Citizens should possess the Yellow slip.</p> <p>Third Countries Citizens should obtain work permit under certain conditions.</p>   |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
| <b>TAX RATE</b>      | <p>The income tax bands are as follows:</p> <table> <thead> <tr> <th>INCOME</th><th>TAX RATE</th></tr> </thead> <tbody> <tr> <td>€ 0–19,500</td><td>0%</td></tr> <tr> <td>19,501 – 28,000</td><td>20%</td></tr> <tr> <td>28,001 – 36,300</td><td>25%</td></tr> <tr> <td>36,300 – 60,000</td><td>30%</td></tr> <tr> <td>60,001 and above</td><td>35%</td></tr> </tbody> </table>  | INCOME | TAX RATE | € 0–19,500 | 0% | 19,501 – 28,000 | 20% | 28,001 – 36,300 | 25% | 36,300 – 60,000 | 30% | 60,001 and above | 35% |
| INCOME               | TAX RATE   |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
| € 0–19,500           | 0%   |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
| 19,501 – 28,000      | 20%  |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
| 28,001 – 36,300      | 25%  |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
| 36,300 – 60,000      | 30%  |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
| 60,001 and above     | 35%  |        |          |            |    |                 |     |                 |     |                 |     |                  |     |
| <b>EXEMPTIONS</b>    | <ul style="list-style-type: none"> <li>Interest → whole amount</li> <li>Dividends → whole amount</li> <li>Remuneration from any office or employment exercised in Cyprus by an individual who was not resident of Cyprus before the commencement of his employment, for a period of 5 years commencing from 1 January following the year of commencement of the employment (provided the employment takes place within 6 months) – applicable up to 2020 → 20% of income subject to maximum of €8,550 annually</li> <li>For high earning individuals moving to Cyprus (for employments commencing after 1 January 2012) a 50% deduction will apply for the first ten years provided that the income from employment exceeds €100,000 per annum. This exemption applies for both Cypriot and non Cypriot citizens. For employments commencing as from 1 January 2015, this exemption is applicable only where the individual was not resident in Cyprus prior to his/her employment and provided that the individual was not a Cyprus tax resident for at least 3 out of the 5 years preceding the year of employment. This exemption cannot be used together with the exemption stated in the above point (the 20% or €8,550) → 50% deduction</li> </ul> |        |          |            |    |                 |     |                 |     |                 |     |                  |     |



# Cyprus

|                             |   |
|-----------------------------|---|
|                             | <ul style="list-style-type: none"> <li>Income or profit (net of all direct expenses) generated from the sale or exploitation of intellectual property owned by a Cypriot resident. —→ 80% exemption</li> <li>Remuneration from salaried services rendered outside Cyprus for more than 90 days in a tax year to a non Cyprus resident employer or to a foreign permanent establishment of a Cyprus resident employer —→ whole amount</li> <li>Profits of a permanent establishment abroad under certain conditions —→ whole amount</li> <li>Capital sums accruing to individuals from any payments to approved funds (eg. provident funds) —→ whole amount</li> <li>Profits from the sale of securities —→ whole amount</li> <li>Lump sum received by way of retiring gratuity, commutation of pension or compensation for death or injuries —→ whole amount</li> </ul>   |
| <b>FORMAL RE-QUIREMENTS</b> | <p><b>Physical Person:</b></p> <ul style="list-style-type: none"> <li>Registration to Tax Authorities (TIC No)</li> <li>Submission of IR1 (Income tax return employee - This is completed by each employee and is submitted at the tax authorities. The employee mentions on the form his/her income, pensions, whether he/she has rents, or any income from commercial use of a building under preservation order.) Deadline: Manual 30 April, Electronically by 31 July each year.</li> </ul> <p><b>Legal entities:</b></p> <ul style="list-style-type: none"> <li>IR7: Employers return - This form is filled by the employer once a year and includes all the employees' deductions and contributions including income, provident fund, social insurance, medical fund etc Submission Deadline 31 July each year</li> <li>IR63: Emoluments Certificate for the year - This is completed by the employer for each employee. This form includes all the deductions and contributions of an employee including income as well as, provident fund, social insurance, medical fund etc. Deadline 31 March each year</li> </ul> |





# Cyprus

## SOCIAL SECURITY BONIFICATION

**Social Security Fund:** The Social Insurance contribution is compulsory in Cyprus and covers all those working in the Republic. It is rated at 7.8% for the employee and the employer.

**Social Cohesion Fund:** As from January 1st 2003, every employer is liable to pay a 2% contribution to a special fund called "Cohesion Fund", on salaries of all employees, both locals and expatriates.

**Redundancy Fund:** is financed solely by contributions from employers. The amount of contribution is 1.2% of the employee's earnings, subject to a ceiling amount which is defined every year.

**Social Security Fund payments:** Social security fund payments are due at the end of the month following the month in question. Every month a list of employees and their deductions is sent to the Social Security Fund. If the payment date is missed, the company incurs a fine of 3% calculated on the payable amount for the first month of delay.



# Arab Republic of Egypt (A.R.E)

|  |   |
|--|---|
| <b>INCOME TAX</b>                      | <p><b>Individuals</b></p> <p>Individuals' income tax is imposed on the total net income of the resident individuals for income earned in Egypt, as well as the income earned outside Egypt for resident individuals whose centre of Commercial, industrial, or professional activities is in Egypt. Also, tax is imposed on the income of non-resident individuals for their income earned in Egypt.</p> <p>Earned income (EGP) Tax rate on bracket (%)</p> <ul style="list-style-type: none"> <li>• First 6,500 0</li> <li>• 6,501 to 30,000 10%</li> <li>• 30,001 to 45,000 15%</li> <li>• 45,001 to 200,000 20%</li> <li>• More than 200,000* 22.5%</li> </ul> <p><b>Entities</b></p> <p>Subject to Income taxes as flat rate 22.5%</p>                            |
| <b>RESIDENCE</b>                       | <p><b>Special Requirements for Foreign Nationals</b></p> <p>To work in Egypt, a foreigner must obtain a work permit from the Office of Manpower and Training in the relevant Governorate, or from the free-zone authority for projects located in free zones.</p> <p>The General Authority for Investment has established a manpower office to assist companies investing in Egypt under Law No. 8 of 1997. Foreign employees of such firms should submit an application to the Authority with the necessary document from the employer. Application review normally takes from one to two months. Permits generally last for 12 months; 12-month coverage is applicable to senior foreign executives. In practice work permits are not required for assignments.</p> |
| <b>NEW TAX LAW (VAT) MAIN FEATURES</b> | <p><b>Key features of VAT</b></p> <p>VAT is a tax on consumption.</p> <p>VAT is a transaction based tax, levied at each stage in the chain of production and distribution.</p> <p>VAT is charged on supplies and VAT is deducted on purchases – except when exemptions apply</p> <p>It is collected by businesses on behalf of the Tax Authority.</p> <p>VAT is reported on a self - assessment basis –businesses submit a periodic VAT return to the Tax Authority in which they calculate the net VAT amount to be paid or refunded.</p>  |



