



European salary survey 2016

British and Greek employees see their net income decreasing;
Belgians and Austrians go through a tax shift

7th edition – December 2016

Appendix - graphs

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Legend

Symbol legend



Married (non-working partner), 2 dependent children



Single, no dependent children



Married (working partner), 2 dependent children



Employee



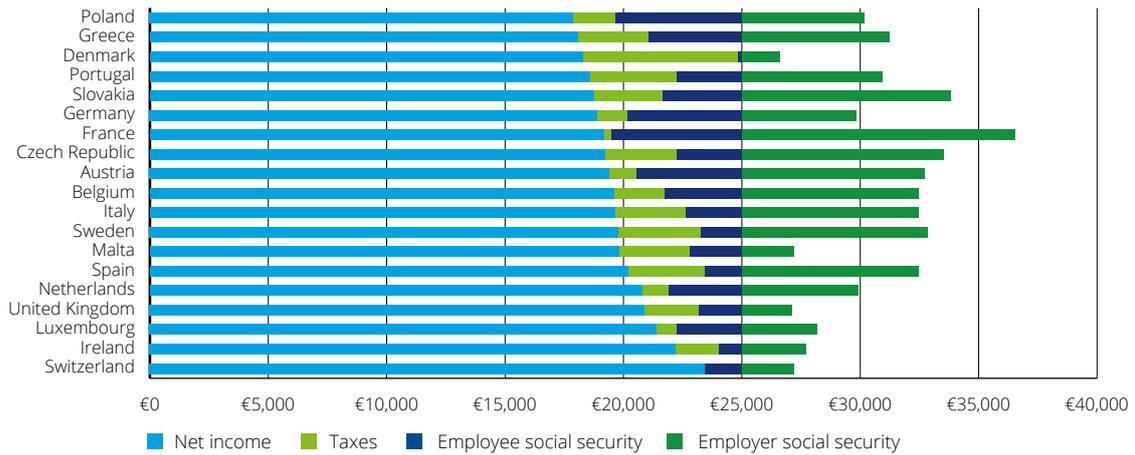
Company car



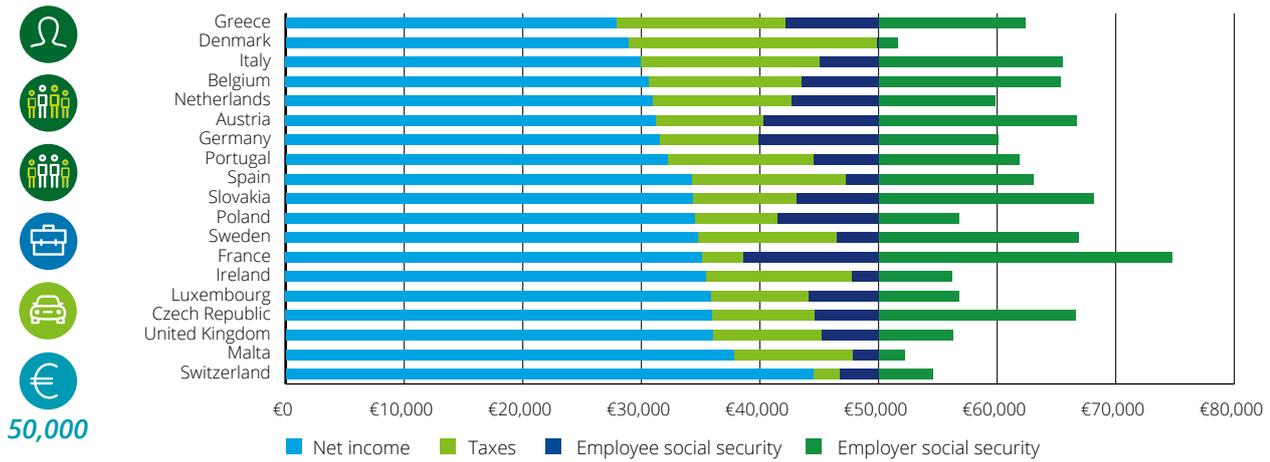
Annual gross income

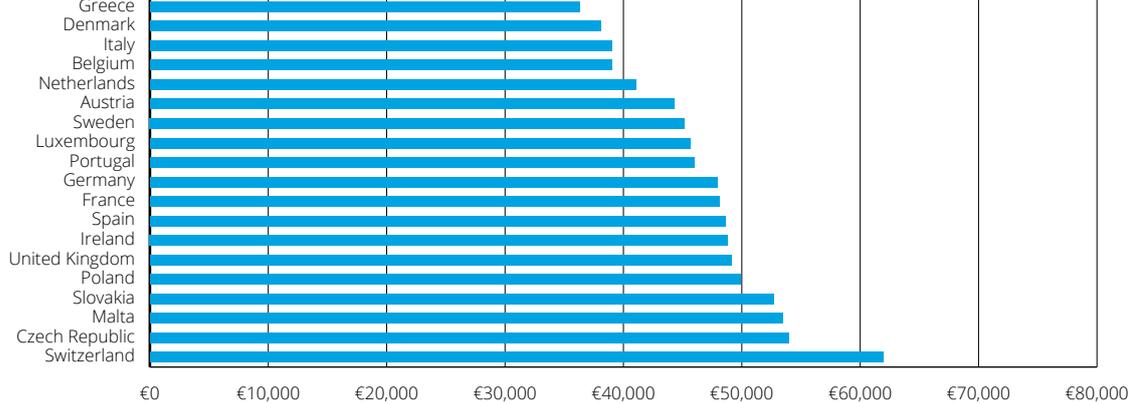
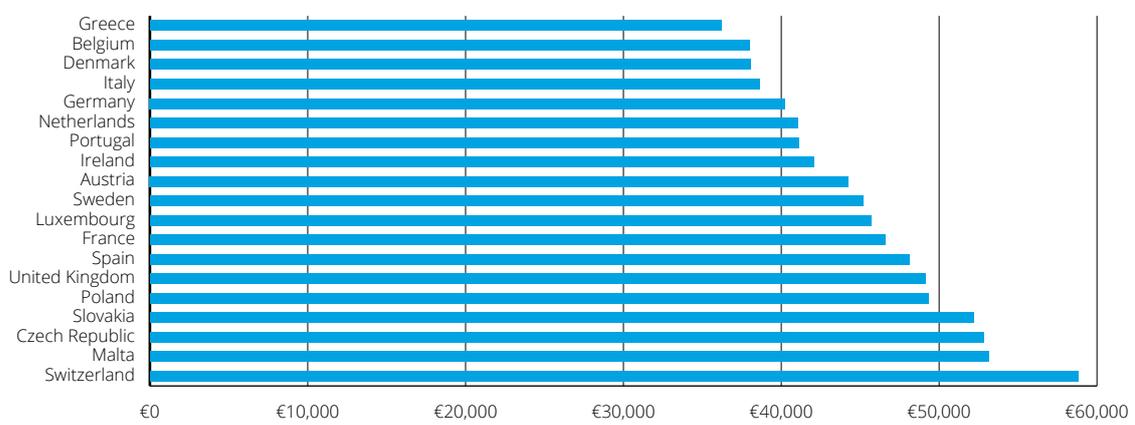
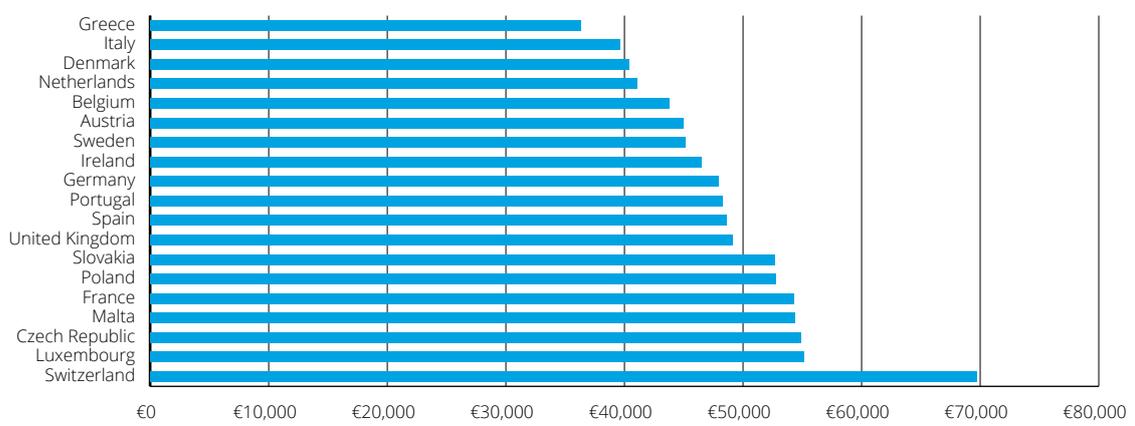
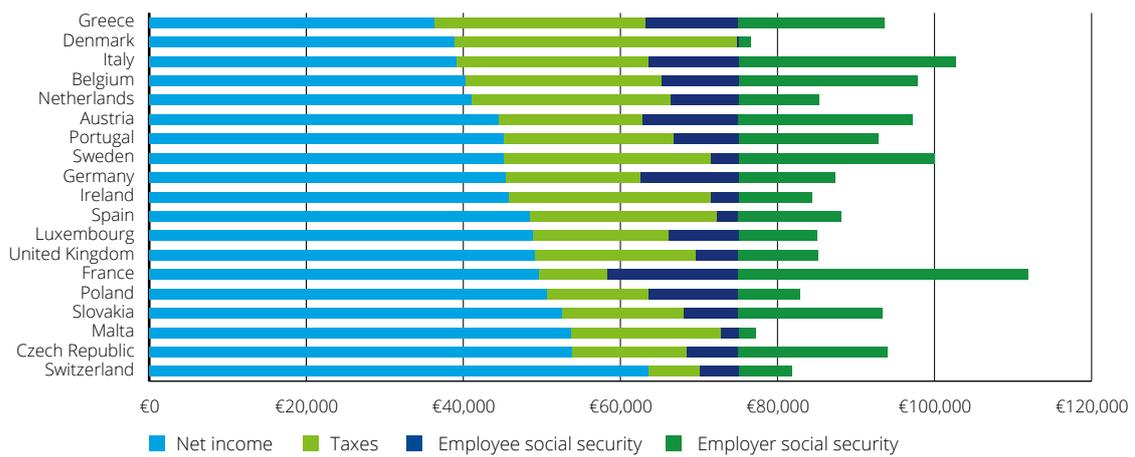
Chapter 1

Sorted on net income

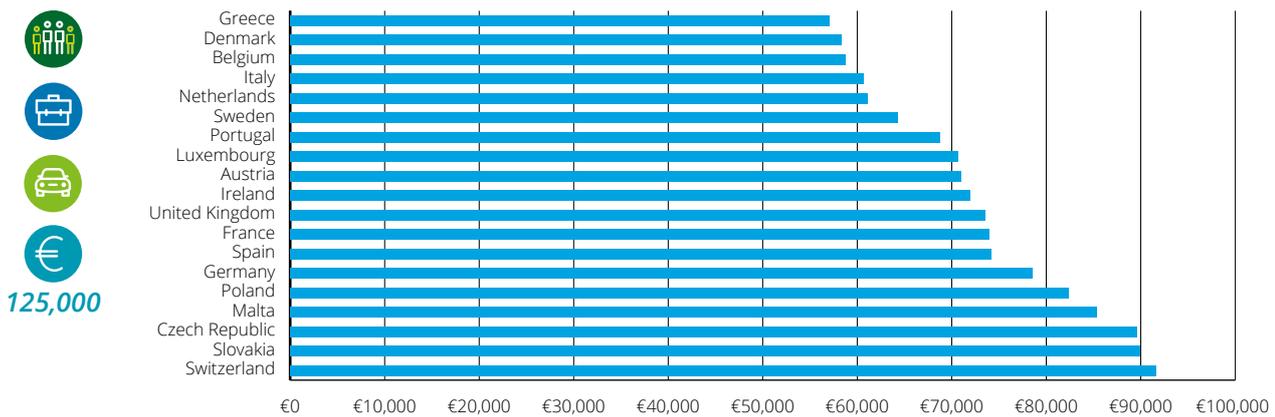
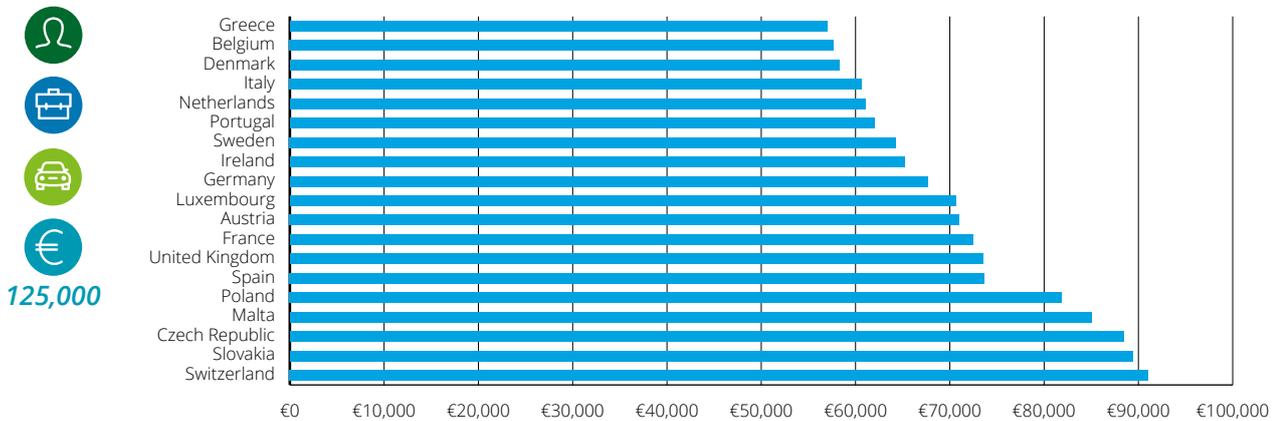
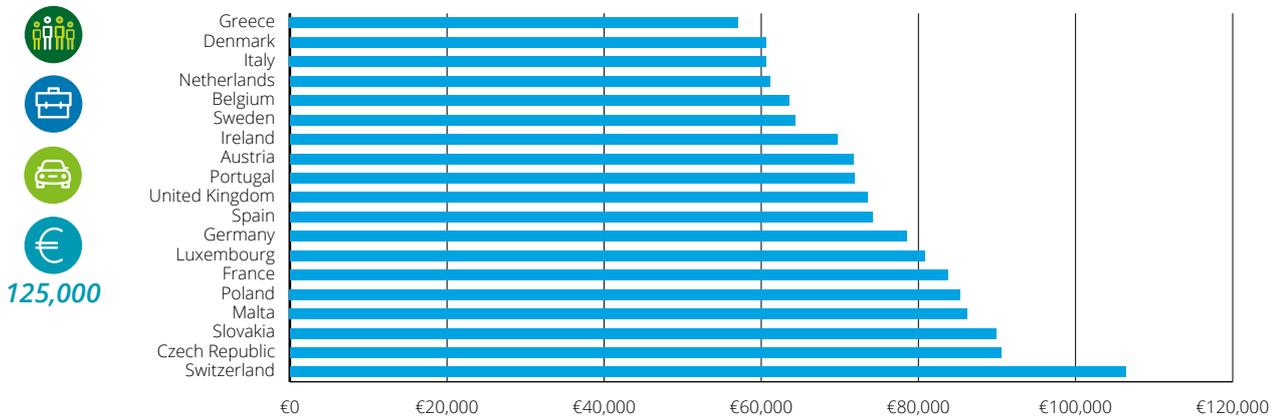
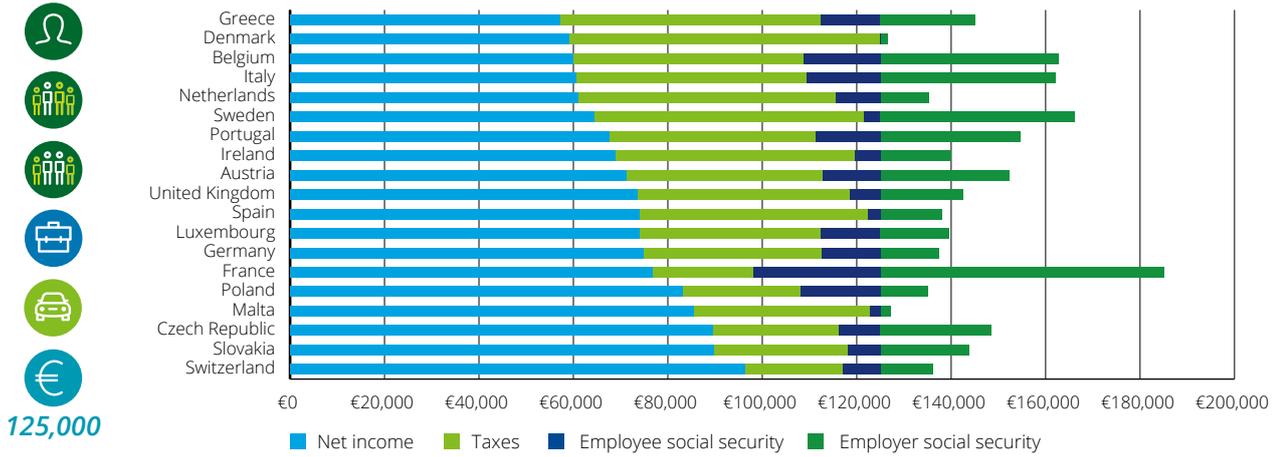


