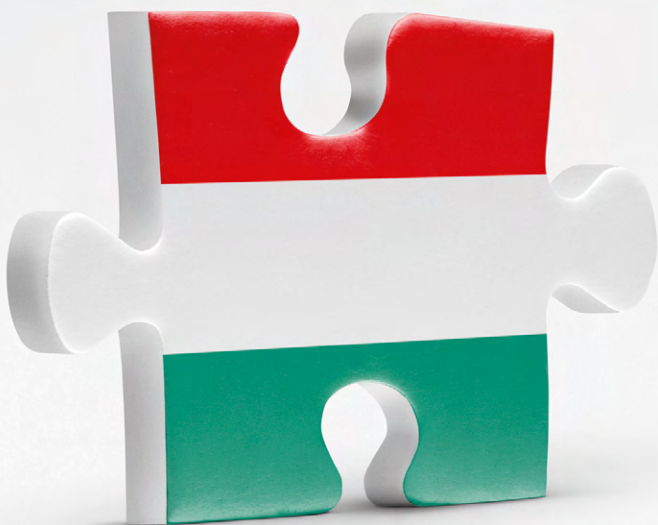




# Investing in Hungary

An overview of the current  
tax system | 2020





## 12 Countries. 1 Company. The TPA Group.

### Investing in Hungary.

#### An overview of the current tax system.

The current developments within Central and Eastern European countries are accompanied by ongoing changes in tax systems. For investors, this means numerous new developments to take into account.

TPA's CEE Country Series covers 12 Central and South Eastern European countries, and gives an overview of the business environment and the most important new developments, including:

- Different types of business organisations, and their most important features
- Key details of corporate and personal income tax and VAT in each country
- Current tax allowances, reliefs and concessions
- Core provisions of double taxation agreements

In the TPA-Country Series there are booklets on Albania, Austria, Bulgaria, Croatia, the Czech Republic, Hungary, Montenegro, Poland, Romania, Serbia, Slovakia and Slovenia. Visit our website [www.tpa-group.com](http://www.tpa-group.com), for detailed information and updates, or subscribe to our electronic newsletter at [service@tpa-group.com](mailto:service@tpa-group.com)

The information in these folders is based on the present legal situation and current administrative practice, and is therefore subject to change. The information is general in nature, and of necessity abridged: the booklets are not a substitute for individual, specific advice.

Our CEE experts will be happy to answer your questions in more detail.

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## Types of organisation

		<i>Name in local language</i>	<i>Registrable in commercial register / legal entity</i>	<i>Minimum capital</i>	<i>Sole-shareholder company</i>
<b>Limited liability company</b>		Korlátolt Felelősségű Társaság (Kft.)	yes / yes	HUF 3,000,000 (EUR 10,000), HUF 100,000 (EUR 333) per shareholder	yes
<b>Stock company</b>	<b>public</b>	Nyilvánosan Működő Részvénytársaság (Nyrt.)	yes / yes	HUF 20,000,000 (EUR 66,667) for public	yes
	<b>private</b>	Zártkörűen Működő Részvénytársaság (Zrt.)		HUF 5,000,000 (EUR 16,667) for private	
<b>Cooperative</b>		Szövetkezet	yes / yes	no	no
<b>General partnership</b>		Közkereseti Társaság (Kkt.)	yes / yes	no	no
<b>Limited partnership</b>		Betéti Társaság (Bt.)	yes / yes	no	no
<b>Registered branch office</b>		Fióktelep	yes / no	no	n / a
<b>Permanent establishment</b>		Telephely	no / no	no	n / a

