



Panama Tax News

Resolution 201-8097 which establishes requirements and conditions of the procedures in the Panama-Pacific Area fiscal regime that taxpayers and interested parties must carryout, before the General Directorate of Revenue (DGI)

November 2021

Resolution 201-8097 which establishes the requirements and conditions of the procedures in the Tax Regime of the Panama-Pacific Area, contemplated in Law 41 of July 20, 2004.

Resolution 201-8097, by virtue of Law 41 of 2004 and its respective amendments, establishes the requirements and conditions for the procedures in the tax regime of the Panama-Pacific Area (PPA). In this sense, the following is established:

- That for the recognition of the tax benefits contemplated in article 58 of Law 41 of 2004, the taxpayer must submit to the tax authority, the following documents:
 1. Power of attorney granted by the Legal Representative of the applicant in favor of a qualified lawyer in Panama.
 2. Request addressed to the director of the tax authority detailing the taxes whose exemption they request, as well as the list of the facts that serve as background

and the corresponding legal basis of the request.

3. Authenticated copy of the passport or personal identity card of the legal representative.
4. Original Public Registry Certificate.
5. Original of the Panama-Pacific Certification where the following information is recorded:
 - Registration of the company in the PPA.
 - Validity of the agreement with the Developer.
 - Activities approved to be developed by the applicant and their physical location within the PPA.

6. Authenticated copy of the Resolution of the Panama Pacific Agency ordering the registration of the applicant in the Panama Pacifico Business Registry.

7. Good Standing Certificate issued by the tax authority referring to the tax for which the exemption is requested.

- In addition, the requirements that must be submitted to the tax authority for applications for a Tax Residence Certificate, contemplated in article 762-Ñ, Resolution 201-0354 of 2016 and its modifications, by individuals and legal entities are established.
- By virtue of the provisions of Resolution 201-15144 of 2015 and its amendments, the documents that must be submitted

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together with the requests for the application of benefits contemplated in the Double Tax Treaties were listed.

- Requirements include invoices, Contracts, remittance bank documents and tax return forms as evidence.
- Requirements are established for the application of real estate tax exemption for individuals and legal entities,

contemplated in Resolution 201- 1838 of 2019 and its amendments.

- It is established that to file a complaint for tax evasion and tax fraud, as contemplated in Article 287 of the Tax Procedure Code, sufficient information must be provided to the DGI to lead to the identification of the offence and that the complaint must deal with facts/situations that are unknown to the

Tax Administration.

- It is reported that the requirements that are not contemplated in the Resolution 201-8097 will be established in the portfolio of services, Resolution No. 201-1838 of May 28, 2019.

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