Table A

	Belgium	Cyprus	Ireland	Luxembourg	The Netherlands	Sweden
Does special tax regimes for holding companies applies?	**No**	**No**	**Yes**	**Yes** In 2007 a new private wealth management vehicle, the "Société de Gestion de Patrimoine Familial" (SPF) was introduced. The SPF succeeds the classical 1929 holding company regime repealed in December 2006. Existing 1929 holding companies benefit from a grandfathering clause until the end of 2010 the extent shares of these companies are not partially or entirely transferred during the transitional period.	**No**	**No**
Is capital duty payable?	**No**	**Yes** Stamp duty is payable on authorized share capital at a flat rate of EUR 102.52, plus 0.6 % of the nominal value of authorized share capital, and on issues of share capital at a flat rate of EUR 17.09.	**No**	**No**	**No**	**No**
Effective corporate tax rate	**33.99%** (33% standard rate + 3% crisis contribution surcharge)	**10%**	**12.5% (trading income)** 25% (non-trading (passive) income)	**28.59%** (21.84% standard rate + 6.75% Municipal Business Tax for Luxembourg city only)	**25.5%**	**26.3%**
Is inter-national joint taxation of groups available?	**No**	**No** Group relief for losses is available.	**No** Limited relief are available for losses, certain costs and management expenses and for capital gains in groups but there are no provisions for consolidation of income.	**Yes** A fully taxable resident company, of which at least 95% of the capital is directly or indirectly held by another fully taxable company or by a Luxembourg permanent establishment of a nonresident company subject to a tax comparable to the Luxembourg CIT, may apply for fiscal consolidation with its parent company.	**Yes** Economic and legal ownership of at least 95% of the shares is required.	**No** A form of tax consolidation is possible through group consolidation
Taxation of capital gains (sale of sub-sidiaries)	**Exempt** If the shareholding satisfies the taxation requirement (i.e. subsidiaries located in an EU Member State are generally considered to be subject to a tax regime similar to Belgian corporate income tax and for subsidiaries located in a non-EU Member State, a nominal or effective tax rate of at least 15% is required). **Required ownership percentage:** No ownership requirements **Required holding period:** No holding requirements	**Exempt** Disposals of shares in a subsidiary are exempt from capital gains tax unless the subsidiary owns immovable property in Cyprus, in which case gains related to that property are taxable. **Required ownership percentage:** No ownership requirements **Required holding period:** No holding requirements	**Exempt** The exemption applies to shareholdings in 'subsidiary' companies resident in the EU or countries with which Ireland has a tax treaty. Other capital gains are normally taxed at 25% where HoldCo is Irish resident at the date of disposal. In calculating the gain, the acquisition cost is increased for inflation from the date of acquisition or its market value on 6 April 1974, if later, up to 31 December 2002. **Required ownership percentage:** 5 % **Required holding period:** 12-month period ending within the 24 months prior to disposal. However, prior periods of ownership can be transferred in certain restructurings/intra-group transactions	**Exempt** However, any costs, such as interest related to the acquisition of the shares or write-downs on participations linked to dividends distributions in/by a qualifying subsidiary, deducted from the taxable profit in previous years, will be recaptured in the tax base of the year of disposal, reducing the amount of capital gain qualifying for exemption. Any such expenses incurred in the year of disposal are set off against any qualifying tax-exempt dividends received; the remaining amount is recaptured. The SPF is exempt from corporate income tax. **Required ownership percentage:** 10 % of acquisition costs of at least EUR 6 million. **Required holding period:** 1 year or commitment to hold for 1 year	**Exempt** **Required ownership percentage:** 5% of the shares in the subsidiary (which has a capital divided into shares) and does not hold these shares as a portfolio investment ("intention test"). Subsidiaries which are held as portfolio investments can still qualify for the participation exemption if more than 50% of the assets are active or if the subsidiary is taxed at a rate of at least 10%, calculated upon a tax base which does not systematically differ from the Dutch tax base. For passive portfolio investments with an effective tax rate below 10%, a tax credit system applies. **Required holding period:** No holding requirements	**Exempt** Capital gains on the sale of "business-related" shares are tax-exempt provided the shares sold are in a company regarded as equivalent to a Swedish limited liability company. Gains on the sale of shares held as portfolio investments are taxed at the 26.3% corporate rate. In the case of a domestic or cross-border intragroup transfer (share-for-share or straight transfer), tax may be deferred if certain conditions are satisfied. Taxation of external share-for-share transfers may also be deferred. **Required ownership percentage:** Unquoted shares are always deemed business-related. Quoted shares are business-related if more than 10% of the votes are held or if the company can demonstrate that the shares are held for business purposes. Shares held as inventory will not qualify for exemption. **Required holding period:** No holding period for unquoted shares. For quoted shares, a 1-year holding requirement exists.