	<i>Capital tax / registration fees</i>	<i>Written form / Notarisation or counter-signature by lawyer</i>	<i>Tax transparency</i>	<i>Registration with tax authorities</i>	<i>Statutory audit (revenues more than HUF 300 million (EUR 1 million), resp. number of employees &gt; 50)</i>
<b>Limited liability company</b>	– / registration in commercial register, changes in commercial register entries	yes / yes	no	yes	Where revenues exceed HUF 300 million (EUR 1 million), resp. number of employees > 50
<b>Stock company</b>	– / registration in commercial register, changes in commercial register entries	yes / yes	no	yes	Where revenues exceed HUF 300 million (EUR 1 million), resp. number of employees > 50
<b>Cooperative</b>	– / registration in commercial register, changes in commercial register entries	yes / yes	no	yes	Where revenues exceed HUF 300 million (EUR 1 million), resp. number of employees > 50
<b>General partnership</b>	– / registration in commercial register, changes in commercial register entries	yes / yes	no	yes	Where revenues exceed HUF 300 million (EUR 1 million), resp. number of employees > 50
<b>Limited partnership</b>	– / registration in commercial register, changes in commercial register entries	yes / yes	no	yes	Where revenues exceed HUF 300 million (EUR 1 million), resp. number of employees > 50
<b>Registered branch office</b>	– / registration in commercial register, changes in commercial register entries	yes / yes	n / a	yes	obligatory
<b>Permanent establishment</b>	– / –	– / –	n / a	yes	no

Exchange rate: EUR 1 = HUF 300 (rounded)

## Corporate income tax

Tax rate	9% Corporate income tax rate for corporations with limited or unlimited tax liability
Minimum corporate income tax base	If the taxable income is not at least 2% of total revenues, then the basis of assessment will be the second amount, unless the taxpayer submits a report about the reasons to the tax authorities.
Tax liability	
Unlimited	Corporations resident or managed in Hungary
Limited	Foreign corporations neither resident nor managed in Hungary, on their Hungarian income from Hungarian permanent establishments.  Foreign corporations with their income from sale of investments (including capital reductions) in real estate companies (owning real estate located in Hungary), if Hungary does not have a DTA with the state in which the foreign corporation is resident or if the DTA assigns the taxation right for such income to Hungary.
Financial year	Calendar year; different financial year possible, but must be reported to the tax office in writing
Accounting	Generally, double-entry bookkeeping in accordance with accounting law
Loss set-offs / carryforwards	Loss set-offs not permitted  Losses can be carried forward for the next 5 years.  Restrictions in case of reorganization: If a shareholder obtains a majority in a legal successor, loss carryforwards of the legal predecessor can not be forwarded to the legal successor, if the majority shareholder did not have a dominating influence in the legal predecessor or the legal successor will not continue the business activity of the legal predecessor.  Restrictions in case of change of shareholder: Loss carryforwards may get lost if a new shareholder gains a major influence which he (or one of his related companies) has not had during the last two (tax) years.  No loss carrybacks
Associated parties	Where another enterprise directly or indirectly controls a majority of the votes in the enterprise or is entitled to appoint the responsible officers (parent company), or  where the enterprise directly or indirectly controls a majority of the votes in another enterprise or is entitled to appoint the responsible officers (subsidiary), or  in the case of the enterprise and another enterprise, where a third party controls a majority of the votes in both enterprises or is entitled to appoint the responsible officers (fellow subsidiary), or

	in the case of a foreign enterprise and its Hungarian establishments, for the Hungarian establishments and parent company, subsidiaries and fellow subsidiaries of the foreign enterprise, or  the enterprise and its foreign permanent establishment, the foreign permanent establishment and the parent company, subsidiaries and fellow subsidiaries of the enterprise, or  the enterprise has a main influence on the decisions made by another enterprise regarding its business and finance policy because of the same management board.  The relevant votes include the votes of associated parties.
Operating expenses	Expenses of the business
Transfer prices	Arm's-length basis
Interest on financing	Deductible provided the investment constitutes assets of the business. Part of net financing costs exceeding the higher from 30% of the EBITDA (earnings before interests, tax, depreciations and amortisation of the tax year) or HUF 939.810.000 (approx. EUR 2.9 million) is not deductible.
Tax depreciation	Depreciation methods: straight-line  Each type of asset is assigned its particular rate of depreciation by law  Depreciation on a daily basis  Additional depreciation for extraordinary wear and tear or loss of useful value
Provisions	Not allowable for tax purposes
Motor vehicle expenses	Deductible provided the vehicle constitutes assets of the business  No input VAT on fuel of cars
Non-deductible expenses	Bribes and inducements  Personal taxes and VAT on non-deductible expenses  Expenses relating to non-taxable income  Expenses relating to time barred claims
Withholding tax	No withholding tax for dividends paid to corporations
Interest	0%
Royalties	0%
Service payments	0%
Dividends	0%
Direct collection	none
Capital gains	As a general rule taxable
Investment income	Generally exempt from corporate income tax

