

## 国际税收快讯

# 2016 年英国财政预算案公布

英国财政大臣于 2016 年 3 月 16 日发布了今年度的财政预算案，以更新的角度关注长期目标。在一系列积极的财政指标下，例如创纪录的低失业率、经济预测增长速度将超过其他主要发达国家，财政大臣公布了这些措施。然而，这些因素或会被其他因素抵消和平衡，例如对全球经济环境的忧虑和英国在欧盟中未来的不确定性。财政大臣重申英国是为迎接这些挑战而做了最好准备的国家，并且承诺英国将持续保持对商业的开放态度。

本动态的焦点放在主要影响外国投资集团的措施。如希望获取更多就 2016 年英国财政预算案的详细分析和评论，请浏览德勤以下的网页：  
[www.ukbudget.com](http://www.ukbudget.com).

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## 商业税收路线图(Business Tax Roadmap)

财政大臣再次确认英国将继续保持原有竞争性的商业环境，并发布了“商业税收路线图”，明确表明政府为实现此目标而需要进行的相关改革。该路线图包括了下文所提到的相关政策，还有政府针对 OECD 税基侵蚀与利润转移相关计划的观点和回应。

**进一步降低公司税税率 (Further reduction of the corporation tax rate):** 财政大臣重申政府相关的承诺，即确保英国在 G20 国家中拥有最低的公司税税率。该税率仍会于 2017 年 4 月 1 日起降低至 19%，并从 2020 年 4 月 1 日起，则会进一步降低到 17%。这比原来立法降低至 18% 的规定为低。新的税率变化很有可能包括在新的财政法案中，并于 2016 年 7 月起施行（如欲了解先前规定，请参阅 2015 年 11 月 25 日出版的税收快讯）

**利息扣除的变化 (Changes to the deductibility of interest):** 财政大臣宣布政府有意继续对公司的利息扣除加以限制。这项提议大体上是按照 OECD 税基侵蚀与利润转移 (BEPS) 项目第四项行动计划的建议，并将于 2017 年 4 月 1 日起生效。根据最新的提议草案，将引入固定比率规则。在该规定下，公司税前可扣除的利息将被限制为英国公司利息折旧及摊销扣除前利润 (EBITDA) 的 30%。集团公司比率规则也将被引入，从而允许在集团层面以利息与利息折旧及摊销前利润 (EBITDA) 的比率作为固定比率的一个替代规则，将允许高杠杆的集团抵扣更多的金额。同时该规定设定了最高总扣除额，即在英国净利息抵扣额不能超过该集团公司在全球向独立第三方负担的净利息费用。即使没有详细的披露，相应的规则也会被引入以解决利润和利息的波动。

引入微小调整后的规定 (de minimus threshold)，使到新措施只适用于在英国支付多于 2 百万英镑的净利息费用的集团公司。特殊规则也将被引入以确保该利息限制措施没有阻碍那些规定对某些私募基础设施项目而开展资金私募的相关条款。

当这些新规定被引入后，世界范围内的最高负债规定将被废除；而其他所有关于债务的反避税规定将被保留，除了税收套利规则将被 2017 年 1 月 1 日生效的新反混合规则 (anti-hybrid rules) 所取代（参见下文）。

政府表明将会适时就规定的各方面进行咨询，预期立法草案不会在 2016 年 12 月之前完成和 2017 年立法。

这些提议的规定显示出与现有系统明显的差别，根据现有规定，利息是否扣除将根据公平交易原则测试，允许将在英国的海外子公司的企业借入资金的收益予以考虑。但新规定只参考英国公司的息税折旧及摊销前利润 (EBITDA)，这将对现在依靠英国以外的子公司的利润去支持英国债务利息费用的集团产生潜在的深远影响。

**混合错配安排 (Hybrid mismatch arrangements):** 在 2015 年 12 月，政府发布了立法草案以实施 BEPS 混合错配提议，将对 2017 年 1 月 1 日或以后发生的对外支付产生效力，同时也涉及混合实体与混合工具（有关之前的讨论，请参阅 2015 年 11 月发布的税收快讯）。预期结果是某些混合错配安排的税收将会改变，引致在英国税前扣除不被允许或者被视作为应税收入。