## Arab Republic of Egypt (A.R.E)

|                             |   |
|-----------------------------|---|
| <b>TAX RATE FOR (VAT)</b>   | <p><b>VAT Rate</b></p> <p>The general VAT rate is 13% for the fiscal year ending 30 June 2017. From 1 July 2017, the general VAT rate increases to 14%. Machinery and equipment used in producing taxable or non-taxable goods or rendering services are subject to a 5% VAT and exported goods and services are subject to a zero VAT rate.</p> <p>Special rates apply to a number of goods and services listed in Table (1) of the VAT Law, as follows:</p> <p>Goods and services subject to the Table rates only<br/> Goods and services subject to the Table rates and the VAT general rate, with a right to deduct the input VAT in the application of VAT at general rate</p>   |
| <b>EXEMPTIONS</b>           | <p><b>Scope of VAT application</b></p> <p>All local and imported goods and services are subject to VAT except those specifically exempted. Services are defined in the law as any imported or local work done and not classified as goods.</p> <p>There are 57 exempted goods and services listed in a separate table including:</p> <ul style="list-style-type: none"> <li>• Tea, sugar and milk</li> <li>• Gas, electricity and water</li> <li>• Banking services that are legally restricted to banks only</li> <li>• Medicines and the active substances used in the manufacture of medicines, whether locally manufactured or imported</li> <li>• Health services except plastic surgery and weight loss services other than for medical purposes</li> <li>• Public education and scientific research services, including schools offering international curricula</li> <li>• Public hospitals, public Medicare services, public clinics, and non-profit organizations</li> <li>• Free radio and TV transmission services</li> <li>• Sale and lease of vacant plots, agricultural lands, buildings and housing and non-housing units.</li> </ul> |
| <b>SPECIAL REQUIREMENTS</b> | <p>The treatment of the double tax issues of types of income is subject to any provisions in the relevant Double Tax Agreement between Egypt and the impatriate's home country.</p>   |



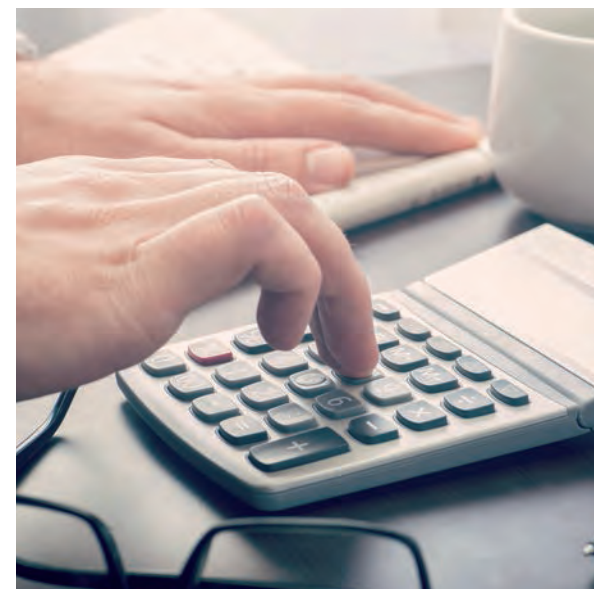
## Arab Republic of Egypt (A.R.E)

|                                     |   |
|-------------------------------------|---|
| <b>SOCIAL SECURITY BONIFICATION</b> | Benefits provided under the social security scheme are pensions, disability payments, sickness payments, maternity and death allowances, and unemployment insurance. These benefits are not given to non-Egyptians.   |
| <b>SECOND-MENTS</b>                 | <p>Egyptians employed in a company formed under the Companies Law should not comprise less than 90% of the total employees, and their remuneration should not constitute less than 80% of the total salaries and wages paid. For technical and administrative staff, Egyptians should not constitute less than 75% in number, and their total earnings should not be less than 70% of the total wages and salaries paid to all such staff. In the free Zones, Egyptians must constitute up to 75% of the projects workforce.</p> <p>For casual and temporary labourers employed by construction contractors, a different system applies. Social security contributions by the contractor amount to 18% of the percentage that labour costs bear to total contract costs. This levy may significantly increase labour costs on projects.</p>   |
| <b>OTHER CONSIDERATIONS</b>         | <p><b>Entry Visas and Work Permits</b></p> <p>Visitors</p> <p>Tourists and visitors are generally permitted to enter the country with a minimum of immigration formalities.</p> <p>Except for nationals from certain countries who must obtain a visa from the Egyptian consulate in the country where they live, most visitors require temporary visas to enter Egypt. These are issued at ports. An initial period of up to one month is normally allowed, but visitors may apply for extensions of up to six months. Visitors are generally prohibited from remaining in Egypt beyond the period authorized and are not permitted to engage in any form of employment or study. If they possess special occupational or professional skills, however, and are sponsored by employers or organizations that can establish that these skills are not reasonably available in Egypt, they may be able to obtain temporary resident entry permits.</p> <p>Visitors must register with the police within seven days of arrival. This procedure is usually handled by one's hotel.</p> |



# Germany

|                      |  |                |  |               |    |                    |        |                     |     |             |     |
|----------------------|--|----------------|--|---------------|----|--------------------|--------|---------------------|-----|-------------|-----|
| <b>RESIDENCE</b>     | <p>An individual is seen as resident in Germany when there is a</p> <ul style="list-style-type: none"> <li>place of residence which infers that it will be used and kept. A place of residence is any premises which contains a minimum standard and is suitable for living</li> <li>habitual abode, when the presence in Germany exceeds the period of 6 months consecutively excluding small interruptions. This is not valid, if the reason for the abode is a visit, relaxation or other comparable purposes.</li> </ul>   |                |  |               |    |                    |        |                     |     |             |     |
| <b>MAIN FEATURES</b> | <p>Tax liability is differentiated between restricted and unrestricted liability.</p> <p>Restricted tax liability arises when a person</p> <ul style="list-style-type: none"> <li>is not resident in Germany and</li> <li>receives domestic income.</li> </ul> <p>With restricted liability many tax concessions are not taken into consideration (e.g. tax allowance for children or the split system for married couples).</p> <p>Under certain circumstances individuals can be treated like unrestricted tax liable taxpayers although they have no residence in Germany.</p> <p>This requires that</p> <ul style="list-style-type: none"> <li>90% of the total income is attributable to a German source or</li> <li>income from abroad does not exceed the amount of € 8.652.</li> </ul> |                |  |               |    |                    |        |                     |     |             |     |
| <b>TAX RATE</b>      | <p>The tax rates are as follows:</p> <table> <tr> <td>Taxable income</td><td></td></tr> <tr> <td>€ 0 - € 8.653</td><td>0%</td></tr> <tr> <td>€ 8.653 - € 53.666</td><td>14-42%</td></tr> <tr> <td>€ 53.666- € 254.447</td><td>42%</td></tr> <tr> <td>€ 254.447 +</td><td>45%</td></tr> </table>  | Taxable income |  | € 0 - € 8.653 | 0% | € 8.653 - € 53.666 | 14-42% | € 53.666- € 254.447 | 42% | € 254.447 + | 45% |
| Taxable income       |  |                |  |               |    |                    |        |                     |     |             |     |
| € 0 - € 8.653        | 0%   |                |  |               |    |                    |        |                     |     |             |     |
| € 8.653 - € 53.666   | 14-42%   |                |  |               |    |                    |        |                     |     |             |     |
| € 53.666- € 254.447  | 42%  |                |  |               |    |                    |        |                     |     |             |     |
| € 254.447 +          | 45%  |                |  |               |    |                    |        |                     |     |             |     |
| <b>EXEMPTIONS</b>    | <p>The following income is exempt:</p> <ul style="list-style-type: none"> <li>maternity and unemployment benefits</li> <li>housing benefits</li> <li>scholarships</li> <li>payments from health and accident insurances</li> <li>refunded tool costs, tips</li> </ul>  |                |  |               |    |                    |        |                     |     |             |     |