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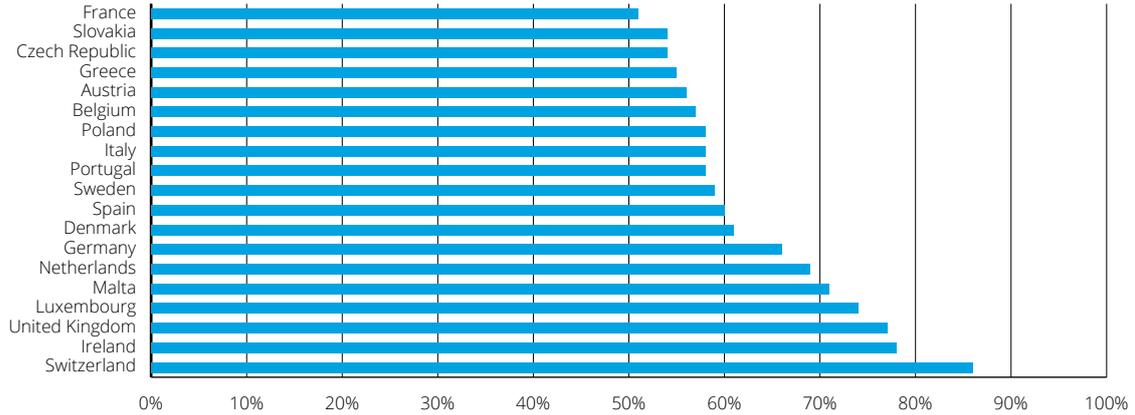
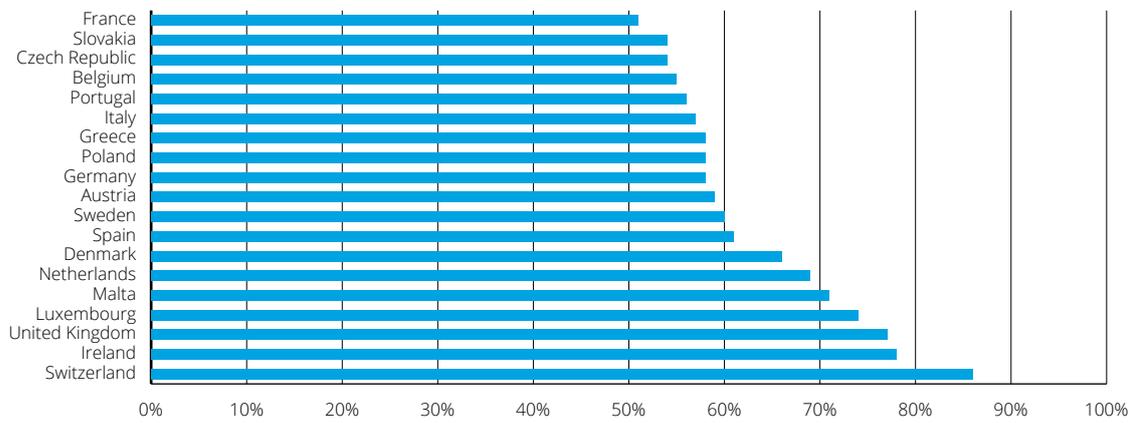
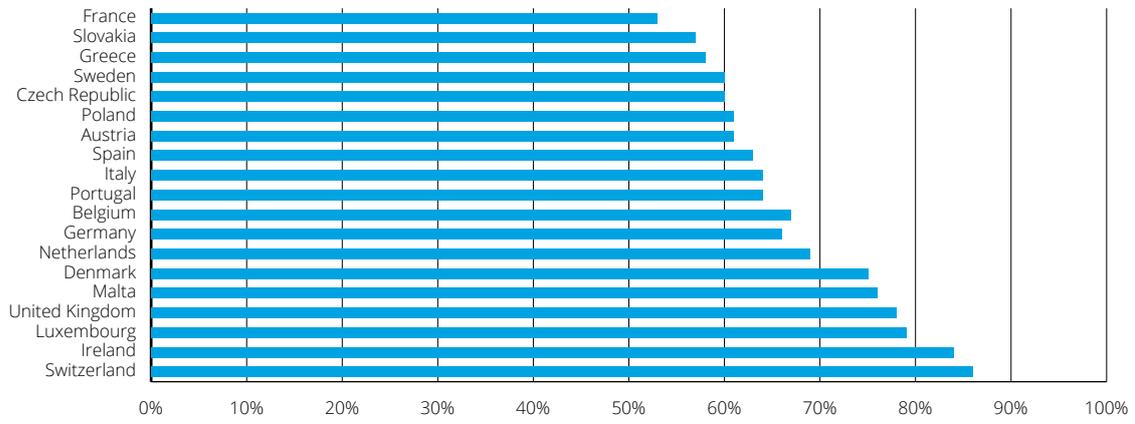
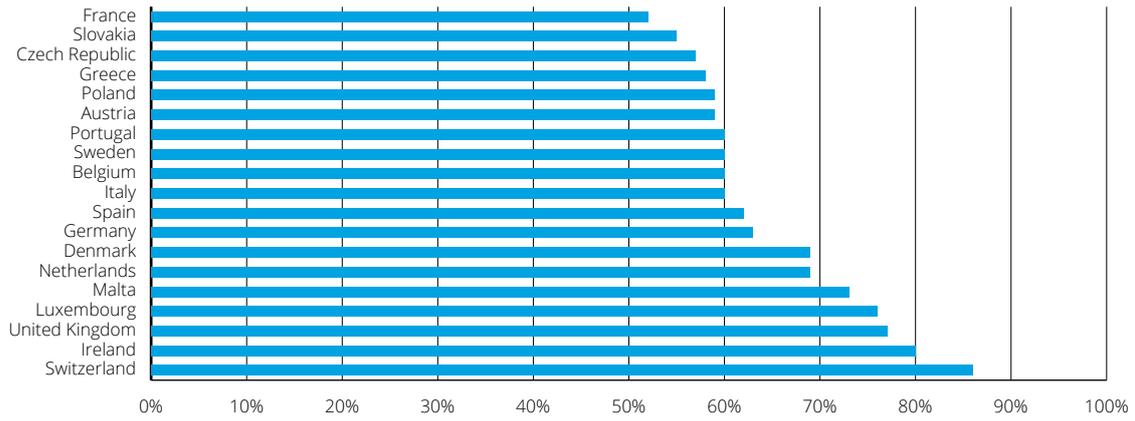
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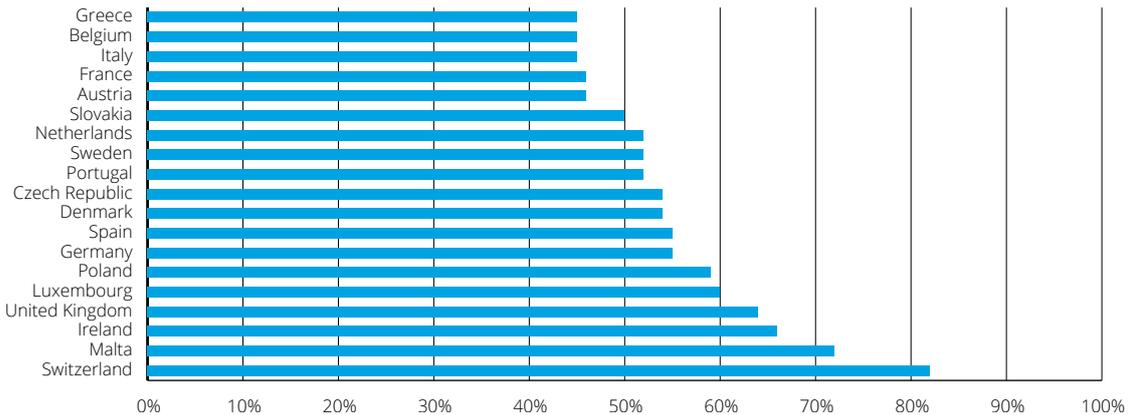
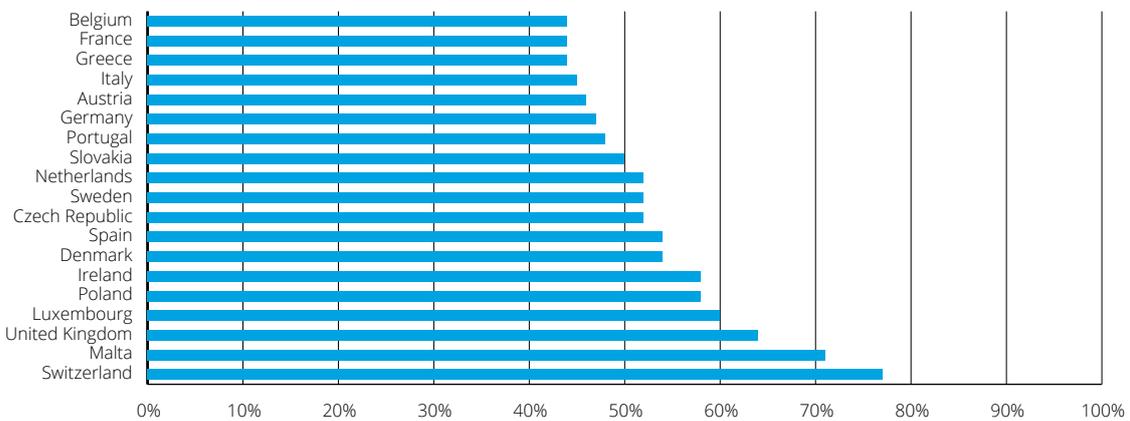
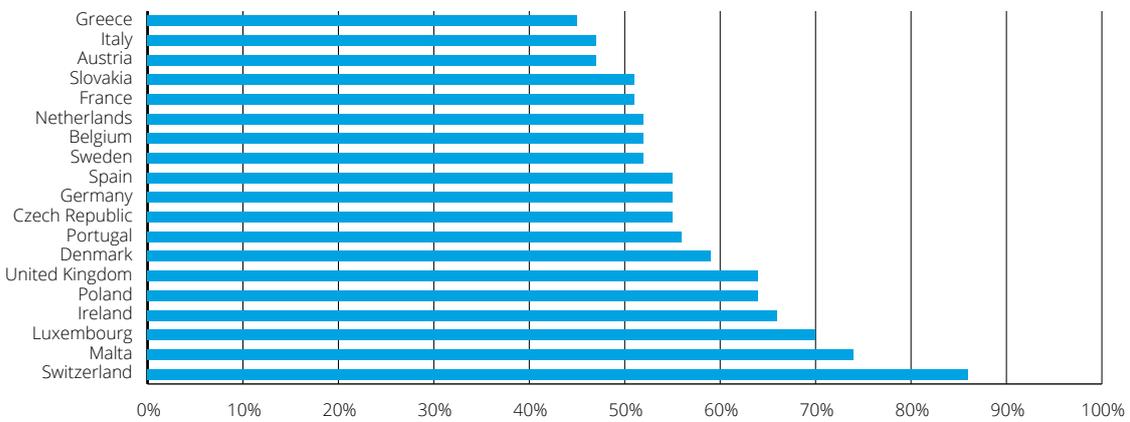
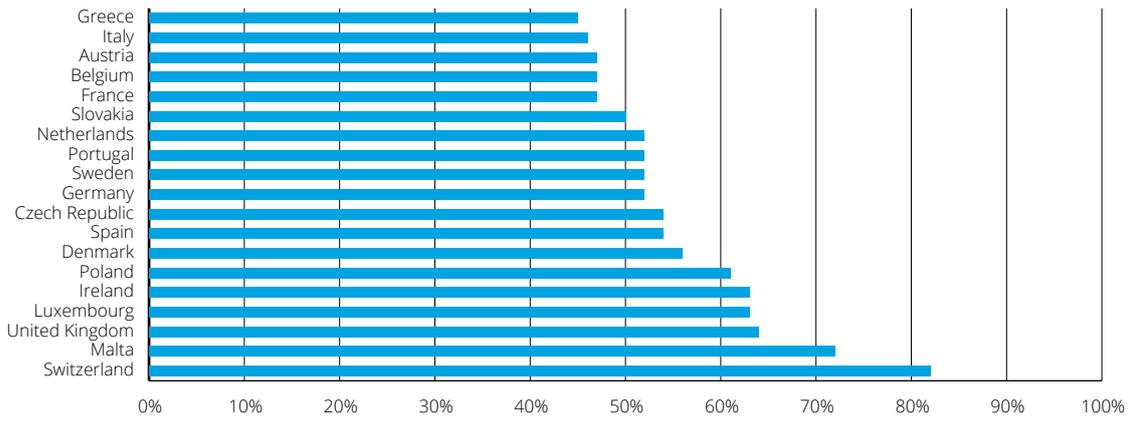


Chapter 1

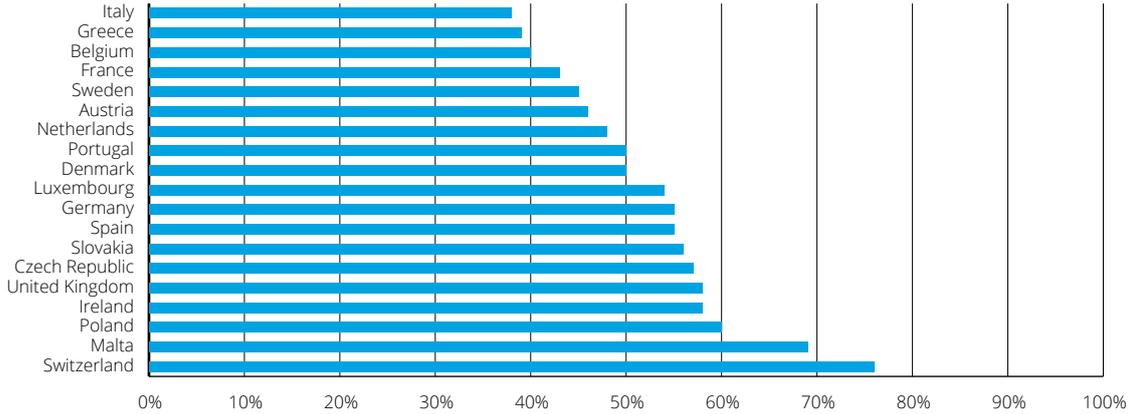
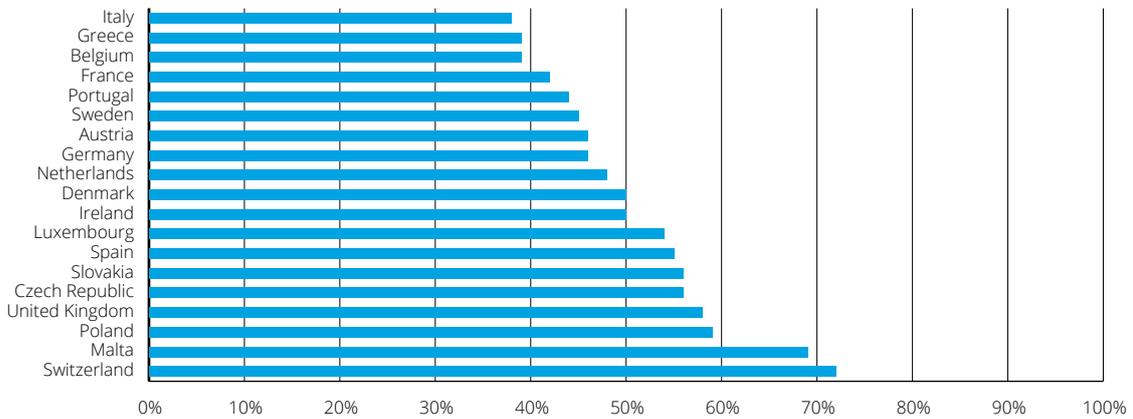
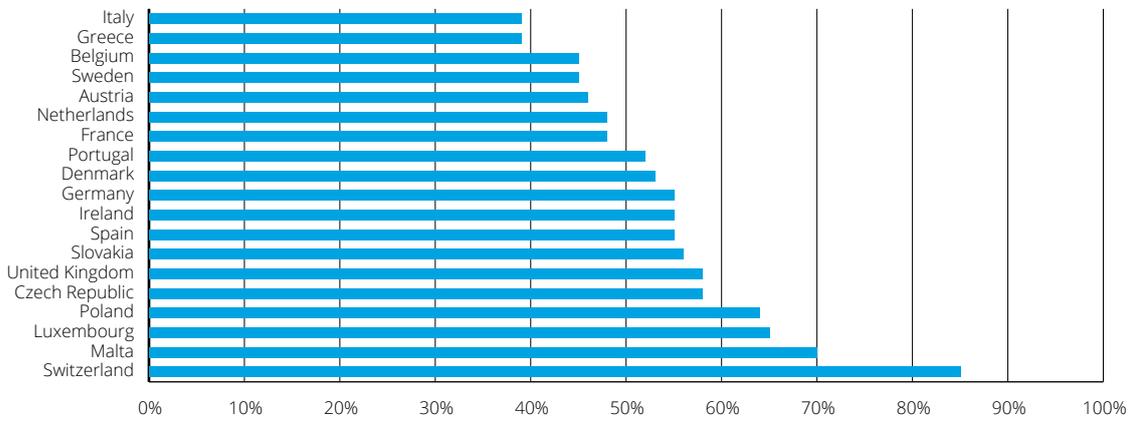
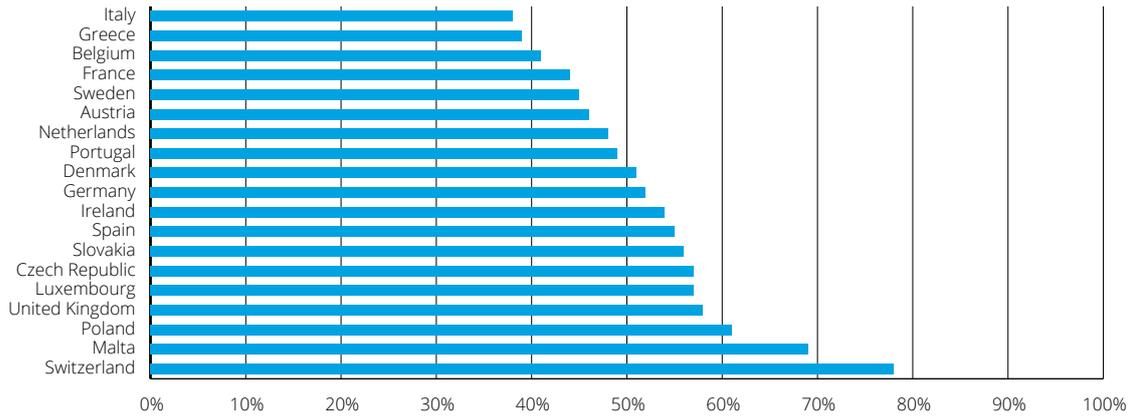
Sorted on net/cost ratio

