worldwide internationally mobile employee guide
FOREWORD

A multinational enterprise operates today through many different countries and brings its products and services to market in a globally managed, cost effective and efficient manner. Notably, with supply chains flowing through so many different jurisdictions, it is not surprising that a major task of any multinational enterprise is meeting the ever-changing visa, payroll and personal tax compliance obligations of its numerous overseas employees, and dealing with the many challenges that arise throughout this process.

PKF is experienced in assisting internationally mobile employees and we understand the issues, complexities and goals surrounding international assignments at both the individual, and organisational, levels. Notably, we customise our services to meet a client’s objectives and concerns and deliver an efficient, comprehensive service.

With offices in over 350 locations, PKF member firms operate in more than 150 countries across 5 regions. We specialise in providing efficient and comprehensive internationally mobile employee support services to international and domestic organisations in all our markets.

Notably, our services include:

- Local payroll services and reporting;
- Employee personal tax compliance services;
- Providing tax advice to new employees (individuals), including an arrival and exit interview;
- Providing tax advice to international companies (the employer) including:
  - Head office foreign tax (permanent establishment) exposure;
  - Administration assistance and assisting with queries and issues;
  - Worldwide remuneration and benefits package structuring.

PKF provides a one-stop global service for multinational groups in taking care of all their overseas employee requirements across many jurisdictions.

Please visit our website at www.pkf.com/mobileemployees to find more information on how PKF may seamlessly help you with your worldwide overseas employee obligations.
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CONTENTS

FOREWORD .......................................................................................................................... 2
IMPORTANT DISCLAIMER .................................................................................................... 3
CONTENTS .......................................................................................................................... 4

AFGHANISTAN .................................................................................................................. 7
ALGERIA ............................................................................................................................. 8
ANGOLA ............................................................................................................................. 9
ARGENTINA ...................................................................................................................... 10
AUSTRALIA ...................................................................................................................... 11
AUSTRIA ............................................................................................................................ 12
AZERBAIJAN ...................................................................................................................... 13
BAHRAIN ......................................................................................................................... 14
BANGLADESH .................................................................................................................. 15
BELARUS .......................................................................................................................... 16
BELGIUM .......................................................................................................................... 17
BOLIVIA ........................................................................................................................... 18
BOSNIA AND HERZEGOVINA ......................................................................................... 19
BOTSWANA ...................................................................................................................... 20
BRAZIL .............................................................................................................................. 21
BULGARIA ......................................................................................................................... 22
CAMEROON ...................................................................................................................... 23
CANADA ........................................................................................................................... 24
CAPE VERDE ..................................................................................................................... 25
CHILE ................................................................................................................................ 26
CHINA ................................................................................................................................ 27
COLOMBIA ....................................................................................................................... 28
COSTA RICA ...................................................................................................................... 29
CROATIA ............................................................................................................................ 30
CYPRUS ............................................................................................................................. 31
CZECH REPUBLIC ........................................................................................................... 32
DENMARK .......................................................................................................................... 33
DOMINICAN REPUBLIC ................................................................................................. 34
ECUADOR .......................................................................................................................... 35
EGYPT ............................................................................................................................... 36
EL SALVADOR .................................................................................................................. 37
ESTONIA ........................................................................................................................... 38
FINLAND ............................................................................................................................ 39
<table>
<thead>
<tr>
<th>Country</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pakistan</td>
<td>78</td>
</tr>
<tr>
<td>Panama</td>
<td>79</td>
</tr>
<tr>
<td>Peru</td>
<td>80</td>
</tr>
<tr>
<td>Philippines</td>
<td>81</td>
</tr>
<tr>
<td>Poland</td>
<td>82</td>
</tr>
<tr>
<td>Portugal</td>
<td>83</td>
</tr>
<tr>
<td>Puerto Rico</td>
<td>84</td>
</tr>
<tr>
<td>Qatar</td>
<td>85</td>
</tr>
<tr>
<td>Romania</td>
<td>86</td>
</tr>
<tr>
<td>Russian Federation</td>
<td>87</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>88</td>
</tr>
<tr>
<td>Serbia</td>
<td>89</td>
</tr>
<tr>
<td>Singapore</td>
<td>90</td>
</tr>
<tr>
<td>Slovak Republic</td>
<td>91</td>
</tr>
<tr>
<td>Slovenia</td>
<td>92</td>
</tr>
<tr>
<td>South Africa</td>
<td>93</td>
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<tr>
<td>Spain</td>
<td>94</td>
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<td>Sri Lanka</td>
<td>95</td>
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<td>Sweden</td>
<td>96</td>
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<td>97</td>
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<td>Taiwan</td>
<td>98</td>
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<td>Tanzania</td>
<td>99</td>
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<tr>
<td>Thailand</td>
<td>100</td>
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<td>Turkey</td>
<td>101</td>
</tr>
<tr>
<td>Uganda</td>
<td>102</td>
</tr>
<tr>
<td>Ukraine</td>
<td>103</td>
</tr>
<tr>
<td>United Arab Emirates</td>
<td>104</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>105</td>
</tr>
<tr>
<td>United States</td>
<td>106</td>
</tr>
<tr>
<td>Uruguay</td>
<td>107</td>
</tr>
<tr>
<td>Venezuela</td>
<td>108</td>
</tr>
<tr>
<td>Vietnam</td>
<td>109</td>
</tr>
<tr>
<td>Zambia</td>
<td>110</td>
</tr>
<tr>
<td>Zimbabwe</td>
<td>111</td>
</tr>
</tbody>
</table>
KEY POINTS

- To legally work in Afghanistan, an internationally mobile employee (foreign employee) must obtain a business visa and work permit (visa):
  - A business visa is issued for business purposes and allows the holder to remain in Afghanistan for a period of up to 30 days. It is, however, not possible to work under this visa or receive remuneration for services, however, this single-entry visa can be used to obtain a work permit (visa), followed by a multiple-entry or stay visa. A business visa can be obtained from the Consulate Section of the Afghan Ministry of Foreign Affairs.
  - A work permit (visa) must be obtained by a foreign national wishing to legally work in Afghanistan and is issued by the Ministry of Labour and Social Affairs. Several documents are required to obtain the work permit (visa) including a completed application on the employing company’s letterhead, the applicant’s original passport, an entry visa (business visa), employee job description, etc.
  - A resident visa is issued by the Ministry of Interior to foreign nationals who have entered Afghanistan with a proper visa. A resident visa is valid from one month to six months and can be extended.

- The administration of tax in Afghanistan is undertaken by the Revenues General Department of the Ministry of Finance (Afghanistan Revenue Department; ARD). Afghanistan resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Afghan-source income only.

- The tax year in Afghanistan runs from 21 December to 20 December.

- An individual is deemed resident in Afghanistan if at any time during the tax year their principal home is in Afghanistan, they are present in Afghanistan for a period totalling 183 days, or they are an employee or official of the government of Afghanistan who has been assigned to perform services abroad.

- Each employee is required to register with the tax authorities and obtain a Tax Identification Number (TIN). If an employee’s taxable income exceeds AFN 60,000 (the amount not chargeable to tax) they are required to file an annual tax return by 21st March following the end of the tax year (no tax return filing extension is possible). Penalties apply for late filing or failure to file a tax return or the late or delayed payment of tax.

- Employment income broadly includes all compensation, in-cash or in-kind, which is due or received by an employee in a tax year. Certain tax exemptions are available to foreign nationals and/or non-residents, where certain specified conditions are met.

- Employment income is taxed at progressive income tax rates up to 20% on amounts exceeding AFN 1,200,000 per annum.

- There is no payroll tax for the employer.

- An employer must withhold tax at source from an employee’s salary at the time of payment and remit this to the tax authority within 10 days following the end of the month in which the tax was deducted.

- When employment ends and the internationally mobile employee leaves Afghanistan they are required to prepare and file a final tax return (and pay any tax due) within two weeks before departing the country (if applicable). Please note that the tax authorities normally communicate with the immigration authorities where they believe a person has an outstanding tax liability.
To legally work in Algeria, an internationally mobile employee (foreign employee) must first obtain a General Agreement in Principle followed by a provisional work authorisation (APT) before an application for a work visa can be made. Following the granting of a work visa:

- Short term assignees (less than 3 months) must then apply for a temporary work authorization (ATT) which lasts for three months and can be renewed once within the year;
- Long term assignees must obtain a work permit (some exemptions apply) and a resident card (both valid for two years and renewable).

The tax authority in Algeria is the Algerian Tax Authority (ATA). Each employer is required to register with the ATA as a taxpayer. Algeria resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Algerian-source income only.

An individual is deemed resident in Algeria if their centre of vital interests is in Algeria, or in a year they spend more than 183 days in Algeria (principal place of stay), or perform a professional activity in Algeria, or own a dwelling or rent a house for at least one year.

An employer is required to register each foreign national working in Algeria with the tax and social security authorities and with the local police station.

The tax year in Algeria runs from 1 January to 31 December (a calendar year). Individual tax returns and tax payments are due by 30th April following the end of the tax year. An individual liable to tax must calculate their tax liability, file a tax return and pay any tax due on a calendar year basis. Spouses are required to file separate tax returns. Separate returns may be filed for dependent children in respect of their independent income.

- A tax return is not required if a taxpayer's only source of income is employment income from which tax has been deducted at source. However, where a resident employee receives other sources of income during a year (other than their monthly declared salary) they must report these on a global revenue return form (Form Gn°1) and this form should be filed with the respective tax office before 30th April each year. Penalties apply for late filing, failure to file or filing an incorrect return.

