



IMPATRIATES TAXATION AND BASIC LABOUR RULES

UPDATED INFORMATION
NOVEMBER 2010

INDEX

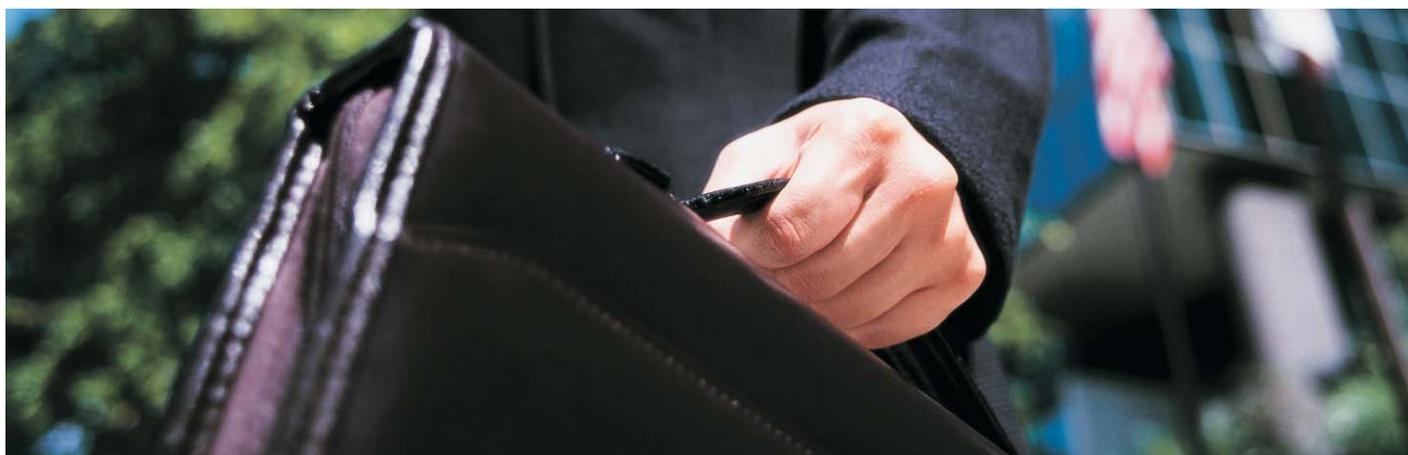


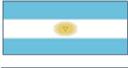
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 Austria	IMPATRIATES REGIME
MAIN FEATURES	<p>Special Regime:</p> <p>Individuals moving to Austria may be taxed by a favorite regime if they make a contribution to boost sciences, research, arts or sports. They have to suffer additional tax burden (because of their movement to Austria) regarding income which is not included in § 98 Austrian tax act. The special regime may be applied to Austrian as well as foreign nationals.</p>
TAX ATION	<p>Following possibilities:</p> <ul style="list-style-type: none"> ■ Flat tax rate ■ Lump-sum income to be taxed
EXEMPTIONS	<p>The following income is exempt (§ 98 EStG):</p> <ul style="list-style-type: none"> ■ Income from agriculture and forestry in Austria ■ Commercial operation if a permanent establishment is located in Austria ■ Income from salaried employment in Austria ■ Specific Austrian sourced capital income (most important: dividends) ■ Income from rent and lease if the land is situated in Austria ■ Sale of property situated in Austria within ten years ■ Sale of participation in an Austrian corporation if the participation counts more than 1 % <p>Border crossers/ Frontier workers may not apply the regime</p>
FORMAL REQUIREMENTS	<ul style="list-style-type: none"> ■ Annually application at the Ministry of Finance ■ Additional tax burden has to be proofed ■ No specific formal requirements
SPECIAL REQUIREMENTS	<p>Following criteria have to be met:</p> <ul style="list-style-type: none"> ■ The applicant has not been resident in Austria during the 10 previous years. ■ The contribution to boost sciences, research, arts and sports has to be for public benefit.
SOCIAL SECURITY BONIFICATION	No specific bonification
OTHER CONSIDERATIONS	Very vague regulation; Application and individual implementation is left to administrative discretion