## Corporate income tax

National parent-subsidiary exemption	No qualifying period / no minimum holding <ul style="list-style-type: none"> <li>Gains on disposal of investments are not exempt</li> <li>Domestic dividends are tax exempt</li> </ul>
International parent-subsidiary exemption	No qualifying period / no minimum holding <ul style="list-style-type: none"> <li>Gains on disposals of investments are not exempt</li> <li>Investment income is tax exempt</li> </ul>
Non-EU states	No qualifying period / no minimum holding <ul style="list-style-type: none"> <li>Gains on disposals of investments are not exempt</li> <li>Investment income is tax exempt</li> </ul>
EU interest and royalties directive	No withholding tax for interest and royalties paid to companies
Amortisation of goodwill	
Asset deal	Recognition of goodwill possible on acquisition of business
Share deal	not available
Group taxation / pooling	Yes  Corporate income tax payers linked by a direct or indirect participation of at least 75% in each other or by that of a third party can under specified circumstances constitute a group for tax purposes.  The sum of tax losses of tax group members with negative tax base can be deducted up to 50% of the sum of tax bases of tax group members with positive tax bases in the year of occurrence. Not used tax losses can be carried forward for 5 years.  For transaction between members of a tax group the transfer pricing provisions are not applicable basically.
Disclosed investment	The acquisition of the shares of a Hungarian or foreign company may be disclosed to fiscal authorities within 75 days. Capital gains/losses on the sale of disclosed investments 1 or more years after date of acquisition are tax neutral (neither taxable nor tax deductible).

## Income tax

Tax rate	Generally at the rate of 15%
Tax-free allowance	none
Taxable base	gross annual income
Tax liability	
Unlimited	on worldwide income (except where DTA restricts the right to assess tax): Natural persons with their residence, habitual abode or vital interests in Hungary

Limited	on certain income in Hungary: Natural persons, who have neither their residence nor their habitual abode in Hungary, on certain Hungarian income
Tax assessment period	Calendar year
Income categories	1. Income from self-employment 2. Income from employment 3. Other income 4. Income of sole proprietors 5. Gains on transfer of property 6. Capital gains 7. Benefits in kind 8. Income from securities trading 9. Other income (e.g., rent)
Accounting	none  Sole proprietors: receipts and payments accounting
Loss set-offs	none
Loss carryforwards	none
Operating expenses	Expenses of the business
Flat-rate option	One-man businesses with annual income of less than HUF 15 million (EUR 50,000): flat rate deduction for business expenses
Motor vehicles	Deduction of actual costs or rate per kilometre
Withholding tax	Withholding tax on income calculated using tax table is generally at the rate of 15%
Interest	15 %, or as reduced by the applicable DTA
Royalties	15 %, or as reduced by the applicable DTA
Dividends	15 %, or as reduced by the applicable DTA

## Filing dates and deadlines

Income tax returns	20 May of the following year
Corporate income tax returns	31 May of the following year
VAT returns	20 <sup>th</sup> of the month following the month of assessment, or quarterly (monthly or quarterly filing)  15 February of the following year (annual filing period)

## Other taxes

Business tax	Maximum of 2% (depending on the municipality)
Capital transfer tax and fees	Only minimal amounts