Employment income includes salaries, wages, pensions and life annuities. Allowable deductions can include amounts deducted by the employer to pay pensions, mandatory social insurance contributions and travel expenses.

Employment income is taxed at progressive individual income tax rates up to 35% on amounts exceeding DZD 1.44 million per annum. There is no payroll tax for the employer.

Social Security Contributions: Social security tax funds both pensions and health care. The employee pays 9% of their gross salary and the employer pays 26% of the employee’s gross salary.

An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit this, monthly or quarterly depending on the number of employees, to the tax authorities.

When employment ends and the internationally mobile employee leaves Algeria they are required to surrender their work permit to their Algerian employer. The employer must notify the departure of each employee to the tax authorities and settle any tax duties.
PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in Angola, an internationally mobile employee (foreign employee) must first obtain a visa:
  - A short-term seven-day visit visa must be used within three days after its issuance (a seven-day extension is possible).
  - An ordinary visa, which is normally granted for 30 days (renewable twice), allows the holder to attend business meetings or conferences but not engage in any remunerated activity.
  - Work visa (permit): All work permit requests must be filled at the Angolan embassy located in the employee’s home country. Foreign nationals who have a temporary employment contract on behalf of an Angolan chartered company, or in the interest of the State, may be granted a 12-month work visa. The visa entitles the holder to specifically engage only in the professional activity for which it was issued for the specified employer (sponsor).
  - Other work visas (permits) may be obtained with the necessary approvals from the Ministry of Public Administration, Employment and Social Security and/or the Ministry of Migration and Foreigners Services, e.g. Work Visa Type A (granted to an individual who will work temporarily for a public or private company in Angola).
  - A residency visa may be granted to a foreign national to enable them to stay in the national territory for a period of 120 days, renewable for equal periods, until the final decision of the application for a residence permit. A residency visa entitles the holder to exercise remunerated professional activity.
  A work permit is normally granted for the duration of an employment contract (between three to thirty-six months).

- The tax authority is the Administração Geral Tributária (General Tax Administration, or AGT), a department of the Angola Ministry of Finance. A tax year runs from 1 January to 31 December (a calendar year). An individual’s liability to taxation in Angola is not determined based on any tax residence criteria since under Angolan law a pure source-based system applies. Consequently, all Angolan residents and non-residents earning income in Angola are subject to personal income tax. (Please note however that the General Tax Code directs that an individual who remains in Angola for more than 183 days during a twelve-month period is to be considered tax resident in Angola). There is no tax return filing requirement in Angola for individuals.

- An employer is required to register each foreign employee (with a work or residence visa) with the tax authority. Employment income includes all forms of remuneration whether paid in cash or in kind. Certain expenses may be claimed, such as travel expenses, and are taxable to the extent that the amount paid to the employee exceeds the limits applicable to civil servants.

- Individuals receiving employment income for work performed in Angola are subject to income tax at progressive rates of up to 17% on amounts exceeding AOA 230,000, deducted at source by an employer under the Pay-As-You-Earn (PAYE) withholding tax system.

- Social Security Contributions: Salaries and additional remuneration specified under law are subject to social security contributions at a rate of 8% for employers and 3% for employees (no cap applies to the amount of remuneration subject to social security contributions).

- An employer must deduct the appropriate amount of tax and social security from an employee’s gross monthly salary and remit this to the tax authorities, together with its payment, monthly. Monthly returns are also submitted by an employer at the time the respective monthly payment is made (by the end of the following month).

- When employment ends, and an internationally mobile employee permanently leaves Angola, there are no specific requirements other than the cancellation of their work visa by the employer.
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KEY POINTS

- To legally work in Argentina, an internationally mobile employee (foreign employee) must obtain a visa which allows them to perform paid work. Under Argentine Immigration Law several types of residence exist for expatriates coming to work in the country. Permanent or temporary residence allows the holder to work.
  - A business visa is issued by an Argentina consulate directly, or through a prior application to the immigration office in Argentina, and is for business purposes only. This type of visa is issued to a foreign national who is invited by a local commercial entity established in Argentina.
  - Labour contract residence is granted to a foreigner who is employed by a local company. It is valid for one year (but can be extended indefinitely).
  - Intra-company transfer residence is granted to a foreigner (employee) who is transferred from a home country company to an Argentine company. It is valid for one year (but can be extended indefinitely).

- The tax authority is the Administración Federal de Ingresos Públicos (Internal Revenue Service, or AFIP). Argentine resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Argentine-source income only. An individual is deemed to be resident in Argentina if they are a native and naturalised Argentine citizen, have been granted permanent residence status in Argentina or remain more than 12 months in Argentine under a temporary authorisation.

- The local employer is required to include each foreign national working in Argentina on the payroll and apply for a tax (labour) identification number for dependent employees (CUIL) and the ‘clave de alta temprana’ (CAT). An employer must also register each employee with the social security authorities and complete the necessary obligations and formalities. Employers are required to provide an annual tax wage statement (Form 649) to each employee showing details of their salary paid and deductions applicable.

- The tax year in Argentina runs from 1 January to 31 December (a calendar year). Tax returns must be filed with the tax authority mid-April or mid-May following the tax year (the exact due date depends on a tax payer's registration number). Where an individual’s only source of income is employment income (from which tax has been deducted at source) and their annual gross salary is below ARS 500,000, then a tax return is not required to be filed. Penalties (interest and fines) apply where tax is paid in arrears.

- Foreign nationals working in Argentina are liable to income tax and social security tax. Employment income includes salaries, wages and most employment benefits. There is no payroll tax in Argentina.
  - Income tax is imposed at progressive rates from 5% up to 35% on amounts exceeding ARS 249,000 per annum. The tax is levied on income earned in Argentina (employment income) and overseas by individuals residing in Argentina. It is payable on an annual basis with five advanced payments (every two months). Any expenses incurred in generating such income may be deducted from the gross income together with deductions or reliefs specifically provided under the law.
  - Social Security Contributions: An employee pays 17% of their gross salary comprising 11% (Pension Fund), 3% (Retiree’s Fund) and 3% (Health Care System). Employer’s pay 23% or 27% which includes a 6% contribution to medical care (social health).
  - Professionals who work in Argentina for less than six months are subject to a single income tax withholding of 24.5%, withheld by the local payer.

- A wealth tax also applies in Argentina if worldwide assets exceed ARS 950,000 (for residents). Non-residents (individuals assigned to work for less than 5 years for a local company) and foreign beneficiaries are only liable on assets located in Argentina.

- When employment ends, and the internationally mobile employee permanently leaves Argentina, the employer should notify the tax authorities for income tax and social security purposes.
**KEY POINTS**

- An internationally mobile employee (foreign employee) may be sponsored to work in a business in Australia either on a temporary residence or permanent residence basis:
  - Short term assignees (temporary residence): A company must first obtain business sponsorship status (accreditation) with the Department of Immigration in Australia to allow it to sponsor foreign staff to work as temporary residents. Following accreditation, a nomination and visa application must be approved for each assignee; the assignee must lodge an application for a subclass 457 visa;
  - Long term assignees (permanent residence). An individual may be sponsored by a company and obtain permanent residence in Australia under the Employer Nomination Scheme, which also follows an employer nomination and personal visa application process (with additional requirements). A permanent visa allows the holder to remain in Australia indefinitely and unconditionally.

A Short-Stay ETA Business Visa entitles travellers to visit Australia for up to three months for business purposes i.e. attend business meetings or conferences but not work in Australia. Other temporary and permanent residence visa categories also exist allowing individuals to work in Australia.

- The tax authority in Australia is the Australian Taxation Office (ATO). Australia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Australian-source income only. The tax year runs from 1 July to 30 June each year. Individuals (residents and non-residents) must submit a tax return to the ATO following the 30 June tax year end by 31 October in the same calendar year. Joint tax returns are not permitted. A tax assessment is issued by the ATO following submission of a tax return and taxpayers have 21 days after the date of the Assessment to pay any tax due. Penalties apply for late filing, failure to file or filing an incorrect return.

- Each new employee (taxpayer) is required to register with the ATO and obtain a unique identification number (Tax File Number; TFN), complete a 'Tax File Number declaration form' and complete an 'employment declaration form'. In addition, they should register with Medicare to obtain a Medicare card.

- Employment income includes salaries, wages, allowances, deductions and most cash compensations. It is taxed at progressive rates of up to 45% on amounts exceeding AUD 180,000 per annum. An employer must withhold tax at source from an employee's gross monthly salary under the Pay As You Go (PAYG) system and remit this, together with its tax, to the ATO. An employer must also contribute 9.5% of salary (capped at AUD 51,620 per quarter for the year ending 30 June 2017) as Superannuation (pension).

- Medicare Levy: Australian resident individuals must pay 2% of taxable income (no ceiling applies) as a Medicare Levy for health services (if they qualify for Medicare services). Low income taxpayers may be exempted or pay a reduced Medicare Levy. Resident taxpayers with high income but inadequate private health insurance may be subject to a Medicare Levy Surcharge of 1%.