 Germany	IMPATRIATES REGIME
MAIN FEATURES	<p>The impatriate can be resident tax payer or non-resident tax payer. If he has his domicile or main residence in Germany, he will be treated as a resident tax payer. Non-resident tax payers can opt to the resident tax liability, if their German income is higher than 90 % of the total income; some other requirements must be fulfilled. Non-resident employees from other EU-countries can opt to tax assessment; they can deduct some advertising costs in the tax declaration.</p>
TAX RATE	<p>Obligation for tax at source:</p> <ul style="list-style-type: none"> ■ Earnings as an employment, ■ Directors' fees, ■ Earnings of artists, sportsmen, writers, journalists. <p>In these cases, the impatriate does not have to fill in an income tax declaration.</p> <p>The employer will deduct payroll tax (tax at source). The tax rate increases progressively (14,0-45,0 %); tax free amount per year for residents: 8.004 €.</p> <ul style="list-style-type: none"> ■ 30 % withholding tax for directors' fees, ■ 15 % withholding tax for artists, sportsmen, writers and journalists.
EXEMPTIONS	<p>The following income from dependent employment is tax free, often up to a fixed amount:</p> <ul style="list-style-type: none"> ■ Special refunds from the German employer: defined travel expenses, work clothes, work equipment, ... ■ Travel between home and place of work ■ Some non-cash benefits (meals, lodging, housing)
FORMAL REQUIREMENTS	<p>If non-residents opt for tax assessment, they have to fill in the form ESt 1C. Resident tax payers have to fill in the form ESt 1A. For tax at source, the employer has to fill in the "Lohnsteuer-Anmeldung" and for the other earnings (artists, sportsmen, writers, journalists, directors' fees) the form StAb.</p>
SPECIAL REQUIREMENTS	<p>The dependent work has to be administrated or exploited in Germany. In each individual case the double tax agreement should be checked, particularly if article 15 (2) can be implemented.</p>
SOCIAL SECURITY BONIFICATION	<p>In every individual case should be checked, if the impatriate has to assure himself in the German social insurance or if he can stay in the social insurance system of his home-country.</p>
OTHER CONSIDERATIONS	<p>Non-resident impatriates are subject to taxation in Germany exclusively with the income they receive from sources situated in Germany. Resident impatriates are subject to taxation with their worldwide income.</p>



 Argentina	IMPATRIATES REGIME																																																		
MAIN FEATURES	<p>There is no formal "special regime" applicable to impatriates. However, there is an income tax provision for foreigners working in Argentina which states that they must be duly established. Foreigners who reside in the country for up to 5 years will only be taxed on income from sources located in Argentina.</p> <p>After 5 years, if the individual is still living in the country, they are taxed on all their income, whether from Argentinean or foreign sources.</p>																																																		
TAX RATE	<p>The following is the general tax scale for individuals:</p> <table border="1" data-bbox="544 577 1428 1037"> <thead> <tr> <th colspan="2">Scale</th> <th colspan="3">Accumulated amounts</th> </tr> <tr> <th colspan="2">Accumulated taxable net income</th> <th colspan="3">Will have to pay</th> </tr> <tr> <th>From \$</th> <th>to \$</th> <th>\$</th> <th>Plus</th> <th>On the amount exceeding</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>10,000</td> <td>--</td> <td>9 %</td> <td>0</td> </tr> <tr> <td>10,000</td> <td>20,000</td> <td>900</td> <td>14 %</td> <td>10,000</td> </tr> <tr> <td>20,000</td> <td>30,000</td> <td>2,300</td> <td>19 %</td> <td>20,000</td> </tr> <tr> <td>30,000</td> <td>60,000</td> <td>4,200</td> <td>23 %</td> <td>30,000</td> </tr> <tr> <td>60,000</td> <td>90,000</td> <td>11,100</td> <td>27 %</td> <td>60,000</td> </tr> <tr> <td>90,000</td> <td>120,000</td> <td>19,200</td> <td>31 %</td> <td>90,000</td> </tr> <tr> <td>120,000</td> <td>More than 120,000</td> <td>28,500</td> <td>35 %</td> <td>120,000</td> </tr> </tbody> </table>	Scale		Accumulated amounts			Accumulated taxable net income		Will have to pay			From \$	to \$	\$	Plus	On the amount exceeding	0	10,000	--	9 %	0	10,000	20,000	900	14 %	10,000	20,000	30,000	2,300	19 %	20,000	30,000	60,000	4,200	23 %	30,000	60,000	90,000	11,100	27 %	60,000	90,000	120,000	19,200	31 %	90,000	120,000	More than 120,000	28,500	35 %	120,000
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EXEMPTIONS	<p>The following incomes are the main exemptions for individuals:</p> <ul style="list-style-type: none"> ■ Interest on bank deposits made in Argentina; ■ Interest and capital gains from sale of national, provincial or municipal government bonds; ■ Donations, inheritance and legacies, profits from State authorized gambling; ■ Capital gains on sale of shares in companies; ■ Dividends and shares of profits distributed by companies resident in Argentine. 																																																		
DEDUCTIONS	<p>The main deductions for individuals are:</p> <ul style="list-style-type: none"> ■ Interest on loans needed to buy assets as a source of taxable income; ■ Interest on loans for the purchase, construction or renovation of home ownership, max. U\$S 5,000 per year; ■ Premiums paid for life insurance to insurers in the country to a max. of U\$S 250 per year; ■ Donations to the treasury, to religious institutions or public welfare agencies. These are limited to 5% of annual net income; ■ Contributions to social security retirement, social works and private healthcare cover; ■ Medical expenses, to a cap of 40% of spending, and also this must not exceed 5% of net income; ■ Non-taxable gain U\$S 2,250 per year; ■ For the spouse U\$S 2,500 per year; ■ For each child U\$S 1,250 per year; ■ For other family members dependent on the taxpayer U\$S 940 per year; ■ Special deduction on salaries U\$S 10,800 annually. 																																																		
FORMAL REQUIREMENTS	<p>If an individual only receives a salary, then they are not required to register with the AFIP, because the tax will be withheld by the employer. If they have additional taxable income from sources located in Argentina, then they are required to apply to the Argentine tax authorities (AFIP) for a Taxpayer ID number (CUIT) and submit the online annual tax form F.711.</p>																																																		