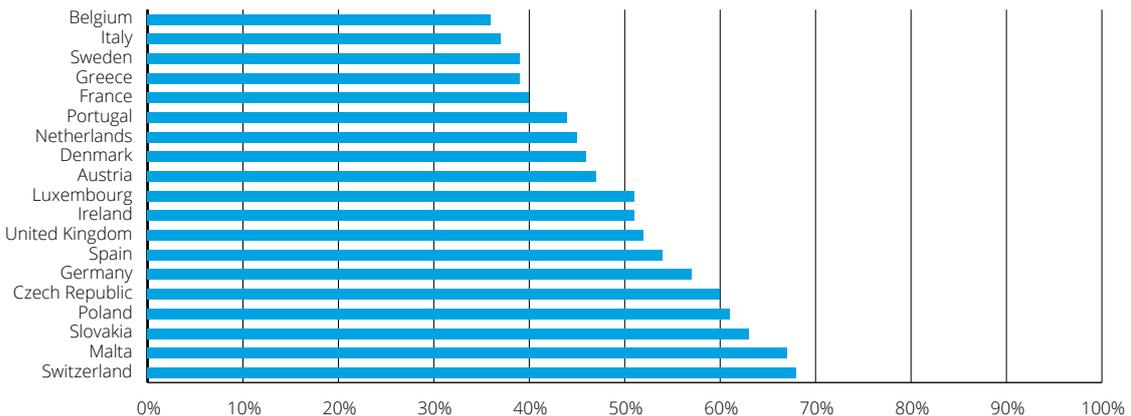
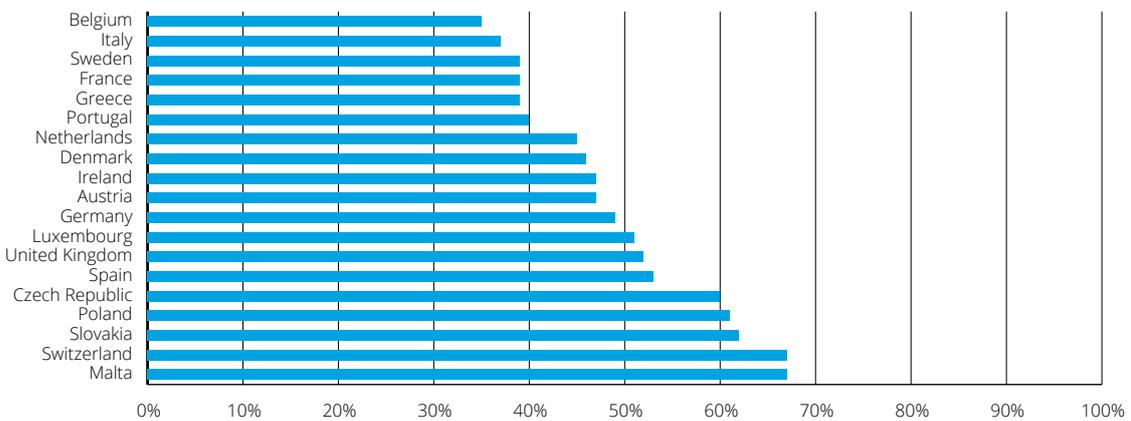
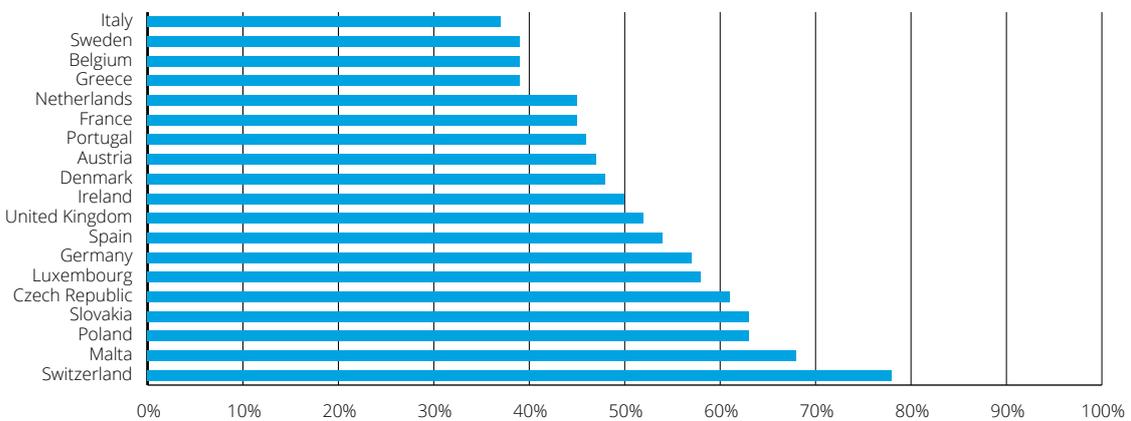
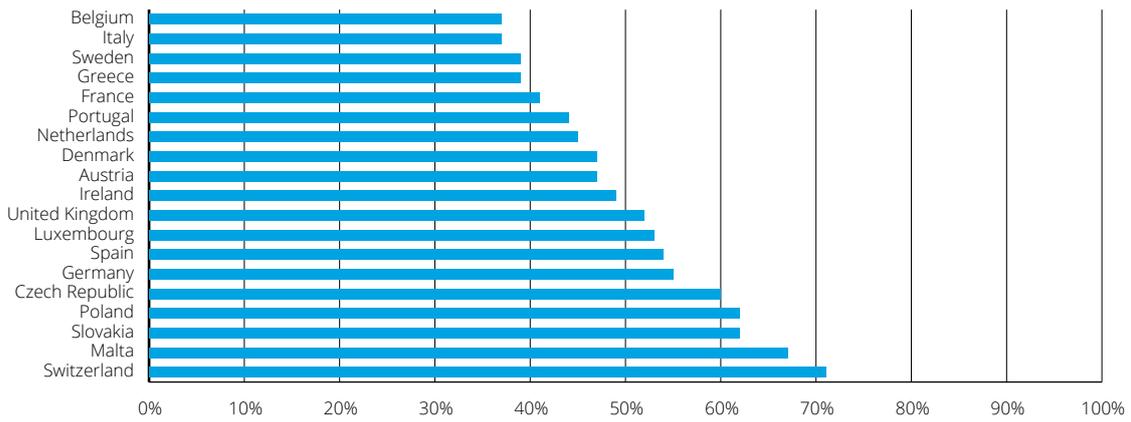
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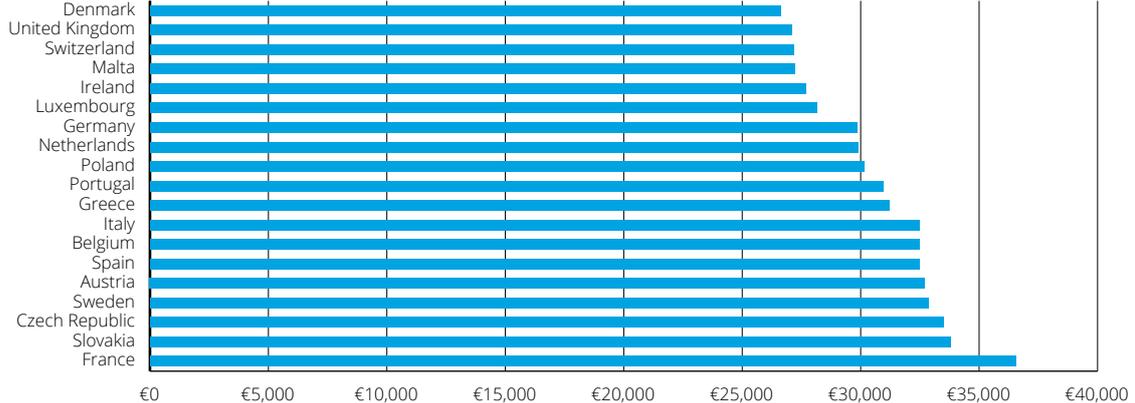
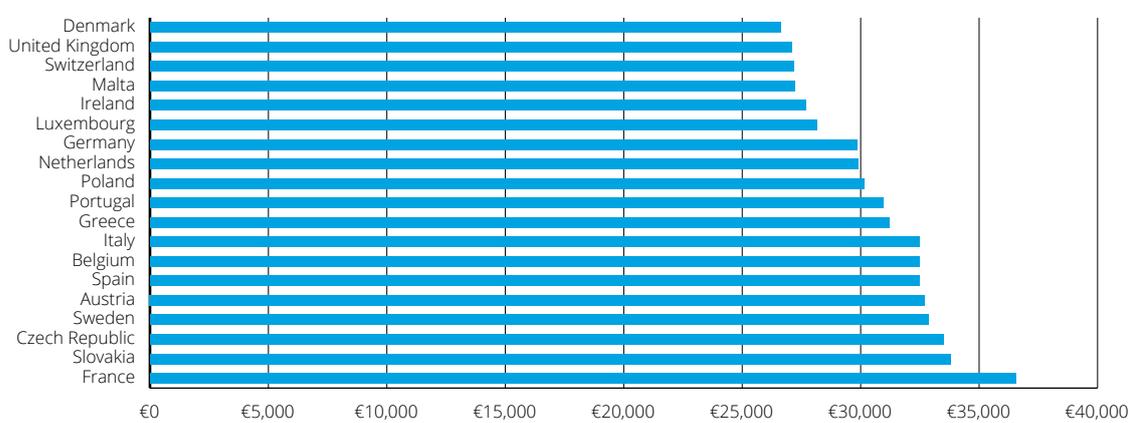
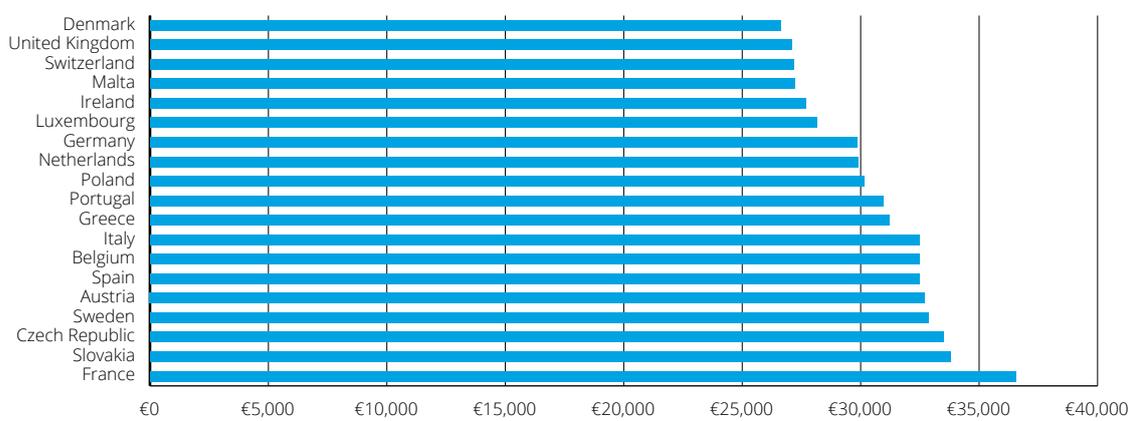
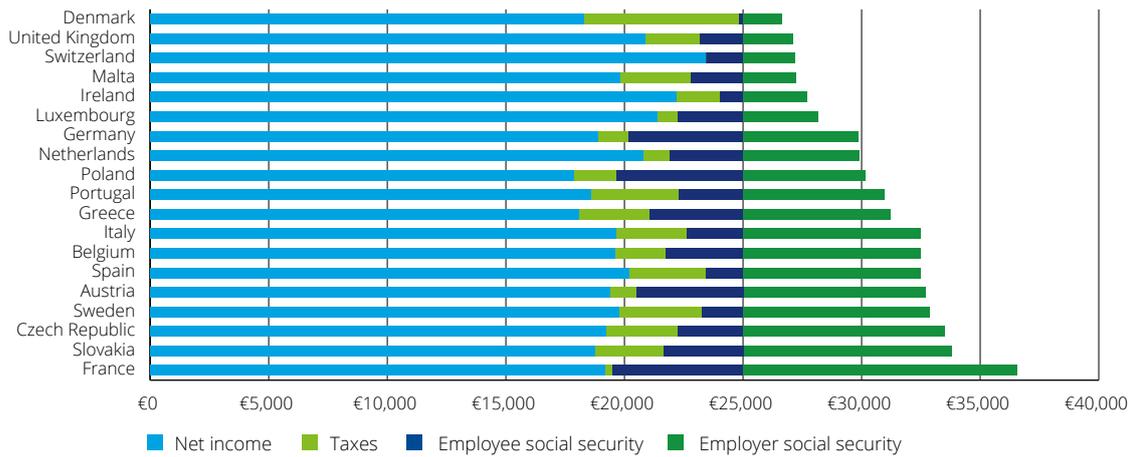
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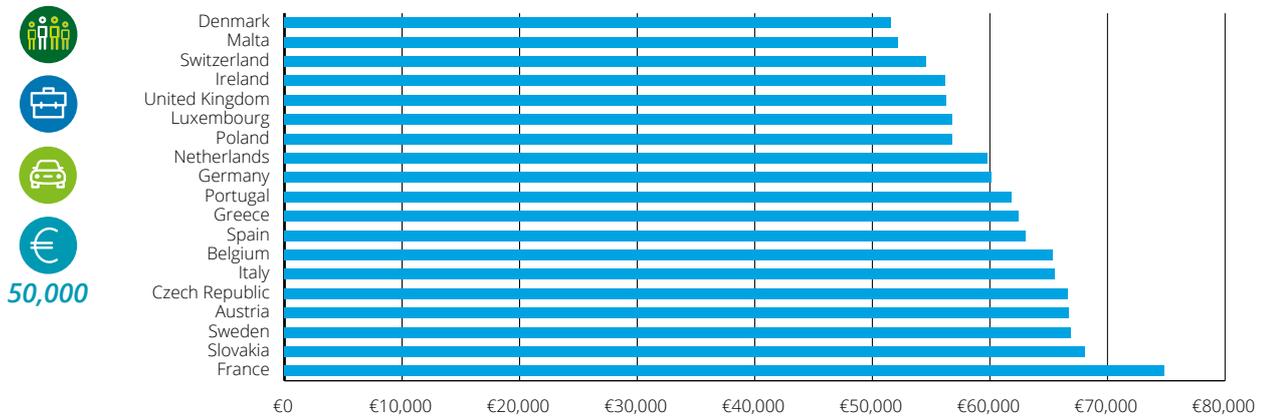
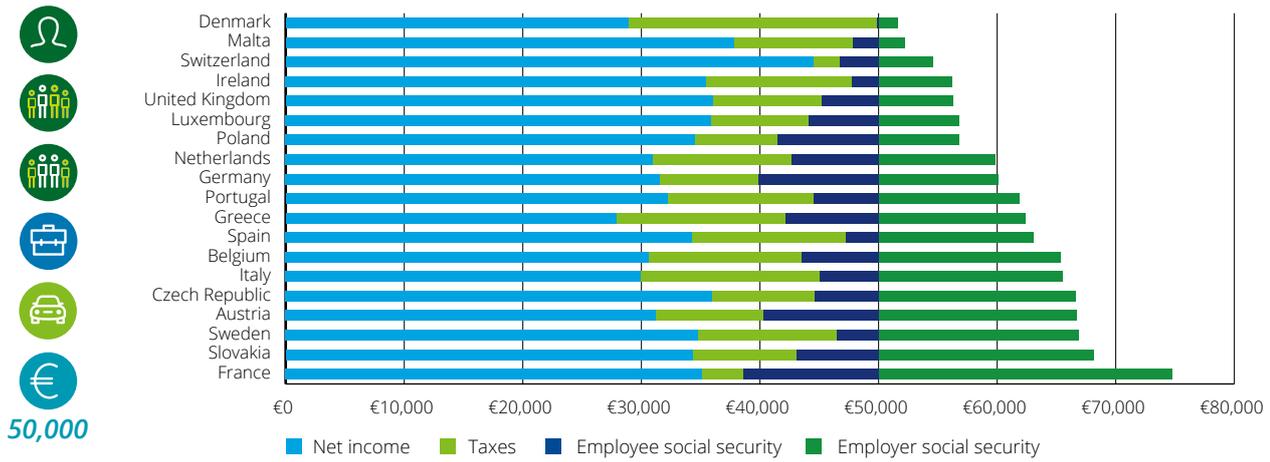


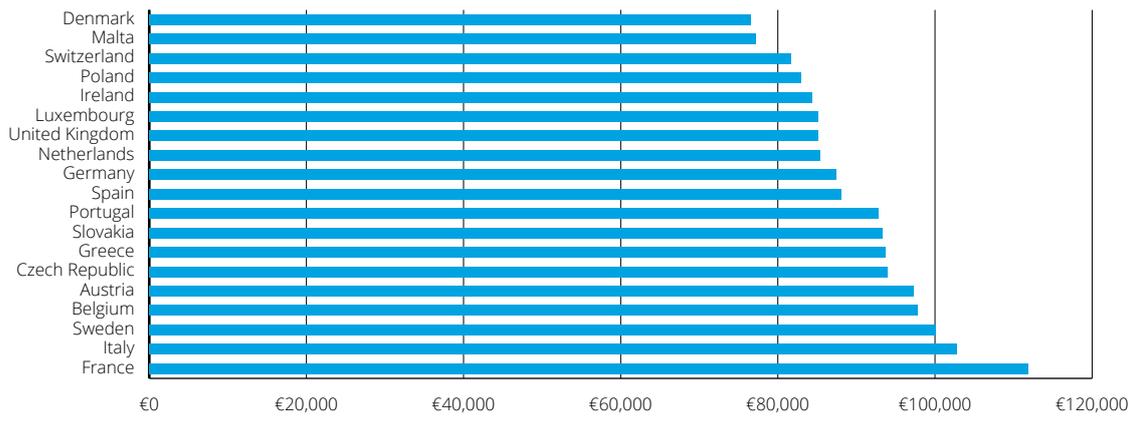
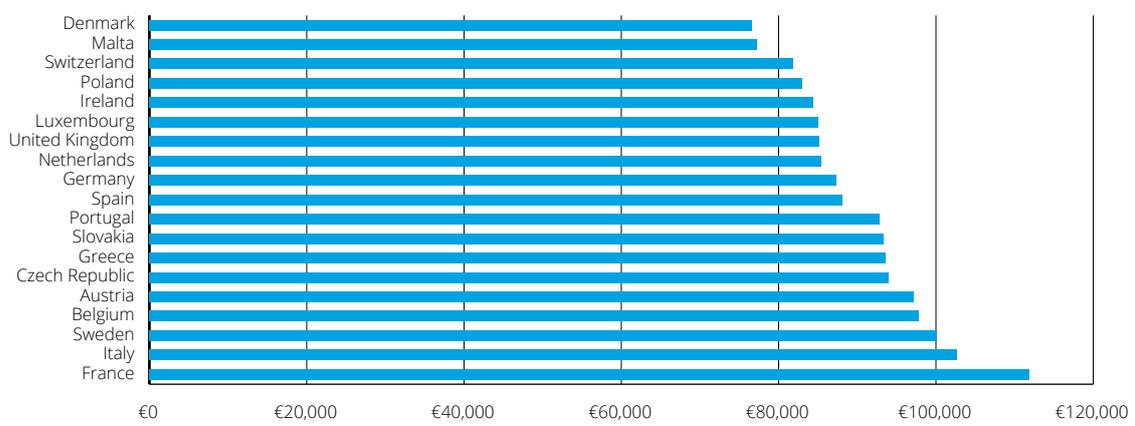
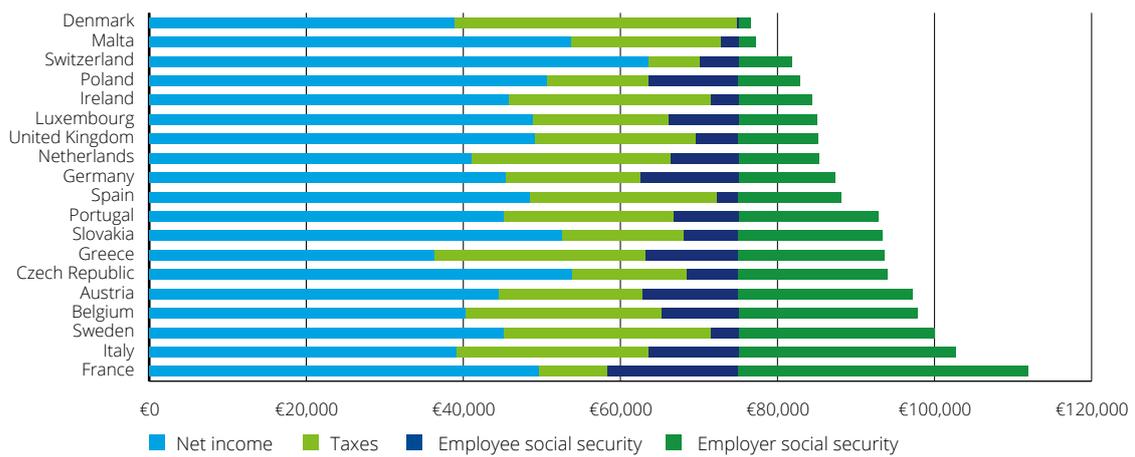
Chapter 1