## Tax regulations

Rulings	<p>Obtainable for transactions planned in the future; possibly for current and completed transactions; or for transfer price determination between associated companies, for a period of 3–5 years</p> <p>Required to be represented by recognised tax adviser</p> <p>To be submitted to Hungarian Finance Ministry</p> <p>Fee payable: min HUF 5 million (EUR 16,667), maximum HUF 11 million (EUR 36,667); for transfer prices determination min HUF 2 million (EUR 6,667)</p>
Penalties for late payment	<p>Default penalty: private persons up to HUF 200,000 (EUR 667), other taxpayers up to HUF 500,000 (EUR 1,667)</p> <p>Penalty for delay: the applicable bank base rate plus 5%, calculated on a daily basis</p>
Criminal provisions	Up to 50%, or 200%, of the unpaid tax

## Tax concessions

Direct	For entrepreneurs: Investments in special economic zones and investments in special business fields can be subject to tax concessions on application: depending on volume of investments and jobs created
Indirect	
Examples of allowable deductions	<p>Families can reduce their tax base monthly by a family allowance per child:</p> <ul style="list-style-type: none"> <li>▪ with 1 child: HUF 66,670 (EUR 222)</li> <li>▪ with 2 children: HUF 133,330 (EUR 444)</li> <li>▪ with 3 or more children: HUF 220,000 (EUR 733)</li> </ul>
Grants	Government grants for the creation of new jobs Investment grants

## Immovable property

Tax depreciation	
Depreciation	Straight-line, using the rates prescribed in Corporate Income Tax Act 1996 No. LXXXI, recognising depreciation under commercial law
Additional depreciation	<p>Of rights (also in connection with real estate), where as a result of contractual changes the rights can no longer be successfully asserted</p> <p>On property, plant and equipment, in the event of physical damage as a result of “force majeure”</p>
Depreciation categories	
Land	no depreciation

Buildings	
Durable construction	2% (concrete, reinforced concrete, brick, etc.)
Medium-life construction	3% (light steel and other metals, etc.)
Lightweight construction	6% (planks, etc.)
Rental property	5%
Tax base for buildings	Acquisition and construction costs as defined in accounting law
Special depreciation	none
Write-ups	none
Property transfer tax	
Objects of taxation	<p>Acquisition of Hungarian real estate for consideration (transactions between associated parties may be tax exempt)</p> <p>under certain circumstances acquisition of investments in a company owning real estate located in Hungary (transactions between associated parties may be tax exempt)</p> <p>under certain circumstances in connection with reorganisations of a company owning real estate located in Hungary (exception: under certain circumstances tax advantaged reorganisation)</p>
Real estate	Land, buildings, additions, appurtenances, building rights, buildings on land owned by others
Basis of assessment	Market value
Tax rate	<p>for commercial buildings 4% up to a fair value of HUF 1 billion (EUR 3.3 million), 2% for exceeding amounts, maximum tax is HUF 200 million (EUR 666,667)</p> <p>reductions for residential property</p>
Property tax (land tax, buildings tax)	
Objects of taxation	Undeveloped land and buildings in Hungary
Basis of assessment	Local government authorities decide between: <ol style="list-style-type: none"> <li>1. Area in m<sup>2</sup></li> <li>2. Market value</li> </ol>
Amount of tax	Either an amount per m <sup>2</sup> or a percentage tax rate, as determined by local government authorities; the statutory maximum amount or maximum tax may not be exceeded
Ceiling	<p>Land: HUF 340 / m<sup>2</sup> or 3.0% of the adjusted market value</p> <p>Buildings: HUF 1,850 / m<sup>2</sup> or 3.6% of the adjusted market value</p>
Real estate funds	
Owner of the fund assets	The fund company, so that for the investor there is no entry in the Property Register and no property transfer tax.

Valuation	3/6-monthly valuation by expert
Borrowing	Maximum permissible 60%
Diversification of risk	Value of any individual property not to exceed 20/30% of total fund assets 15% of the fund assets: cash, securities
Taxation	15% if fund shares are owned by a private investor 9% if the investor is subject to corporate income tax

Authority	The relevant tax office is responsible for collection of contributions.
Statutory provisions	The applicable statutory provisions are Law 1997/80 governing the provision of social insurance and private pensions and Law 2018/52 governing the social contribution tax. Employees' contributions total 18.5% and employer's contributions total 21%.