SOCIAL SECURITY CONTRIBUTIONS	<p>Companies contracting scientists, professionals or technicians from outside the country can apply for exemption from paying the majority of these employees' social security obligations, as long as the contract for these employees does not exceed the term of 2 years.</p> <p>However Argentina has specific social security agreements with: Uruguay, Brazil, Chile, Italy, Paraguay, Greece, Portugal and Spain. Therefore, workers coming from those countries are exempt from contributing to the Argentine pension system if in their respective countries they are covered by similar systems. The period of exemption varies according to the agreement.</p>
PERSONAL PROPERTY TAX	<p>In personal property tax, impatriates can only be taxed on property located in Argentina, for the first 5 years. After this period, if the individual is still a resident in Argentina, they will be taxed on all the assets located in Argentina and abroad.</p>

 UK	IMPATRIATES REGIME
MAIN FEATURES	<p>Special Regime:</p> <p>Individuals who are resident in the UK but not UK domiciled can opt to be taxed on their non-UK income on the amount remitted to the UK (remittance basis).</p> <p>If an individual opts for the remittance basis he will lose his personal allowances and annual capital gains exemption.</p> <p>There is also a special charge of £30,000 per annum for longer term residents (resident in the UK for at least 7 out of the preceding 9 tax years).</p> <p>The above special charge of £30,000 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>
TAX RATE	<p>Basic tax rate: 20% on income up to £37,400.</p> <p>Higher tax rate: 40% on income between £37,401 and £150,000.</p> <p>Additional rate: 50% on income above £150,000.</p>
EXEMPTIONS	<p>The following income is exempt:</p> <ul style="list-style-type: none"> ■ Scholarships, disability pensions, lottery winnings, betting and draws. ■ Income from deposits and assets held in an ISA (Individual Savings Account). ■ Statutory redundancy payments. ■ Interest on personal injury damages awarded by a court in the UK. ■ Tax repayment interest. ■ Some social security and child benefits.
FORMAL REQUIREMENTS	<p>If opting for the remittance basis this must be claimed on the tax return.</p>
SPECIAL REQUIREMENTS	<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>
SOCIAL SECURITY BONIFICATION	<p>No specific bonification.</p>
OTHER CONSIDERATIONS	<p>No other considerations.</p>



 Chile	IMPATRIATES REGIME	
MAIN FEATURES	Individuals who come to Chile to work as an employee, professional or any profitable activity, will be taxed according to non resident income Tax rules, without losing their status as income tax payers for the period during the option and the six following tax periods.	
TAX RATE	The first six months they will be subjected to single taxation of 20% rate. From the seventh month, they will be subjected to a Global Complementary Taxation of a progressive rate from 0% to 40%, as residents.	
SUBJECTED TO TAX	The following income are subjected to taxation:	
	■ Scientific, cultural or sport activities.	
	Employee	If they moved to Chile as employee, intended to reside, are subjected to single taxation with a progressive rate from 0% to 40% , as residents.
	Professional or profitable labour	The first six months are subjected to taxation of an additional single withholding with 20% rate, from seventh month they will be subjected to taxation of Global Complementary taxation with a progressive rate from 0% to 40%, as if they were residents.
	■ Engineering jobs, technical consultancy and Professional services.	
	Employee	If they moved to Chile as employee; intended to reside, they will be subjected to single taxation with progressive rate from 0% to 40%, as residents.
	Professional or profitable labour	the first six months will be subjected to additional single withholding of 15% rate, from the seventh month they will be subjected to Global Complementary taxation with a progressive rate from 0% to 40%, as if they were residents.
	■ Other activities.	
Employee	They are subjected to an additional single withholding with a progressive rate.	
Professional or profitable labour	the first six months will be subjected to additional single withholding of 20% rate, from the seventh month they will be subjected to Global Complementary taxation with a progressive rate from 0% to 40%.	
EXEMPTIONS	Employee	Scholarship grant
		transport
		Food
		Legal Compensation
		Social Security benefits

