Withholding taxes

Type of income	Rate
Dividends	15% of gross dividends (unless parent-subsidiary regime applies, exemption or reduced rate possible with tax treaty countries)
Interest	0% (except for profit-sharing bonds and debt instruments with remuneration linked to the issuer's profits)
Royalties	0% (with some exceptions)
Liquidation proceed	0%
Director's fees	20% of gross fees paid to resident or non-resident directors

Special tax regimes

- Flag shipping register
- Pension funds (ASSEP/SEPCAV/PPV)
- Securitisation
- SICAR (investment company in risk capital)
- Specialised investment fund
- SPF (private wealth management company)
- Undertakings for collective Investments

Administrative requirements

Tax returns

- CIT, MBT and NWT returns – submission by 31 May of the following fiscal year
- Self-assessment for capital companies (a 5 years statute of limitation)

Tax payments

Advances payable quarterly:

- CIT: 10 March, 10 June, 10 September, and 10 December
- MBT and NWT: 10 February, 10 May, 10 August, and 10 November

Taxes assessed are payable within one month of notification by the tax authorities.

Deferment of Tax payment

Delay	Interest
≤ 4 months	None
5 to 12 months	0.1% per month
13 months to 3 years	0.2% per month
> 3 years	0.6% per month

Penalties

- Failure to pay or late payment: interest charge of 0.6% per month
- Failure to submit tax return or late submission: 10% of tax due and a fine up to a maximum of €1,239.47

VAT

Tax rates applicable

Rate	Goods and services
17%	Standard rate
14%	Management and safekeeping of securities, publicity and marketing printed matter, etc.
8%	Gas, electricity, etc.
3%	Radio and television broadcasting services, hotels, food products, books, newspapers, etc.

Return periods

- Monthly returns and annual summary return if annual turnover exceeds €620,000
- Quarterly returns and annual summary return if annual turnover is between €112,000 and €620,000
- Single annual return if annual turnover is less than €112,000
- Annual simplified return for companies with a nil input VAT deduction right

Submission of returns and VAT payments

Type of return	Legal deadline
Monthly return	Before 15th of following month
Quarterly return	Before 15th of month following quarter-end
Single annual return (including simplified regime)	Before 1 March following year end
Recapitulative annual return	Before 1 May following year end

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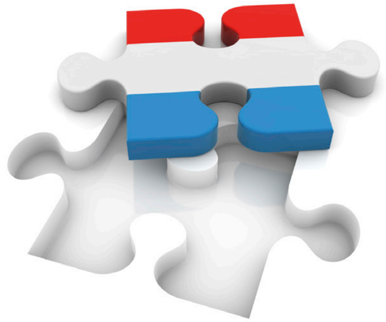
Corporate Pocket Tax Guide 2015
Luxembourg



January 2015

Corporate Income Tax (CIT)

Taxable base

CIT is calculated based on the profit according to the commercial balance sheet. Certain types of income are exempt and certain charges are non-deductible.

Exempt income

- Parent-subsidiary exemption
  Dividends or capital gains received by a Luxembourg entity from a shareholding will be fully exempt from Luxembourg corporate income tax and municipal business tax if:
  - The entity deriving such income holds or commits itself to hold directly or indirectly this shareholding for an uninterrupted period of at least 12 months
  - The shareholding threshold does not fall below either a 10% participation or a €1,2 million acquisition price (€6 million for capital gains) throughout the period
  - Qualifying recipient and distributing/disposed entities are listed in article 166 of the Income Tax Law (ITL) and within the Grand Ducal Decree dated 21 December 2001
- Exemption from withholding tax
  Dividends distributed by a Luxembourg entity will be exempt from Luxembourg withholding tax if:
  - The entity receiving such income holds or commits to hold directly or indirectly its shareholding in the Luxembourg entity for an uninterrupted period of at least 12 months
  - The shareholding threshold does not fall below either a 10% participation or a €1,2 million acquisition price throughout that period
  - Qualifying recipient and distributing entities are listed in article 147 ITL, including fully taxable parent companies resident in a country having a tax treaty with Luxembourg and subject to a tax similar to the Luxembourg CIT
- Exempt incomes due to double tax treaty provisions
  Luxembourg treaty network usually provides for exemption of dividends, foreign branch and real estate income, etc.
- Exemption of dividends
  An exemption of 50% is granted on the dividend income received from a resident fully taxable capital company, a company falling within the scope of the Parent Subsidiary Directive or a capital company resident of a state, with which the Grand Duchy has a double tax treaty and which is subject to a tax corresponding to the Luxembourg CIT
- Exemption of intellectual property income
  80% of income resulting from the exploitation of intellectual property rights acquired or established after 31 December, 2007 and 80% of the capital gains arising from such assets are exempt