- When employment ends, and an internationally mobile employee permanently leaves Australia, they are required to complete a tax return to calculate the Australian tax payable in the year of departure.
AUSTRIA
CAPITAL: Vienna
CURRENCY: Euro (EUR)
POPULATION: 8.60 million (2017 estimate)
LANGUAGES: German, Hungarian, Slovenian, Austrian German

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KEY POINTS

- A citizen from Switzerland or a citizen of a European Union (EU) member country (except citizens of Croatia - access restriction until 30 June 2020) or a citizen of a European Economic Area (EEA) member country wishing to work in Austria will not require a work permit or a residence permit. Within four months following their arrival in Austria however they must obtain a registration certificate (‘Anmeldebescheinigung’) to remain longer than three months.

- To legally work in Austria, a citizen of a country that is not Switzerland or not a member of the EEA / EU will require a combined work and residence permit to enable them to work for a specific employer or free access to the employment market. Before such an individual comes to Austria, the Austrian employer must apply for a provisional work permit (‘Sicherungsbescheinigung’) at the local labour authority. Following this, and after the residence permit has been obtained by the individual (from an Austrian embassy in their home country by presenting the provisional work permit), the employer must apply for a final work permit (‘Beschäftigungsbewilligung’). Work permits are normally granted for one year and are renewable.

- The Austrian tax authority is the Bundesministerium für Finanzen (Federal Ministry of Finance, or BMF). Austria resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Austrian-sourced income only. Residence is deemed in Austria if an individual's domicile is in Austria or they have established a habitual place of abode in Austria e.g. staying for six-months.

- The tax year in Austria runs from 1 January to 31 December (a calendar year). An employee is not required to register with the tax office or submit a tax return if their only income consists of employment income from which tax has been withheld at source.

- Employment income includes all remuneration and benefits received from employment. Certain expenses may be deducted from employment income, notably, the specific deductions provided under an Order of the Ministry of Finance.

- Employment income is taxed at progressive income tax rates up to 50% on amounts exceeding EUR 90,000 per annum (amounts exceeding EUR 1 million per annum are taxed at 55%). The tax payable may be reduced by certain tax credits and other deductions subject to personal circumstances. Each year, in addition to regular salary payments there are normally two ‘extra non-regular payments’ providing effectively 14 pay periods a year. The 13th and 14th ‘extra non-regular payment’ periods have a lower (fixed) tax rate, broadly 6%, and are mandatory payments in most industries in Austria. Social Security Contributions, based on the gross compensation paid, are required for all employees, unless an employee is exempt under a totalization agreement or EU regulations.

- An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit this monthly to the tax authorities. There is no wealth tax (net worth tax), inheritance tax or gift taxes in Austria.

- When employment ends and the internationally mobile employee leaves Austria, the Austrian employer must notify the social security authority. If residence is also being surrendered, the employee must de-register at the local community office (and, if an EU/EEA/Swiss national, de-register the registration certificate at the competent immigration authority).
PKF CONTACT INFORMATION

For information about internationally mobile employee services in Azerbaijan, please contact Stefaan De Ceulaer (PKFI Director - Tax and Legal Support) on +32 468 22 3924 or email stefaan.deceulaer@pkf.com.
Alternatively, please contact Oliver Grosse-Brauckmann (International Support Director) on +44 20 3691 2523 or email oliver.grosse-brauckmann@pkf.com.

KEY POINTS

- To legally work in Azerbaijan, an internationally mobile employee (foreign employee) must obtain a business visa and a work permit:
  - A business visa will allow the holder to attend business meetings or conferences but not engage in any work or remunerated activity. A business visa can be single entry, double-entry or multiple-entry and is valid for one month, three months or a year respectively.
  - A work permit in Azerbaijan is obtained through the ‘one window’ principle which enables all documents necessary for obtaining a work permit to be submitted to one state body, the State Migration Service (SMS). The SMS co-ordinates with the other relevant departments to issue identification cards and work permits. Work permits can be double-entry or multiple-entry and are valid for either three months or a year respectively.
- The tax authority in Azerbaijan is the Ministry of Taxes of the Republic of Azerbaijan. Azerbaijan resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Azerbaijani-source income only.
- Unless provided otherwise in an applicable double tax agreement (tax treaty), an individual is deemed resident in Azerbaijan if they are present in the country for 183 days or more in a calendar year.
- The tax year in Azerbaijan runs from 1 January to 31 December (a calendar year).
- Employment income broadly includes all compensation, whether received in cash or in kind.
- Resident individuals (employees) are not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and they do not receive any other income from another source.
- Employment income is taxed at the progressive income tax rates up to 25% on amounts exceeding AZN 30,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the State Budget within 20 days of the following month.
- An employer must file a tax return every quarter (by the 20th day of the month following the end of the respective reporting quarter) for the employment income withheld at source. Penalties apply for late filing or failure to file a tax return or the late or delayed payment of tax (in addition, penalties also apply in cases of fraud or tax evasion).
- Social security contributions of the employer and employee are paid by the employer to the Social Protection Fund. An employee pays 3% of their gross salary and an employer pays 22% of the employee’s gross salary.
- There is no payroll tax for the employer.
- A foreign national employee may drive a car (vehicle) legally in Azerbaijan if their home country driver’s license is legally translated into Azeri.
- When employment ends, and the internationally mobile employee permanently leaves Azerbaijan, the local employer must comply with the necessary formalities in informing the relevant authorities and surrendering any documentation or permits.
BAHRAIN

CAPITAL: Manama
CURRENCY: Bahraini Dinar (BHD)
POPULATION: 1.42 Million (2017 estimate)
LANGUAGE: Arabic

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KEY POINTS

- To legally work in Bahrain, a foreign national (expatriate) must obtain an entry visa (if required), a work permit and personal identification card (Smartcard):
  - Entry visa: Except for nationals from the Gulf Cooperation Council (GCC) states, i.e. Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates, all foreign nationals must obtain a valid visa to enter Bahrain.
  - Work permit: A foreign national wishing to work under an employment contract with a Bahrain employer must hold a work permit. The work permit application is made through the Labour Market Regulatory Authority (LMRA) when the foreign national (prospective employee) is still in his or her home country and not in Bahrain. On obtaining a finalised work permit and entering Bahrain, the foreign national must undertake a medical exam and provide proof of an address in Bahrain. They will then be issued with a personal identification card (Smartcard).

- The tax authority in Bahrain is the 'Tax Department' within the Ministry of Finance (MoF).

- Bahrain resident and non-resident individuals are not subject to tax on their income.

- Tax residence for individuals is not defined within the Bahrain legislation.

- The tax year in Bahrain runs from 1 January to 31 December (a calendar year).

- Since there is no Personal Income Tax (PIT) law enacted in Bahrain, and no personal tax compliance obligations, an employee is not required to file an annual tax return.

- Employment income is not taxed in Bahrain.

- Social Security Contributions – for expatriates (foreign employees):
  - A foreign national (expatriate) employee does not pay any social security contributions in Bahrain.
  - The employer pays 3% of the foreign employee's gross salary to cover employment injuries and 1% of the foreign employee's gross salary to cover unemployment.

An employer pays social security contributions monthly to the Social Insurance Organization of Bahrain (SIO).

- Social Security Contributions – for Bahrain national employees:
  - For a Bahrain national employee, social security contributions (pension fund) are payable by both the employer and employee. The employee pays 6% of their gross salary and the employer pays 9% of the employee's gross salary.
  - A Bahrain national employee must also pay an unemployment insurance contribution of 1% of their gross salary. No contribution is required by the employer.
  - The employer of a Bahrain national employee must pay 3% of the employee’s gross salary to cover employment injuries. No contribution is required by the employer.

An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the SIO.

- Municipal tax of 10% applies on the monthly rental of residential (and business) property.

- When employment ends, and the internationally mobile employee permanently leaves Bahrain, their work permit should be cancelled and their personal identification card (Smartcard) surrendered.
KEY POINTS

- To legally work in Bangladesh, a foreign national must obtain an entry visa and a work permit. An application to the Bangladeshi embassy for a work permit must also enclose a letter of employment from the business in Bangladesh (employer) together with a confirmation letter from the issuing body, the Board of Investment, the Bangladesh Export Processing Zones Authority (BEPZA), or the NGO Affairs Bureau.

- The Bangladesh tax authority is the National Board of Revenue (NBR).

- Bangladesh resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Bangladesh-source income only.

- An individual is deemed resident in Bangladesh if they stay in Bangladesh for 182 days or more in any income year, or 90 days or more in an income year if that person has previously resided in Bangladesh for a period of more than 365 days during the preceding four years.

- The tax year in Bangladesh runs from 1 July to 30 June.

- Each individual (employee) is required to complete and file an annual tax return by 30th September, following the end of the tax year (30th June). Joint returns are not allowed. A filing extension is possible upon application to the Deputy Commissioner of Taxes. Penalties apply for failure to file a return or its late filing, or failure to pay tax.

- Employment income includes salaries, bonuses, allowances, benefits-in-kind and any other amounts received in cash or in kind.

- Taxation of employment income:
  - Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding BDT 4.75 million per annum for individuals other than female taxpayers, senior taxpayers of 65 years or more and disabled taxpayers.
  - Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding BDT 4.8 million per annum for female taxpayers, senior taxpayers of 65 years or more and disabled taxpayers.
  - Tax is withheld from an employee’s monthly salary through the Pay-As-You-Earn (PAYE) system.

- No social security contributions are paid by employees or employers in Bangladesh. Certain companies are required however to pay 5% of their profits into a Workers Profit Participation Fund.