政府正扩大相关立法的范围以便消除涉及常设机构产生的错配，这将增加受新政策影响的各种安排的数量，包含一些普通的财务融资架构。

**亏损抵扣政策的改变 (Changes to loss relief rules):** 亏损税前抵扣方面发生的主要改变：

- 就发生于 2017 年 4 月 1 日及之后的亏损，现有的区别不同类型亏损的做法将被取代，意味着公司将可以利用以前年度亏损抵扣将来所产生的任何种类的收益，而不需要将同类的亏损抵扣同种类的收益。
- 集团公司税务抵扣规则将发生改变，允许集团内一间公司所发生的亏损弥补集团内任何其他公司产生的收益，但这些亏损必须发生于 2017 年 4 月 1 日及往后年度。这个与现有的集团公司税收抵扣规则相背离的规定将是一个重要和备受欢迎的改变。
- 从 2017 年 4 月 1 日起，如果抵扣超过 5 百万英镑的应税收益，一项限制性措施将被引入以减少税收损失结转至下年度，具体来说，就不超过 5 百万英镑的应税收益可以继续被完全抵消，超过 5 百万英镑的应税收益可用于抵扣的亏损限制超出部分的 50%。就集团而言，5 百万英镑的标准将以一个集团为单位，而不是以每个子公司计算。

石油与天然气税收制度没有任何改变。

针对银行业的变化，包括限制他们的税收亏损结转至下年度。这些银行层面的改变将限制税收亏损结转至下年度，仅可以抵扣 25% 的应税收益，该政策将于 2016 年 4 月 1 日起施行。

**特许权使用费的预提税 (Withholding tax on royalty payments) :** 三项关于英国特许权使用费的预提税法规的改变：

- 征收预提所得税的项目将扩大到所有为知识产权所支付的特许权使用费，这也是对商标和品牌使用征税的开始。
- 英国来源地的定义将被修改，这样预提税的范围将包括那些与外国公司在英国的常设机构有关的支付(在现行法规下，预提税仅适用于那些来自英国的特许权使用费)。
- 引入新的反避税条文，如果一个英国居民及其关联方以享受英国税收协定为目的而安排某项支付，这与条约的目标和宗旨不符，将不适用该协定。

前两项法规将适用于财政法案所得到御批及以后所产生的费用，即可能会在 2016 年 7 月生效。

第三项法规将适用于 2016 年 3 月 17 日及以后所产生的费用。

公司应尽快审查现有的安排以评估新的法规是否合规。这些变化将适用于英国的税收协定所规定的税收减免。

**大量持股豁免政策 (SSE) 的潜在改变:** 财政大臣宣布，政府将会评估 SSE，该政策可以减免处理一定份额以上股票的英国公司的资本利得税。目前尚没有提出具体的改革提议；讨论将会集中考虑 SSE 是否还在继续实现其原有政策目标，会否对其政策设计进行一些改变，以增加其简单性，连贯性和国际竞争力。

**转让定价指引的变化:** 对“转让定价指引”的法律定义进行更新，引入 2015 年 10 月发布的 BEPS 一揽子国际税改项目报告中所含的 OECD 转让定价指引作出修订（可参考 2015 年 10 月 5 日的

国际税收快讯)。这是一种形式体现,因为英国税务当局(英国税务海关总署)已经在执行新的指引,所产生的实际影响应该将会很小。

**营业房产税(Business rates):** 对很多企业来说,营业房产税是最大的税款支出之一。政府最近完成了对营业房产税的政策评估,并宣布了新的制度,将对所有纳税人减税。小型企业将从2017年4月1日开始减税,所有企业都将会从2020年4月开始减税。这是营业房产税年度指数根据通胀价格指数(RPI)调整为根据消费者价格指数(CPI)衡量通胀所引发的结果。对营业房产税的调整将体现在更加频繁的重估财产价值,以使纳税人更容易支付应纳税款。

**印花税和土地税(SDLT):** 财政大臣宣布将实施新的印花税和土地税制度,以替代现有的全额累进税率征收非居民财产税收的制度。新制度将于2016年3月17日起生效。

现行税制下,购买非住宅房地产时,根据财产的所有成本(包括相关增值税)乘以一个固定百分比的税率计算税款。新税制下,印花和土地税的计算采取差额累进税率计算,即达到150,000英镑的部分0%税率,从150,001英镑到250,000英镑的部分适用2%税率,250,000英镑以上的部分适用5%税率。

