

Tax Brochure

Parent Companies | 2017

A European Comparison

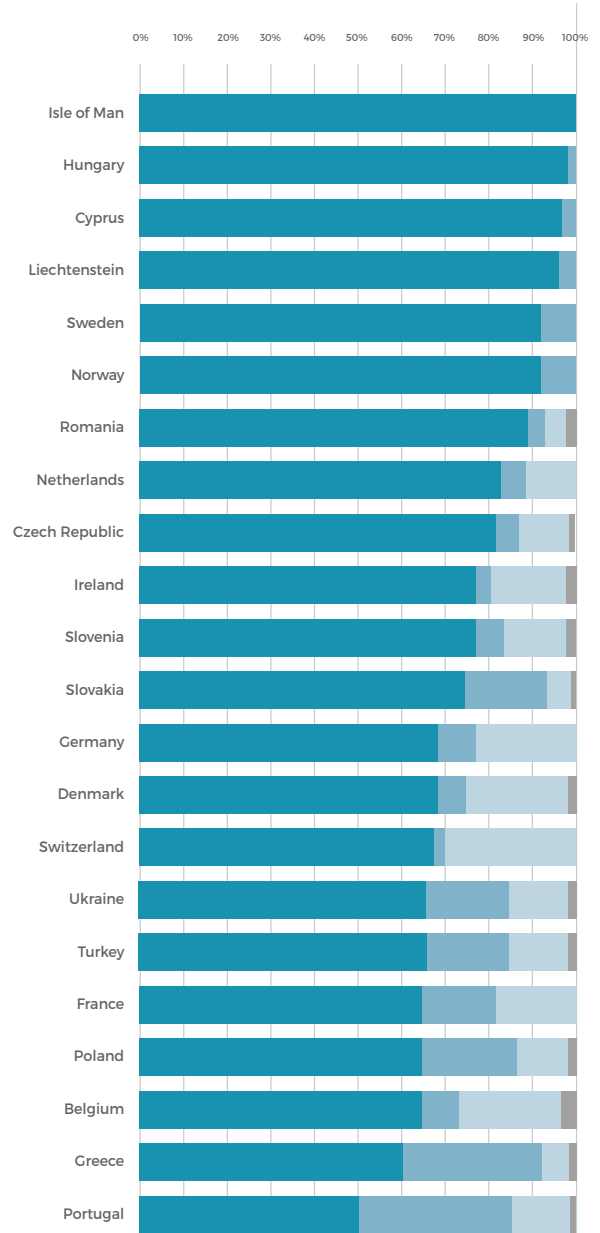


The AGN European Region conducts annual surveys of corporate tax, parent companies, self-employed, value added tax (VAT), salary and social security and inheritance taxes. These surveys have been produced for a number of years and provide interesting comparisons from year to year and from country to country and give an insight into trends.

Introduction: Parent companies are used to hold participations in group companies, to collect dividends and make capital gains from the sale of subsidiaries in the most tax efficient way.

The objective of the survey of parent company jurisdictions is to compare and contrast the conditions for the exemption of dividends and capital gains and to try to identify the most useful and flexible jurisdiction to place the parent company. The tax calculations are based on a standard profit and loss account and balance sheet with subsidiaries in France, Germany, USA and Switzerland.

Countries Covered: The 2017 survey covers 22 countries, which is made up of 16 EU countries plus Isle of Man, Norway, Switzerland, Turkey and Ukraine.



■ Net Cash Received
 ■ Corporate Tax
 ■ Withholding Tax on Dividend
 ■ Withholding Tax on Interest