- An employer must submit an annual return by 31st August each year disclosing the pay and tax deducted for each employee. There is no payroll tax for the employer.

- When employment ends, and the internationally mobile employee permanently leaves Bangladesh, they are required to file an income tax return (from 1st July to date of departure) and obtain a Tax Clearance Certificate.
KEY POINTS

- To legally work in Belarus, a foreign national (expatriate) must obtain an entry visa, a work permit and a residency permit:
  - Entry visa: An entry visa for Belarus may be obtained from Belarus overseas embassies and consulates. It is important that a foreign national wishing to work enters Belarus with a visa with the right to work by hire (and not a business visa which conveys no right to work by hire). The ‘right to work by hire’ visa provides the holder with up to 90 days in Belarus and is obtained by way of a notarised copy of a special permit for foreigners to work by hire in Belarus from regional Citizenship and Migration Departments (Ministry of Internal Affairs).
  - Work permit: A special work permit must be obtained by a foreign national wishing to work in Belarus (and having a ‘right to work by hire’ visa). A work permit is issued for one year and is renewable.
  - Residency permit: A temporary residence permit is valid for one year and is renewable. This is the most common residency permit used by foreign nationals working in Belarus on production of certain documents including a special work permit. A permanent residence permit may be obtained if the foreign national is to stay long term in Belarus, subject to an immigration quota.

- The tax authority in Belarus is the Ministry of Taxes and Duties of the Republic of Belarus (MTD). Belarus resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Belarusian-source income only.

- An individual is deemed resident in Belarus if they are present in Belarus for more than 183 days in a calendar year.

- The tax year in Belarus runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. Please note, if an employee also receives income from overseas, or non-employment income, they must complete and file an annual tax return by 15th March of the year following the tax year. Any tax must be paid by the 15th May of the year following the tax year. Joint returns are not allowed. Penalties apply if a tax return is filed late or tax is not paid by the due date.

- Employment income includes salaries, bonuses, allowances and any other amount received in cash or in kind from employment.

- Employment income is broadly taxed at a flat rate of 13% except when received by employees of companies registered in the High Technologies Park which is taxed at a flat rate of 9%. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: The employee pays 1% of their gross salary and the employer pays 34% of the employee’s gross salary (28% for pension insurance and 6% for social insurance). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the Fund of Social Protection of People under the Belarusian Ministry of Labour and Social Protection.

- There is no payroll tax for the employer.

- When employment ends, and the internationally mobile employee permanently leaves Belarus, their work permit and residency permit should be cancelled with the authorities.
KEY POINTS

- To legally work in Belgium, a non-European Economic Area (EEA) country citizen must obtain a work permit (unless exempt), a type D residency visa (if in Belgium for more than three months), register in the municipality where they stay, and obtain a Belgian residence permit. An EEA country citizen does not require a work permit or residency visa to work in Belgium, however, a ‘Declaration of Registration’ must be obtained from the local authority in Belgium.

- The tax authority in Belgium is the Belgian Administration of Direct Taxes (ADT), which is part of the Federal Public Service Finance. Belgium resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Belgian-source income only.

- An individual is deemed resident in Belgium if they have established their domicile in Belgium. A special tax regime applies to expatriates (international assignees) who are broadly deemed Belgium resident if:
  - A single person - their permanent home is established in Belgium;
  - A married person (or legally cohabitant) - their family has accompanied them to Belgium (irrefutable presumption).

- An employer is required to register each foreign national working in Belgium with the social security authorities. A new employee is required to register with the local authority (select and register with a ‘Mutuelle/Mutualiteit’). The local authority will then inform the local tax inspector of the employee’s arrival.

- In Belgium, a tax-efficient expatriate tax regime has been available since 1983 with the objective of lowering the overall payroll cost for an employer and optimising the net-in-hand salary for the expatriate. The regime effectively treats certain expatriates (temporary living in Belgium) as non-resident for Belgium personal tax purposes. The benefits of the Belgium expatriate tax status are twofold:
  - Each calendar year, the expatriate is entitled to ‘tax-free allowances’. Certain allowances are granted by the employer to cover additional expenses incurred as a direct result of an assignment to, or employment in, Belgium. The allowances, within certain limits, are tax-free for the expatriate;
  - Each calendar year, the expatriate is entitled to a ‘business travel exclusion’ allowance. That is, the part of the salary that relates to actual business days spent outside Belgium is tax-free in Belgium.

- The tax year in Belgium runs from 1 January to 31 December (a calendar year). Individuals must file an annual tax return by the date indicated on the return (unless the taxpayer obtains an extension), which is normally 30 June. Within 12 months an assessment will be issued (or refund notice). A taxpayer must settle any liability within two months of receiving the assessment.

- Employment income is defined broadly and includes salaries, wages, bonuses, commissions, allowances, benefits in kind, etc. It is taxed at the progressive income tax rates up to 50% on amounts exceeding EUR 38,080 per annum (2017 tax year) plus applicable municipal (commune) taxes. An employee pays social security contributions of 13.07% of their monthly gross compensation and an employer pays 22.65% of the employee’s monthly gross compensation. An employer must withhold tax and social security contributions at source from an employee’s gross monthly compensation and remit to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Belgium, they must report their departure at the municipality’s town hall, report any change of address to the Tax Office, complete a final return from 1 January to date of departure (and file within three months of the date of departure, or if under the special tax regime, file the following year), and obtain a ‘Certificate of Departure’ from the local authority. The employer must notify the social security authorities, if applicable.
KEY POINTS

- To legally work in Bolivia, a foreign national must obtain an entry visa, work permit and residency visa:
  - Work permit: A provisional work permit must be obtained from a Bolivian consulate or embassy outside Bolivia, before the foreign national enters Bolivia.
  - Residency visa: There are several types of residency permit. A temporary residency visa is normally obtained by expatriates wishing to undertake paid work in Bolivia on a short-term basis, normally with a family connection or if considering making an advantageous investment in Bolivia. A subject-to-contract visa is valid for up to two years (renewable) and is utilised by foreign nationals working in Bolivia. A permanent residence visa provides the same rights as a Bolivian national (except to seek public office or vote) and is an indefinite visa.

Business meetings can be attended on a tourist visa which is valid for 90 days and renewable. Under this visa it is not possible to work or receive any remuneration for work. There are other temporary visas which may be more suitable depending on the purpose of the visit, notably a specific object visa (also valid for 90 days).

- The tax authority in Bolivia is the Servicio de Impuestos Nacionales (Internal Revenue Service, or IRS). The tax basis in Bolivia is territorial and the concept of residence is not defined with the legislation. Individuals are subject to tax on their Bolivian-source income only, regardless of their nationality or residence. Foreign-source income earned by individuals is not taxed in Bolivia.

- The tax year in Bolivia runs from 1 January to 31 December (a calendar year).

- An employee is not required to register with the tax office or file a tax return if their only income consists of employment income from which tax has been withheld at source.

- If an employee has other sources of income he or she must file a tax return with the IRS by 30 April following the end of the tax year. An interest penalty is calculated on a daily basis on any overdue tax until paid. In addition, the IRS can impose a penalty of up to 100% of the omitted tax.

- Employment income includes salaries, allowances, bonuses (except Christmas bonus), benefits in kind and any other amount, whether paid in cash or in kind, for work carried out in Bolivia by an employee.

- Employment income is subject to personal income tax (Regimen Complementario del Impuesto al Valor Agregado or RC-IVA) at a rate of 13%. An employer must withhold RC-IVA from an employee's gross salary and remit this to the tax authorities together with a monthly consolidated tax return in respect of the employees' gross salaries and the tax (RC-IVA) deducted.

- Social Security Contributions comprise of contributions to the Social Security Office (Caja Nacional de Salud, or CNS), Housing Fund (Fondo de Vivienda [Provivienda], or FV), Pension Fund Administration (Administradoras de Fondos de Pensiones, or AFP), and Solidarity Fund. An employer contributes to all four at a rate of 16.71% of the employee's gross salary. An employee pays 12.21% of their gross salary to the AFP. An employee also pays 0.5% of their gross salary to the Solidarity Fund in addition to a variable amount of 1%, 5% or 10% depending on the difference between their gross salary and progressive thresholds.

- An employer must withhold the employee’s contributions from their gross salary and remit these, together with the employer’s contributions, to the tax authority by the last working day of the following month.
KEY POINTS

- Bosnia and Herzegovina consist of two key territorial and administrative bodies, namely, the Federation of Bosnia and Herzegovina (FBH) and the Republic of Srpska (RS). There is also the District of Brcko (BD).

- To legally work in Bosnia and Herzegovina (FBH and RS), a foreign national must obtain an entry visa and a work permit. It is important that the foreign national enters Bosnia and Herzegovina at the time the assignment begins and not before, otherwise, this could delay obtaining a work permit.

- The tax authority in the FBH is the Porezna uprava, Federalno Ministarstvo Finansija FBH (Tax Administration, Federal Ministry of Finance in the FBH). The tax authority in the RS is the Porezna uprava, Ministarstvo finansija RS (Tax Administration, Ministry of Finance in the RS). Bosnia and Herzegovina (FBH and RS) resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on FBH/RS-source income only.

- An individual is deemed resident in the FBH if they have a permanent residence in FBH, or spend at least 183 days in a calendar year in FBH, or carry out a remunerated dependent activity outside the FBH which is paid from the FBH budget. An individual is deemed resident in the RS if they have a permanent residence in RS, or remain in the RS continually (or with interruptions) for at least 183 days in any 12-month period.