新税率将减少150万英镑或以下房地产购买时所需缴纳的印花和土地税。高额购买房地产的税负会有明显提高,因为新实行的5%税率高于现行的最高税率4%。

## 特定行业措施 (Industry-specific measures)

财政大臣宣布以下特定行业的措施,包括:

- **石油和天然气公司:** 为了应对经济大环境下石油价格继续下降所带来的挑战,财政大臣宣布了几项支持石油和天然气行业的措施。包括:将附加税税率从20%降至10%,将石油收益税税率降至0%,以平衡已开发地域的基础设施与新开发项目之间的投资不均。这些措施已于2016年1月1日起生效。鼓励开采投资的措施已经发布。
- **保险公司:** 保费税的税率将从9.5%提高至10%,并承诺所有增加的收入将用于防洪和重建措施的支出。

## 税务合规 (Compliance)

财政大臣宣布以下与税务合规的相关措施:

- 在2015年夏季公布的财政预算案中,财政大臣宣布利润超过2千万英镑公司的缴税日期将会提前(该门槛随集团内公司数量的减少而有所降低)。符合条件的公司将被要求在会计期间开始后的第三、六、九、十二个月纳税。这项政策自2017年1月1日及以后开始的会计期间起生效。但是,为了让公司适应新的纳税时间表,这一政策已经推迟,将适用于自2019年4月1日及以后开始的会计期间。
- 2015年夏季公布的财政预算案再次确认英国税务合规框架鼓励大企业的下述合规行为。三项主要措施包括:
  - 要求大企业应公布和英国税收有关的税务战略,并上载相关资料到互联网。这些税务战略应于2017年内准备好,具体日期取决于公司的会计期;



- 公布一项特别措施以应对那些频繁运用激进的税收筹划并 / 或拒绝跟英国税务海关总署 (HMRC) 合作的公司;
- 公布一个公司税务合规框架以应对大企业税务风险, 并确保大企业按时缴纳适当税款。
- 在 2015 年秋季的声明中, 财政大臣宣布为应对 2020 年 4 月的公司税改, 会改进税收管理, 将电子申报和网上申报进行整合。政府已经在考虑如何改进企业和个人的税款缴纳管理方式, 并且宣布于 2018 年起, 保存数字纳税记录并将其定期更新报送给英国税务海关总署 (HMRC) 的企业可以自行选择现收现付 (pay-as-you-go) 的税款缴纳方式。这种企业可以通过选择最合适的税款缴纳方式来优化现金流管理。

## 增值税 (Value added tax)

财政大臣宣布了一项应对快速发展的在线增值税侵蚀的一揽子方案, 主要针对海外公司和在线商城两大领域。英国税务当局正在加强现有的增值税立法, 要求海外公司必须就增值税方面在英国进行注册, 并任命一个在英国代表设立增值税。同时, 英国税务当局被赋予更灵活的权限, 可以要求相关公司提供某些形式的担保, 以覆盖可能产生的增值税应付税款。英国税务当局同时被赋予了新的权利, 如果海外公司没有遵守英国的增值税政策, 可以要求在线商承担海外公司来应付未付税款的连带责任。