FORMAL REQUIREMENTS	The income payable organization must withhold the corresponding tax, state and pay the withhold within the first twelve days of withhold issuing.
SPECIAL REQUIREMENTS	Every one who entered to Chile as impatriated quality should obtain a Visa subjected to a job agreement to enable them to work and receive incomes.
SOCIAL SECURITY BONIFICATION	Those professionals which a percentage is discounted as concept of Social Security and health insurances in foreign country (country of origin) duly empowered will be exempted from obligation in social security organizations
OTHER CONSIDERATIONS	During the three first months from their arrival to Chile, they will be only subjected to the income tax from chilean source, after this terms will be taxed over their incomes from any origin, both national as foreing.



 Luxembourg	IMPATRIATES REGIME
MAIN FEATURES	<p>Article 9 of Luxembourg Income Tax Law ("LITL"):</p> <p>"The Minister of Finance may, upon proposal of the tax authorities and after due deliberation by the government, determine on a lump sum basis the tax liability of persons coming from overseas and establishing their tax residency in Luxembourg, at the most for the first 10 years of such establishment".</p>
COMPATIBILITY WITH EU RULES	The Article 9 LITL has been aimed by the EU Code of Conduct
MAIN APPLICATION	<p>The main application has been the so-called tax regime of bank experts and bank managers.</p> <p>This regime, the main feature of which did consist in the allowance of flat-rate deductible expenses, has been initiated by the Government on 19 December 1986 and has been abolished with effect for the tax year 1994.</p> <p>Luxembourg jurisprudence has ruled that the State cannot be held as liable for the withdrawal of such regime and that previous beneficiaries are not entitled to any indemnity for the prejudice caused by such withdrawal.</p>
FORMAL OR SPECIAL REQUIREMENTS	See "main features" above. No specific requirements.
SOCIAL SECURITY BONIFICATION	No specific bonification.
OTHER CONSIDERATIONS	The application of Article 9 LITL as made on a case by case basis is not disclosed to the public, safe situations where such application does not aim a specific person, but a category of taxpayers (e.g.: bank experts and managers)

 Romania	IMPATRIATES REGIME
MAIN FEATURES	<p>According to the Romanian Tax Code, if an individual is carrying out independent activities and it is located in Romania for a period of more than 183 days (during a period of 12 months) is considered resident and is taxed in Romania.</p> <p>Non-resident individuals who develop independent activity through a permanent establishment in Romania are taxed at the annual taxable net income from independent activity that is attributable to the permanent establishment from Romania.</p> <p>Non resident individuals employed in Romania (who carry out dependent activities in Romania) are treated as residents.</p>
TAX RATE	General tax rate: 16%
EXEMPTIONS	<p>The following incomes are exempt from the tax on incomes obtained from Romania by non-residents:</p> <ul style="list-style-type: none"> ■ interest on public debt instruments in domestic and foreign currency obtained by trading government securities and bonds issued by local-administrative units in domestic and foreign currency on domestic and/or international financial market, and also the interest on the instruments issued by National Bank of Romania for the purpose of achieving the objectives of monetary policy and income from trading securities issued by National Bank of Romania; ■ prizes of a non-resident physical person obtained from Romania, as a result of participation in national and international artistic, cultural and sporting festivals financed from public funds; ■ prizes granted to non-resident pupils and students at contests financed from public funds; ■ incomes of foreign legal entities that carry out consulting activities in Romania within the framework of a contract of free financing agreements done by the Government of Romania/public authorities with other governments/public authorities or with governmental or non-governmental international organizations; ■ dividends obtained by foreign legal entity that are resident in another Member State of the EU (including Members of the European Free Trade Association) and owns 10% of the share capital of Romanian legal entity for a continuous period of at least two years, ending on the date of dividend payment.
FORMAL REQUIREMENTS	<p>The employer has to perform the activity for which the work permit is released. The conditions that must be fulfilled by foreigners in order to obtain the work permit in Romania are the following:</p> <ul style="list-style-type: none"> ■ To meet the specific training requirements, work experience and certification required by the employer; ■ To prove that they are medically fit for job requirements and have no criminal record to be incompatible with the work that will take place in Romania; ■ To have all the necessary documents required for entering Romania according to the foreigners' regime. <p>Work permits can also be granted to foreigners:</p> <ul style="list-style-type: none"> ■ coming from countries with whom Romania has concluded agreements, conventions or agreements abolishing visas for crossing the border for this purpose or for which Romania has renounced unilaterally at the visa requirement; ■ allowed to stay temporarily for family reunification; ■ allowed to stay temporarily for study purposes and calls for employment under an individual labour contract with part-time program up to 4 hours per day; ■ that are detached in Romania.