## Social insurance

Social insurance	Statutory health, accident and pension insurance for all gainfully employed persons (covers benefits in kind and in cash)
Contribution rates and maximum contribution	Contribution rates are fixed, no contribution ceiling for pension insurance
Self-employed persons	
Basis of assessment	without supporting documents and vouchers, 90% of income; with appropriate documentation, income less associated costs
Social contribution tax	17.5%, with effect from 01.07.2020 18.5%
Pension insurance	10% (no maximum contribution)
Medical insurance	7%
Vocational education and training	1.5%
Unemployment contribution	1.5%
Authority	The relevant tax office is responsible for collection of contributions.
Statutory provisions	The applicable statutory provisions are Law 1997/80 governing the provision of social insurance and private pensions and Law 2018/52 governing the social contribution tax. Total contributions amount to 42%.
Employed persons	
Basis of assessment	Tax base for income tax
Social contribution tax	17.5%
Pension insurance	10% employee
Medical insurance	7% employee
Vocational education and training	1.5% employer
Unemployment contribution	1.5% employee
Handicapped quota	For employers with more than 25 employees, handicapped persons must make up 5% of the total number employed. If this threshold is not achieved, employers pay a yearly amount of HUF 1,350,000 (EUR 4,500) per person on the number of handicapped persons that should be employed.

## General managers

Civil law	Contracts for services / employment contract
Social insurance	Subject to social insurance
Income tax	Income tax on wages and salaries, including all payroll-related costs
VAT	No VAT
Work permit	Not required
Residence permit	Not required
Liability	In case of negligence, e.g., with respect to employer's taxes, or delay in declaring insolvency
Minimum remuneration	none

## VAT

Tax rates	Standard rate: 27%  Reduced rate 5%, e.g. for <ul style="list-style-type: none"> <li>▪ supply of pharmaceuticals</li> <li>▪ supply of books</li> <li>▪ district heating supply of meat, eggs, milk</li> <li>▪ accomodation</li> </ul> Reduced rate 18%, e.g. for <ul style="list-style-type: none"> <li>▪ supply of milk products, of products manufactured using flour and milk</li> </ul>
Supply of goods	Supply of goods and withdrawal for private use (self supply) are taxable.
Place of supply of goods	Principally the place where the item is located at the time disposal is transferred (static supply).  In case of dispatch/transportation by the supplier or purchaser: the place where dispatch/transportation begins (moving supply).  Importation from third country: If the supplier owes the import VAT – import country  In case of transportation by ship, airplane, railroad within the EU: the place of dispatch

		Special provisions for chain and triangular transactions	
Supply of services		Supply of services and private use / supply of services without consideration (self-supply) are taxable	
Place of supply of services		From 1 January 2010 a differentiation is made between services rendered <ul style="list-style-type: none"> <li>to taxable persons ("Business to Business", "B2B") or</li> <li>to non-taxable persons ("Business to Customer", "B2C").</li> </ul>	
		For purposes of determining the place of the supply of services, <ul style="list-style-type: none"> <li>taxable persons and</li> <li>non-taxable legal entities holding a VAT registration number</li> </ul> will be considered as "taxable persons".	
▪ Basic rule		<b>B2B</b>	<b>B2C</b>
		Place of recipient  (The place where the recipient of services has established his business)	Place of supplier  (The place where the supplier of services has established his business)
▪ Special cases		<b>B2B</b>	<b>B2C</b>
Supplies of services by intermediaries		Place of recipient (basic rule)	Place of the underlying transaction
Property services		Place of the property	Place of the property
Cultural, artistic, scientific, educational, sports, entertainment or similar services, like services in connection with fairs and exhibitions including services of the respective organizers		Place of recipient (basic rule)	Where the services are physically carried out
Other services concerning the right of admission and related other services for events like fairs and exhibitions		Place of the event	Where the services are physically carried out
Passenger transport		Distances covered	Distances covered
Transportation of goods (without intra-community portion)		Place of recipient (basic rule)	Distances covered
Intra-community goods transportation		Place of recipient (basic rule)	Place of departure of the transport
Ancillary transport services		Place of recipient (basic rule)	Where the services are physically carried out
Appraisal and processing of movable tangible objects		Place of recipient (basic rule)	Where the services are physically carried out