With-holding taxes on dividends to non-resident parent companies	**Non-treaty: 15% - 25%** **Treaty: 0% - 15%** **EU: 0%** Dividends are exempt from withholding tax if paid to a parent company located in a country with which Belgium has a tax treaty which includes an exchange of information clause.	**Non-treaty: 0%** **Treaty: 0%** **EU: 0%**	**Non-treaty: 20%** **Treaty: 0%** **EU: 0%**	**Non-treaty: 15%** **Treaty: 0% - 15%** **EU: 0%** No withholding tax is levied on dividends distributed by a Luxembourg company to a parent company located in a treaty country if conditions similar to those in the Luxembourg participation exemption regime are satisfied. The requirements for the exemption are that the parent company (i) holds at least 10% of the company paying the dividends or a participation acquired for at least EUR 1.2 million; (ii) holds or commits to hold the shares for an uninterrupted period of at least one year; (iii) has a legal form similar to the one of the forms listed in the Luxembourg corporate income tax code; and (iv) is subject to a tax similar to the Luxembourg corporate income tax. There is no withholding tax on dividends distributed by an SPF.	**Non-treaty (Coop): 0%** **Non-treaty (BV): 15%** **Treaty: 0% - 15%** **EU: 0%** For Coops: the Dutch Coop is an upcoming legal form for Dutch holding companies. Dividend distributions from a Dutch Coop are not subject to dividend withholding tax. If the participation in the Coop represents a substantial interest (at least 5% of the subscribed capital) and the investment is not a business asset of the shareholding entity (e.g. in case of passive activities), there is a remote risk that dividends may be subject to 25.5% corporate income tax (with a credit for the 15% Dutch withholding tax in cases where a withholding tax is levied). For BVs: when a tax treaty or directive applies, the dividend withholding tax in corporate structures is usually reduced to a maximum of 5%. A 0% rate is available under the treaties with Mexico, Norway, Singapore, Switzerland and the U.S.. Under most treaties, the rate is 5% where the beneficial owner is a company. If the participation in the BV represents a substantial interest (at least 5% of the subscribed capital) and the investment is not a business asset of the shareholding entity (e.g. in case of passive activities), there is a remote risk that dividends may be subject to 25.5% corporate income tax (with a credit for the 15% Dutch withholding tax in cases where a withholding tax is levied).	**Non-treaty: 0% - 30%** **Treaty: 0% - 30%** **EU: 0%** A final withholding tax of 30% applies to dividends paid by a Swedish company to a foreign company. Sweden has implemented the EC Parent/Subsidiary Directive under which the dividend withholding tax rate can be reduced to 0% in certain situations. The 0% rate also applies if the receiving company is a 'foreign company' (as defined in domestic legislation) regarded as equivalent to one of the Swedish entities included in a list, provided the shares held are business-related.