SPECIAL REQUIREMENTS	<p>The period for which the working permits are granted depends on the type of the working permit, as follows:</p> <ul style="list-style-type: none"> ■ Work permits for permanent workers: undefined period; ■ Authorization for detached workers: maximum one year, once every five years. One year period can be extended based on an international agreement between the state of origin and Romania; ■ Work permit for seasonal workers: maximum 6 months within a 12 months period. It cannot be extended but, with a nominal work permit, a person can return to Romania to work for the same employer, after the 12 months period is over; ■ Authorization for workers on probation: the period necessary to obtain an accreditation in Romania; ■ Authorization for cross-border workers: 1 year with the possibility to extend it only at the same employer. <p>The necessary documents required for obtaining different working permits are submitted by the employer to the Romanian Immigration Office.</p>
SOCIAL SECURITY BONIFICATION	No specific bonification
OTHER CONSIDERATIONS	<p>Non residents are subject to taxation in Romania exclusively for the income they receive from sources situated within Romania.</p> <p>They may not qualify as for the status of tax residents for purposes of the application of a Double Taxation agreement.</p>

 Spain	IMPATRIATES REGIME
MAIN FEATURES	<p>Special regime:</p> <p>Individuals who have moved to Spain can opt to be taxed according to non resident income tax rules without losing their status as Income Tax Payers, for the tax period during the option and for the following five periods.</p>
TAX RATE	General tax rate :24%
EXEMPTIONS	<p>The following incomes are exempt:</p> <ul style="list-style-type: none"> ■ Scholarships, Grants, Pensions, Lottery winnings, betting winnings and draws. ■ Interest and capital gains derived from financial and other movable assets obtained by members of an EU member State. ■ Public debt ■ Securities issued in Spain by non residents. ■ Interest on non resident accounts. ■ Profits distributed by subsidiary companies to their parent companies resident in another EU member State. ■ Transfer of securities or reimbursement from shares in mutual investment funds in official secondary markets of Spanish securities. ■ Dividends or shares of profits obtained by individuals who are resident in another EU member State. (Limit of € 1,500 per year.)
FORMAL REQUIREMENTS	<ul style="list-style-type: none"> ■ Opting for, declining, or exclusion from the Special Regime is done by filling out Form 149. ■ Taxpayers who opt for the Special regime must file a special Income Tax return on Form 150.

SPECIAL REQUIREMENTS	<p>They have to meet the following criteria:</p> <ul style="list-style-type: none"> ■ They have not been resident in Spain during the 10 previous years. ■ Their move to Spain is a result of a work contract. ■ The work is effectively performed in Spain. ■ The work is performed for a company or organization resident in Spain. ■ The salaries and wages are not exempt from taxation. ■ Workers displaced from 1/1/2010: The salaries and wages cannot exceed € 600,000 / year for workers who arrived in Spain after 1/1/2010.
SOCIAL SECURITY PAYMENTS	There is no specific payment.
OTHER CONSIDERATIONS	They are subject to taxation in Spain only on income received from sources within Spain. They may not qualify for the status of tax residents for purposes of the application of a Double Taxation agreement.