Deductions

Companies may only deduct expenses exclusively caused by enterprise to the extent that they are not connected with exempt income.

Other deductions

- Gifts and donations
- Losses carried forward indefinitely (but not carried back) without any amount restriction, etc.

Non-deductible expenses

- Directors' fees
- Non-deductible taxes (CIT, MBT, NWT), etc.
- Expenses in connection with exempt income
- Fines

Tax rate applicable

Taxable income (€)	Rates (increased by a 7% unemployment fund contribution)
≤ 15,000.00	20% (21.4%)
> 15,000.00	21% (22.47%)

Minimum income tax

Such tax will be due when Luxembourg collective entities are in a tax loss position or paying less than the minimum income tax. The amount paid will be creditable against future corporate income tax without time limit. This tax applies as follows:

- Collective entities (irrespective whether they are regulated or not) that have (I) qualifying holding and financing assets, exceeding 90% of their balance sheet and (II) a total balance sheet exceeding €350,000, are liable to a minimum flat income tax €3,210 including the unemployment fund contribution
- Other companies are subject to a progressive minimum income tax depending on the total assets on their balance sheet. Such tax will range from €535 (for a total balance sheet up to €350,000) to €21,400 (for total balance sheet exceeding €20,000,000), including the unemployment fund contribution

Tax reliefs

- Credit for audiovisual or venture capital investments
- Credit for hiring unemployed individuals
- Credit for investment in continued professional education
- Incentives for research and development
- Investment tax credit
- Foreign withholding taxes, etc.

Municipal Business Tax (MBT)

Taxable base

MBT taxable income is calculated broadly on the same basis as CIT. The tax basis is 3% of the adjusted taxable income. There is an allowance which amounts to €17,500 for entities liable to CIT and €40,000 for other businesses.

Tax rate applicable

The MBT rate changes according to the municipality in which the undertaking is located. The rate for Luxembourg city is 225% giving an overall MBT rate of 6.75% (3% X 225%).

Effective income tax rate

29.22% including CIT, MBT (for Luxembourg city) and contribution to the unemployment fund.

Tax consolidation

Luxembourg resident companies can form a fiscal unity where a company and one or more of its subsidiaries (95% ownership is required) are integrated financially. The parent company is responsible for paying the consolidated tax liability (CIT and MBT). Luxembourg branches of non-resident companies may head a Luxembourg fiscal unity.

Registration tax

A one-time registration tax of €75 applies for company incorporation, amendments to the bylaws and transfer of the seat of a foreign company to Luxembourg.

Net Worth Tax (NWT)

Taxable base

The unitary value of the company is determined mainly by reference to the net worth of the enterprise. This is based on fair market value of the assets and liabilities adjusted for certain exemptions (e.g. shareholdings qualifying for the participation exemption regime, certain intellectual property assets) and certain special valuations fixed by law (e.g. for buildings).

Tax rate applicable

0.5%.

Tax reduction

Reduction in NWT is possible if the taxpayer commits, before the end of the accounting period, to the creation of a reserve (booked in the commercial accounts) to be maintained for at least 5 years. The tax reduction amounts to a fifth of the reserve and can not exceed the amount of CIT liability before imputation of tax credits.

Tax treaty network

Luxembourg has broad tax treaty network including all major industrialized countries, all key financial centers and almost all of the important developing countries. The Grand Duchy has more than 70 treaties in force.