- The tax year in Bosnia and Herzegovina runs from 1 January to 31 December (a calendar year).

- In Bosnia and Herzegovina (FBH and RS) an employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.

- If an employee receives income from another source they are required to complete and file an annual personal income tax return by the end of March following the year for which the tax is being assessed (and pay any tax due by this date). Joint tax returns are not allowed.

- If an individual is working in Bosnia and Herzegovina, and are paid directly for the work from abroad, they must calculate monthly income tax and pay it within five days (FBH) or seven days (RS) from the date of receipt of the income.

- Employment income includes salaries, wages, bonuses, allowances and any other amounts received, in cash or in kind, by an employee.

- Employment income is taxed at a flat personal income tax rate of 10% in both FBH and RS. In FBH, the tax is applied to an employee’s gross taxable employment income less an annual personal deduction of BAM 3,600 and any other relevant deductible allowance. In RS, the tax is applied to an employee’s gross taxable employment income less an annual personal allowance of BAM 2,400 and any other relevant deductible allowance. The tax is withheld at source by the employer from an employee’s salary under the Pay-As-You-Earn (PAYE) system.

- Social security contributions are payable by the employer and employee in the FBH and the RS and cover health, pension and unemployment insurance (and child protection in RS). In the FBH, the employee pays 31% of their gross salary and the employer pays 10.5% of the employee's gross salary. In RS, only the employee pays at a rate of 33% of their gross salary.

- When employment ends, and the internationally mobile employee permanently leaves Bosnia and Herzegovina (FBH or RS), they are required to have their work permit cancelled and, if they have been receiving income from other sources and completing annual tax returns, they should file a final tax return upon leaving by 31 March of the following year.
KEY POINTS

- To legally work in Botswana, an employee of the home country (non-Botswana national) must obtain a work permit and a residence permit regardless of how long they will be present in Botswana. Certain nationalities will also require entry clearance (a visa).
  - Work permits: To obtain a work permit an employee requires sponsorship from a Botswana employer. A work permit is granted up to five years (and may be renewed subject to continuing employment). Under a work permit, a foreign national may change employers subject to signing a contract with the new employer and obtaining a release letter from the preceding employer. Please note, the Ministry of Labour and Home Affairs operates a point-based system (PBS) for the assessment of applications for work permits and residence permits.
  - Residence permits: A residence permit for employment purposes is issued in Botswana for a maximum five years, depending on the duration of the contract. Within six months from the date of approval of a residence permit, the holder must take up residence in Botswana otherwise the permit may be cancelled. The Regional Immigrants Selection Boards consider applications for work permits and residence permits simultaneously.

- A number of statutory obligations are placed on an employer of foreign nationals, which include:
  - Retaining the original work permit on file for all foreign nationals employed;
  - Advertising the employment position at least 14 days before submission of the application for a work permit to demonstrate that no Botswana citizen was available to fulfil the role;
  - Retaining paperwork on personnel files for all employees;
  - Completing and submitting for approval a succession plan; and,
  - Ensuring each non-Botswana employee has an under-study.

- The tax authority in Botswana is the Botswana Unified Revenue Service (BURS). Botswana operates a territorial tax system and therefore an individual is liable to income tax on accrued income and gains from a source within, or deemed to be within, Botswana regardless of where paid or provided. Broadly, income derived from sources outside Botswana is not subject to tax.

- The tax year in Botswana runs from 1 July to 30 June. An employee is required to register as a taxpayer with the tax authority (unless their annual remuneration is less than BWP 36,000), obtain a Taxpayer Identification Number (TIN), and file tax returns. An employee's tax return should be prepared and filed with the tax authorities on or before 30 September following the end of the tax year.

- Employment income broadly includes salaries, wages, allowances and the value of non-cash benefits provided by an employer to an employee (unless specifically exempt).

- Employment income is taxed at progressive individual income tax rates up to 25% on amounts exceeding BWP 144,000 per annum. Social security taxes are not levied in Botswana. Employment income, including benefits in kind, is subject to monthly withholding tax under the Pay-As-You-Earn (PAYE) scheme. There is no payroll tax for the employer.

- An employer must withhold tax at source from an employee’s gross monthly salary under the PAYE scheme and remit this to the tax authorities on or before the 15th of month following that of the payroll.

- When employment ends, and the internationally mobile employee permanently leaves Botswana, the local employer must comply with the necessary formalities in informing the relevant authorities and surrendering any documentation or permits.
KEY POINTS

- To legally work in Brazil, a foreign national (expatriate) must obtain either a permanent or a temporary “V” visa (unless the foreign individual already has a residence permit granted by the Mercosul agreement) and an employee workbook (‘Carteira de Trabalho e Previdência Social’ or CTPS) from the local regional office of the Ministry of Labour.
  - All individuals residing in Brazil are obliged by law to possess and carry an identity card issued by the Federal Police authorities (foreign nationals are recorded in the National Register of Foreigners, RNE).
  - The foreign employee should also complete a specific form and obtain a Taxpayer Number (CPF) from the Federal Tax Authorities.
- The tax authority in Brazil is the Receita Federal do Brasil (Department of Federal Revenue of Brazil, or IRS). Brazil resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Brazilian-source income only.
- An individual is deemed resident in Brazil if they have a habitual residence in Brazil, work for a Brazilian government department or agency outside Brazil, enter Brazil under a permanent visa, or enter Brazil under a temporary visa to work and remain in Brazil for more than 184 days within a 12-month period.
- The tax year in Brazil runs from 1 January to 31 December (a calendar year). All residents subject to income tax must file an annual federal tax return by the last business day of April of the following year. The balance of any tax owed should also be paid on this date (although there is an option to pay in eight monthly instalments but this attracts interest on the outstanding amount until paid). Non-residents are not required to file tax returns. Penalties apply for late filing, failure to file or filing an incorrect return.
- Employment income includes salaries, wages, benefits-in-kind, allowances and any other amounts received by an employee from an employer. Certain deductions are permitted from employment income.
  - Locally employed individuals are entitled to receive one month’s remuneration at the end of the year as a Christmas gratuity (referred to as the ‘13th month salary’).
  - Working 12 months for a company in Brazil entitles an individual to take a 30-day paid vacation and a bonus representing one third of their monthly remuneration.
- Employment income is taxed at progressive individual income tax rates up to 27.5% on amounts exceeding BRL 55,977 per annum.
- Social Security Contributions: An employee pays 8% to 11% of their gross salary depending on their salary categories. An employer pays a maximum of 39.8% of each employee’s gross salary; 8% to their deferred salary account for the severance fund, 20% to the public pension system (National Institute for Social Security or INSS) and a maximum of 11.8% for other social security taxes. Please note, in some business sectors, the INSS contribution is replaced by a contribution levied on gross revenue. An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities.
- There is no net worth or wealth tax levied in Brazil.
- When employment ends, and the internationally mobile employee permanently leaves Brazil, they are required to complete a ‘Departure Communication’ (specific form) to the IRS, complete and submit an exit income tax return, and request a Tax Clearance Certificate (TCC).
PKF CONTACT INFORMATION

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KEY POINTS

- The documentation requirements (entry visa, work permit, residency visa) to legally work in Bulgaria depend on which country the foreign national is a citizen:
  - **EU / EEA / Swiss citizens:** No work permit (or registration with the Employment Agency) is required to remain and work in Bulgaria for up to three months based on a valid identification card or international passport. If a citizen intends to stay and work longer than three months they must register with the Bulgarian Immigration Office (and through this registration a long-term certificate can be obtained).
  - **Visa-free regime - Non-EU / non-EEA / non-Swiss citizens** who hold a Schengen visa and a residence permit issued by a Schengen country, and citizens of countries under Annex II of Council Regulation 539/2001, are not required to obtain a Bulgaria visa and can stay for up to 90 days within each 6-month period (based on a valid international passport). The Schengen visa area includes Switzerland and all EEA countries except Bulgaria, Croatia, Cyprus, Ireland, Romania and the United Kingdom. If a citizen under the visa-free regime wishes to work in Bulgaria they must obtain a work permit from the Employment Agency (the intended employer must submit the application). Work permits are valid for one year and can be renewed.
  - **Non-preferred countries - Non-EU / non-EEA / non-Swiss citizens (who are not subject to the visa-free regime)** require a Bulgarian visa and a valid international passport to enter Bulgaria (Type C visa). As above, if a citizen not under the visa-free regime wishes to work in Bulgaria, they must obtain a work permit from the Employment Agency (applied for by intended employer). Work permits are valid for one year and can be renewed.
  - A residency visa may be obtained by an individual wishing to reside long term in Bulgaria and they may apply for a long-term and permanent residence certificate, normally issued for a term of up to five years.

- The tax authority in Bulgaria is the National Revenue Agency, Ministry of Finance (NRA). Bulgaria resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Bulgarian-source income only.

- An individual is deemed resident in Bulgaria if their centre of vital interests is in Bulgaria (i.e. personal and economic ties to the country such as a permanent address in Bulgaria, family, employment, possession of property, etc.), or they stay in Bulgaria for more than 183 days in any 12-month period.

- The tax year in Bulgaria runs from 1 January to 31 December (a calendar year). An employee is not required to file an annual tax return if their only income consists of employment income from which tax has been withheld at source and the advance tax paid is equal to the annual tax due. An employee who receives income from other sources, as well as employment income, must complete and file an annual tax return by 30 April of the year following the calendar year.