Sorted on employer
cost

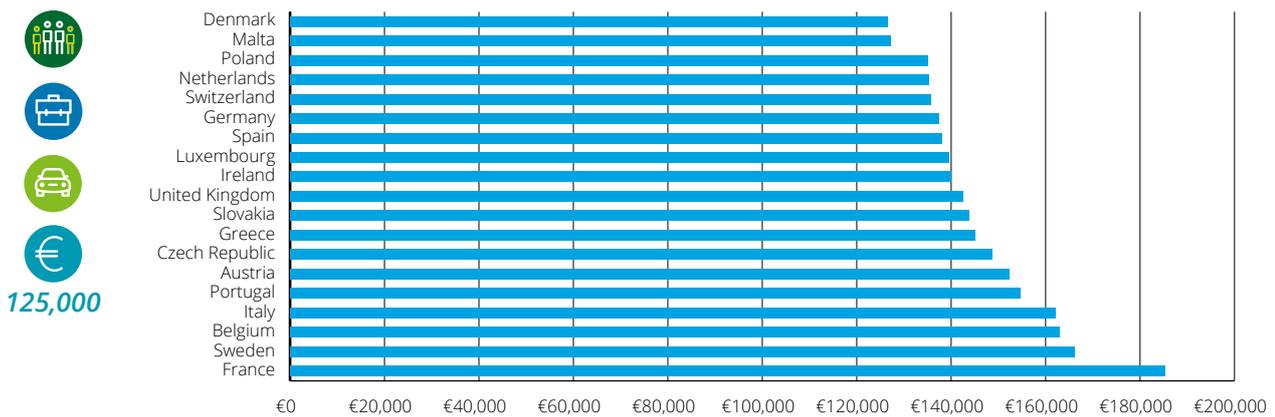
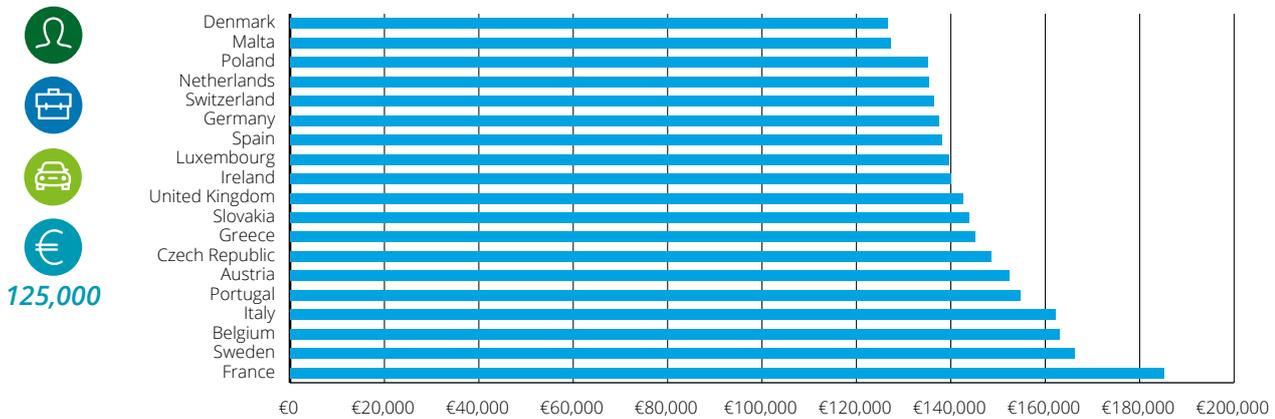
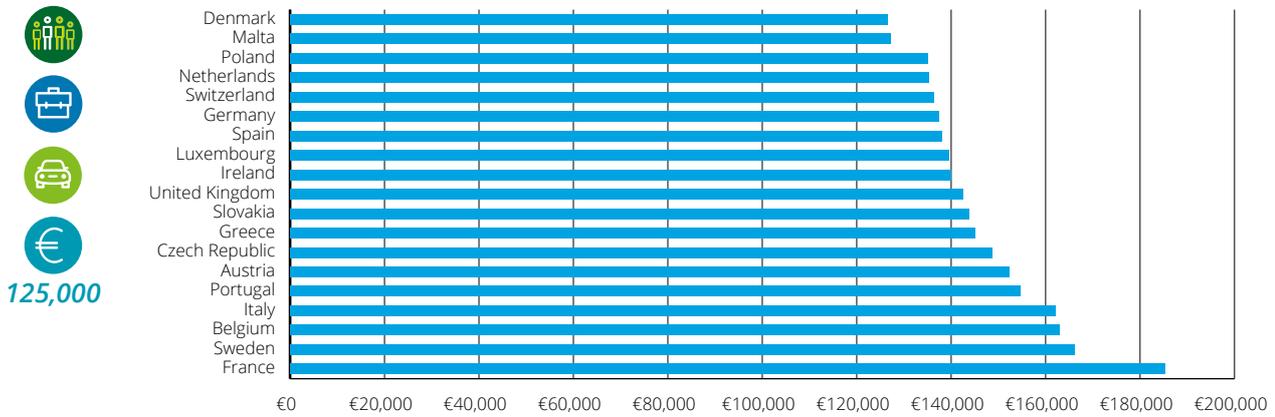
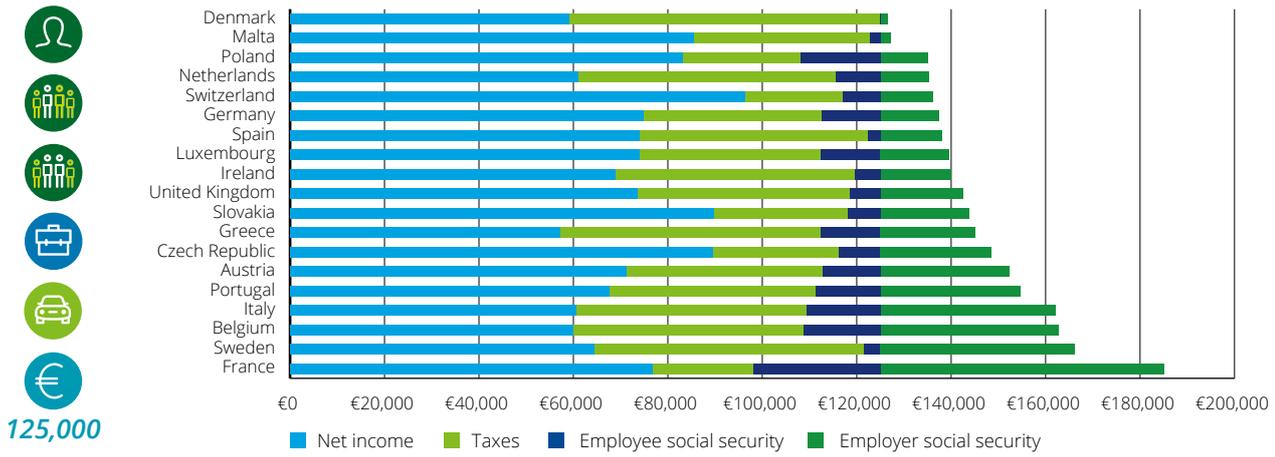


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Summary of highest tax rates

Country	Any changes compared to last year?	Highest tax rate	From an income higher than
Czech Republic	Yes – Level of income on which the Solidarity tax of 7% is applicable, was slightly increased.	Fixed rate of 15% (in practice effective tax rate is 20.1% as the tax base is increased with SSHI contributions made by the employer). The highest tax rate incl. Solidarity tax is 23.35%	On the full income. Additionally the Solidarity tax of 7% is due on annual income that exceeds the threshold of 1,296,288 CZK or +/- 47,975.13 EUR. The solidarity tax of 7% is also applied on monthly income exceeding the threshold of 108,024 CZK or +/- 3,997.93 EUR
Slovakia	No	25%	35,022.36 EUR (below this threshold, the tax rate is 19%)
Poland	No	32%	85,528 PLN (+/- 19,965.92 EUR)
Malta	No	35%	60,000 EUR
Ireland	Yes	40% (plus social contribution of 3%, 5.5% or 8% depending on income levels)	33,800 EUR (for an unmarried person) and 42,800 EUR (for a married person with 1 working partner)
Greece	Yes	45% (plus solidarity contribution of 10%)	40,000 EUR but the solidarity contribution is only due on income above 220,000 EUR
Italy	Yes	43% (plus regional tax 1.73 – 3.33% and municipal tax 0 – 0.9%)	75,000 EUR
Luxembourg	No	42.80% or 43.60% (depending on whether the income exceeds the limit or not)	150,000 EUR (unmarried taxpayers) 300,000 EUR (couples who are taxed together)
France	No	45% *plus special solidarity contributions amounting to approximately 15.5% on investment income **plus 4% of contribution on high income	150,000 EUR * As from the 1st euro **As from 500,000 EUR for single taxpayers (1,000,000 EUR for married taxpayers)
Germany	Yes	45% (plus solidarity contribution of 5.5%, church tax if applicable)	254,447 EUR
United Kingdom	Yes – increased tax free personal allowance (£11,000) and impact of exchange rate	45%	£ 150,000 (+/- 180,000 EUR)
Switzerland	Depending on both the canton and the municipality of the person's residence	Canton of Geneva, city of Geneva: 46.6% (top marginal rate)	801,055 EUR
Austria	Yes	55%	1,000,000 EUR

Country	Any changes compared to last year?	Highest tax rate	From an income higher than
Netherlands	Yes – a reduction of the rate in the second and third wage and income tax brackets from 42% to 40.4%. In addition, the third bracket is extended. As a result, the fourth bracket starts at an income in excess of EUR 66,422 instead of EUR 57,586.	52%	66,422 EUR
Belgium	Yes – rise in the scale to which the marginal rate applies	53.5% (including municipal tax: 0 – 9%)	38,080.01 EUR
Denmark	Yes	55.79%	68,273.56 EUR
Spain	Yes – tax rates have been reduced since 1 January 2016	45% for withholding purposes. Final tax rate depends on the region where the person lives. 47% in Catalonia 43.5% in Madrid	60,000 EUR
Portugal	Rates remain unchanged. The number of children on parents living with the taxpayer no longer influences the tax rate that applies. The deduction for children was increased. The 3.5% fixed surtaxed has been changed and is now progressive between 0% and 3.5%. 3.5% applies to taxable income over Euro 80.000.	56.5% (including 3.5% surtax applicable)	250,000 EUR
Sweden	Yes	57% (which relates to a specific municipality and includes the church fee)	On income above 430,200 SEK (+/- 46,022 EUR) national tax of 20% is charged. On income above 625,800 SEK or +/- 65,947 EUR, an additional 5% national tax is charged.

Summary of social security rates

Country	Any changes compared to last year?	Highest tax rate	From an income higher than
Denmark	No	Limited	Employees: fixed contribution of 153 EUR per year Employers: fixed contribution of approximately 1,350 – 1,750 EUR per year
Malta	Yes – increased limit	Limited	Employers and employees each pay 10% of the basic weekly wage subject to a maximum income of 344.87 EUR per week (max contribution 34.49 EUR per week or 1,793 EUR per year) for persons born before 1/1/1962 and 425.74 EUR per week (max contribution 42.57 EUR per week or 2,214 EUR per year) for persons born after 31/12/1961
Netherlands	Yes, increased limit for employee and employer contributions. Increased tax rate for employers	Limited	Employees: 28.15% on maximum earnings of 33,715 EUR Employers: 19.63% on maximum earnings of 52,763 EUR
Spain	Yes – increased limit for employee and employer contributions	Limited	Employees: 6.35% on a maximum income of 43,704 EUR Employers: approximately 29.9% (an additional percentage has to be added, which depends on the activity of the employer) on a maximum income of 43,704 EUR
Slovakia	Yes – increased limit	Limited	Employees: 13.4% with a limit for contributions to 51,480 EUR per annum Employers: 34.4%. However there is no limit for accident insurance (0.8%).
Sweden	Yes – further increased limit maximum employee contributions	Limited for employees Unlimited for employers	Employees: 7% on a maximum income of 478,551 SEK or +/- 51,195 EUR i.e. maximum contribution of 32,500 SEK or +/- 3,583 EUR. As a tax reduction with a corresponding amount is granted, it is generally at no cost to the employee. Employers: 31.42% (employees born in 1951 and later)
Germany	Yes – increased limit	Limited	Employees and employers pay together (about 50/50) approximately 33.28% on a maximum income of 74,400 EUR (old federal states) for pension and unemployment and on a maximum income of 50,850 EUR for sickness and disability.
Austria	Yes – increased limit, increased percentages for employees and decreased percentage for employers	Limited	Employees and employers pay together approximately 39.6% (18.12% for employees and 21.48% for employers) on a maximum income of 4,860 EUR p.m. for ordinary payments and 38.1 % (17.12% for employees and 20.98% for employers) on a maximum income of 9,720 EUR p.a. for extraordinary payments

Country	Any changes compared to last year?	Highest tax rate	From an income higher than
Czech Republic	Yes – increased limit for Social Security (SS) (and impact of exchange rate)	Limited, but contribution to HI is uncapped	<p>Employees: 6.5% on a maximum income of 1,296,288 CZK or +/- 47,975.13 EUR (SS) 4.5% on the full income (HI)</p> <p>Employers: 25% on a maximum income of 1,296,288 CZK or +/- 47,975.13 EUR (SS) 9% on the full income (HI)</p>
Ireland	Employer's PRSI at 10.75% applies to income in excess of €376 per week (€356 in 2015). The Class A employee PRSI rate of 4% remains unchanged. However, effective from 1 January 2016, for gross earnings between €352.01 and €424 the PRSI at 4% is reduced by a new tapered weekly PRSI weekly credit. The maximum weekly credit available is €12 (applying at gross weekly earnings of €352.01). For gross weekly earnings over €352.01, the maximum PRSI credit of €12 is reduced by 1/6th of weekly earnings in excess of €352.01. There is no credit available for gross income in excess of €424.	Unlimited	<p>Employees: approximately 4% but with certain exemptions</p> <p>Employers: either 8.5% or 10.75% with no exemptions depending on weekly wage of the employee</p>
Switzerland	Yes	Unlimited	<p>Employees and Employers both pay:</p> <ul style="list-style-type: none"> • 5.125% (AHV); • 1.1% on max. 148,200 CHF (+/- 110,237 EUR) (ALV 1) • 0.5% (ALV 2: salary - 148,200 CHF) • 4% or more pension (2nd pillar) (% depending on type of contract)
Poland	Yes – increased limits for employee and employer contributions for pension and disability	Unlimited but some contributions are capped (pension and disability)	<p>Employees: 2.45% unlimited (sickness) + maximum contribution 13,697.79 PLN or +/- 3,197.65 EUR (pension and disability) + 9% unlimited (health contribution)</p> <p>Employers: maximum pension and disability contribution 19,780.29 PLN or +/- 4,617.57 EUR + <0.4% -3.60%> unlimited (work accidents) + 2.45% unlimited (employment fund) + 0.1% unlimited (fund for guaranteed employee benefits).</p>

Country	Any changes compared to last year?	Highest tax rate	From an income higher than
Luxembourg	No	Limited	Employees: 11.05% on a maximum income of 115,377.84 EUR + 1.4% of dependence contribution + 0.5% of temporary tax which are not capped Employers: 12.62% - 15.09% on a maximum income of 115,377.84 EUR
United Kingdom	Yes – small changes in the thresholds	Unlimited	Employees: 12% on income between 8,060 GBP and 43,000 GBP or +/- 47,883 EUR and 2% above Employers: 13.8% on all income above 8,060 GBP or +/- 8,975 EUR
Portugal	No	Unlimited	Employees: 11% Employers: 23.75%
Greece	Yes	Limited	Employees and employers together pay 41.06% of which employees pay 16% and employers 25.06%, on a maximum annual gross income of 87,912 EUR. These changes apply as of June 2016.
Italy	No	Limited for employees hired after 31/12/1995 Unlimited for employees hired prior to 31/12/1995	Employees approximately 10% (on a maximum income of 100,324 EUR if the limit applies) Employers approximately 30 to 38% (on a maximum income of 100,324 EUR if the limit applies)
Belgium	No	Unlimited	Employees: 13.07% Employers: approximately 35%
France	Yes – Employee and employer retirement contributions increased by 0.05%.	Unlimited	Employees: approximately 20% Employers: approximately 45%