# Germany

|   |   |
|---|---|
| <b>FORMAL RE-<br/>QUIREMENTS</b>                | When an individual arrives in Germany the employer should collect all necessary information with a questionnaire. Registration and contributions to social security depends if the individual has an A 1 certificate (within EU)  |
| <b>SPECIAL RE-<br/>QUIREMENTS</b>               | The treatment of the remittance basis on certain types of income is subject to any provisions in the relevant Double Tax Agreement between Germany and the impatriate's home country.   |
| <b>SOCIAL SEC-<br/>URITY BONIFI-<br/>CATION</b> | Basically applicable to individuals with a residence permit who are unable to participate in the job market   |
| <b>SECOND-<br/>MENTS</b>                        | Individuals are not subject to taxation in Germany when <ul style="list-style-type: none"><li>• the place of residence retains abroad and</li><li>• the continuous stay in Germany does not exceed 183 days p.a. and</li><li>• the foreign employer pays the wages and</li><li>• the wage costs will not be charged to a domestic company/branch.</li></ul> |



# Greece

| <b>RESIDENCE</b>     | <p>An individual is considered resident in Greece if he/she is present in the country for more than 183 days within any 12-month period.</p> <p>The individual is regarded as a Greek tax resident for the calendar year during which that 12 month period ends.</p> <p>Exceptions apply to individuals who visit Greece exclusively for tourism, medical, therapeutic or similar personal purposes.</p>  |                |          |           |     |                  |     |                  |     |               |     |
|----------------------|---|----------------|----------|-----------|-----|------------------|-----|------------------|-----|---------------|-----|
| <b>MAIN FEATURES</b> | <p>Individuals in Greece who are resident in Greece but not GR domiciled are taxed in Greece only for their income generated in Greece.</p> <p>Such individuals can obtain a statement from Greece for the paid tax, and if they submit another annual tax return in their home country they can compensate this paid tax (with some restrictions).</p> <p>Individual impatriates married to a spouse living in Greece are taxed in Greece for their worldwide income. However, there is a recent decision of the Greek high instance court that claims that this approach is not correct, so a future amendment may occur.</p> <p>The Greek tax authority may consider an impatriate as liable for taxation of his/her worldwide income if there is evidence that the individual has vital interest in Greece or in the presence of other facts that prove that the person practically lives in Greece (for example, having a child attending a local school).</p> |                |          |           |     |                  |     |                  |     |               |     |
| <b>TAX RATE</b>      | <table> <tr> <th>Taxable income</th><th>Tax Rate</th></tr> <tr> <td>0-€20,000</td><td>22%</td></tr> <tr> <td>€20,001- €30,000</td><td>29%</td></tr> <tr> <td>€30,001- €40,000</td><td>37%</td></tr> <tr> <td>Above €40,000</td><td>45%</td></tr> </table>   | Taxable income | Tax Rate | 0-€20,000 | 22% | €20,001- €30,000 | 29% | €30,001- €40,000 | 37% | Above €40,000 | 45% |
| Taxable income       | Tax Rate  |                |          |           |     |                  |     |                  |     |               |     |
| 0-€20,000            | 22%   |                |          |           |     |                  |     |                  |     |               |     |
| €20,001- €30,000     | 29%   |                |          |           |     |                  |     |                  |     |               |     |
| €30,001- €40,000     | 37%   |                |          |           |     |                  |     |                  |     |               |     |
| Above €40,000        | 45%   |                |          |           |     |                  |     |                  |     |               |     |
| <b>EXEMPTIONS</b>    | <p>The categories of income, which are exempt from tax, include the following:</p> <ul style="list-style-type: none"> <li>• Interest income derived from senior debt or treasury bills of the Greek Government in case the beneficiary is an individual.</li> <li>• Interest income derived from bonds of the EFSF</li> <li>• Capital gains arising from the transfer of listed securities acquired prior to 1 January 2009</li> <li>• In case of listed securities acquired after 1 January 2009, an exemption from capital gains tax applies only if the participation in the company's share capital is less than 0.5%.</li> </ul>   |                |          |           |     |                  |     |                  |     |               |     |



# Greece

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|-------------------------------------|---|
|                                     | <ul style="list-style-type: none"> <li>Capital gain arising from the transfer of Greek and EU/ EEA corporate bonds</li> <li>Profits from the transfer of titles for individuals who are tax residents of a country with which Greece has signed a Double Tax Treaty for the avoidance of double taxation, on condition that they provide a tax residence certificate</li> <li>Certain allowances paid and expenses reimbursement by the employer to the employee are tax-free provided that respective expenses were incurred exclusively in the frame of the business activity of the employer</li> <li>Moreover, specific categories of employment income and pensions are "exempted" for income tax purposes by the new Income Tax Code (indicatively, income from performance of duties by a foreign diplomatic or consular representative etc, alimony received by the beneficiary, pensions received due to disability by war victims or their families etc, allowance, salaries or pensions to disabled persons with disability of at least 80%, allowance due to unemployment paid by OAED under conditions, EKAS allowance, payments to recognized political refugees etc.).</li> <li>Capital gains arising from the sale of EU / EEA based UCITS is tax exempt.</li> <li>Profit from disposal of produced electricity to DEH company or another supplier after joining the "Special development program of photovoltaic systems up to ten (10) KW"</li> </ul> |
| <b>FORMAL REQUIREMENTS</b>          | When an individual arrives in the GR their employer should complete a 'starter checklist'.  |
| <b>SPECIAL REQUIREMENTS</b>         | The treatment of the remittance basis on certain types of income is subject to any provisions in the relevant Double Tax Agreement between Greece and the impatriate's home country.  |
| <b>SOCIAL SECURITY BONIFICATION</b> | A1 certificate and any specific OAED program.   |
| <b>SECONDMENTS</b>                  | <p>Individuals working for more than 183 days in Greece are considered Greek residents. Thus the tax treatment is equalized to that applied to any Greek citizen working permanently in Greece.</p> <p>There is not a special tax treatment for individuals working inland &amp; abroad (from Greece) under a single contract. In all cases the critical fact whether a person will be considered as a tax resident in Greece is the days spent in Greece.</p>  |