- Employment income includes salaries, wages, bonuses, allowances, benefits-in-kind and any other income received, in cash or in kind, paid by, or on behalf of, an employer. There are certain non-taxable items and “in-kind social expenses” which are specifically excluded from taxable employment income. Employment income is taxed at a flat rate of 10%. The employer must withhold the tax from an employee's monthly gross salary and remit it to the tax authorities by the 25th day of the month following the month of salary payment.

- Social Security Contributions: Total social security contributions are between 31.7% and 32.4% of an employee's gross salary. The employee pays 13.3% of their gross salary and the employer pays between 18.4% and 19.1% of the employee's gross salary (based on position and industry). The monthly social security tax base is capped at BGN 2,600 per month.
PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in Cameroon, a foreign national (expatriate) must obtain an entry visa, a work permit and a residence permit. An entry visa is required by a foreign national wishing to work in Cameroon except if a national of Chad, Central African Republic, Republic of Congo (Brazzaville) or Nigeria. To apply for a work permit, a foreign national must enter with a long stay entry visa of six months.
  - A work permit must be obtained by a foreign national wishing to work in Cameroon for more than six months and must be applied for by the employer. Technically, a work permit must be obtained before the employee commences work.
  - A residence permit must be obtained by a foreign national within three months from entry into Cameroon if they intend to remain in Cameroon past three months. It is important that the application for a residence permit includes a certified true copy of a valid passport (no more than three months old and bearing evidence of the six-month long stay visa).

- The tax authority in Cameroon is the General Directorate of Taxation (GDT). Cameroon domiciled individuals are subject to tax on their Cameroon income. Non-domiciled individuals are subject to tax on Cameroon-source income only. Income or profits taxable in Cameroon under the terms of an international convention for the avoidance of double tax will be subject to tax in Cameroon irrespective of an individual’s tax domicile. An individual is deemed to have a tax domicile located in Cameroon if they have a home or a principal place of residence in Cameroon, if they are engaged in a salaried or non-salaried activity in Cameroon (except when this activity is an accessory activity), if they maintain a ’centre of interests or business’ in Cameroon, or, if they are a civil servant or state employee working in a foreign country and are exempt from tax in the foreign country.

- The tax year in Cameroon runs from 1 January to 31 December (a calendar year). Within eight days from the start of employment an employer must register the employee with the National Social Insurance Fund (NSIF) and notify the tax and employment authorities. An employee is not required to prepare or file a tax return if their income consists of only employment income from which tax has been deducted at source. Employment income includes all cash and non-cash amounts received by an employee from an employer including allowances and benefit-in-kind (valued according to fixed percentages of gross remuneration received).

- Employment income is taxed at progressive individual income tax rates up to 35% on net taxable income exceeding XAF 5 million per annum. In addition, a surcharge of 10% of the principal tax is also applied (for council tax).

- Social Security Contributions: The employee pays 4.2% of their gross salary and the employer pays 11.2% of the employee’s gross salary. An employer also pays an additional Social Security Contribution of between 1.75% and 5% (for industrial accidents) based on the employees’ activities (level of risk rated low, medium and high).

- Following the end of the year, an employer must file a social security regularization document by 15th January and a tax regularization document by 15th March. An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities by the 15th day of the following month.

- When employment ends, and the internationally mobile employee permanently leaves Cameroon, they must obtain an exit visa before leaving the country. In addition, they are required to obtain tax clearance and social security clearance from the tax and social security authorities respectively within thirty days from the application of an exit visa.
KEY POINTS

- The following rules relate to the federal government of Canada and provinces/territories (except for Quebec). To legally work in Canada, an employee of the home country must obtain an appropriate work permit and entry visa. A work permit is obtained from Immigration, Refugees and Citizenship Canada (IRCC) following a Labour Market Impact Assessment (LMIA) conducted by Service Canada (unless the employer is exempt from a LMIA). Certain workers may be eligible for permanent resident visa applications made through the Express Entry System. Each is assessed and provided a Comprehensive Ranking Score (CRS). Permanent resident visa eligibility may include a Skilled Worker Class, a Canadian Experience Class, and provincial nominee programs.

- The tax authority in Canada is the Canada Revenue Agency (CRA). Canadian resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Canadian-source income only. Income tax treaties between Canada and various countries may provide possible tax benefits. Home country tax consequences should be considered prior to moving to Canada.

- On arrival in Canada and having a valid work permit, the employee should apply for a Social Insurance Number (which is required by the employer and the CRA), register with the relevant provincial authority if eligible for provincial medical coverage, and, complete CRA Form TD1 (and the corresponding provincial form of the local province) and provide these to the employer.

- The tax year in Canada runs from 1 January to 31 December (a calendar year). Individuals must file tax returns to report Canadian source income (or worldwide income for a Canadian resident) and determine taxes due or refundable. An annual tax return must be filed by 30 April in the following tax year (and any outstanding tax paid by this date). Broadly, an employee is not required to file a tax return if they only have employment income which has been taxed at source (and the CRA has not requested a return to be filled).

- Income from employment includes salaries, benefits in kind and broadly any other amount, benefit or allowance provided to an employee by an employer. Employment income is taxed in Canada at a federal level (credits and allowances apply) and at a provincial / territorial level (tax rules for Quebec are separate and must be consulted). Employment income at a federal level is taxed at progressive income tax rates up to 33% on amounts exceeding CAD 202,800 (2017) and at a provincial / territorial level at progressive income tax rates of up to 21%. There are two parts to social security contributions for an employee and employer; a contribution to the Canada Pension Plan of 9.9% (an employee and employer both pay 4.95%) and a contribution to Employment Insurance (EI) of 3.91% (an employee pays 1.63% and an employer pays 2.28%). An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the relevant tax authorities. In some cases, contributions to CPP may be exempt (under a totalization agreement between Canada and an employee’s home country).

- When employment ends, and the internationally mobile employee permanently leaves Canada, a final tax return for the period of the year before departure will be required, together with payment of any tax. (Note: an individual ceasing to be a resident of Canada is deemed to dispose of their assets at their fair market value on the date Canadian residency is relinquished and this may give rise to a significant tax liability).
KEY POINTS

- To legally work in Cape Verde, an employee of the home country must obtain an appropriate visa and a residence permit:
  - Short term assignees (less than 3 months) should enter Cape Verde with the appropriate entry visa. A foreign citizen from an Economic Community of West African States (ECOWAS) member country is exempt from visa requirements for up to 90 days (although they must present an International Certificate of Vaccine).
  - Long term assignees: Foreign citizens wishing to remain in Cape Verde beyond the validity of the visa, or the exemption period, must apply for a residence permit. Please note, foreign citizens coming to Cape Verde for work purposes are required to obtain a residence permit (and must present a valid employment contract as part of the application documents).

- The employer, during the first calendar month of work, must register the employee with the social security authorities (INPS – Instituto Nacional de Previdência Social).

- A new employee (foreign national) should register with the Cape Verdean tax authorities at the local tax office and apply for a taxpayer number (NIF – Número de identificação fiscal).

- The tax authority in Cape Verde is the Cape Verde Ministry of Finance (MoF). Cape Verde resident individuals are subject to income tax (Imposto sobre o Rendimento das Pessoas Singulares, or IRPS) on their worldwide income. Non-resident individuals are subject to tax (IRPS) on Cape Verde source income only.

- An individual is deemed resident in Cape Verde if they are physically in Cape Verde for 183 days during a tax year, have a habitual abode in Cape Verde on 31 December of the tax year, exercise functions of a commissioner of public character for the Republic of Cape Verde, or they are a crew member of an aircraft or ship and employed by an entity having its domicile, head office or place of effective management in Cape Verde (and resident in Cape Verde during the past five years).

- The tax year in Cape Verde runs from 1 January to 31 December (a calendar year).

- A foreign national’s employment income will, broadly, be liable to personal income tax (Imposto sobre o Rendimento das pessoas Singulares) and social security contributions (Previdência Social).

- Employment income includes all direct and/or indirect cash payments made to an employee by way of the employment relationship, comprising salaries, wages, allowances, bonuses, commissions, per diems, and any other cash payments. Employment income is taxed at progressive personal income tax rates up to 27.5% on amounts exceeding CVE 1.8 million per annum (taxable income up to CVE 220,000 is exempt from tax).

- Social Security Contributions (Previdência Social): The employee pays 8.5% of their gross salary and the employer pays 16% of the employee’s gross salary.

- An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities. The tax must be paid by the 15th day of the following month.

- When employment ends, and the internationally mobile employee permanently leaves Cape Verde, the local employer must comply with the necessary formalities in informing the relevant authorities and surrendering any documentation or permits.
KEY POINTS

- To legally work in Chile, a foreign national must obtain an entry visa and a work visa:
  - Entry visa: Most citizens from countries which Chile has diplomatic relations can enter Chile without requiring a visa. Alternatively, tourist permits can be obtained on arrival and are valid for 90 days and renewable for an additional 90 days.
  - Work visas: Foreign nationals wishing to work in Chile must obtain a subject-to-employment-contract visa which is valid for up to two years and is renewable indefinitely for additional two-year periods. The employee may apply for permanent residence status after having this visa for two years in Chile.

- The tax year in Chile runs from 1 January to 31 December (a calendar year). The tax authority in Chile is the Servicio de Impuestos Internos (Internal Revenue Service, or IRS). Chile resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Chilean-source income only.