Taxation of dividends from subsidiary companies	**95 % exempt** On shares qualifying as financial fixed assets. Five specific categories of dividends listed in the legislation are excluded from the 95% deduction. **Required ownership percentage:** 10 % of acquisition cost of at least EUR 2.5 million. **Required holding period:** 1 year	**Exempt** **Required ownership percentage:** Foreign dividends are exempt if the Cyprus company owns at least 1% of the share capital of the payer and i) the payer does not engage in more than 50% investment activities (excluding dividend income received directly or indirectly from trading subsidiaries); or ii) where investment activities exceed 50%, the foreign tax burden on the company's income is not significantly less than the Cyprus tax on the Cyprus company (in practice, less than 5%). **Required holding period:** No holding requirements	**Exempt** (domestic dividends)/ Taxable with credit for foreign tax In many instances, the 12.5% tax rate for qualifying foreign dividends, combined with onshore pooling of foreign tax credits, can result in an effective dividend exemption for qualifying foreign dividends. **Required ownership percentage:** 5 % (no minimum participation in companies resident in Ireland). **Required holding period:** No holding requirements	**Exempt** The participation exemption does not apply to nonresident joint stock companies which are not liable to an effective tax rate of at least 10.5%, with the tax base determined in a manner not similar to that employed by Luxembourg. Any costs during the year that are economically related to exempt dividend distributions will not be deductible from the tax base up to the amount of exempt dividends received in the same year. The remaining amount will be added to the tax base in the year of disposal. The SPF is exempt from corporate income tax. **Required ownership percentage:** 10 % of acquisition costs of at least EUR 1.2 million. **Required holding period:** 1 year or commitment of to hold for 1 year.	**Exempt** **Required ownership percentage:** The participation exemption applies if HoldCo holds at least 5% of the shares in the subsidiary (which has a capital divided into shares) and does not hold these shares as a portfolio investment ("intention test"). Subsidiaries which are held as portfolio investments can still qualify for the participation exemption if more than 50% of the assets are active or if the subsidiary is taxed at a rate of at least 10%, calculated upon a tax base which does not systematically differ from the Dutch tax base. For passive portfolio investments with an effective tax rate below 10%, a tax credit system applies. **Required holding period:** No holding requirements	**Exempt** Exemption is available if the shares held are "business-related" and the subsidiary is regarded as equivalent to a Swedish limited liability company (not required if the subsidiary qualifies under the EC Parent/Subsidiary Directive). **Required ownership percentage:** Unquoted shares are always deemed business-related. Quoted shares are business-related if more than 10% of the votes are held or if the company can demonstrate that the shares are held for business purposes. Shares held as inventory will not qualify for exemption, unless the subsidiary qualifies under the EC Parent/Subsidiary Directive. **Required holding period:** No holding period for unquoted shares. For quoted shares, a one-year holding requirement exists. Dividends received within the one-year period are tax exempt provided the shares are not disposed of before the end of that period.
With-holding taxes on liquidation proceeds	**Yes**	**No** No withholding tax where the liquidation is part of a reorganization or where the shareholder is nonresident in Cyprus. In other cases, on liquidation, undistributed profits of the previous five years are treated as a distribution on dissolution and subject to a 15% defense contribution.	**No**	**No**	**Generally no** Any excess of the liquidation payment over the paid in capital is treated as a dividend and subject to dividend withholding tax.	**Yes** A 0% rate applies if the parent company is a company listed in the EC Parent/Subsidiary Directive and controls at least 10% of the share capital of the distributing company. The 0% rate also applies if the receiving company is a 'foreign company' (as defined in domestic legislation) regarded equivalent to one of the Swedish entities included in a list provided that the shares held are considered business-related. If not business-related, the domestic 30% rate or a reduced treaty rate applies. A refund of withholding tax paid is available.
With-holding taxes on interests	**Non-treaty: 15%** **Treaty: 0% - 15%** **EU: 0%**	**Non-treaty: 0%** **Treaty: 0%** **EU: 0%**	**Non-treaty: 20%** **Treaty: 0% - 20%** **EU: 0%** In addition to tax treaties and the EC Directive, Ireland also has a broad range of domestic exemptions from interest withholding tax, which allow gross interest payments to be made in a range of situations.	**Non-treaty: 0%** **Treaty: 0%** **EU: 0%** Legislation implementing the EC Savings Directive into Luxembourg law introduced a withholding tax on interest paid by a paying agent situated in Luxembourg to individual beneficial owners (or to some extent also 'residual entities') resident in another EU Member State or in certain Dependent and Associated Territories.	**Non-treaty: 0%** **Treaty: 0% %** **EU: 0%**	**Non-treaty: 0%** **Treaty: 0%** **EU: 0%**
Does CFC rules applies?	**No** No specific CFC legislation, but general anti-avoidance measures may achieve the same effect.	**No**	**No**	**No**	**No** No specific CFC legislation but general anti-avoidance measures (non-applicability of the participation exemption) apply to low taxed portfolio investment companies.	**Yes**
Does Thin Capital-ization rules applies?	**Yes**	**No**	**No**	**(No)** Safe haven debt-to-equity ratio of 85:15. For holding companies, a debt-to-equity ratio of 99:1 may also be applicable. There is no thin cap limit for an SPF but the annual subscription tax is due on the amount of debt exceeding eight times the paid-up capital and share premium	**Yes**	**Yes**
Number of jurisdictions with active Double Tax Treaties	**88**	**45**	**48**	**57**	**82**	**80**