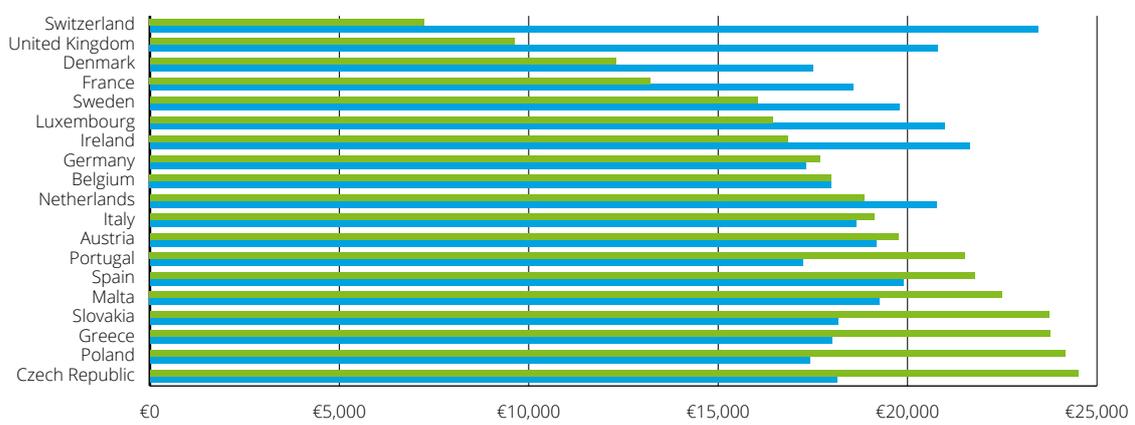
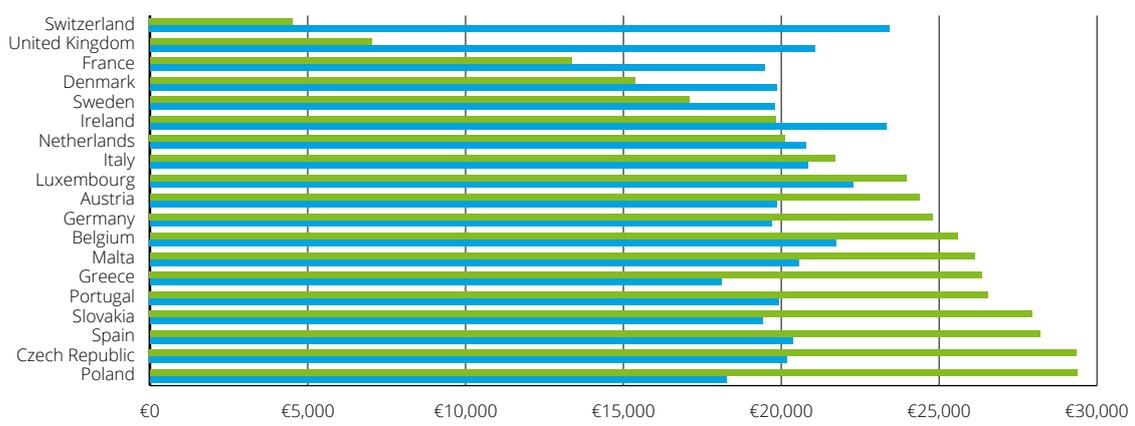
Statutory gross minimum wages

Country	Statutory gross minimum wage
Luxembourg	1,922.96 EUR per month for unskilled employees and 2,307.56 EUR per month for skilled employees
Belgium	From age 21: 1,501.82 EUR per month From 21 years and 6 months' service: 1,541.67 EUR per month From age 22 + 12 months' service: 1,559.38 EUR per month
Netherlands	From age 15: 461.15 EUR per month From age 16: 530.35 EUR per month From age 17: 607.20 EUR per month From age 18: 699.45 EUR per month From age 19: 807.05 EUR per month From age 20: 945.50 EUR per month From age 21: 1,114.45 EUR per month From age 22: 1,306.60 EUR per month From age 23 and older: 1,537.20 EUR per month
Germany	1,360 EUR per month (based on a 40-hour week) Since January 2015 a minimum wage of 8.50 EUR/hour has been imposed
France	1,466.62 EUR per month (based on a statutory 35-hour week)
Ireland	1,586 EUR per month (based on a 40-hour week)
United Kingdom	Since April 2016, the national minimum wage is GBP 7.72 per hour for people aged 25 and older or approximately 1,226.88 GBP per month (based on a 40 hour week) (+/- 1,370.04 EUR), GBP 6.70 per hour for workers aged 21 to 24, GBP 5.30 per hour for those aged 18 to 20 and GBP 3.87 per hour for those aged under 18.
Malta	Under 17 years old – 158.39 EUR per week or 686.36 EUR per month 17 years old – 161.23 EUR per week or 698.66 EUR per month As of 18 years old – 168.01 EUR per week or 728.04 EUR per month
Spain	648.60 EUR per month
Greece	Under 25 years old: 510.95 EUR per month As of 25 years old: 586.08 EUR per month
Portugal	530 EUR per month
Poland	1,850 PLN (+/- 431,87 EUR) per month
Slovakia	405 EUR per month

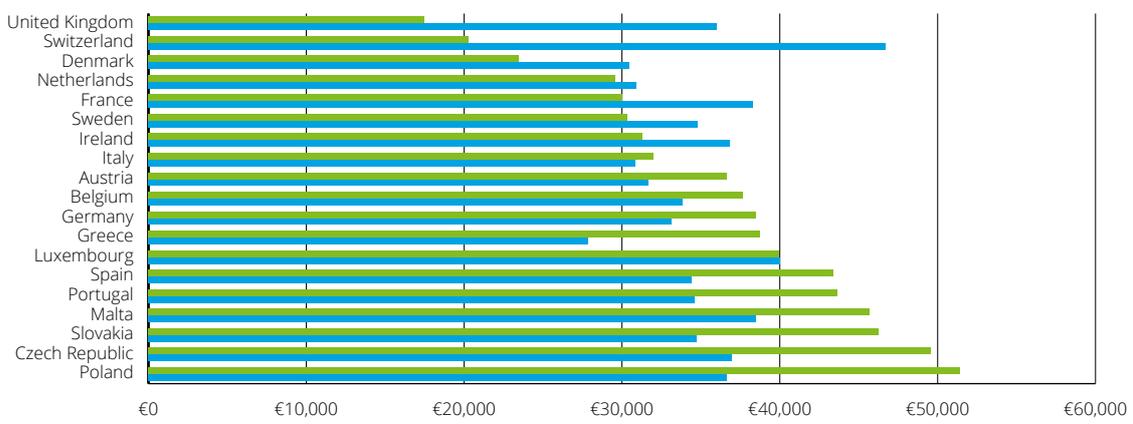
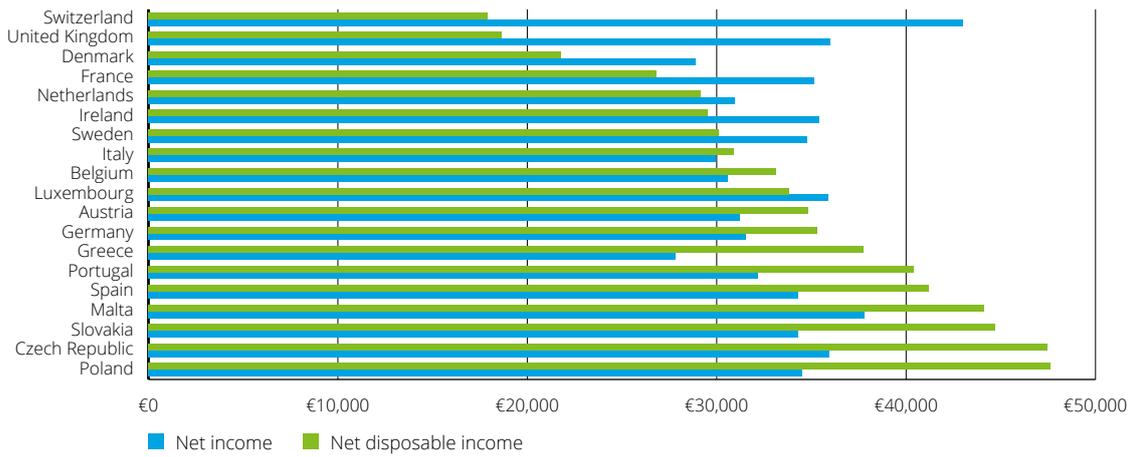
Country	Statutory gross minimum wage
Czech Republic	9,900 CZK (+/- 366.40 EUR) per month.
Austria	No statutory minimum wage; fixed in collective contracts for most industries
Denmark	No statutory minimum wage;
Italy	No statutory minimum wage;
Sweden	No statutory minimum wage; Minimum wages are established by collective bargaining agreements between employers and unions without any involvement of the government. The collective agreements have strong positions in Sweden and may not be deviated from.
Switzerland	No statutory minimum wage

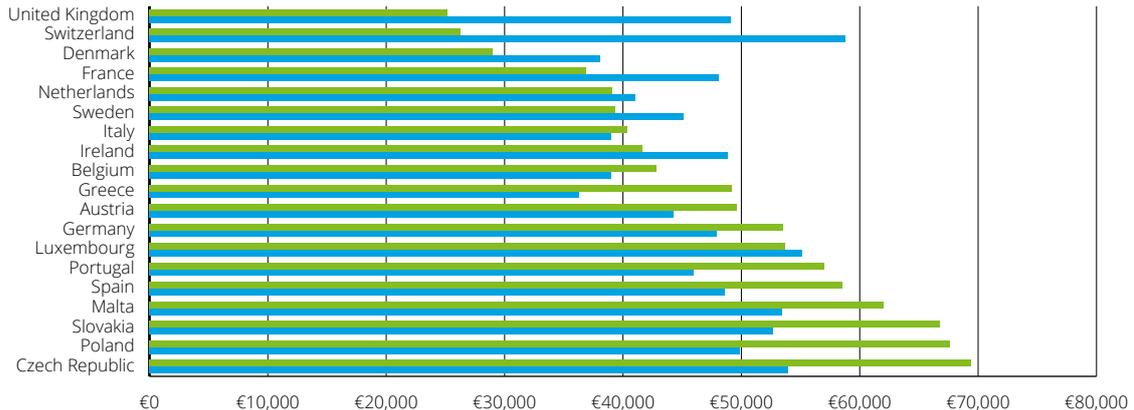
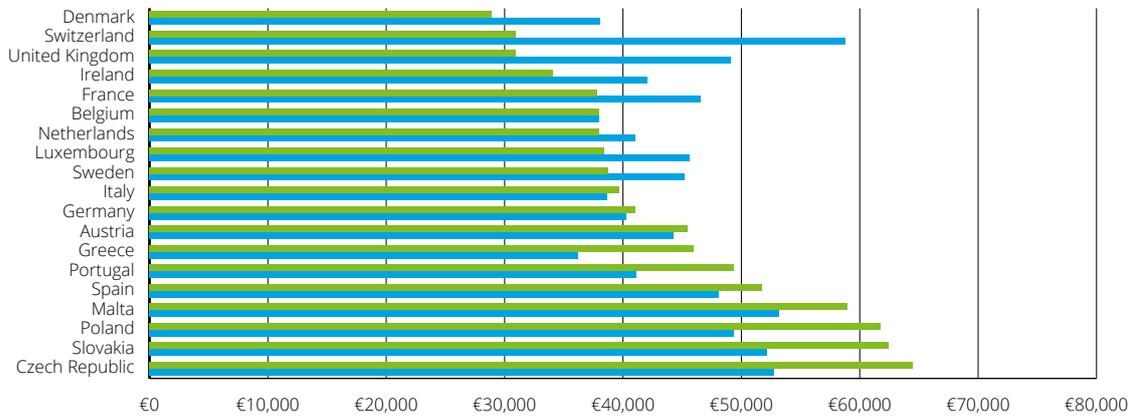
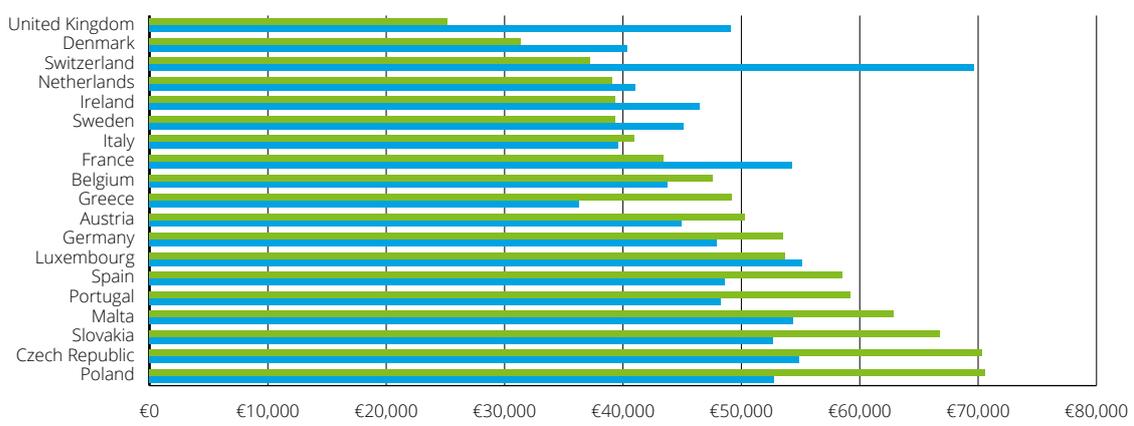
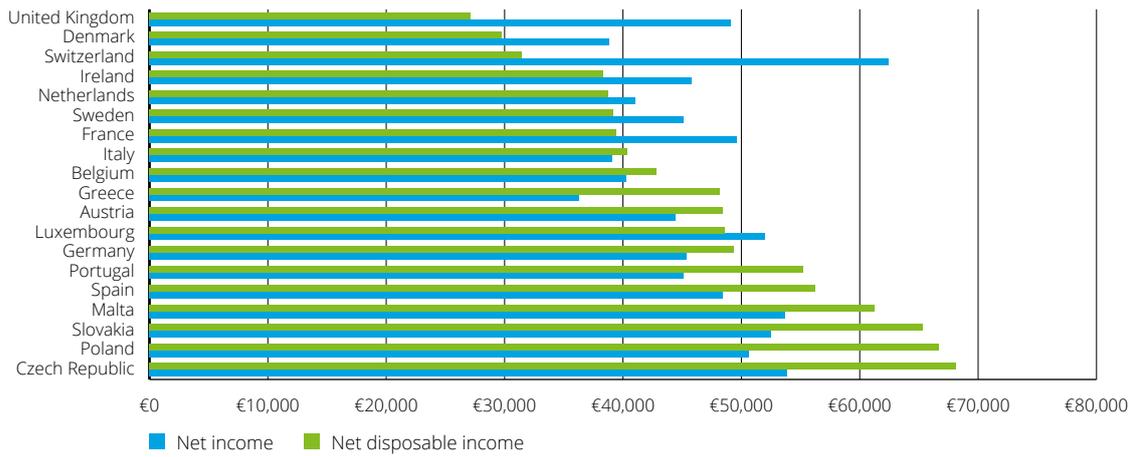
Chapter 2

Sorted on net
spendable income

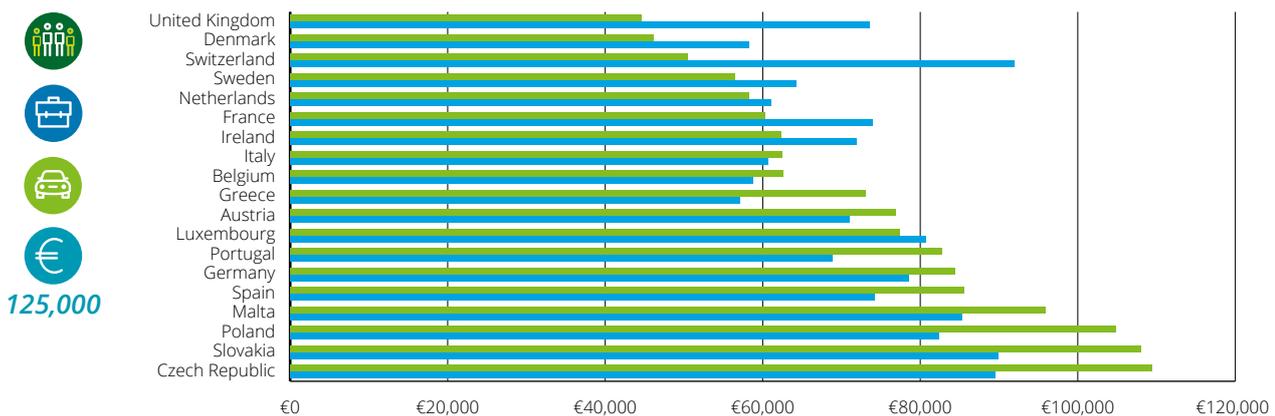
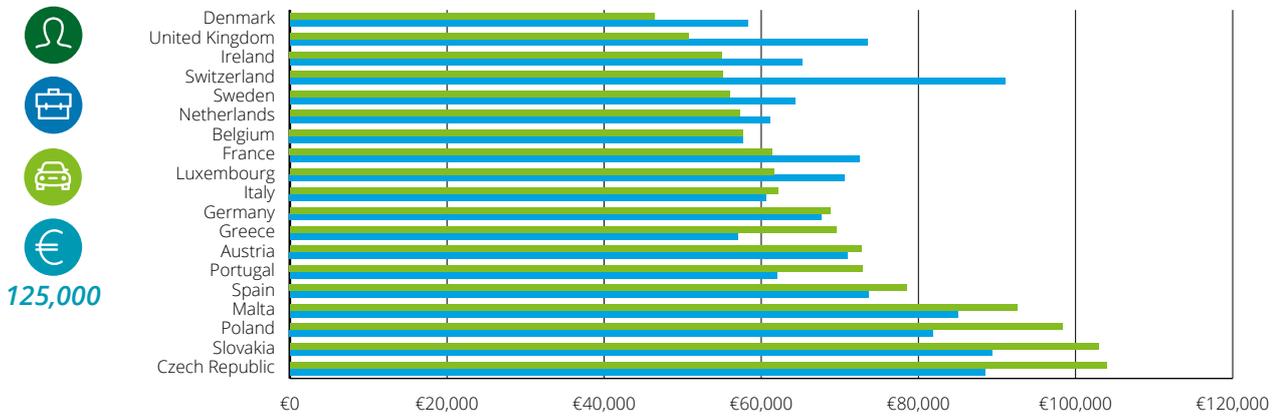
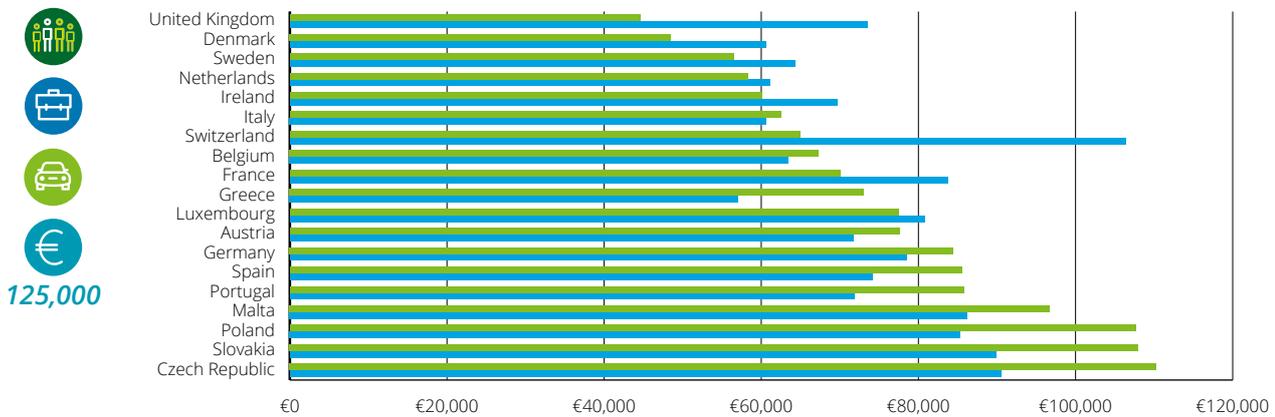
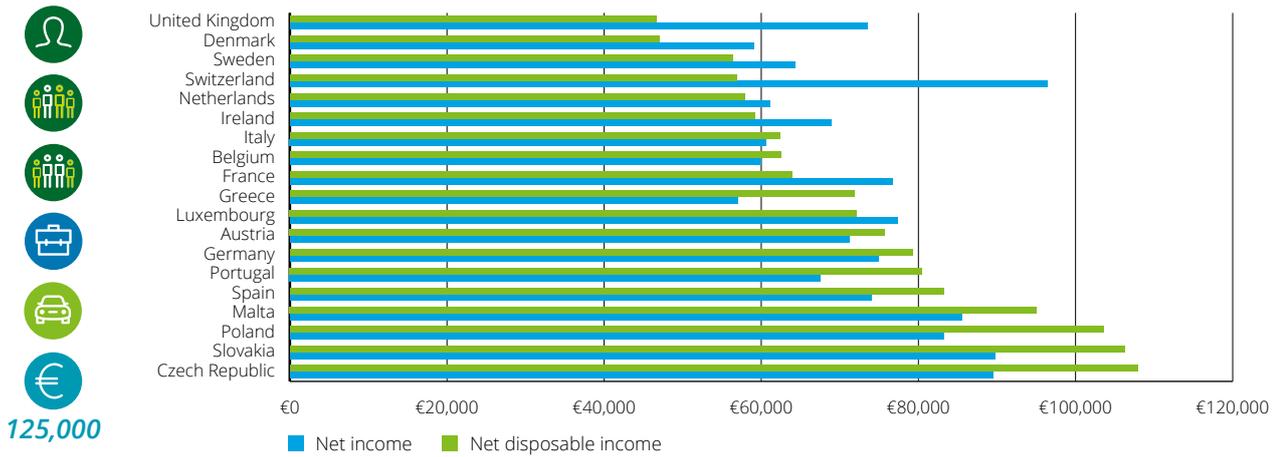