- Foreign nationals (expatriates) are subject to tax on Chilean-source income only in their first three years of residence (a three-year extension is permitted) and then subject to tax on their worldwide income. An individual is deemed resident if they stay in Chile for more than six consecutive months in a calendar year, or for more than six months in total over two consecutive tax years.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source (some tax-exempt income is also ignored for tax return filing purposes such as arising from securities, within some caps).

- An employee who receives income from other sources, and not just employment income or tax-exempt income, must complete and file an annual tax return by April of the year following the end of the tax year. Any tax must also be paid by this date. Penalties apply if a tax return is filed late or not at all, or tax is paid late or less tax is paid than owed.

- Employment income is subject to the sole second category income tax and includes salaries, wages, bonuses, benefits in kind and any other kind of remuneration received under an employment contract. Employment income is taxed at progressive income tax rates up to 35% on amounts exceeding CLP 5,614,320 per month (please note that the tax tables are updated monthly for inflation purposes).

- Social Security Contributions: The employee pays 17% of their gross salary (in respect of health insurance and pension fund contributions, both capped at a floating amount); a variable fee for the administration of pension funds (up to 1.48% on the same base, depending on the company that administers the funds) and 0.6% premium in respect of unemployment insurance. The employer usually pays 4.76% of the employee’s gross salary. The employer pays a monthly 0.95% premium on remuneration (a cap applies) for occupational accidents, and eventually up to 3.4% in respect of variable additional contributions based on the risk of the employment activity; a 2.4% contribution on remuneration (3% for fixed-term contracts) in respect of unemployment insurance (floating cap applies), and a 1.41% premium for life and disability insurance. Under some specific conditions a foreign employee (technician) may opt for not making social security contributions in Chile where both the employee and employer are exempt from making social security contributions (except those relating to unemployment insurance and occupational accidents).

- An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit this to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Chile, there are no formal tax compliance requirements to be completed before leaving.
KEY POINTS

- Chinese visas are classified according to the purpose of foreigner’s stay in China. It includes L-visa for tourists, F-visa for business visits, Z-visa for employment, D-visa for long term residence stay, etc. From 1st April 2017, a foreigner must apply for a work permit before obtaining a Z-visa. Foreigners are divided into three categories: A for high level talent, B for professional personnel, and C for foreigners who are non-technical or service workers hired on a temporary/seasonal basis. Various criteria are rated and used to generate a score for each foreign applicant, such as salary, educational background, Chinese language fluency, experience, and length of service. After a foreigner enters China with a Z-visa it has to be replaced by a Resident Permit within 30 days from the entry date.

- A foreigner’s individual income tax liability is determined by whether they are domiciled in China, the period of their stay in China and the source of their income:
  - If resident in China for 90 days or less during the year they are subject to tax on Chinese-source income only, but not taxed on any compensation paid by an employer (outside China) for services performed within China (as long as the compensation is not borne by or paid through the employer's China establishment). An applicable double treaty agreement extends the 90 days to 183 days.
  - If resident in China for less than one year they are subject to tax on Chinese-source income only. If resident in China for one year (365 days in a tax year) or more, the foreigner is subject to tax on their worldwide income. (For the purpose of the one-year rule, temporary absences (absences not exceeding 30 days at a time, or an aggregate not exceeding 90 days in a tax year) are not subtracted in computing the period of stay).
  - If resident in China for more than one year but less than five years, upon approval by the governing tax authorities, a foreigner can pay Chinese tax on their Chinese-source income which is paid by a company, enterprise or individual.
  - If resident in China for more than five years, they are taxable on their worldwide income.

- The tax year in China runs from 1 January to 31 December (a calendar year). The central tax authority in China is known as the State Administration of Taxation (SAT), which is the top tier of a multi-layer structure with state and local tax bureaus under its administration. A foreigner must apply for tax registration with the local tax authorities for the first time before their individual income tax (“IIT”) on the salary is declared. IIT for salaries and wages are filed on a monthly basis. Usually, the employer should act as the withholding agent to declare the tax on behalf the employee.

- If a foreigner is present in China for a full tax year and receives over RMB 120,000 in annual income, they are required to file an annual IIT return before 31st March of the following year.

- Certain amounts provided to an expatriate are not taxed if they are included within their employment contract, or by company policy, and recorded through proper reimbursements supported by Chinese valid tax invoices. These including housing, meal, laundry, relocation, home leave, children's education, language training and business trips. The expenses should be for reasonable purposes and at a reasonable amount. Employment income is taxed at the progressive individual income tax rates up to 45% on amounts exceeding CNY 80,000 per month.

- Social Security Contributions (SSCs): Cities/regions in China apply SSCs at different rates. Broadly, the average rate for an employee is 11% of their gross salary and the average rate an employer is 30% of the employee's gross salary (a cap applies).
COLOMBIA
CAPITAL: Bogotá
CURRENCY: Colombia Peso (COP)
POPULATION: 49.12 Million (2017 estimate)
LANGUAGE: Spanish

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KEY POINTS

- The immigration rules in Colombia were unified under Decree 1067 of 2015 and the requirements for each type of visa were more defined. To legally work in Colombia, a foreign national must obtain an entry visa and a temporary working visa (TP-4). If a foreign nation requires an entry visa, it can be requested electronically, personally, or through a representative. Foreign nationals from Cambodia, India, Mainland China, Myanmar, Thailand and Vietnam holding an entry permit do not require a visa to enter Colombia.
  - Temporary working visa TP-4: This visa is used by foreign nationals being employed in Colombia by a corporation domiciled in Colombia. The multiple entry TP-4 visa is granted for the entire term of the contractual relationship up to three years. A foreign national who has been a holder of a TP-4 visa for a minimum of five continuous and uninterrupted years can be granted a resident visa. (A foreign national who holds a TP-15 (Common Market of the South) visa for two continuous and uninterrupted years can also be granted a resident visa).

- The tax authority in Colombia is the Dirección de Impuestos y Aduanas Nacionales (DIAN). Colombia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Colombian-source income only. An individual is deemed resident in Colombia if they stay in Colombia for more than 183 continuous or discontinuous days during a consecutive 365-day period. A new employee must obtain a tax identification number (NIT) from the tax authorities.

- The tax year in Colombia runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and their income is lower than COP 41,654,000 (and credit card purchases or whole purchases during the taxable year are lower than COP 41,654,000) or their gross equity is lower than COP 133,889,000 within the respective tax year, or the accumulated balance on their banking accounts, savings, deposits or financial investments are lower than COP 133,889,000 during the tax year. If a taxpayer exceeds any of these limits in a tax year they must file an annual tax return by the due date published each year by the tax authorities based on the last two digits of a tax payers tax identification number (NIT).

- Employment income includes salaries, wages, bonuses, benefits in kind and any other amount, received in cash or in kind, under an employment relationship. Under the law, 25% of employment income is exempt from tax albeit a monthly maximum cap applies of COP 7,646,160 (which is increased annually). Employment income is taxed at progressive income tax rates up to 33% on amounts exceeding UVT 4,100 per annum (or COP 130,621,900). A UVT tax unit (Unidad de Valor Tributario) is equivalent to COP 31,859 for 2017 (revised annually). An employer must withhold tax at source from an employee's gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: An employee pays 4% of their gross salary and an employer pays 20.5% of the employee's gross salary plus a variable percentage based on their job type (for work accident insurance). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with his contributions, to the government.

- Payroll Tax: An employer must pay 9% of the monthly payroll (excluding all employees who earn less than 10 minimum monthly wages) to the government.

- When employment ends, and the internationally mobile employee permanently leaves Colombia, the employer must notify the Unidad Administrativa Especial Nación Colombia of the cessation of their activities through the SIRE system within 15 calendar days of the cessation. Their (work/residence) visa should also be cancelled.
KEY POINTS

- To legally work in Costa Rica, a foreign national must obtain an entry visa, work visa / permit:
  - An entry visa should be obtained (if required) from a Costa Rican overseas consulate or embassy. The rules setting out whether a citizen of a required country needs to obtain an entry visa are numerous and frequently change so it is advisable to check directly with the local Costa Rican consulate or embassy in the home country of the foreign national.
  - Work visa / permit: Work authorisation documents are issued to foreign nationals on a case by case basis. The Ministry of Work’s policy is to protect the domestic labour force so it is not possible to obtain a work permit in certain occupations unless the employer is recognised by the immigration authorities and registered with them.
  - Residence visas / permits may be issued to foreign nationals wishing to work and reside in Costa Rica long term by the immigration authorities. The requirements for each application may vary and so should be checked on a case-by-case basis.

- The tax authority in Costa Rica is the Tax Administration of Costa Rica (Dirección General de Tributación, or DGT).

- Costa Rica resident individuals and non-residents are both taxed on their Costa Rica-source income. Foreign-source income is not taxed. Residents are subject to income tax, whilst non-residents are subject to withholding tax.

- An individual is deemed resident in Costa Rica if they have lived in Costa Rica for more than six consecutive months during a taxable year (although a shorter term is normally applied by the tax authorities with respect to employed individuals).

- The tax year in Costa Rica runs from 1 October to 30 September.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.

- An employee who receives income from other sources, as well as employment income, must complete and file an annual tax return by 15th December in the following tax year and also pay any tax due by this date i.e. return filed and tax paid within two months and 15 days after the end of the fiscal year.