	Restaurant and catering services	Where the services are physically carried out	Where the services are physically carried out
	Restaurant and catering services in connection with intra-community passenger transport	Place of departure	Place of departure
	Hiring of means of conveyance for up to 30 days	Where the means of transport is actually put at the disposal of the customer	Where the means of transport is actually put at the disposal of the customer
	Hiring of means of conveyance for over 30 days	Place of recipient (basic rule)	Where non-taxable person is established  Special regulations for hiring pleasure boats
	"Listed services" to third country recipients	Place of recipient (basic rule)	Where non-taxable person is established
	Telecommunication, broadcasting and electronically supplied services	Place of recipient (basic rule)	Where non-taxable person is established
Reverse Charge (reversal of tax liability)		For all supplies of services and work supply Special regulation (among others) for building services	
Requirements		The supplier of the service has no domestic domicile or habitual abode, nor a domestic permanent establishment involved in supplying the service  The recipient of the supply of services is a taxable person registered in Hungary (even for non-taxable activities)	
Consequences		Invoice without VAT, indication of the reverse charge, VAT registration numbers of the supplier and the recipient  The recipient owes the VAT.	
Tax exemption		Important differentiation concerning input VAT deduction	
Zero rated  (Input VAT deduction is applicable in spite of VAT-free supply of goods and services)		<ul style="list-style-type: none"> <li>Exports of goods</li> <li>Subcontracting</li> <li>Cross-border goods transportation</li> <li>Cross-border passenger transport by boat and aircraft</li> <li>Mediation of the above transactions</li> </ul>	
VAT exemption  (Input VAT deduction is not applicable)		<ul style="list-style-type: none"> <li>Sales of banks, insurance companies and pension funds</li> <li>Property sales (the supplier can opt for tax liability)</li> <li>Tax-free renting of property</li> <li>Sales of doctors, dentists etc.</li> </ul>	
Real Estate			
Rent		Renting of immovable property is VAT exempt; the lessor can opt for tax liability	
Sale		Revenues from the sale of real property are VAT exempt; the seller can opt for tax liability (27 %).	



**VAT**

		<b>Exception:</b> Sale of building lots and of land with buildings without permit of use or with permit of use younger than 2 years is always taxable.
Leasing		
	Financial leasing with contractual transfer of ownership	Supply of goods
	Financial leasing with option	Supply of services
	Operating Leasing	Supply of services
Input VAT refund for Hungarian taxable persons within the EU		<p>New regulations as of 1 January 2010 concerning input VAT amounts (initially for input VAT ex 2009) invoiced in another EU member state. Application for refund is no longer required to be made at the foreign tax authorities, instead:</p> <p>Electronic application to be made by the Hungarian taxable person at its competent Hungarian tax office at the latest by 30 September of the following year. Separate applications are required for each member state.</p> <p>Filing of original invoices is only necessary if required by fiscal authorities of the respective member state.</p> <p>Minimum amount of refundable input VAT: EUR 400 (EUR 50 if the refund period coincides with the calendar year).</p>
Foreign taxable persons		Taxable persons without domicile or permanent establishment in Hungary.
	Registration	Registration required if sales are effectuated in Hungary.
	Input VAT refund for taxable persons domiciled in the EU	<p>New regulation as of 1 January 2010 (concerning input VAT ex 2009):</p> <p>If no sales are made in Hungary, electronic application at the competent tax office in the EU member state (originating country) of the taxable person.</p>

**Mergers & Acquisitions**

Financing		
	Financial assistance by the subsidiary	Financial assistance is prohibited in Hungary in the case of Stock Corporations. For limited liability companies there is no regulation.
	Subordinate debt (mezzanine capital)	The use of subordinate debt is allowed.
	Interest expense for acquisition financing	Interest on debt used for purchase of a share in a subsidiary is tax deductible in the parent company.
	Interest expense on subordinate debt (mezzanine capital)	Currently, there is no special legal regulation in Hungary regulating interest on subordinate debt.