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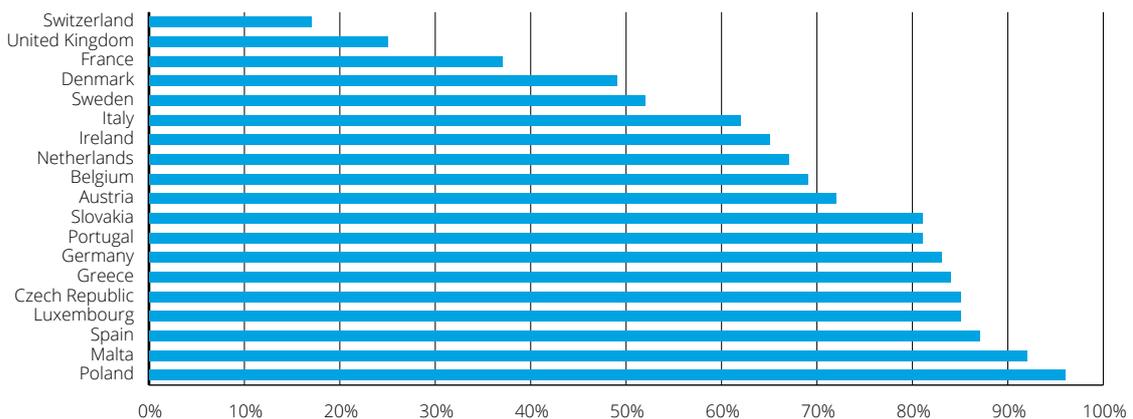
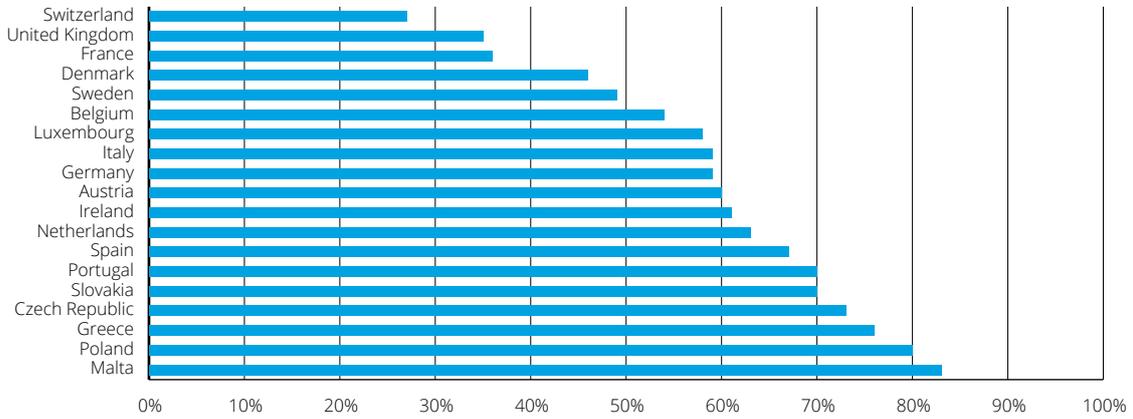
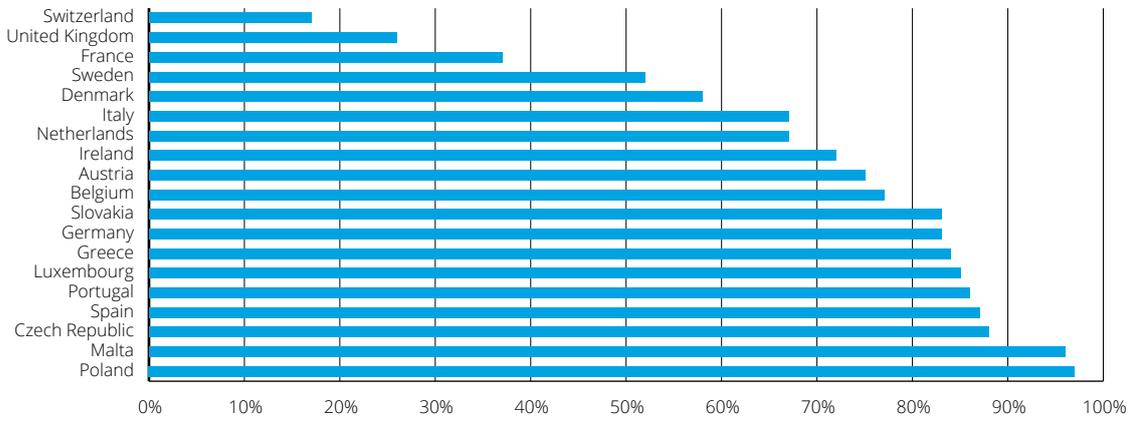
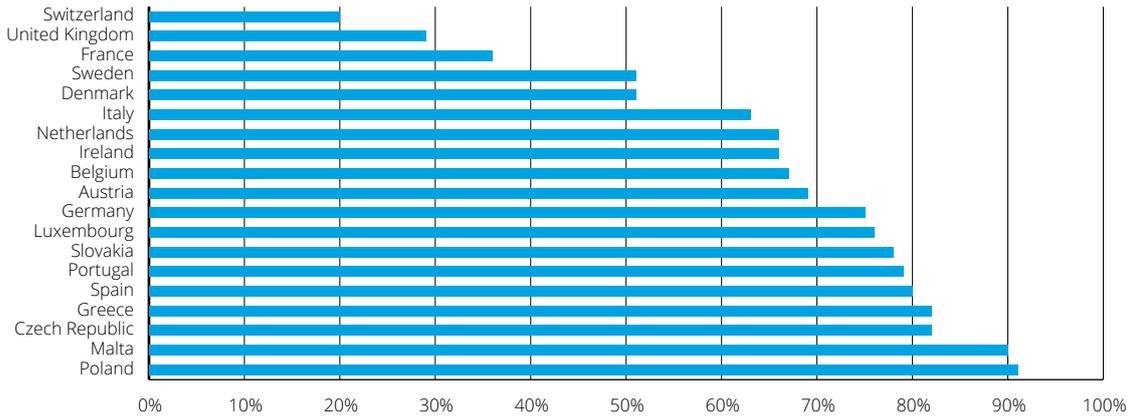
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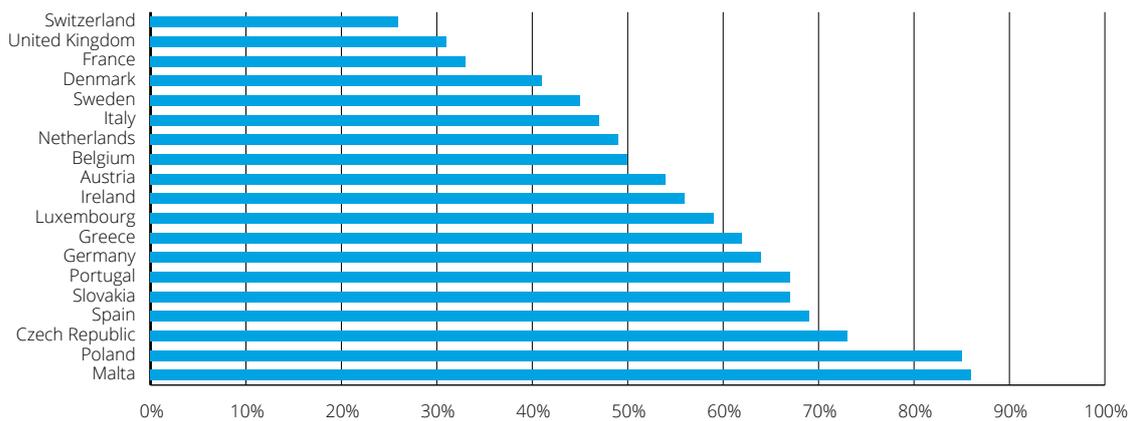
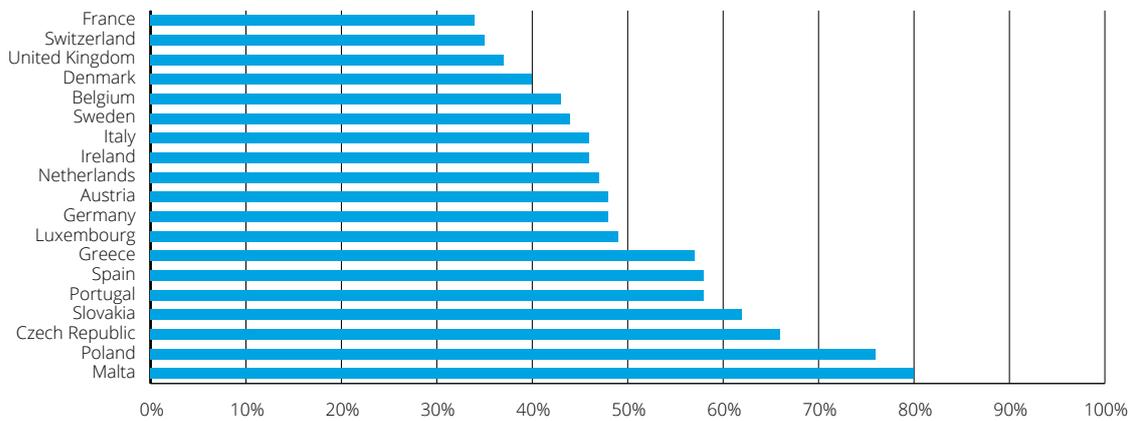
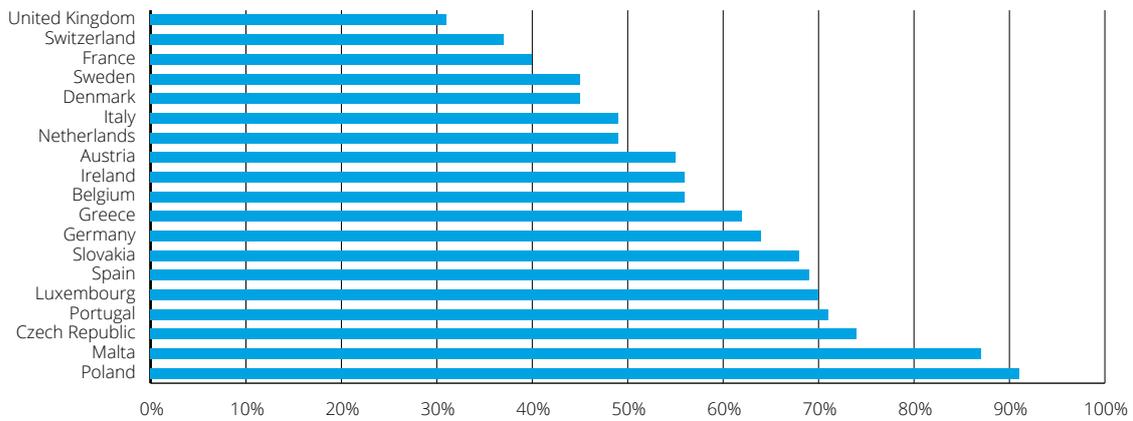
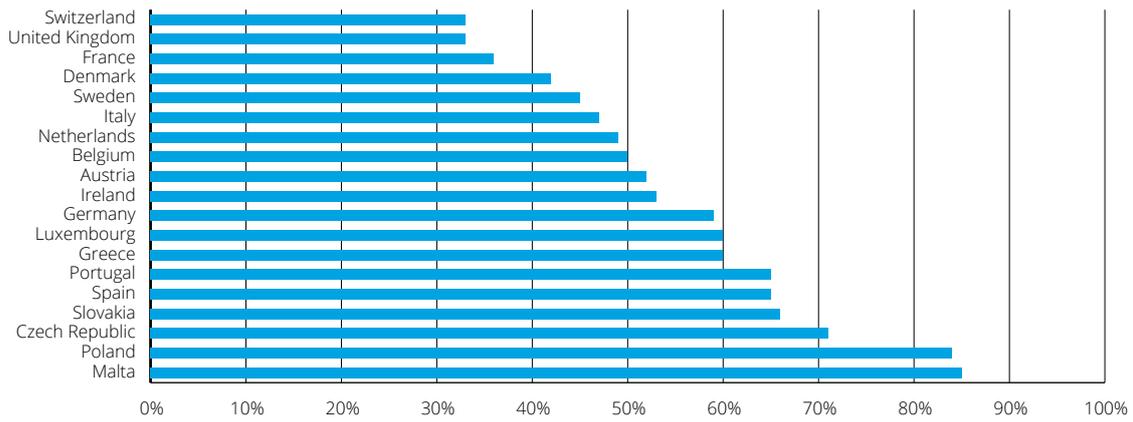