# Mexico

|                  |   |
|------------------|---|
| <b>RESIDENCE</b> | <p>Any worker who has permission to enter the country and meets the basic requirements to work may be part of what we call expatriates. The categories are:</p> <p><b>Expatriates with permission to work</b></p> <p>Those with a job offer or invitation by any authority or academic institution, artistic, sporting or cultural by which receives remuneration in Mexico, will be allowed to enter for seasonal for no more uninterrupted time to 180 days, counted from the date of entry.</p> <p><b>Temporary expatriation</b></p> <p>Temporarily and not for more than 4 years authorization may be granted to a foreigner to settle in the country, but always subject to a job.</p> <p><b>Expatriate family temporary</b></p> <p>Relatives of temporary expatriate, may reside in the country as a temporary resident. This includes:</p> <ul style="list-style-type: none"><li>• Sons of temporary resident spouse and children, concubine or concubine</li><li>• Wife, concubine, concubine or equivalent figure</li><li>• Parent of temporary resident</li></ul> <p><b>Permanent Expatriation</b></p> <p>Foreigners considered as permanent expatriates, have the status of stay of permanent residents and the possibility of obtaining a permit to work in exchange for remuneration in the country subject to an offer of employment, and the right to enter and leave the territory national as many times as they wish.</p> <p>These people must prove to have a job in showing the occupation that will develop the required timing, the workplace and the data of the certificate of registration of the employer and must obtain a visa with permission to perform remunerated activities.</p> |
|------------------|---|



# Mexico

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| <b>MAIN FEATURES</b>                | <p>The tax legislation considers residents in Mexico the following people:</p> <ul style="list-style-type: none"> <li>The national and foreigner individuals that have their house in Mexico. People can also be considered as residents when they have their house in another country if they are in the following cases: <ul style="list-style-type: none"> <li>When more than the 50% of their annual income is obtained in Mexico.</li> <li>When the center of their professional activities is located in Mexico.</li> </ul> </li> <li>People who are Civil servants or Mexican workers, even when the main base of its business is abroad.</li> <li>The legal entities (Business partnerships, Associations or Civil partnerships, among others) that have been established according to the Mexican laws, as well as the ones that have established the main base of its business or their working headquarters in Mexico.</li> </ul> |
| <b>TAX RATE</b>                     | <p>FOR SALARIES: The following rates will be applied to the annual income obtained:</p> <ul style="list-style-type: none"> <li>Tax will not be paid for the first \$125,900.00 pesos</li> <li>The 15% rate, when income is for more than \$125,900.00 up to one million pesos</li> <li>The 30% tax, when income obtained exceeds one million pesos</li> </ul>  |
| <b>EXEMPTIONS</b>                   | <p>In order to know how much and how residents should pay tax, they must select their type of income, since tax rates vary between the different income types. Information can be found <i>here</i>: <a href="http://www.sat.gob.mx/english/Paginas/English/cases_fees.aspx">http://www.sat.gob.mx/english/Paginas/English/cases_fees.aspx</a></p>   |
| <b>FORMAL REQUIREMENTS</b>          | <p>When an individual arrives in México their employer should complete a 'starter checklist' which they will use to notify the National Migration Institute of relevant information.</p>   |
| <b>SPECIAL REQUIREMENTS</b>         | <p>There are also several tax related obligations for people/entities who make payments to foreign residents.</p>  |
| <b>SOCIAL SECURITY BONIFICATION</b> | <p>No specific bonification; Depends on the residents type of income.</p>  |





# Mexico

|                              |   |
|------------------------------|---|
| <b>SECOND-MENTS</b>          | <p>All expatriate withholding tax shall be paid by the resident company in Mexico or resident abroad with permanent establishment in Mexico, by the 17th of the month immediately after it was caused.</p> <p>When payment for the provision of subordinate staff service is performed by a foreign resident without a permanent establishment in Mexico, the expatriate must find out and pay the tax incurred later than the 17th of each month of the calendar. (That is, if the expatriate has tax residence in Mexico, they must pay like any other Mexican employee.)</p> |
| <b>OTHER CON-SIDERATIONS</b> | <p>When the expatriate does not have tax residence in Mexico, but it has a source of wealth located in the country, specific rules for residents abroad apply. These are described precisely in the section of the Income Tax Law "Of the foreign residents with income from a source of wealth located in national territory."</p>   |



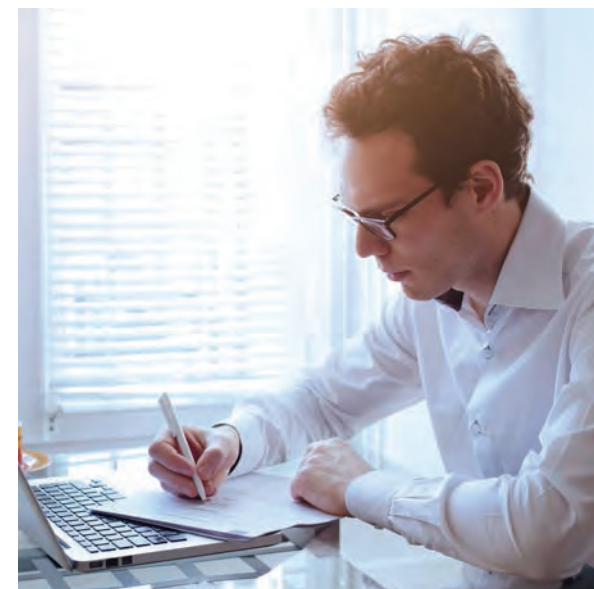
# Romania

|                      |  |
|----------------------|--|
| <b>RESIDENCE</b>     | <p>An individual is considered a Romanian tax resident if he/she meets at least one of the following conditions:</p> <ul style="list-style-type: none"> <li>• the individual has his/her domicile in Romania;</li> <li>• the individual has his/her center of vital interests in Romania;</li> <li>• the individual is present in Romania for a period exceeding 183 days during any 12 months period, ending during the corresponding calendar year.</li> </ul> <p>This means that individuals coming to Romania can potentially plan the number of days they spend in Romania in a given tax year in order to ensure whether they become Romanian residents or not.</p>  |
| <b>MAIN FEATURES</b> | <p>There are exceptions to this rule for non-Romanian citizens working in Romania as employees of foreign governments, who are not treated as Romanian tax residents, irrespective of whether they meet the above mentioned conditions or not.</p> <p>Foreign citizens are liable to Romanian tax only on their Romanian-source income during their first year in which they meet the residence conditions, but, if they still meet the conditions during the second year, they will be liable to Romanian income tax on their worldwide income starting with this second year (unless they can provide a tax residence certificate from a country with which Romania has concluded a treaty for the avoidance of double taxation – DTT).</p> <p>Romania has an extensive network of DTTs which determine the circumstances under which foreign individuals are treated as Romanian tax residents. If a foreign individual can demonstrate that during his/her assignment to Romania, he/she remains a tax resident of another state with which Romania has concluded a tax treaty, then the provisions of the treaty will prevail.</p> <p>When the permanent residence permit is granted, foreign citizens will be given by the Romanian Immigration Office a Personal Identification Number – CNP – which will be granted only once, regardless of their number of entries or period of time spent on Romanian territory. This number consists of 13 digits, it will be stated in the temporary residence or any other type of documents which will be obtained in the future and it will only be changed when obtaining Romanian citizenship.</p> |