	Acquisition debt push down (the debt is transferred to the subsidiary after the acquisition)	There is no special legal regulation. Interest on such debt is generally regarded as tax-deductible.
Squeeze-out options		
	Possibility to exclude minority shareholders	No squeeze out option exists.
Capital gains – corporations		
	Sale of shares in a joint stock corporation	The gain on the sale of shares in a joint stock corporation is taxable income.
	Sale of shares in a limited liability company	The gain on the sale of shares in a limited liability company is taxable income.
	Sale of interest in a partnership	The gain on the sale of ownership interest in a general partnership and in a limited partnership is taxable income.
	International participation exemption	<p>Disclosed investment: Since 1 January 2007, the acquisition of 10% or more of the shares of a Hungarian company or foreign company can be disclosed to fiscal authorities within 75 days.</p> <p>Capital gains/losses on the sale of such disclosed investments 1 or more years after the acquisition are tax neutral (neither taxable nor tax deductible).</p>
Sale of business (enterprise)		
	Definition	Sale of the business is possible. The component parts of the business are tangible and intangible assets, liabilities and employees.
	Accounting and tax treatment	During a sale of a business, the transferred assets are recorded by the buyer at the actual value agreed by the parties.
	Goodwill	If the purchase price is higher than the value of the business as determined on the basis of the fair value of individually valued assets, a goodwill is created.
	Goodwill amortization	Amortization in financial accounts is possible if the value of goodwill continually decreases from year to year. For tax purposes 10% amortization per year is acknowledged.
Mergers		
	Types of mergers described by commercial law	Upstream merger, side-stream merger, takeover of assets by main shareholder
	Valuation	Revaluation in financial accounting is optional. Possible in the case of companies which are terminated in the course of the merger.
	Valuation in financial accounting	Assets are recorded at fair value, liabilities remain at book values, and the remaining difference is recorded as capital reserve within the equity of the successor company.
	Goodwill amortization	n / a
	Tax treatment of the revaluation	Revaluation of assets is basically taxable, thereafter the basis for tax depreciation is the revalued amount.

## Mergers & Acquisitions

		Preferential merger: revaluation difference is not taxable, but is also not the basis for tax depreciation.
Contributions (transfer of assets to the capital of a company)		
Contribution in kind		The shareholder may contribute assets to the registered capital of the company and the amount of contribution shall be determined by the fair value of the assets as agreed between the shareholder and the company. The contributor guarantees the agreed value. An expert opinion is voluntary. Tax losses cannot be transferred.
Tax treatment		The difference between net book value and fair value of the contributed assets is taxable.
Goodwill amortization		n / a

## Double taxation agreements

The right to taxation in the event of sale of interests in property companies is subject to differing provisions. In accordance with the OECD Model Agreement, for those countries for which there is a "yes" in the real estate clause column the right to taxation in the case of share deals lies not with the country of residence of the vendor but with the country in which the property is situated.

Country	Effective date	Real estate clause	Dividends %	Interest %	Royalties %
Albania	24.08.1995	no	5/10	0	5
Australia	10.04.1992	yes	15	10	10
Austria	09.02.1976	no	10	0	0
Armenia	25.02.2010	yes	5/10	10	5
Azerbaijan	13.12.2008	yes	8	8	8
Bahrain	19.06.2015	yes	0/5	0	0
Belarus	24.06.2004	no	5/15	5	5
Belgium	18.04.1984	no	10	15	0
Bosnia and Herzegovina	01.01.2003	no	10	0	10
Brazil	22.05.1992	no	15	10/15	15/25
Bulgaria	07.09.1995	no	10	10	10
Canada	16.04.1996	yes	5/10/15	10	10
China	31.12.1994	yes	10	10	10
Croatia	07.06.1998	no	5/10	0	0
Cyprus	24.09.1982	no	5/15	10	0
Czech Republic	27.12.1994	no	5/15	0	10
Denmark	04.07.2011	yes	15	0	0
Egypt	22.05.1994	yes	15/20	15	15
Estonia	05.07.2004	no	5/15	10	0
Finland	25.10.1978	yes	5/15	0	0/5
France	28.04.1980	no	5/15	0	0
Georgia	20.03.2012	yes	5	0	0
Germany	30.12.2011	yes	5/15	0	0
Greece	01.01.1986	no	10/45	10	0/10
Hongkong	29.11.2010	yes	5/10	5	5