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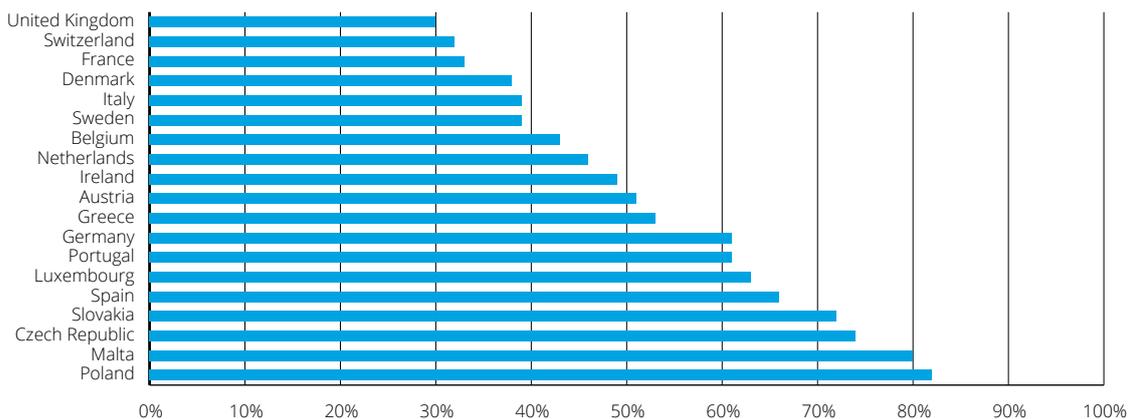
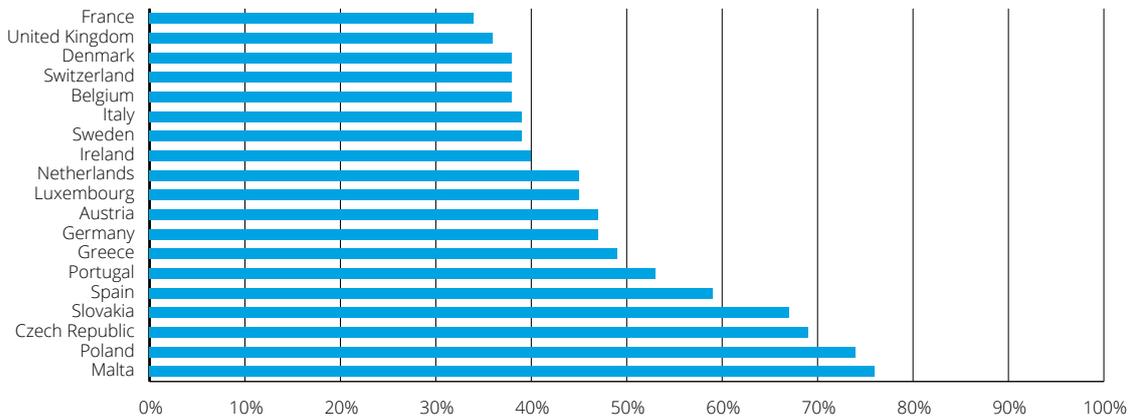
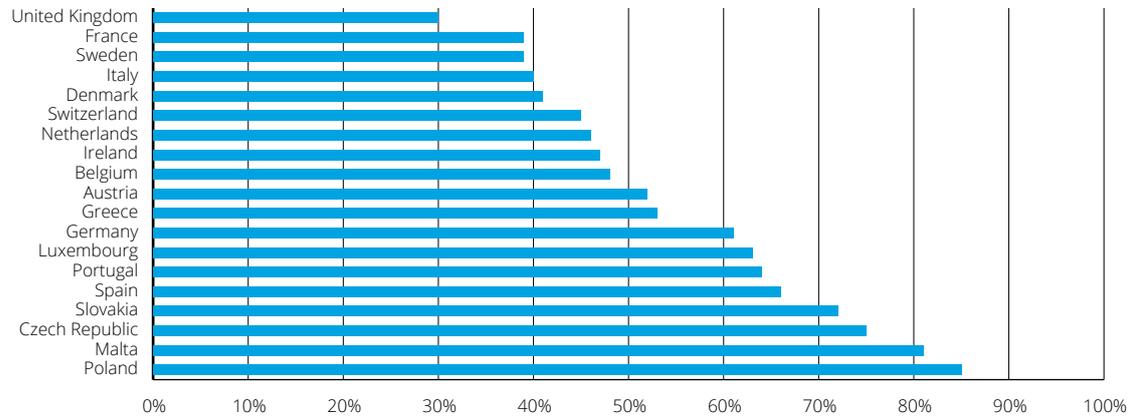
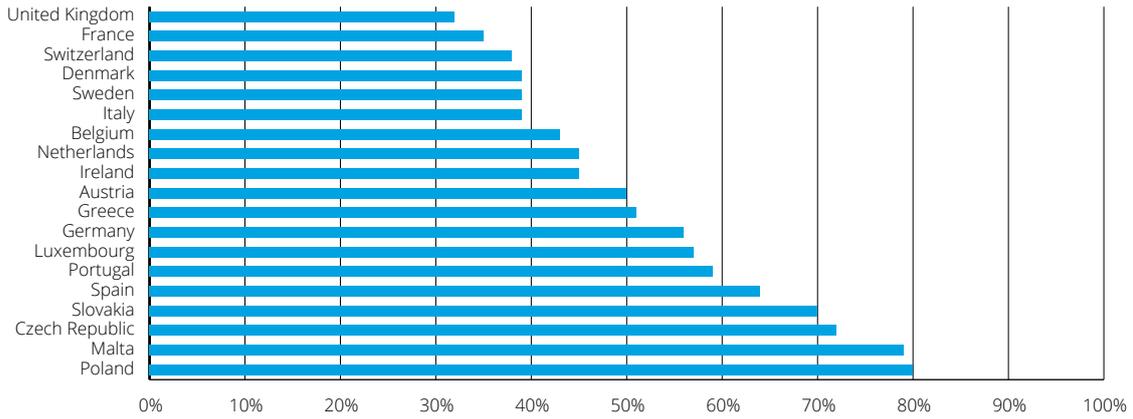
Sorted on net
spendable/cost ratio

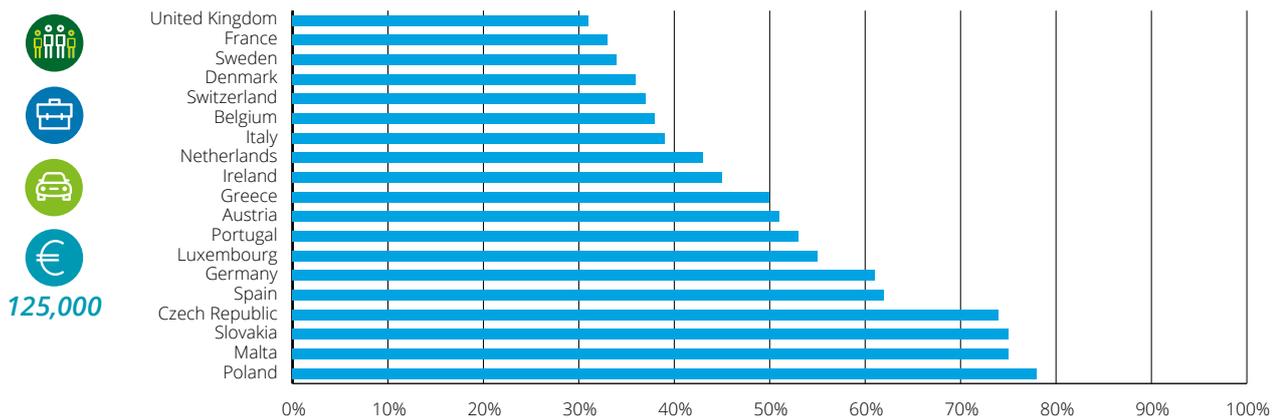
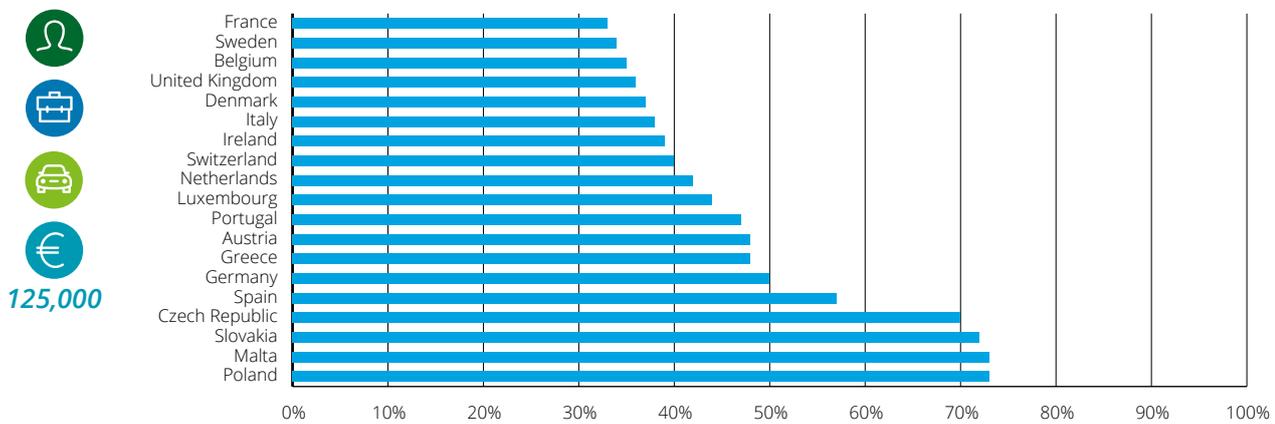
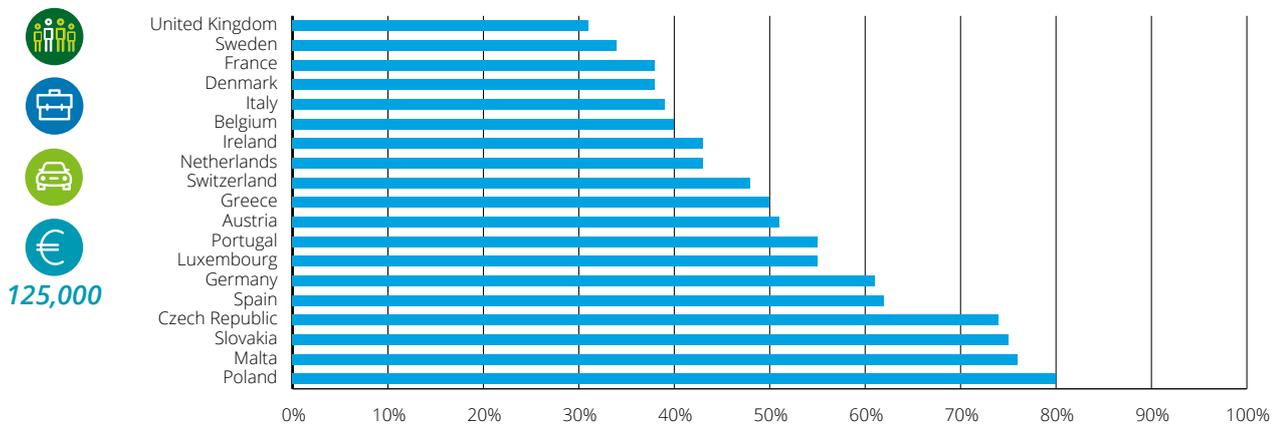
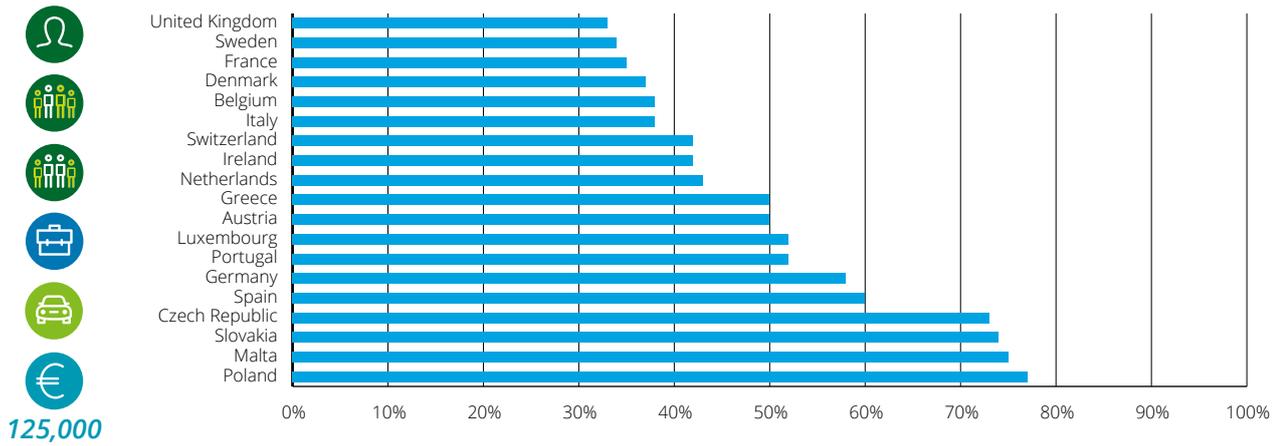
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Summary of taxation of capital

Belgium

Interest

Interest and other yields from loans, claims on debt and cash deposits are in principle taxed at a flat rate of 27% since January 1st, 2016. The due taxes are withheld via an advance levy at source (following which, Belgian movable income should in principle not be mentioned in a Belgian income tax return).

As an exception to this general rule, a flat tax rate of 15% applies to:

- Interests from state bonds issued between 24 November and 2 December 2011 (the so called "Leterme-bonds"); and
- Interests from a regulated savings deposit exceeding an amount of EUR 1,880 per person per year (income year 2015 – tax year 2016).

The amount up to EUR 1.880 is exempt from taxes.

Note that the 15% rate is also increased to 17% in case of distribution of a liquidation reserve during the initial 5-year blocking period as well as in case of a capital decrease during the initial blocking period deemed originating from so-called "click" dividends.

Dividends

Belgian dividends are in principle subject to taxes that are levied at source, at a flat rate of 27% (also as from January 1st, 2016).

However:

- Dividends from residential real estate investment companies ("vastgoedbevaks") are taxed at a flat rate of 15%; and
- Dividends originating from so called "VVPR-shares" issued as of 1 July 2013, are – provided certain conditions are met - subject to a withholding tax rate of either 15 or 20%.

The existing reduced rates for dividends from real estate vehicles ("vastgoedbevaks") would be abolished. The draft explanatory memorandum confirms that the following (existing) reduced rates would remain applicable:

- Interest from regulated savings deposits;
- Interest from the 2011 "Leterme bonds"; and
- Dividends from new shares in SMEs, issued since 1 July 2013 (VVPR – SME).

Capital gains

Capital gains received by individuals in light of the "normal management" of their private (movable) estate, are in principle not taxable in Belgium.

However, a so-called "speculation tax" due at a flat rate of 33% has been introduced for resident and non-resident taxpayers.

The tax is due on the capital gains realized (outside the exercise of a professional activity) on quoted shares, options and warrants or other quoted financial instruments which have been acquired for consideration less than 6 months before the alienation for consideration.

The shares, options, warrants or other quoted financial instruments should be quoted (i) on a Belgian or foreign regulated market in the sense of Art. 2, 1st ind., 3^o of the Law of 2 August 2002, or (ii) on a multilateral trading facility in the sense of Art. 2, 1st ind., 4^o of the Law of 2 August 2002 (provided there is daily trading and a central order book), or (iii) on a trading platform of a third country fulfilling a similar function.

For purposes of the speculation tax, the notion "shares" is defined as any shares in companies or assimilated securities as well as share certificates, except shares in collective investment vehicles (as meant by the Law of 3 August 2012), in undertakings investing in debt claims (as meant by the Law of 19 April 2014) and in regulated real estate companies.

The tax also targets capital gains realized on "other quoted financial instruments", leveraged or unleveraged, through which an investor invests in changes to the value of an underlying asset, provided the underlying asset consists solely of one or more specific quoted shares. The Explanatory Memorandum relating to the tax clarifies that quoted "turbos", "speeders", "sprinters", warrants and futures may fall under this category, but excludes convertible bonds.

The tax equally applies, on the one hand, where the shares, options, warrants or other quoted financial instruments have been acquired through a donation inter vivos ("schenking onder levenden/donation entre vifs"), and, on the other hand, in case of short sales ("shorttransactie /vente à découvert") as meant by Art. 2, 1st ind., b of EU Regulation n° 236/2012 of 14 March 2012. The 6-month period is calculated based on the LIFO method. In case of short selling, the 6-month period is calculated between the date of sale and the date of acquisition of the shares, options, warrants or other quoted financial instruments concerned.

Two situations are excluded from the speculation tax:

1. Capital gains realized on shares, options or warrants acquired in the context of a professional activity (cf. employee stock option plans), where the acquisition has triggered a taxable professional income in the hands of the beneficiary, according to the ITC or similar foreign law provisions;
2. Capital gains realized as a result of the transfer of quoted shares, options, warrants or other quoted financial instruments solely pursuant to the issuer's initiative, and where no choice was available for the taxpayer [e.g. mergers, demergers, spin-offs, "squeeze outs" (Art. 513 Companies Code) and (non-optional) stock dividends].

The tax is also not be due in case of a share exchange governed by Art. 95 and 96 ITC.

The tax is in principle levied through a withholding tax due by the intermediaries established in Belgium who intervene "in any manner" in the transaction. This withholding tax releases the taxpayer from reporting. If no Belgian intermediary intervenes, the speculation gain has to be reported in the tax return.

The taxable base is equal to the difference between:

- The sales price reduced with the stock exchange tax borne by the taxpayer on the sale, and
 - The acquisition price increased with the stock exchange tax borne by the taxpayer (or donor in case of donation inter vivos) on the acquisition. If this price is unknown, the withholding tax is due on the sales price (less the stock exchange tax) and any excess has to be reclaimed through the tax return.
- Under certain very limited, specific circumstances, capital losses could be taken into account in determining the capital gain realized.

The speculation tax applies on shares, options, warrants or other quoted financial instruments acquired as of 1 January 2016, except in case of short selling where the tax applies in case of a sale as of 1 January 2016.

Wealth tax

During the pre-election period (May 2014), there was often talk of introducing a general wealth tax (mostly by the socialist and green parties).

However, up to now no Belgian wealth tax has been introduced.

Cayman tax

In light of the Belgian "tax shift", a budgetary measure has been adopted, i.e. the so called "look-through- tax" or "Cayman-tax". This tax includes a new tax treatment with respect to "legal arrangements" (like for example trusts and foundations), and applies as of 1 January 2015.

This new Belgian tax treatment entails that a Belgian tax resident who is considered a "founder" of this legal arrangement, becomes taxable in Belgium further to a fictitious attribution of income from the assets owned by the legal arrangement.

No taxation on behalf of the founder occurs in case he can prove that the beneficiary 1) has been granted or paid income from the legal arrangement, and 2) qualifies as a resident of an EEA-state, or a state with which Belgium has concluded a double tax treaty or an agreement (or similar juridical instrument) relating to the exchange of information in tax matters.

Only the third beneficiary that qualifies as a Belgian tax resident, is taxable on the income received from the legal arrangement.

Limited exemptions are available.

Austria

Interest - dividends - capital gains

Interests, dividends and capital gains in Austria are generally collected in the form of withholding taxes retained at source at a fixed rate (i.e. capital gains tax "KESt") or taxed at a special tax rate. In 2016 the fixed income tax rate on investment income increased to 27.5%. The fixed tax rate for interest from cash deposits at banks is 25% (with certain exceptions).

Wealth tax

There is no wealth tax in Austria.

Czech Republic

Interest - dividends

Interest and dividends are subject to a Czech tax rate of 15% (advance levy).

Capital gains

In principle, capital gains are also taxed at a fixed taxation rate of 15%, although there are various exceptions to this:

- Capital gains made from the sale of shares acquired before 1st January 2008 are tax-exempt if the shares have been owned by the taxpayer for at least 6 months.
- Capital gains on shares acquired after 1st January 2008 and that have been owned by the taxpayer for more than 6 months are tax-exempt if the taxpayer has not held more than 5% of the capital or the related voting rights in the company during the previous 24 months.
- Capital gains on shares that do not meet the conditions set out above are exempt if the period between the acquisition and sale of the securities is longer than 5 years.
- Capital gains on shares acquired after 1st January 2014 are tax-exempt if the shares have been owned by the taxpayer for at least 3 years.
- No tax is payable if the income (not the capital gain itself) from such sales of shares does not cumulatively exceed CZK 100,000 in a tax year.
- Capital gains made from the sale of a property owned by the Czech taxpayer for more than 5 years (2 years if the taxpayer was living in the property) are also tax-exempt unless the property is being used for business purposes.
- Capital gains on moveable assets are exempt from tax unless they are used for business purposes, with the exception of gains made on cars, aircraft and boats, which are always exempt from tax if the individual has owned the property for at least 1 year.

Wealth tax

There is currently no wealth tax in the Czech Republic. However, it seems appropriate to repeat that, as from 2013, there is a solidarity contribution of 7% due on income that exceeds the threshold of 47,194.83 EUR (1,277,328 CZK) and that this solidarity tax of 7% is also applied on monthly income that exceeds the threshold of 106,444 CZK (or +/- 3,932.90 EUR).

Denmark

Interest

Income from interest is subject to a maximum tax rate of approximately 35.88% if the thresholds of 41,900 DKK or 5,632 EUR per year for unmarried individuals and 83,800 DKK or 11,264 EUR per year for married individuals are not exceeded. For interest income above this threshold, sliding scale rates apply up to +/- 42%.