 Portugal	IMPATRIATES REGIME
MAIN FEATURES	<p>Special Regime:</p> <p>The Portuguese Government approved in, September 2009, a new Personal Income Tax regime for non-habitual resident individuals, which may potentially give rise to tax saving opportunities for expatriates.</p> <p>The regime is applicable for a period of ten consecutive years. If a non-habitual resident individual, in a given year, choose not be taxed under this special regime, still may enjoy such regime, for the remaining applicable period.</p>
TAX RATE	<p>Under the regime, employment and self employment income derived from "high value added activities of a scientific, artistic or technical nature" that is earned by non-habitual residents in Portugal will be taxed at a 20% rate.</p> <p>The list of activities which should be considered as high value-added activities is published by Portuguese government</p>
EXEMPTIONS	<p>The regime establishes a tax exemption for:</p> <ul style="list-style-type: none"> ■ foreign-source employment income; self employment income, ■ rental income, ■ interest, dividends as well as other investment income and capital gains, <p>if all this incomes could have been taxed in the State of source, under an existing Double Tax Treaty or such incomes have been taxed in another non blacklisted jurisdiction under its domestic legislation (if no DTT exists).</p>
FORMAL REQUIREMENTS	The status of non-habitual tax resident becomes effective upon registration of individuals with the Portuguese tax authorities.
SPECIAL REQUIREMENTS	The regime will apply to individual taxpayers who become resident for tax purposes in Portugal, provided they have not been taxed as tax residents in Portugal in the previous five years.
SOCIAL SECURITY BONIFICATION	No specific pontification

 India	IMPATRIATES REGIME
MAIN FEATURES	<p>Special Regime:</p> <p>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.</p>
TAX RATE	General tax rate: 24%
EXEMPTIONS	<p>The following incomes are exempt:</p> <ul style="list-style-type: none"> ■ Scholarships and grants, pensions, lottery winnings, betting and draws. ■ Interest and capital gains derived from financial and other movable assets obtained by residents of the State member of the EU. ■ Public debt ■ Securities issued in Spain by not residents. ■ Interest of non resident accounts. ■ Profits distributed by subsidiary companies to their parent companies resident in another Member State of the UE. ■ Transfer of securities of the reimbursement of shares in mutual investment funds in official secondary markets of Spanish securities. ■ Dividends and shares of profits obtained by individuals that are resident in another Member State of the EU (limit of 1.500 euros/year).
FORMAL REQUIREMENTS	<p>Opting for, declining or exclusion from the Special Regime is achieved by filling Form 149.</p> <p>The taxpayers who opt for the Special Regime must file a special Income tax return on Form 150.</p>
SPECIAL REQUIREMENTS	<p>They have to meet the following criteria:</p> <ul style="list-style-type: none"> ■ They have not been residents in Spain during the 10 previous years. ■ Their displacement to Spain is a consequence of a work contract. ■ The work is effectively performed in Spain. ■ The work is performed for a company or organization resident in Spain. ■ The salaries and wages are not exempt from taxation. ■ Workers displaced from 1/1/2010: The salaries and wages can not exceed 600.000 euros / year.
SOCIAL SECURITY BONIFICATION	No specific bonification
OTHER CONSIDERATIONS	<ul style="list-style-type: none"> ■ They are subject to taxation in Spain exclusively for the income they receive from sources situated within Spain. ■ They may not qualify as for the status of tax residents for purposes of the application of a Double Taxation agreement.

 Bulgaria	IMPATRIATES REGIME
MAIN FEATURES	<p>Special Regime:</p> <p>Non residents in Bulgaria are taxable on their income derived from Bulgarian sources.</p>
TAX RATE	<p>General tax rate: 10% flat tax</p>
EXEMPTIONS	<p>The following incomes are exempt:</p> <ul style="list-style-type: none"> ■ Interest on deposits in Bulgarian banks, branches of foreign banks in Bulgaria and banks located in any EU/EEA country ■ Interest and discounts on corporate, state and municipal securities ■ Investment income on voluntary insurance, voluntary health insurance and life insurance deals ■ Scholarships and grants, pensions, lottery winnings, betting and draws. ■ Profits distributed by subsidiary companies to their parent companies resident in another Member State of the UE.
FORMAL REQUIREMENTS	<p>Annual tax declaration, however for the incomes from employment, exempted incomes and incomes taxed with a final withholding taxes, filing of a tax returned is not obliged.</p>
SPECIAL REQUIREMENTS	<p>The following incomes are taxable in Bulgaria, even if you are a non-resident:</p> <ul style="list-style-type: none"> ■ employment income, when the work is performed on the territory of Bulgaria, ■ income from services rendered on the territory of Bulgaria ■ management fees received by managers and members of management boards of Bulgarian companies ■ dividends and liquidation proceeds from participation in Bulgarian resident companies ■ interest paid by Bulgarian resident entities (except interest on bank deposits) ■ rental or other income derived from real estate or movable property in Bulgaria ■ royalties paid by Bulgarian resident entities ■ technical services' fees paid by Bulgarian resident entities ■ franchise and factoring fees paid by Bulgarian resident entities ■ capital gains ■ awards from games, contests and competitions that are not provided by an employer
SOCIAL SECURITY BONIFICATION	<p>For an EU or EEA citizen working in the country the provisions of EEC Regulation 1408/71 are applicable. Under this Regulation you would be insured for social security purposes only in one member state. Generally this would be Bulgaria, unless you can obtain a E101 certificate from your born country social security authorities that proof that you are secured in that country.</p> <p>If you do not have a E101, you would be subject to mandatory social security contributions in Bulgaria.</p>
OTHER CONSIDERATIONS	<ul style="list-style-type: none"> ■ Non residents are subject to taxation in Bulgaria exclusively for the income derived from the sources in the country (Bulgaria). ■ They may not qualify as for the status of tax residents for purposes of the application of a Double Taxation agreement.