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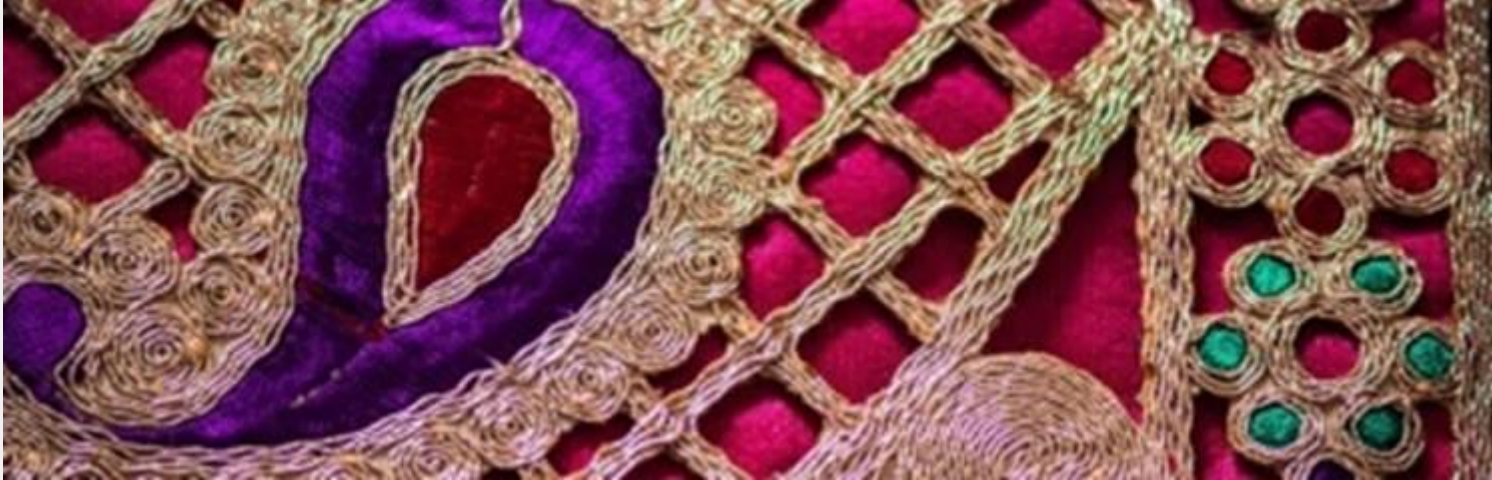
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## International Tax Newsflash

# United Kingdom Budget 2016 announced

The UK Chancellor delivered his budget on 16 March 2016 with a renewed focus on long-term objectives. The Chancellor had the advantage of making the announcements following a range of positive economic indicators, such as record low unemployment and an economy forecasted to grow at a faster rate than that of any other major developed country. However, this must be balanced against growing fears of the state of the global economy and uncertainty over the UK's future in the EU. The Chancellor repeatedly stated that the UK is amongst the best prepared to deal with these challenges and reiterated that the country remains "open for business."

This alert focuses on the key measures that will affect foreign-owned groups. For detailed coverage and

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comments on the UK Budget 2016, visit Deloitte's dedicated website at [www.ukbudget.com](http://www.ukbudget.com).

## Business Tax Roadmap

The Chancellor reaffirmed that the UK will remain a competitive business environment and released a "Business Tax Roadmap" setting out the reforms by which the government proposes to achieve this objective. The roadmap includes the measures discussed below, as well as the government's view on, and response to, each of the actions under the OECD base erosion and profit shifting (BEPS) project.

**Further reduction of the corporation tax rate:** The Chancellor reiterated the government's commitment to ensuring that the UK has the lowest corporation tax rate in the G20. The reduction in the rate to 19% still will take effect on 1 April 2017, but from 1 April 2020, the rate would be further reduced to 17%. This goes further than the reduction to 18% that previously was enacted. The new rate change is likely to be included in the Finance Bill that will be enacted in July 2016 (for prior coverage, see the tax alert dated 25 November 2015).

**Changes to the deductibility of interest:** The Chancellor announced the government's intention to proceed with restrictions on interest deductibility for corporations. The proposals broadly follow the recommendations from Action 4 of the OECD's BEPS project and would take effect from 1 April 2017. Under the draft proposals, a fixed ratio rule would be introduced, under which deductible interest would be restricted to 30% of UK EBITDA. A group ratio rule would be introduced to allow the group's net interest-to-EBITDA ratio to be used as an alternative to the fixed ratio, which may allow a greater amount to be deducted for highly geared groups. There also would be an overall cap that would mean that UK net interest deductions cannot exceed the global net third-party expense of the group. Rules would be introduced to address volatility in earnings and interest, although no details have been provided.

A de minimis threshold would be introduced so that the new measures would apply only to groups with more than GBP 2 million of net UK interest expense. Specific rules also would be introduced to ensure that the restriction does not impede the provision of private finance for certain private infrastructure projects in the UK.