# Romania

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|-----------------------------|--|
| <b>TAX RATE</b>             | <p>The current income tax rates for residents and non-residents in Romania are as follows:</p> <ul style="list-style-type: none"> <li>• residents: 16% flat tax rate;</li> <li>• non-residents: 16% flat tax rate.</li> </ul>  |
| <b>EXEMPTIONS</b>           | <p>If certain conditions are met, tax-exempt income includes the following:</p> <ul style="list-style-type: none"> <li>• employment income derived from non-Romanian employers in respect of work done outside Romania, unless this income is paid by or on behalf of a Romanian employer;</li> <li>• costs borne by employers for their employees while on business trips in Romania or abroad, including per-diem (within certain limits), travel, and housing costs, if it can be demonstrated that they are business-related;</li> <li>• relocation allowances covering moving expenses of the expatriate employee and his/her family, as well as the transportation of the household goods to the location of his/her employment;</li> <li>• reimbursable loans granted to employees free of interest or with interest lower than the market interest rate do not give rise to taxable benefits at the level of the employees;</li> <li>• employer's contributions to qualifying voluntary pension funds or voluntary pension schemes, up to a limit of 400 Euro per year.</li> </ul> |
| <b>FORMAL REQUIREMENTS</b>  | <p>In terms of social security contributions that are due in Romania, the employer is obliged to calculate, withhold and make the payment. In case of a non-resident employer, the entity must register in Romania for social security purposes.</p> <p>Alternatively, the individual may take over the responsibility of declaring and paying Romanian social security contributions, based on an agreement concluded with the employer in this respect.</p> <p>An informative declaration has to be filed by the Romanian company where the individual carries out activity in Romania within 15 days from the beginning of his/her activity.</p> <p>The non-resident employer also has the obligation to file an informative form with the Romanian Labor Authorities no later than the individual's first day of activity in Romania.</p>  |
| <b>SPECIAL REQUIREMENTS</b> | <p>Special requirements may be subject to the provisions of DTTs concluded between Romania and the impatriate's home country.</p>  |



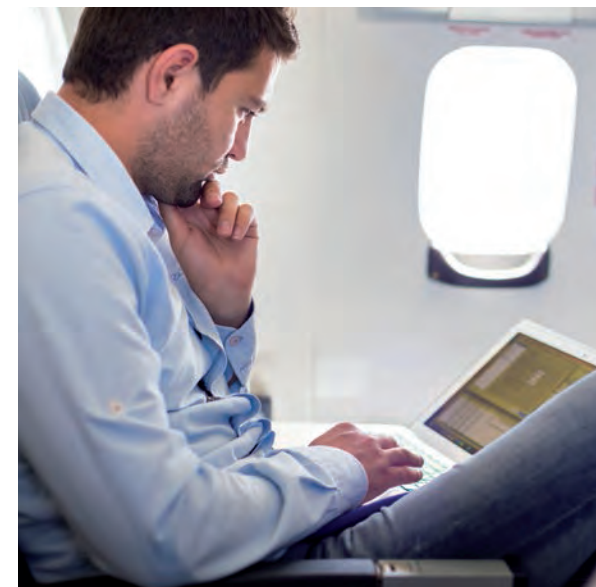
# Romania

|                                     |   |
|-------------------------------------|---|
| <b>SOCIAL SECURITY BONIFICATION</b> | No specific bonification.   |
| <b>SECONDMENTS</b>                  | <p>Under Romania's Labour Code, the duration of domestic secondments is limited to one year. Secondment can be extended further for 6-month periods for objective reasons and on the basis of the employee's consent.</p> <p>This rule differs from that in the Regulation 883, which stipulates an initial secondment period of 24 months. Thus, if an employer wants to second the employee for two years but still does not want to become exposed to any risk for the employee challenging such decision, the administrative procedure for the A1 form would need to be carried out twice, once for obtaining the document and again for extending it.</p> <p>Taxable allowances and any other taxable amounts received for periods of secondment in Romania are considered income paid for the month when the expense request is approved and not for the month when the amounts are paid by the employer to the employee.</p> |
| <b>OTHER CONSIDERATIONS</b>         | The legal framework in Romania has specific limitations when it comes to impatriates taxation in Romania. Both employers and foreigner employees should pay attention to structuring and documenting the terms of international employments or secondments, as the case may be, considering both the applicable EU Directives and Regulations, as well as domestic legislation in force.  |



# Serbia

|                      |   |
|----------------------|---|
| <b>RESIDENCE</b>     | <p>Based on legislation, a non-resident individual can be a taxpayer of personal income tax for income earned on the territory of the Republic if he/she fulfills the following conditions:</p> <ul style="list-style-type: none"> <li>Continuously or intermittently resides on the territory of the Republic of Serbia for more than 183 days in the period of 12 months commencing or ending in that fiscal period</li> <li>If he/she has a habitual abode or center of business, family or other vital interests on the territory of Serbia</li> </ul> <p>If the above mentioned conditions are inconclusive, then the competent authority will review such a case and make a decision.</p> <p>Beside the domestic legislation, the tax treatment of personal earnings with most European countries is also regulated by Agreements on the avoidance of double taxation (DTTs).</p> |
| <b>MAIN FEATURES</b> | <p>Main possible incomes are as follows:</p> <ol style="list-style-type: none"> <li>salary from employment in a domestic company</li> <li>salary from employment or fees from other types of engagement by a foreign company, paid from abroad</li> <li>income from renting of movable and immovable property</li> </ol> <p>Real estate owners are equalized with locals and are subject to payment of property taxes.</p> <p>Depending on the amount of total annual income, impatriates can also be payers of annual personal income tax.</p>   |
| <b>TAX RATE</b>      | <p>Depending on the type of income, the tax rate varies:</p> <ol style="list-style-type: none"> <li>Tax on salaries - 10% on the gross amount reduced for the prescribed non-taxable part; the tax payment and obligation of submission of tax return is done by the employer</li> <li>Tax from for foreign employment and other types of income calculated by self-taxation varies from 10% to 20% depending on the type of income and whether there is a valid DTT in force; tax should be paid and OPO form submitted within 30 days of receipt of payment. It is the impatriate's obligation to do so.</li> </ol>   |





# Serbia

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|-------------------|---|
|                   | <p>3. The method of submission of tax return and tax payment for rental income depends on whether the tenant is a natural person (in which case the tax obligation belongs to the owner) or a legal entity (in which case that entity calculates and pays the tax and submits the tax return).</p> <p>Property tax is payable according to a Decision issued by authorities, and varies depending on the value of assets and other conditions.</p> <p>Annual personal income tax rate depends on the amount:</p> <ul style="list-style-type: none"> <li>• up to six times the average annual income - 10%.</li> <li>• the amount over six times the average annual salary - 10% on the amount up to six times the average annual salary + 15% on the amount exceeding that threshold.</li> </ul>  |
| <b>EXEMPTIONS</b> | <p>There are some tax exemptions depending on the type of income:</p> <ol style="list-style-type: none"> <li>1. income from employment up to prescribed non-taxable amounts: per diems; compensation for traveling to and from work; jubilee awards; aid in case of death of an employee, a member of his family; severance pay</li> <li>2. Collective insurance against accidents or in the event of severe illness or surgical intervention</li> <li>3. Other types of income mainly of social and humanitarian nature eg. social and humanitarian aid, pensions and disability benefits, pupil and student scholarships, premiums and resources for agriculture, etc.</li> <li>4. Compensation for pecuniary and non-pecuniary damage,</li> <li>5. Personal deductions for annual personal tax: for the taxpayer - 40% of the average annual salary per employee, for each dependent family member - 15% of the average annual salary per employee; however, the total amount of personal deductions may not exceed 50% of the taxable income.</li> <li>6. The tax credit for property tax: the tax on the building or apartment where the taxpayer resides is reduced by 50%, up to a maximum of 20,000 RSD.</li> </ol> |