 Cyprus	IMPATRIATES REGIME																	
MAIN FEATURES	Non-resident individuals are taxed for the income derived from the sources in Cyprus. Though those who have a permanent establishment in Cyprus may opt to be taxed as resident.																	
TAX RATE	Progressive income tax rate applies to individuals	<table border="1"> <thead> <tr> <th data-bbox="930 389 1050 421">Taxable income (EUR)</th> <th data-bbox="1050 389 1220 421"></th> <th data-bbox="1220 389 1332 421">Rate (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="930 421 1050 452">up to 19500</td> <td data-bbox="1050 421 1220 452"></td> <td data-bbox="1220 421 1332 452">0</td> </tr> <tr> <td data-bbox="930 452 1050 483">19,501 28,000</td> <td data-bbox="1050 452 1220 483"></td> <td data-bbox="1220 452 1332 483">20</td> </tr> <tr> <td data-bbox="930 483 1050 515">28,001 36,300</td> <td data-bbox="1050 483 1220 515"></td> <td data-bbox="1220 483 1332 515">25</td> </tr> <tr> <td data-bbox="930 515 1050 546">36,301 and over</td> <td data-bbox="1050 515 1220 546"></td> <td data-bbox="1220 515 1332 546">30</td> </tr> </tbody> </table>	Taxable income (EUR)		Rate (%)	up to 19500		0	19,501 28,000		20	28,001 36,300		25	36,301 and over		30	
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28,001 36,300		25																
36,301 and over		30																
EXEMPTIONS	<p>Exempt incomes in Cyprus includes;</p> <ul style="list-style-type: none"> ■ profits from the sale of securities, including shares in companies and units in mutual funds ■ income from a buy-back or redemption of units in mutual funds ■ capital sums arising from any payments to pension, provident and other insurance funds. ■ any lump sums received by way of retiring gratuities, commutations of pensions, death gratuities or as consolidated compensation for death or bodily injury ■ Salaries of the crew of Cyprus ships ■ dividends received from companies and mutual funds as well as interest not accruing from ordinary business activities of an individual ■ a separate income taxation at a rate of 5% may be provided to recipients of a pension based on services rendered abroad on their pension income in excess of EUR 3,420 annually ■ non-resident individuals for the first three years of their employment in Cyprus will have 20% or EUR 8,550 (whichever is lower) of their annual salary tax exempted. 																	
FORMAL REQUIREMENTS	<p>Different formalities applies to non-residents who are EU citizens and to those individuals who are non EU citizens.</p> <p>EU citizens who are non residents of Cyprus intent to take up employment in Cyprus</p> <ul style="list-style-type: none"> ■ Needs to apply for a registration certificate within 4 months upon entry to Cyprus at the local immigration branch of the Police providing the necessary documentation for the application. ■ Apply for a social security number upon securing employment in Cyprus. <p>Non EU citizens wants to be employed in Cyprus, employer needs to make an application to Department of Labour. Department of Labour examines the application and grants permit if it believes that there is the absence of prospect in the local market by local labour force (Cypriot or EU citizens) that meets the needs of employer. To examine these applications the decisions of the relevant Ministerial committee on matters of foreign workers are taken into account. Employment contract needs to be signed.</p> <p>Employer has to pay social insurance contribution on behalf of employee as well.</p>																	
SPECIAL REQUIREMENTS	EU member states residents whom would like to exercise profession that is regulated by legislation in Cyprus such as doctor, lawyer, accountant, engineer, electrician etc. should contact the competent body responsible to examine applications for the specific profession to acquire permit just like in the case of Cypriot nationals.																	
SOCIAL SECURITY BONIFICATION	No specific bonification																	
OTHER CONSIDERATIONS	According to the Cyprus income tax law an individual is considered as resident if he resides in Cyprus for a period or periods of totaling 183 days in a tax year and resident individuals are subject to income tax on their world wide income.																	