The worldwide debt cap rules would be repealed when the new measures are introduced; all other anti-avoidance measures related to debt would be retained, exception the tax arbitrage rules that are due to be replaced by the new anti-hybrid rules with effect from 1 January 2017 (see below).

The government has indicated that further consultation on the detailed design of all aspects of the rules would be conducted "in due course" and draft legislation is not expected before December 2016 for enactment in 2017.

The proposed rules represent a significant departure from the current system, under which interest deductibility is determined by reference to a general arm's length test that allows the earnings of overseas subsidiaries of UK borrowing companies to be taken into account. As the new rules would operate only by reference to UK EBITDA, the measures potentially would have a significant impact on groups that currently rely on the earnings of non-UK subsidiaries to support interest deductibility on UK debt.

**Hybrid mismatch arrangements:** In December 2015, the government released draft legislation to implement the BEPS hybrid-mismatch proposals that would take effect for payments made on or after 1 January 2017 and that involve a hybrid entity or hybrid instrument (for prior coverage, see the tax alert dated 11 December 2015). As a result of these changes, the tax effect of certain hybrid mismatch arrangements would alter, potentially leading either to a disallowance of a deduction in the UK or the taxation of income in the UK.

The government now is going further by extending the scope of the legislation to eliminate mismatches involving permanent establishments. This expansion would broaden the number of arrangements that would be affected by the new rules, including certain common financing structures.

**Changes to loss relief rules:** Significant changes have been announced to the loss relief rules:

- The existing distinction between different categories of losses would be removed for losses incurred on or after 1 April 2017, which would mean that companies would be able to utilize carried forward losses against any type of income arising in future periods, rather than needing to stream losses against the same type of profits.
- The group relief rules would be changed to allow brought forward losses of one group company to be offset against profits of any other UK group company, where the losses are incurred on or after 1 April 2017. This is a significant—and welcome—departure from the current group relief rules that allow only current period losses to be surrendered to other group members.
- As from 1 April 2017, a restriction would be introduced to reduce the amount of brought forward tax losses that may be offset against taxable profits in excess of GBP 5 million. Specifically, while full offset would continue to be available for the first GBP 5 million of taxable profits, the amount of loss that could be offset against profits in excess of this amount would be restricted to 50% of the excess. For groups, the GBP 5 million threshold would apply per group rather than per company.

None of the changes would apply to the oil and gas tax regime.

Separate changes were announced in relation to banks, which already are subject to rules that restrict the utilization of their brought forward tax losses. These bank-specific changes would restrict the amount of brought forward losses that could be offset to 25% of taxable profits, with effect from 1 April 2016.

**Withholding tax on royalty payments:** Three changes to the UK's withholding tax rules for royalty payments have been announced:

- The categories of royalties that are subject to withholding tax would be expanded to include royalties paid in respect of all intellectual property, which for the first time would include payments made in respect of trademarks and brand names.
- The definition of UK source would be amended, such that withholding would apply where the payments are connected with a UK permanent establishment of a foreign company (under current rules, withholding tax applies only where the royalty comes from a UK-source).
- A new anti-avoidance provision would be introduced to deny access to the UK's tax treaties where the payment is made by a UK person to a connected party under an arrangement that has a purpose of obtaining access to the treaty, where this is not in line with the object and purpose of the treaty.



The first and second measures would take effect for payments made on or after the date the Finance Bill receives Royal Assent, which is likely to be during July 2016. The third measure would take effect for payments made as from 17 March 2016.

*Companies should urgently review existing arrangements to assess whether the new rules would have an impact and to remain compliant. The changes would be subject to any relief granted under the UK's tax treaties.*

**Potential changes to the substantial shareholdings exemption (SSE):** The Chancellor announced that the government would review the SSE, which exempts from corporation tax capital gains on qualifying share disposals by UK companies. No specific proposals for change have been put forward; the consultation will consider whether the SSE continues to deliver on its original policy objectives and whether changes could be made to its design to increase its simplicity, coherence and international competitiveness.

**Changes to transfer pricing guidelines:** The legislative definition of “transfer pricing guidelines” would be updated to incorporate the revisions to the OECD transfer pricing guidelines that were published as part of the BEPS package released in October 2015 (for prior coverage, see the tax alert dated 5 October 2015). This is more of a formality since the UK tax authorities (HMRC) already are operating in accordance with the new guidance and should have little practical impact.