# Serbia

|                                     |   |
|-------------------------------------|---|
| <b>FORMAL REQUIREMENTS</b>          | <p>Under prescribed conditions, expats can obtain temporary residency visa and working visa. Working visas for foreigners may be requested as regular work permit for employment, or permits for special cases of employment for moving within the company. In all cases, there is a set of prescribed conditions that an impatriate has to fulfill (e.g. temporary residence permit, proof that the seconded person was employed by a foreign employer for at least one year; act of referral to temporary work in Serbia or movement within the company etc.)</p> <p>A foreigner who is employed in the Republic in accordance with the law, has the same rights and obligations in terms of work, employment and self-employment as citizens of the Republic, if the conditions are met in accordance with the law.</p>  |
| <b>SPECIAL REQUIREMENTS</b>         | In case of applying an Agreement on Double Tax Treaty Avoidance (DTT) an impatriate has to provide proof of tax residency from the home country.  |
| <b>SOCIAL SECURITY BONIFICATION</b> | The employer at whose request a work permit has been issued is obliged to report the foreigner to mandatory social security.  |
| <b>SECONDMENTS</b>                  | <p>In the case of a natural person who, as a seconded worker, performs work for the needs of a domestic legal entity and for their work performed in the territory of the Republic of Serbia earns salary from its foreign employer with who he/she has concluded a contract of employment, and those earnings are not borne by the permanent establishment and natural person residents in the Republic for a period that does not exceed 183 days (if they cumulatively met all three conditions under the DTT with the country whose resident is a foreign legal entity), such remuneration (wages) of this natural person are not subject to personal income tax in the Republic of Serbia.</p> <p>In case that there have not been met the conditions from the DTT (eg. there is a valid DTT but the natural person who performs activities on the territory of the Republic resides in the Republic of Serbia for more than 183 days, in which case they are considered residents of the Republic), or in cases where there is no agreement, and a natural person (non-resident) performs work in the territory of the Republic of Serbia, in these cases, this income of a natural person - seconded worker is subject to income tax as applicable to citizens in the Republic of Serbia. Individuals who are not citizens of the Republic of Serbia, ie. foreigners, are not entitled to tax exemptions otherwise available to first time home buyers (paying tax on transfer of absolute rights) even though they are resident in the territory of the Republic of Serbia.</p> |
| <b>OTHER CONSIDERATIONS</b>         | Evidence of eligibility for employment of a foreigner shall be kept on the premises where the foreigner works.  |



# Singapore

|                |  |                    |                       |
|----------------|--|--------------------|-----------------------|
| RESIDENCE      | An individual will be treated as tax resident for a particular Year of Assessment (YA) if he satisfies any of the following conditions:  |                    |                       |
|                | Singapore Citizen who normally resides in Singapore except for temporary absences; or<br>Singapore Permanent Resident (SPR) who has established a permanent home in Singapore; or<br>Foreigner who has stayed/worked in Singapore (excluding director of a company) for 183 days or more in the previous year i.e. year before the YA. |                    |                       |
|                | A non-resident of Singapore for tax purposes is an individual who does not qualify as a tax resident of Singapore.   |                    |                       |
| MAIN FEATU-RES | Tax residents may claim expenses, donations, tax reliefs and rebates to save tax. The total income less deductions (expenses, donations and tax reliefs) will be taxed at progressive rates ranging from 0% to 22%.  |                    |                       |
|                | Non-residents may claim expenses and donations to save tax. However, non-residents are not eligible to claim tax reliefs and rebates. The employment income is taxed at 15% or the resi-<br>dent rate, whichever gives rise to a higher tax amount. Director's fees, consultant fees and all other income are taxed at 22%.            |                    |                       |
| TAX RATE       | Tax Rate for Residents (From YA 2017)  |                    |                       |
|                | Chargeable Income  | Income Tax Rate(%) | Gross Tax Payable(\$) |
|                | On the first 20.000  | 0                  | 0                     |
|                | On the next 10.000   | 2                  | 200                   |
|                | On the first 30.000  | -                  | 200                   |
|                | On the next 10.000   | 3.50               | 350                   |
|                | On the first 40.000  | -                  | 550                   |
|                | On the next 40.000   | 7                  | 2.800                 |
|                | On the first 80.000  | -                  | 3.350                 |
|                | On the next 40.000   | 11.5               | 4.600                 |



# Singapore

|                      |      |        |
|----------------------|------|--------|
| On the first 120.000 | -    | 7.950  |
| On the next 40.000   | 15   | 6.000  |
| On the first 160.000 | -    | 13.950 |
| On the next 40.000   | 18   | 7.200  |
| On the first 200.000 | -    | 21.150 |
| On the next 40.000   | 19   | 7.600  |
| On the first 240.000 | -    | 28.750 |
| On the next 40.000   | 19.5 | 7.800  |
| On the first 280.000 | -    | 36.550 |
| On the next 40.000   | 20   | 8.000  |
| On the first 320.000 | -    | 44.550 |
| In excess 320.000    | 22   |        |

## Tax Rate for non- residents

## Taxes on Employment Income

The employment income of non-residents is taxed at flat rate of 15% or the progressive resident tax rates (see table above), whichever is a higher tax amount.

Taxes on Director's fee, Consultation fees and All Other Income  
Director's fees, consultation fees and all other income, are generally taxed at 22%.



# Singapore

|                                     |   |  |
|-------------------------------------|---|--|
|                                     | <b>From YA 2017</b>   |  |
|                                     | <b>Type of Income</b>   | <b>Non-resident individual tax rate</b>  |
|                                     | Director's Remuneration   | 22%  |
|                                     | Income derived from activity as a non-resident professional (consultant, trainer, coach, etc)   | 15% of gross income or   |
|                                     | Income derived from activity as a non-resident public entertainer (artiste, musician, sportsman, etc)   | 22% of net income  |
|                                     | Other income e.g. property rental income  | 10% concessionary rate   |
|                                     | SRS withdrawal by a non- member   | 22%  |
|                                     | Interest, royalty etc   | 22%  |
|                                     |   | Reduced final withholding tax rate (subject to conditions) as follows:<br>Interest: 15%<br>Royalty: 10%<br>OR 22% if reduced final withholding tax rate is not applicable. |
| <b>EXEMPTIONS</b>                   | All income earned in or derived from Singapore is chargeable to income tax. Generally, overseas income received in Singapore on or after 1 Jan 2004 is not taxable, except in some circumstances. Overseas income is taxable in Singapore if: a) It is received in Singapore through partnerships in Singapore; or b) if the individual's overseas employment is incidental to the individual's Singapore employment i.e. his work overseas is part of his work here. |  |
| <b>FORMAL REQUIREMENTS</b>          | If the individual is a resident in Singapore, he can e-File your completed tax form from 1 Mar to 18 Apr every year. Also, can do paper file, to submit the completed tax form by 15 Apr of each year.  |  |
| <b>SOCIAL SECURITY BONIFICATION</b> | No specific bonification.   |  |