Dividends

Dividends are taxed in Denmark at a rate of 27% if the threshold of 50,600 DKK or 6,801 EUR per year is not exceeded. The portion of income above 6,801 EUR per year is taxed at a fixed rate of 42%.

Capital gains

Gains on shares in Denmark are taxed at a rate of 27% if the threshold of 50,600 DKK or 6,801 EUR per year is not exceeded. The portion of income above 6,801 EUR per year is taxed at sliding scale rates up to +/- 42%.

Wealth tax

There is no wealth tax in Denmark.

Germany

Interest - dividends - capital gains

Interest, dividends and capital gains in Germany have been taxed at a fixed rate of 26.375% on the gross income received (26.375% = 25% income tax, plus a solidarity contribution of 5.5%). If applicable, a 'church tax' of 8 to 9% is also levied (depending on the taxpayer's place of residence). In this regard, a tax-free amount of 801 EUR per year is taken into consideration for a single taxpayer, while the tax-free amount for married taxpayers is 1,602 EUR per year.

Wealth tax

Germany used to have a wealth tax, but it has not been levied since 1997. There are currently no signs that a new wealth tax might be introduced in Germany.

Greece

Interest

The interest income in Greece is taxed at a tax rate of 15%.

Dividends

In Greece, dividends are taxed at a rate of 10%.

Capital gains

Capital gains are effectively taxed at a rate of 15%.

Wealth tax

There is no wealth tax in Greece.

France

Interest

Interest is subject to the progressive French personal income tax rates. However, interest is subject to a withholding tax of 24% plus 15.5% special solidarity contributions. This is an advance payment on the progressive personal income tax.

Dividends

Dividends received are subject to the progressive French personal income tax rates, after deducting 40%. However, dividends are subject to a withholding tax of 21% plus 15.5% special solidarity contributions. This is an advance payment on the progressive personal income tax.

Capital gains

Capital gains on the sale of shares made by individuals are subject to the progressive French personal income tax rates. The taxable basis is equivalent to the difference between the selling price and purchase price (or the market value if the property was obtained free of charge), plus any costs and expenditure. The capital gain could be reduced by a deduction related to the holding period.

Capital gains on the sale of real estate property are taxed at a fixed rate of 19% plus 15.5% special solidarity contributions. Certain capital gains on the sale of real estate property are fully tax exempt (example: gains realised on the sale of the person's principal place of residence).

Wealth tax

France applies a wealth tax on the value of a person's assets exceeding 1.3 million EUR on 1st January of the assessment year concerned. If the net wealth is above 1.3 million EUR, wealth tax is calculated as follows:

Net wealth	Applicable tax rate
Up to 800,000 EUR	0%
From 800,000 EUR to 1,300,000 EUR	0.50%
From 1,300,000 EUR to 2,570,000 EUR	0.70%
From 2,570,000 EUR to 5,000,000 EUR	1%
From 5,000,000 EUR to 10,000,000 EUR	1.25%
Over 10,000,000 EUR	1.50%

The actual wealth tax and income tax to be paid is limited again, in this instance to a maximum of 75% of the taxpayer's total annual income.

Ireland

Interest

In Ireland, interest is subject to a fixed tax rate of 41% from 1st January 2014. The Universal social charge (3%, 5.5% or 8% depending on income levels) will be due on the earned interest and an additional social insurance contribution is also levied on income from interest.

Dividends

When dividends are paid out, a 20% levy is retained in Ireland. The recipient's dividend income is taxable at the marginal income tax rate (either 20% or 40%) in which regard a tax credit is granted in relation to the levy already retained.

Capital gains

Capital gains realised from the sale of the taxpayer's own assets are subject to a tax rate of 33% as from 6th December 2012. To calculate the taxable base of the gain on a specific asset, the following costs may be deducted: the indexed purchase price, the indexed expenditure made to improve the value of the asset and any incidental costs related to acquiring and/or selling the item in question.

Wealth tax

There is no actual wealth tax as such in Ireland, but note that a "restriction for high-earners" was introduced as from 1 January 2010 in Ireland. This means that individuals with an annual income of at least 125,000 EUR are subject to a minimum effective tax rate of 30% (instead of minimum 20%, which was the case previously) by limiting or rejecting certain personal allowances and reductions on their behalf.

This restriction is being applied gradually for incomes between 125,000 EUR and 400,000 EUR per year and the total restriction applies to annual incomes in excess of 400,000 EUR.

Italy

With respect to taxation of capital, the Italian legislation makes a distinction depending on whether the income relates to a qualified participation or an unqualified participation. In the event of listed companies, qualified participations must represent more than 2% of the voting rights at the general meeting of shareholders, or more than 5% of shareholder capital. If it concerns a non-quoted company, a qualified participation needs to represent more than 20% of the voting rights at the general meeting of shareholders or more than 25% of shareholder capital.

Interest

From 1st July 2014, income from interest is taxed at a fixed rate of 26% (previously 20%).

Dividends

Similarly, dividends from non-qualified participations are taxed at 26% since 1st July 2014. Dividends from qualified participations are subject to the sliding scale rates of Italian income tax (up to 49.72% of the gross dividend).

Capital gains

Capital gains realised from the sale of shares of qualified participations are also subject to the sliding scale rates of Italian income tax (up to 49.72% of the gross capital gain). Capital gains on the sale of shares in view of non-qualified participations are taxed at 26% since 1st July 2014.

Wealth tax

Italy has no wealth tax as such, but there are various tax systems for high-wealth taxpayers.

For example, there is an additional tax of 10% on certain types of income (bonuses and stock options) paid to managers and company directors working in the financial sector. There is also an additional solidarity contribution owed by every Italian taxpayer with a total gross annual income in excess of 300,000 EUR. An Italian "wealth tax" is since 2011 also due on foreign financial assets and on real estate of Italian resident individuals.

Luxembourg

Interest

In principle, interest in Luxembourg is subject to the sliding scale rates, with a tax exemption for interest and dividends up to 1,500 EUR (3,000 EUR for couples taxed jointly). A final 10% withholding tax rate is only applicable for interest income paid by a Luxembourg paying agent to a Luxembourg individual tax resident. A 10% tax rate is also applicable if the interest income is received by a Luxembourg resident and comes from a paying agent established in the EEA or in a State with which Luxembourg concluded a tax treaty including measures equivalent to the EC Savings Directive. If one wants to opt for this scenario, a specific declaration needs to be filed at the latest by March 31 after the end of the calendar year in which the interest income was received. If not, the income is taxable upon filing at the progressive tax rates. Note that interest income and dividends are tax free up to an amount of € 1.500 (and € 3.000 for jointly taxed couples).

Dividends

A tax rate of 15% applies to dividends received from an entity that under Luxembourg regulations is described as being fully taxable in Luxembourg. Also, if certain conditions are met, 50% of dividends can be considered as being tax-free. In any event, a tax-free amount of 1,500 EUR (3,000 EUR for couples taxed jointly) applies to dividends.

Capital gains

In principle, the marginal tax rate of 42.80% (if income is less than 150,000 EUR for unmarried taxpayers and less than 300,000 EUR for individuals taxed jointly) or 43.60% (if the above mentioned limit is exceeded) only applies to capital gains made on the sale of moveable assets in the short term (i.e. within 6 months). However, if there is a substantial participation in capital (i.e. a direct or indirect participation of more than 10% in the capital of an entity) capital gains realised in specific circumstances may also be taxed if they have already been held for more than 6 months, in which case they are then taxed at a lower rate.

Wealth tax

Luxembourg legislation makes no provision for a wealth tax.

Malta

Interest

Interest income derived in Malta is subject to a fixed tax rate of 15% which is due by means of a final withholding tax levied at source.

Dividends

Dividends are taxed at the highest tax rate of 35%.

Capital gains

In principle, capital gains arising in Malta are subject to the marginal tax rate ranging between 0 to 35%. However, capital gains realised in view of the sale of a real estate property are taxed at a final tax rate of 12% if the property was purchased more than 12 years ago. As from first January, 2015 the 12% final withholding tax on transfer value and 35% tax on the profit or gain, was replaced by an 8% final withholding tax on the value of the property transferred.

There are four exceptions as follows:

3. Transfer of property not forming part of a project, the applicable final withholding tax rate shall be 5% on the value of the property transferred if the property is transferred before five years from the date of its acquisition.
4. Properties acquired before the 1st January 2004 in respect of which a notice of a promise of sale or transfer relating to that property had not been given to the Commissioner before the 17th November, 2014, the applicable final withholding tax rate shall be 10% of the value of the property transferred.
5. 2% final withholding tax applies on a transfer of property acquired as a residence and sold not later than three years after the date of acquisition.
6. 5% final withholding tax applies when it is a transfer of property situated in Valletta, that was acquired by the transfer or before the 31st December 2018, and such property has been restored and/or rehabilitated. The said transfer of property has to be made not later than five years from the 31st December 2018.

Wealth tax

There is no wealth tax imposed by Maltese legislation.

Netherlands

Interest - dividends - capital gains - wealth tax

Savings and investments in the Netherlands are assumed to generate an annual yield of 4% of the investment. Based on this statutory assumption, this deemed yield of 4% is the taxable base which is subject to a tax rate of 30%. The actual value of interest, dividends or profits from savings and investments is not taxed.

In principle, the taxable base of this tax on assets consists of the positive value of the total savings and investments, minus the individual's debts. There are a number of exceptions and the Dutch tax administration takes account of certain tax-free amounts.

Given that not the actual yield is taxed but a fixed amount of 4% of the deposit, this system is still the cause of much debate in the Netherlands. In recent years, a savings account in Holland has only generated average interest income of 1.5% - 2.5% while inflation has been approximately 2% - 3%. For this reason, many people in the Netherlands consider this fixed appraisal of 4% to be too high. In response to this criticism, the Dutch tax authorities have specifically stated that the current appraisal will not be lowered, because 4% was also applied in better economic times and was rather on the low side at the time.

Wealth tax

There is no actual wealth tax in the Netherlands, only the deemed annual yield is taxed.

Poland

Interest - dividends

In Poland, interest income and dividends are taxed at a fixed rate of 19% at the moment of arising of income. The taxable base equals the gross income.

Capital gains

Capital gains realised following the sale of assets are also taxed at a fixed rate of 19%. Here, the taxable base equals the sale price minus the costs incurred to obtain or retain the income/asset. In case it concerns capital gains realised in view of the sale of shares, the taxable base can be lowered by the purchase price and any transactional costs incurred (including brokerage costs). Capital gains become taxable in the annual tax return for the given tax year (no tax paid in advance during the year).

Wealth tax

There is no wealth tax applicable in Poland and there are no signals there would be a wealth tax installed in the future.

Portugal

Interest - dividends - capital gains

In Portugal, interest income, dividends and capital gains are currently all taxed at a fixed rate of 28%.

Wealth tax

Portugal has no wealth tax.

Slovakia

Dividends

Dividends are not taxable in Slovakia. Dividends are however subject to health insurance contributions of 14%.

Interest

Interest income is taxed at a fixed rate of 19%.

Capital gains

Capital gains are taxed in Slovakia at 19% or 25% depending on the amount of income. A non-taxable amount of 500 EUR can be claimed on capital gains.

Wealth tax

Slovakian legislation does not impose any wealth tax.

Spain

Interest — dividends

As of January 1st, 2016 interest and dividends tax rates have been reduced. Income from interest and dividends below 6,000 EUR now is taxed at 19%, at 21% when the income exceeds the threshold of 6,000 EUR but remains below 50,000 EUR and at 23% for the portion above 50,000 EUR. The exemption on the first 1,500 euros of dividends has been removed since January 1st, 2015. Despite tax on interest and dividends being collected by way of an advance levy, Spanish taxpayers must declare this income in their annual tax return in order to be taxed properly.

Capital gains

The same tax rates for interest and dividends apply to capital gains. As of January 1st, 2016, capital gains made from the sale of assets are taxed at the tax rate of 19% if the income is lower than 6,000 EUR, at 21% if the income is more than 6,000 EUR but less than 50,000 EUR, and at 23% if the capital gain exceeds the threshold of 50,000 EUR. In principle there is no advance levy.

Wealth tax

Up to and including 2007, a wealth tax was levied annually in Spain. As from tax year 2008, this tax was neutralised by applying a 100% discount. With the goal to improve the current financial situation, Spain decided on 16th September 2011 to reactivate the wealth tax temporarily, specifically for the period from 1st January 2011 to 31st December 2012. Meanwhile it has been extended yearly, for 2013, 2014 and 2015. A number of major changes were introduced in relation to the system that was previously in effect. For example, a higher earnings threshold was introduced meaning that in principle a taxpayer's main place of residence is not subject to wealth tax (the new threshold is 300,000 EUR, compared to 150,000 EUR in the past). An increased limit has been introduced in relation to the personal exemption to which taxpayers are entitled, resulting in net assets under 700,000 EUR being exempted from wealth tax (previously the threshold was 108,182 EUR). The Spanish wealth tax entails sliding scale rates ranging from 0% to 2.5%.

Sweden

Interest - dividends

Swedish residents are taxable in Sweden on their worldwide investment income. This income includes interest from bank accounts, dividends from listed shares and capital gains made from the sale of financial instruments, property and other assets. Investment income is taxed at a fixed percentage of 30% without any personal deductions on that income being eligible. However, normally speaking, interest paid can be deducted (at least partly) from the income.

Capital gains

In general, capital gains are taxed as income from capital and hence at 30%. A capital gain is equivalent to the difference between the selling price and the acquisition price of the asset in question. Capital gains realized from the sale of a permanent residence is taxed at an effective tax rate of 22% and capital gains/dividends from the sale of unlisted non-qualified shares are taxed effectively at 25%.

Wealth tax

In 2007, the Swedish wealth tax was abolished. For the time being, the Swedish government has not expressed any intention of reintroducing a wealth tax.

Switzerland

Interest - dividends

In Switzerland, interest and dividends are taxable at sliding scale rates (depending on where the recipient lives, the highest rate is approximately 45.5%). There are no (partial) exemptions. However, a tax credit applies to take account of the advance levy (of 35%) already deducted and paid. For individuals who are not required to submit a Swiss income tax return (i.e. people who only pay tax at source and have an annual income of less than 120,000 CHF or +/- 110,237 EUR), the at-source levy of 35% on interest and dividends is the final tax and no adjustment is possible.

Capital gains

Capital gains are free of tax in Switzerland.

Wealth tax

Swiss legislation imposes a wealth tax with low rates and slow progression: for married individuals who live in the canton of Geneva and in the city of Geneva, the wealth tax rate rises to 1% on net wealth above the threshold of 3,674,580 EUR (4,000,000 CHF).

United Kingdom

Interest

In the United Kingdom interest income is taxed in the same way as other income and hence is subject to the progressive tax rates. In practice, this means that there are 3 different rates that apply to interest income and that, depending on the total income, the interest is subject to a tax rate of 20%, 40% or 45%.

Individuals are entitled to a Personal Savings Allowance (a 0% band for interest)- 1,000 GBP for basic rate taxpayers, 500 GBP for higher rate taxpayers and 0 GBP for additional rate taxpayers. With effect from 6 April 2016, UK bank interest is no longer subject to 20% tax withholding at source- any tax due is paid at the time the tax return is filed.

Residents of the United Kingdom can subscribe to a number of smaller investment schemes for which any interest is tax-exempt.

Dividends

Dividends are treated as the top slice of income (apart from capital gains).

Capital gains

The British tax system with respect to capital gains is highly complex. Each individual has an annual exempt amount (11,100 GBP in 2015-2016) and only gains in excess of this are taxed. Capital gains (less capital losses) in excess of this amount are taxed as the top part of income. If the taxpayer receives an annual income ranging between 11,600 GBP and 43,000 GBP (the basic rate limit), he will owe 18% on any capital gains up to the basic rate limit and 20% on gains in excess of that. However, please note that separate 18% and 28% rate apply to capital gains on the disposal of residential property, where gains are not eligible for Private Residence Relief.

Wealth tax

There is no wealth tax in the United Kingdom.

Summary of taxation of capital - Income derived in 2016

Country	Tax rate on interest	Tax rate on dividends	Tax rate on capital	Wealth tax
Austria	27.5%	27.5%	25%	N/A
Belgium	27%	27%	33%	N/A
Czech Republic	15%	15%	15%	N/A
Denmark	35.88% (< threshold) - 42% (> threshold)	27% (< threshold) - 42% (> threshold)	27% (< threshold) - 42% (> threshold)	N/A
France	24% ¹	21% ¹	Progressive French personal income tax rates ¹	YES
Germany	26.375%	26.375%	26.375%	N/A
Greece	15%	10%	15%	N/A
Ireland	41% ²	20% or 40% ²	33%	N/A
Italy	26%	26%	26%	N/A
Luxembourg	10% (in principle progressive rates, but 10% if certain conditions are met)	15%	42.80% (< threshold) - 43.60% (> threshold) ³	N/A
Malta	15% (final withholding)	35%	0%-35%	N/A
Netherlands	30% ⁴	30% ⁴	30% ⁴	N/A (the wealth itself is not taxed, only the deemed annual yield)
Poland	19%	19%	19%	N/A
Portugal	28%	28%	28%	N/A
Slovakia	19%	14% ⁵	19% or 25%	N/A
Spain	19% (< 6,000 EUR), 21% (< 6,000- 50,000 EUR), 23% (> 50,000 EUR)	19%, 21% or 23%	YES	
Sweden	30%	30%	30%	N/A
Switzerland	35%	35%	N/A	YES
United Kingdom	20, 40% or 45%	7.5%, 32.50% or 38.10% - to the extent dividends exceed £5,000 dividend allowance	18% or 28% (for residential property; 10% or 20% for other assets)	N/A

1 France: Additionally, this income is subject to special solidarity contributions totalling 15.5%.

2 Ireland: Additionally, this income is subject to the Universal social charge (3.5%, 7% or 8%) and may be subject to an additional social insurance contribution

3 Luxembourg: The above mentioned tax rates for capital gains only apply if the capital gain is realised in the short term (less than 6 months) OR in case it concerns a (direct or indirect) substantial participation in capital (>10% of the capital of an entity).

4 Netherlands: The income is presumed to amount to an annual yield of 4% of the investment and this 4% of the investment is the taxable base (the actual income is not considered).

5 Slovakia: Dividends are not taxable but are however subject to health insurance contributions of 14%.

Contact



For more information, please contact:

Patrick Derthoo

Partner

+32 9 393 75 05

pderthoo@deloitte.com

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