 Serbia	IMPATRIATES REGIME
MAIN FEATURES	<p>Special Regime:</p> <p>Same income tax rules applicable to non resident individuals as resident tax payers.</p>
TAX RATE	<p>Salary tax rate: 12%</p>
EXEMPTIONS	<p>The following incomes are exempt:</p> <ul style="list-style-type: none"> ■ Pensions. ■ Parent and child support. ■ Company support in case of death of family member (up to the 350 EURO at the moment). ■ Scholarship and loans to the pupils & students (up to the 60 EURO at the moment).
FORMAL REQUIREMENTS	<p>Employment contracts with foreign nationals are equal to the ones with local nationals, in respect of the both rights and obligations of the employer and employee. Salary is received in local currency and it can be expressed as RSD equivalent of USD/EUR amount.</p>
SPECIAL REQUIREMENTS	<p>Opinion of National Employment Agency of the Republic of Serbia is required.</p>
SOCIAL SECURITY BONIFICATION	<p>Under the Law, Serbian source income derived from employment is subject to tax and social security contributions. Social security contributions are payable by employer and the employee at the equal proportional rates (17.9%), but the employer is obliged to calculate, withhold and pay them from remuneration paid to employees.</p> <p>The status of expats regarding social security insurance depends on whether the country of their origin has signed the Convention on Social Security with Serbia (SFRY/FRY) or not. The purpose of this Convention/Agreement is to avoid double payments of social security contributions by citizens in the countries involved. Provided that expatriates are covered by a recognized social insurance, they do not have to pay local social security insurance in both countries.</p>
OTHER CONSIDERATIONS	<ul style="list-style-type: none"> ■ Non residents are subject to income tax for the incomes derived from the sources in Serbia. ■ They may not qualify as for the status of tax residents due to Double Taxation agreement.



 Turkey	IMPATRIATES REGIME
MAIN FEATURES	<p>Special Regime:</p> <p>The taxation of personal income in Turkey is related to what is known as a 'full tax liability' versus 'limited tax liability'. Full taxpayers are residents of Turkey who need to meet any one of the following conditions;</p> <ul style="list-style-type: none"> ■ His/her home or principal residence is in Turkey (home is considered to be where his family lives) ■ His/her usual residence in Turkey (being in Turkey for more than 183 days in any tax year will usually qualify) ■ His/her principal place of professional activity or employment is in Turkey. ■ His/her center of economic interest in Turkey. <p>The full taxpayers are legally required to report all their income from whatever sources anywhere in the world and liable for taxation on that basis.</p> <p>Limited taxpayers on the other hand are generally non-residents who do not meet the above conditions and are liable for taxes only on the income they may have secured in Turkey.</p>
TAX RATE	General tax rate: progressive rates varying 15%-35% withholding tax
EXEMPTIONS	<p>Foreigners listed hereunder are regarded as unsettled at Turkey even if they do stay at Turkey for more than six months (thus only liable for the income secured in Turkey);</p> <ol style="list-style-type: none"> 1. Businessman, scientists and artists, specialists, official, diplomat, press and broadcasting reporters coming to Turkey for a specific and temporary task or work, and others with identical situations coming for education, health treatment, rest and travel purposes 2. Detained or left at Turkey due to conviction, imprisonment or disease reasons beyond one's control. <p>In principle, all income earned in Turkey is subject to income tax governed and implemented by two separate acts, one of which is for individuals (No. 193) and the other for corporations (No. 5422).</p>
FORMAL REQUIREMENTS	N/A
SPECIAL REQUIREMENTS	N/A
SOCIAL SECURITY BONIFICATION	<p>A foreign national with residence status in Turkey is not required to pay Turkish social security contributions if they remain covered by their home country and provided proof of foreign coverage is filed with the local social security office. If an individual is not covered by a foreign social security arrangement full contributions would usually be imposed in Turkey. Foreign nationals also qualify for unemployment insurance, provided there is a reciprocal agreement between Turkey and their home countries.</p>
OTHER CONSIDERATIONS	N/A



ANDORRA
ANGOLA
ARGENTINE
AUSTRIA
BELGIUM
BULGARIA
COLOMBIA
COSTA RICA
CYPRUS
CHILE
CHINA
ECUADOR
EL SALVADOR
FRANCE
GERMANY
GREECE
GUATEMALA
HONDURAS
ITALY
INDIA
LUXEMBOURG
MALTA
MEXICO
NETHERLANDS
PAKISTAN
PANAMA
PERU
PORTUGAL
REPUBLICA DOMINICANA
ROMANIA
SERBIA
SPAIN
SWITZERLAND
TURKEY
UNITED KINGDOM
URUGUAY
USA
VENEZUELA