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Country	Profit before interest and tax (%)	Withholding tax on interest paid (%)	Withholding tax on dividend paid (%)	Corporate Tax (%)	Net cash received by Parent Company (%)	Dividend exemption (%)	Capital gains exemption (%)	Passive income allowed (%)	Trading activities allowed (Y/N)	Related interest expense allowed (Y/N)	Investment cost writedown allowed (Y/N)	Goodwill write-off (Y/N)	Company legal form	Minimum capital (€)	Time to perform (weeks)	Company shareholders (Minimum)	Company directors (Minimum)	Capital contribution tax (%)	Disclosure of beneficial owner (Y/N)	Banking secrecy exist (Y/N)	File accounts (Y/N)	File statutes (Y/N)	Parent - subsidiary directive minimum holding (%)	Parent - subsidiary directive minimum period (months)
Belgium	100.00%	2.95%	24.03%	10.06%	62.96%	95.00%	100.00%	0.00%	Y	Y	N	N/A	BVBA	€ 18,600.00	1	1	1	0.00%	Y	Y	Y	Y	10.00%	12
Cyprus	100.00%	0.00%	0.00%	3.69%	96.31%	100.00%	100.00%	100.00%	Y	Y	N	N	LTD	€ 1.00	1	1	1	0.60%	Y	Y	Y	Y	0.00%	0
Czech Republic	100.00%	1.47%	12.68%	5.61%	80.23%	100.00%	100.00%	100.00%	Y	Y	N	Y	SRO	€ 1.00	4	1	1	0.00%	Y	Y	Y	Y	10.00%	12
Denmark	100.00%	2.16%	22.58%	6.50%	68.75%	100.00%	100.00%	100.00%	Y	Y	N	N	A/S ApS IVS	€ 0.00	1	1	1	0.00%	Y	N	Y	Y	10.00%	0
France	100.00%	0.00%	18.63%	15.62%	65.75%	95.00%	88.00%	0.00%	Y	Y	N	Y	SARL	€ 1.00	3	1	1	0.10%	Y	N	Y	Y	10.00%	24
Germany	100.00%	0.00%	21.12%	10.06%	68.81%	95.00%	95.00%	100.00%	Y	Y	N	N	GmbH	€ 25,000.00	1	1	1	0.00%	N	Y	Y	Y	10.00%	0
Greece	100.00%	1.47%	5.83%	31.85%	60.84%	0.00%	0.00%	100.00%	Y	Y	N	N	SA	€ 24,000.00	0	1	3	0.00%	N	Y	Y	Y	0.00%	0
Hungary	100.00%	0.00%	0.00%	0.89%	99.11%	100.00%	100.00%	100.00%	Y	Y	Y	Y	LTD	€ 10,000.00	1	1	1	0.00%	N	Y	Y	Y	0.00%	0
Ireland	100.00%	1.96%	17.29%	3.69%	77.05%	100.00%	100.00%	0.00%	Y	Y	N	N	ltd/dac	€ 100.00	1	1	1	0.00%	Y	Y	Y	Y	5.00%	0
Isle of Man	100.00%	0.00%	0.00%	0.00%	100.00%	100.00%	100.00%	100.00%	Y	Y	Y	Y	LTD	€ 1.00	0	1	1	0.00%	N	N	N	Y	0.00%	0
Liechtenstein	100.00%	0.00%	0.00%	4.92%	95.08%	100.00%	100.00%	100.00%	Y	N	N	N	LTD	€ 50,000.00	1	1	1	0.00%	Y	Y	Y	Y	0.00%	0
Netherlands	100.00%	0.00%	12.47%	7.00%	80.53%	100.00%	100.00%	100.00%	Y	Y	Y	Y	BV	€ 1.00	1	1	0	0.00%	N	Y	Y	Y	0.00%	0
Norway	100.00%	0.00%	0.00%	7.03%	92.97%	100.00%	100.00%	100.00%	Y	Y	N	Y	AS	€ 3,000.00	1	1	1	0.00%	Y	N	Y	Y	1.00%	0
Poland	100.00%	1.96%	13.22%	20.55%	64.26%	100.00%	0.00%	100.00%	Y	Y	N	Y	LTD	€ 1,150.00	4	1	1	19.00%	Y	Y	Y	Y	10.00%	24
Portugal	100.00%	3.44%	23.59%	22.74%	50.22%	100.00%	100.00%	100.00%	Y	Y	N	N	LTD	€ 1.00	1	1	1	0.00%	Y	Y	Y	Y	10.00%	12
Romania	100.00%	1.57%	4.27%	4.72%	89.43%	100.00%	100.00%	100.00%	Y	Y	N	N	SRL	€ 45.00	2	1	1	0.00%	Y	Y	Y	Y	10.00%	12
Slovakia	100.00%	1.87%	5.01%	18.60%	74.52%	100.00%	0.00%	0.00%	Y	Y	Y	N	SRO	€ 5,000.00	2	1	1	0.00%	Y	Y	Y	Y	0.00%	0
Slovenia	100.00%	1.47%	12.12%	9.37%	77.04%	95.00%	50.00%	100.00%	Y	Y	Y	N	LTD	€ 7,500.00	1	1	1	0.00%	Y	N	Y	Y	10.00%	24
Sweden	100.00%	0.00%	0.00%	6.50%	93.50%	100.00%	100.00%	0.00%	Y	Y	N	Y	AB	€ 5,000.00	1	1	1	0.00%	Y	N	Y	Y	10.00%	12
Switzerland	100.00%	0.00%	31.02%	1.52%	67.46%	100.00%	100.00%	100.00%	Y	Y	Y	Y	GmbH	€ 18,000.00	1	1	1	1.00%	Y	Y	Y	Y	0.00%	0
Turkey	100.00%	1.47%	10.22%	21.97%	66.33%	0.00%	0.00%	100.00%	Y	Y	N	N	LTD	€ 3,000.00	1	1	1	0.00%	N/A	N/A	N/A	N/A	0.00%	0
Ukraine	100.00%	1.47%	10.29%	21.54%	66.69%	100.00%	100.00%	100.00%	Y	N	N	N	LTD	€ 1.00	52	1	1	0.00%	N	Y	Y	Y	0.00%	0