# Spain

|   |  |
|---|--|
| <b>RESIDENCE</b>                              | <p>Individuals are considered to have their usual place of residence in Spain when any of the following circumstances apply:</p> <ul style="list-style-type: none"> <li>• They remain in Spain for more than 183 days during a calendar year. The sporadic absences are calculated, 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.</li> <li>• They situate the main base or centre of their activities or economic activities, directly or indirectly, in Spain.</li> </ul> <p>Also, it is presumed, that a taxpayer has their usual place of residence in Spain when, using the above criteria, the not legally separated spouse and the underage dependant children are usually resident in Spain. 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> |
| <b>MAIN FEATURES</b><br><b>Special regime</b> | Individuals displaced to Spain can opt to be taxed according to non resident income tax rules, without losing their status as Income Taxpayers, for the period during the option and the five following tax periods.   |
| <b>TAX RATE</b>                               | <p>General tax rate: 24%</p> <p>From 600.000 Euros onwards: the excess will be subject to withholding tax and tax at 47%</p>   |
| <b>EXEMPTIONS</b>                             | <p>The following incomes are exempt:</p> <ul style="list-style-type: none"> <li>• Scholarships and grants, pensions, lottery winnings, betting and draws.</li> <li>• Interest and capital gains derived form financial and other movable assets obtained by residents of the State member of the EU.</li> <li>• Public debt</li> <li>• Securities issued in Spain by not residents.</li> <li>• Interest of non resident accounts.</li> <li>• Profits distributed by subsidiary companies to their parent companies resident in another Member State of the UE.</li> <li>• Transfer of securities of the reimbursement of shares in mutual investment funds in official secondary markets of Spanish securities.</li> </ul>   |



# Spain

|   |   |
|---|---|
| <b>FORMAL RE-<br/>QUIREMENTS</b>          | <p>Opting for, declining or exclusion from the Special Regime is achieved by filling Form 149. The taxpayers who opt for the Special Regime must file a special Income tax return on Form 150 or Form 151 (after 1st January 2015).</p> <p>Withholding tax are declared in Form 216 (monthly/quarterly if SMEs companies) and in Form 296 (yearly)</p>  |
| <b>SPECIAL RE-<br/>QUIREMENTS</b>         | <p>They have to meet the following criteria:</p> <ul style="list-style-type: none"> <li>• They have not been residents in Spain during the 10 previous years.</li> <li>• Their displacement to Spain is a consequence of a work contract (except professional sportsmen) or as a legal manager of a non-related company.</li> <li>• Income obtained in Spain should not be considered obtained through a permanent establishment located in Spain.</li> <li>• The work is effectively performed in Spain (until 31st December 2014).</li> <li>• The work is performed for a company or organization resident in Spain (until 31st December 2014).</li> <li>• The salaries and wages are not exempt from taxation (until 31st December 2014).</li> </ul> |
| <b>SOCIAL SECURITY BONIFI-<br/>CATION</b> | No specific bonification.   |
| <b>SECOND-<br/>MENTS</b>                  | <ul style="list-style-type: none"> <li>• They are subject to taxation in Spain exclusively for the income they receive from sources situated within Spain.</li> <li>• They may not qualify as for the status of tax residents for purposes of the application of a Double Taxation agreement.</li> </ul>  |
| <b>OTHER CON-<br/>SIDERATIONS</b>         | <p>There is a special transitory regime requirements for workers displaced before 1st January 2015.</p> <p>Should the special regime not apply, non residents displaced to Spain are subject to the same tax and labor rules (Social Security) than Spanish tax residents.</p>  |



# United Kingdom

|                      |   |
|----------------------|---|
| <b>RESIDENCE</b>     | <p>The rules determining whether an individual is resident in the UK are based on a combination of factors such as:</p> <ul style="list-style-type: none"> <li>• the number of days the individual is in the UK;</li> <li>• whether they had been UK resident in previous tax years; and</li> <li>• how many 'ties' they have to the UK.</li> </ul> <p>This means that individuals coming to the UK can potentially plan the number of days they spend in the UK in a given tax year in order to ensure they do not become UK resident (if they so wish).</p> <p>It is possible to split the tax year into periods of UK residence and non-residence on the year of arrival and the year of leaving.</p>  |
| <b>MAIN FEATURES</b> | <p>Individuals who are resident in the UK but not UK domiciled can elect to be taxed on their UK income and their non-UK income and gains up to the amount remitted to the UK (remittance basis). This is an alternative to being taxed on their worldwide income and gains in the UK.</p> <p>If an individual opts for the remittance basis he will lose his:</p> <ul style="list-style-type: none"> <li>• personal allowance; and</li> <li>• annual allowance (re capital gains).</li> </ul> <p>There is also a special annual charge for longer term residents. This is:</p> <ul style="list-style-type: none"> <li>• £30,000 per annum for individuals who have been UK resident for at least 7 out of the preceding 9 tax years;</li> <li>• £60,000 per annum for individuals who have been UK resident for at least 12 out of the preceding 14 tax years; or</li> <li>• £90,000 per annum for individuals who have been UK resident for at least 17 out of the preceding 20 tax years.</li> </ul> <p>The above special charge and loss of personal allowances and annual capital gains exemption does not apply to non-UK domiciles whose unremitted foreign income and gains are less than £2,000.</p> <p>It is common practice to calculate the individual's tax liability based on the arising basis and the remittance basis and then elect the basis which results in the lower tax liability.</p> |