**Business rates:** Business rates are one of the largest items of expenditure for many businesses. The government recently concluded a business rates review and, as a result, has announced a new regime that should lead to reductions for all ratepayers. Small businesses would see cuts in business rates from 1 April 2017, while all businesses should see a reduction in rates from April 2020, as a result of a switch in the annual indexation of business rates from the RPI inflation measure to the CPI measure. The administration of business rates also would be revised to revalue property more frequently and make it easier for businesses to pay taxes that are due.

**Stamp duty land tax (SDLT):** The Chancellor announced a move to a new SDLT system that would replace the current “slab” system operating for nonresidential property. These changes would take effect from 17 March 2016.

Under current rules, a purchaser of nonresidential property is charged a fixed percentage on the entire cost of the property (inclusive of VAT where relevant). Under the new rules, SDLT would be payable on a graduated basis, defined as 0% for the first GBP 150,000; 2% on the value between GBP 150,001 and GBP 250,000; and 5% on the proportion above GBP 250,000.

The new rules would reduce the SDLT burden for property purchased for GBP 1.5 million or less. High-value property could see a significant increase, since the new 5% rate is an increase on the existing 4% top rate.

## Industry-specific measures

The Chancellor made announcements relevant for specific industries, including the following:

- *Oil and gas companies:* In light of the challenging commercial conditions as oil prices continue to decrease, the Chancellor announced certain methods to support the UK oil and gas industry. These measures include reducing the supplementary charge from 20% to 10% and reducing petroleum revenue tax to zero to balance investment between older fields and infrastructure and new developments. These measures would be backdated to take effect from 1 January 2016. Measures also are proposed to encourage investment in exploration.
- *Insurance companies:* The rate of the insurance premium tax would be increased from 9.5% to 10%, with a commitment that all additional revenue would be spent on flood defense and resilience measures.

## Compliance

The Chancellor has announced several compliance-related measures:

- In the 2015 Summer Budget, the Chancellor announced that tax payment dates for companies with profits exceeding GBP 20 million would be moved forward (with the threshold reduced by the number of companies, where there is a group). Companies within these rules will be required to make payments in the third, sixth, ninth and the 12th months following the start of an accounting period. These rules were intended to take effect for accounting periods starting on or after 1 January 2017. However, to allow companies to adjust to the new payment schedule, this measure has been pushed back and would apply to accounting periods commencing on or after 1 April 2019.
- The announcements made in the 2015 Summer Budget to ensure the UK compliance framework encourages the right behaviors from large businesses were reaffirmed. The three key measures are:
  - A requirement for large businesses to publish their tax strategy as it relates to UK taxation, which must be available on their websites. The strategy would have to be made available in 2017, the precise date depending on the company's accounting period;
  - A "special measures" regime to tackle businesses that frequently engage in aggressive tax planning and/or that refuse to engage with HMRC in a collaborative way; and
  - A framework for cooperative compliance to manage the tax risks presented by large businesses to ensure they pay the right amount of tax at the right time.
- In the 2015 Autumn Statement, the Chancellor announced major changes to tax administration that would integrate electronic recordkeeping with online tax reporting, with the changes applying to corporation tax from April 2020. The government has been consulting on how to improve the way in which businesses and individuals manage their tax payments and has announced that, as from 2018, businesses that keep digital records and provide regular digital updates to HMRC would be able to adopt pay-as-you-go tax payments on a voluntary basis. Businesses choosing to adopt this route would be able to choose payment patterns that suit them, so as to optimize their cash flow.

## Value added tax

The Chancellor announced a package of measures aimed at tackling rapidly growing online VAT evasion. Two key areas that are being targeted are overseas businesses and online marketplaces. HMRC is strengthening existing VAT legislation that would require overseas businesses that should be registered for VAT in the UK to appoint a UK-established VAT

representative and giving HMRC greater flexibility in relation to when it can require some form of security to cover the VAT likely to be payable. HMRC also would be given new powers to make online marketplaces jointly and severally liable for the unpaid VAT of overseas businesses that are noncompliant with UK VAT rules.

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