Country	Effective date	Real estate clause	Dividends %	Interest %	Royalties %
Iceland	01.01.2006	yes	5/10	0	10
India	01.01.2006	yes	10	10	10
Indonesia	04.02.1993	no	15	15	15
Iran	30.12.2016	yes	0	5	5
Ireland	05.12.1996	yes	5/15	0	0
Israel	13.11.1992	no	5/15	0	0
Italy	16.05.1977	no	10	0	0
Japan	13.02.1980	no	10	10	0/10
Kazakhstan	03.03.1996	yes	5/15	10	10
Korea	29.03.1989	no	5/10	0	0
Kosovo	12.03.2014	yes	0/5	0	0
Kuwait	21.12.1994	yes	0	0	10
Latvia	24.12.2004	yes	5/10	10	5/10
Liechtenstein	24.12.2015	yes	0/10	0	0
Lithuania	24.12.2004	yes	5/15	10	5/10
Luxembourg	26.01.2017	yes	0/10	0	0
Macedonia	12.11.2002	no	5/15	0	0
Malaysia	25.12.1992	no	10	15	15
Malta	29.11.1992	yes	5/15	10	10
Mexico	03.11.2011	yes	5/15	10	10
Moldova	16.08.1996	no	5/15	10	0
Mongolia	14.04.1998	no	5/15	10	5
Morocco	20.08.2000	no	12	10	10
Netherlands	18.08.1987	no	5/15	0	0
Norway	01.01.1982	no	10	0	0
Oman	18.03.2017	yes	0/10	0	8
Pakistan	06.02.1994	yes	15/20	15	15
Philippines	07.02.1998	yes	15/20	15	15
Poland	08.08.1995	no	10	10	10
Portugal	28.01.1999	no	10/15	10	10
Qatar	20.03.2012	yes	5	0	5
Romania	15.09.1995	no	5/15	15	10
Russia	03.11.1997	no	10	0	0
San Marino	29.11.2010	yes	5/15	0	0
Saudi Arabia	01.05.2015	yes	5	0	5/8
Serbia	01.01.2003	no	5/15	10	10
Singapore	18.12.1998	no	5/10	5	5
Slovakia	21.12.1995	no	5/15	0	10
Slovenia	01.01.2006	yes	5/15	5	5
South Africa	05.05.1996	no	5/15	0	0
Spain	10.03.1988	no	5/15	0	0
Sweden	01.01.1983	yes	5/15	0	0
Switzerland	09.11.2014	yes	0/15	0	0
Tunisia	19.07.1997	no	10/12	12	12
Thailand	11.10.1989	yes	15/20	10/25	15
Turkey	09.09.1995	no	10/15	10	10
Turkmenistan	19.11.2016	yes	5/15	10	10
Ukraine	24.06.1996	yes	5/15	10	5

## Double taxation agreements

## Notes

<i>Country</i>	<i>Effective date</i>	<i>Real estate clause</i>	<i>Dividends %</i>	<i>Interest %</i>	<i>Royalties %</i>
United Arab Emirates	04.10.2014	yes	0	0	0
United Kingdom	03.11.2011	yes	10/15	0	0
Uruguay	13.08.1993	no	15	15	15
USA	01.01.1980	yes	5/15	0	0
Uzbekistan	13.12.2008	yes	10	10	10
Vietnam	30.06.1995	yes	10	10	10

## TPA Group

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