# United Kingdom

|                                     |   |              |                      |                   |     |                    |     |            |     |
|-------------------------------------|---|--------------|----------------------|-------------------|-----|--------------------|-----|------------|-----|
| <b>TAX RATE</b>                     | <p>The income tax bands are as follows:</p> <table> <tr> <td>£0 - £11,000</td><td>0% Subject to below.</td></tr> <tr> <td>£11,001 - £43,000</td><td>20%</td></tr> <tr> <td>£43,001 - £150,000</td><td>40%</td></tr> <tr> <td>£150,001 +</td><td>45%</td></tr> </table> <p>The 'personal allowance' (0% rate band shown above) is reduced by £1 for every £2 of income above £100,000.</p>   | £0 - £11,000 | 0% Subject to below. | £11,001 - £43,000 | 20% | £43,001 - £150,000 | 40% | £150,001 + | 45% |
| £0 - £11,000                        | 0% Subject to below.  |              |                      |                   |     |                    |     |            |     |
| £11,001 - £43,000                   | 20%   |              |                      |                   |     |                    |     |            |     |
| £43,001 - £150,000                  | 40%   |              |                      |                   |     |                    |     |            |     |
| £150,001 +                          | 45%   |              |                      |                   |     |                    |     |            |     |
| <b>EXEMPTIONS</b>                   | <p>The following income is exempt:</p> <ul style="list-style-type: none"> <li>Scholarships, disability pensions, lottery winnings, premium bonds, betting and draws.</li> <li>Income from deposits and assets held in ISAs (Individual Savings Account) and National Savings Certificates.</li> <li>Statutory redundancy payments.</li> <li>Interest on personal injury damages awarded by a court in the UK.</li> <li>Tax repayment interest.</li> <li>Some social security and child benefits.</li> <li>Savings income up to £1,000 if you are a 20% tax payer. Savings income up to £500 if you are a 40% tax payer. You have to pay tax on all your savings income if you are a 45% tax payer.</li> <li>The first £5,000 of dividend income.</li> <li>Rent received from lodgers in your house that's below £7,500 per year.</li> </ul> |              |                      |                   |     |                    |     |            |     |
| <b>FORMAL RE-REQUIREMENTS</b>       | <p>When an individual arrives in the UK their employer should complete a 'starter checklist' which they will use to notify HMRC of relevant information.</p> <p>If opting for the remittance basis this must be claimed on the tax return.</p>  |              |                      |                   |     |                    |     |            |     |
| <b>SPECIAL RE-REQUIREMENTS</b>      | <p>The treatment of the remittance basis on certain types of income is subject to any provisions in the relevant Double Tax Agreement between the UK and the impatriate's home country.</p>   |              |                      |                   |     |                    |     |            |     |
| <b>SOCIAL SECURITY BONIFICATION</b> | <p>No specific bonification.</p>  |              |                      |                   |     |                    |     |            |     |



# United Kingdom

## SECOND- MENTS

Broadly individuals who are in the UK for periods of less than 46 days are non UK resident (assuming they have not been UK resident in any of the previous 3 tax years). Aside from this where the individual works in the UK on average for more than 35 hours per week then they are automatically UK resident.

Individuals who are resident but are not domiciled in the UK and undertake duties of employment both in the UK and overseas under a single contract of employment are entitled to favourable tax treatment for the first three years of residence which allows the earnings from the employment to be apportioned between UK and overseas duties on a days basis, subject to further detailed rules.

Where an individual is not UK resident during the 2 tax years before the tax year of arrival, the individual can claim a deduction against his employment income where the employer pays for travel expenses for the individual and his family, to and from their home country for up to 5 years from the date of arrival.

In addition in the UK employees are allowed to have up to £8,000 of costs incurred in relation to relocating reimbursed tax free. Broadly individuals who are in the UK for periods of less than 46 days are non UK resident (assuming they have not been UK resident in any of the previous 3 tax years). Aside from this where the individual works in the UK on average for more than 35 hours per week then they are automatically UK resident.

Individuals who are resident but are not domiciled in the UK and undertake duties of employment both in the UK and overseas under a single contract of employment are entitled to favourable tax treatment for the first three years of residence which allows the earnings from the employment to be apportioned between UK and overseas duties on a days basis, subject to further detailed rules.

Where an individual is not UK resident during the 2 tax years before the tax year of arrival, the individual can claim a deduction against his employment income where the employer pays for travel expenses for the individual and his family, to and from their home country for up to 5 years from the date of arrival.

In addition in the UK employees are allowed to have up to £8,000 of costs incurred in relation to relocating reimbursed tax free.





# United Kingdom

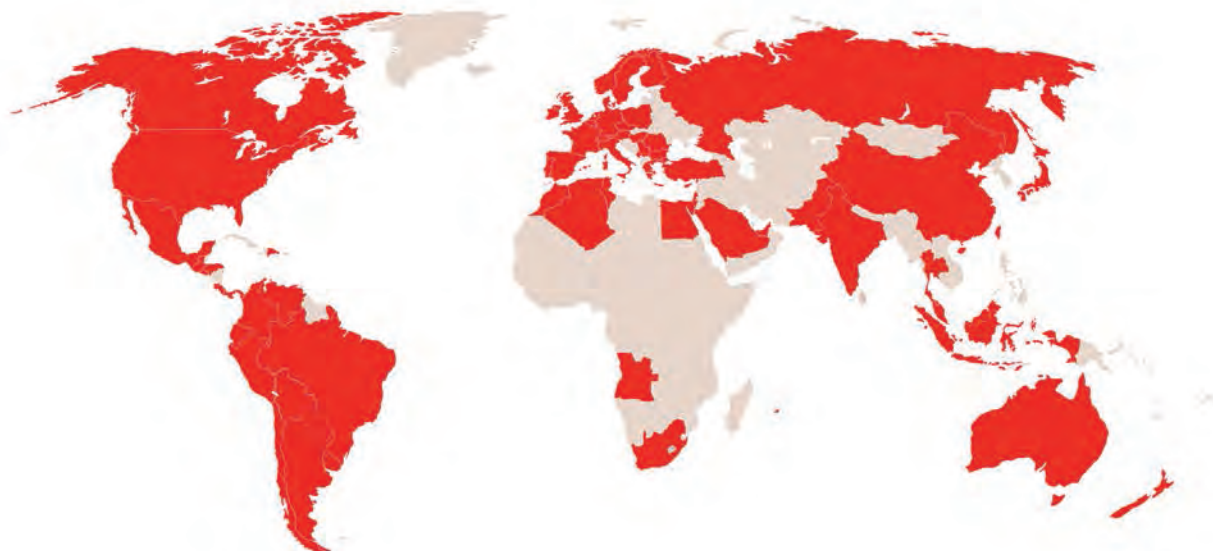
## OTHER CON- SIDERATIONS

If it is not obvious as to whether an individual is resident in the UK for a particular tax year the detailed statutory residence test should be followed and we recommend that records are kept to support the treatment.

If funds are remitted to the UK from overseas, the source and origin of the funds should be recorded to assist in later calculations.

Further records should be kept regarding the individual's expenditure, assets, journeys to and from the UK and working hours.





#### **EUROPA**

Andorra  
Austria  
Belgium  
Bulgaria  
Cyprus  
Czech Republic  
Denmark  
Finland  
France  
**Germany**  
Greece  
Hungary  
Ireland  
Italy

Luxembourg  
Malta  
Montenegro  
Norway  
Poland  
**Portugal**  
Romania  
Russia  
Serbia  
**Spain**  
Sweden  
Switzerland  
**The Netherlands**  
United Kingdom

#### **AMERICA**

**Argentina**  
Bolivia  
Brazil  
Canada  
**Chile**  
**Colombia**  
Costa Rica  
Dominican Republic  
Ecuador  
El Salvador  
Guatemala  
Honduras  
**Mexico**  
Panama

Paraguay  
Peru  
**Uruguay**  
USA  
Venezuela

#### **MIDDLE EAST AND AFRICA**

UAE  
Algeria  
Angola  
Egypt  
Israel  
Mauricio  
Morocco

Saudi Arabia  
South Africa  
Tunisia  
Turkey

#### **ASIA-PACIFIC**

Australia  
China  
India  
Indonesia  
Japan  
Malaysia  
New Zealand  
Pakistan  
Singapore  
Thailand