- Employment income includes salaries, commissions, bonuses, pensions, fringe benefits and all other amounts received by an employee.

- Employment income is taxed at progressive income tax rates up to 15% on amounts exceeding CRC 14,256,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: The employee pays 9.34% of their gross salary and the employer pays 26.33% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Costa Rica, there are no tax compliance requirements to be completed. A departure tax is payable at USD 29 (by air) and USD 4 (by land).
PKF CONTACT INFORMATION

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KEY POINTS

- The documentation requirements (visa, work permit, temporary residence permit) to legally work in Croatia depend on which country the foreign national is a citizen:
  - EU / EEA citizens (excluding citizens of Austria, Malta, the Netherlands, and Slovenia), may remain in Croatia for up to three months if they possess a valid passport or identity card. If an eligible EU/EEA citizen intends to stay and work longer than three months they must obtain a temporary residence permit (within eight days following the end of the three-month period) from the relevant police department or police station. A residence card is issued at the request of a citizen of the EEA with a validity period of five years.
  - Non-EU / non-EEA citizens normally require an entry visa and, in accordance with the Act on Foreign Nationals and they must obtain a work permit if they wish to work in Croatia (which is subject to annual quotas). A work permit is issued for a period of one year by the Ministry of Internal Affairs. A foreign national who has obtained permanent residence in Croatia does not require a work permit.
  - Permanent residence: A foreign national who has a temporary residence permit for five years without interruption can apply to the Ministry of Internal Affairs for permanent residence.

- The tax authority in Croatia is the Ministry of Finance (MoF).

- Croatian resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Croatian-source income only. An individual is deemed resident in Croatia if they have a permanent or temporary place of residence in Croatia i.e. they own a property in Croatia or have a property at their disposal for an uninterrupted period of 183 days and stay in Croatia for at least 183 days (and are therefore considered to have a temporary place of residence in Croatia).

- The tax year in Croatia runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return, however, where an employee receives income from other sources other than employment income, or from a source abroad, the MoF (Tax Administration) will undertake an annual tax calculation. Where a tax liability arises, this must be paid within 15 days following receipt of the tax assessment (annual tax calculation). Please note, according to tax laws, a taxpayer must submit a tax return only under certain circumstances.

- Employment income includes salaries, bonuses, allowances, benefits in kind and any other amounts received by an employee for services rendered. Annual (taxable) employment income is taxed at 24% up to HRK 210,000 and 36% over this amount. A monthly individual basic personal allowance deduction is available of HRK 3,800 (2017).

- Social Security Contributions: The employee pays 20% of their gross salary and the employer pays 17.2% of the employee's gross salary. There is no payroll tax for the employer.

- An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit this to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Croatia, their work permit or temporary residence permit must be cancelled.
KEY POINTS

- The documentation requirements (entry visa, temporary resident permit / work permit) to legally work in Cyprus depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens do not need to register on arrival and are not required to have an entry visa or work permit to remain and work in Cyprus for up to three months as long as they have a valid EU passport or identification card. If an EU / EEA / Swiss citizen intends to stay and work longer than three months, they must obtain a registration certificate (yellow slip) from the Civil Registry and Migration Department (CRMD) and the application must be made a month before the expiry of the three-month period.
  - Non-EU / non-EEA / non-Swiss citizens are required to have the correct entry visa, they must register on arrival and obtain the right permits to stay and work in Cyprus – most international companies in Cyprus employ foreign nationals via a simplified procedure with the CRMD which grants residence and employment permits. Otherwise, a foreign national can obtain a temporary resident permit / work permit which allows them to work in Cyprus for an initial two years (extendable).

- The tax authority in Cyprus is the Tax Department (TD) of the Ministry of Finance. Cyprus tax resident and domicile individuals are subject to tax on their worldwide income. Cyprus tax residents but not domicile are exempted from dividend and interest income. Non-resident individuals are subject to tax on Cyprus-source income only. An individual is deemed resident in Cyprus if they stay in Cyprus for a period or periods exceeding 183 days in any calendar year. An individual may also be considered tax resident in Cyprus if they stay in Cyprus for 60 days or more in a calendar year and do not stay 183 days in another country.

- The tax year in Cyprus runs from 1 January to 31 December (a calendar year). An employee receiving gross income over EUR19,500 must complete and file an annual tax return by 30th April of the year following the year of income (or by 30th September if filing using the electronic Taxisnet system). An employer has the option with the submission of the tax return to pay the balance of any tax due with the self-assessment. If this is not paid, following receipt of the tax return, the tax authority will issue an assessment showing the balance of any tax payable after setting off the tax deducted from an employee’s gross salary by an employer under the Pay-As-You-Earn (PAYE) system. Normally, there is no further tax to pay if the employee has only employment income and tax has been withheld at source. If there is a balance of tax due, this should be paid by the end of the month following the month in which the assessment was raised.

- Employment income includes salaries, bonuses, allowances, benefits in kind and all other amounts received by an employee from employment whether in money or otherwise. Employment income is taxed at progressive income tax rates up to 35% on amounts exceeding EUR 60,000 per annum. A tax-free amount of EUR 19,500 should be deducted from the income before the tax calculation is applied. Individuals taking up employment in Cyprus, who were non-resident prior to employment, are entitled to an allowance of 20% of their remuneration up to a maximum of EUR 8,543 for a period of three years. Individuals with an annual remuneration of more than EUR 100,000 are entitled to an increased allowance of up to 50% for a period of five years. Under the PAYE system, an employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: An employee pays 7.8% of their gross salary and the employer pays 11.5% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this to the Social Insurance Office.

- When employment ends, and the employee permanently leaves Cyprus, they should obtain a tax clearance certificate from the tax authorities (and before doing so, ensure all tax obligations are settled).
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KEY POINTS

- The documentation requirements (entry visa, work permit, Blue Card, residency permit) to legally work in the Czech Republic depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens do not require an entry visa or work permit however they must register at the Labour Office and with the Czech Foreigner's Police within 30 days of their arrival. It is preferable that they also hold an EU Health Insurance Card. If an EU / EEA / Swiss citizen intends to stay longer than three months it is recommended that they obtain a residence permit.
  - Non-EU / Non-EEA / Non-Swiss citizens must have the appropriate entry visa (if relevant) and obtain a work permit (residence permit). Alternatively, an employee may apply for an Employee Card supported by the local employment contract or agreement (posted by the employer) – on approval from the Ministry of Interior, the Czech embassy or consulate will issue a special visa to the employee. A ‘Blue Card’ can be obtained if the citizen has high qualifications and is both a work permit and a visa in one document and permits the holder to work (in the specified job) and reside in the Czech Republic.

- The tax authority (for individuals) in the Czech Republic is the Finanční úřad (Tax Authority, or TA). Czech Republic resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Czech Republic-source income only.

- An individual is deemed resident in the Czech Republic if they have a permanent home in the Czech Republic or have spent at least 183 days of the relevant calendar year in the Czech Republic. New employees (foreign nationals) must register with the tax authority and will then be issued with a tax identification number.

- The tax year in Czech Republic runs from 1 January to 31 December (a calendar year).

- Broadly, most employees are not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, as well as employment income, must complete and file an annual tax return by 1st April of the following year or 1st July if the tax return is to be prepared by a registered tax advisor under a power of attorney (a filing due date extension may be possible under certain circumstances on application).

- Employment income includes salaries, bonuses, allowances, benefits in kind and any other income received by an employee for services rendered. Employment income is taxed at a flat rate of 15%. Income from employment is also subject to a "solidarity surcharge" that represents an additional 7% applied to the amount which in total exceeds 48 times the annual average salary (for 2017: CZK 1,355,136). An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: The employee pays 11% of their gross salary (4.5% health insurance, 6.5% old-age pension) and the employer pays 34% of the employee’s gross salary (9% health insurance, 25% state social security funds). There is no payroll tax for the employer.

- When employment ends, and the internationally mobile employee permanently leaves the Czech Republic, the tax authority must be informed so that their registration can be cancelled and the Labour Office and the Ministry of Interior notified (to cancel the work / residence permit). If relevant, the employee should file a final income tax return by the normal statutory filing due date.
DENMARK

CITY: Copenhagen
CURRENCY: Danish Krone (DKK)
POPULATION: 5.75 Million (2017 estimate)
LANGUAGE: Danish

PKF CONTACT INFORMATION

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<tr>
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<th>Name</th>
<th>Telephone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
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</tr>
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</table>

KEY POINTS

- The documentation requirements (visa, work permit) to legally work in Denmark depend on which country the foreign national is a citizen:
  - Nordic nationals: No work or residence permit is required for citizens of Finland, Iceland, Norway or Sweden to remain and work in Denmark;
  - EU / EEA nationals: No work permit is required and an EU / EEA national can remain in Denmark for up to 3 months (6 months if seeking employment) without a residence permit. An EU Registration Certificate must be obtained however if the EU/EEA national intends to stay longer than three months.
  - Non-EU / non-EEA nationals: To enter Denmark and remain for up to three months non-EU / non-EEA nationals must obtain a business/tourist visa and apply for a residence and work permit before entering Denmark (a work permit is required even if the work assignment is less than three months). A number of schemes exist to ease the employment of desired professions and qualified individuals including the Positive List, the Pay Limit Scheme, and the Fast Track Scheme.

- The tax authority in Denmark is the Skatteministeriet (Danish Customs and Tax Administration, or SKAT). Denmark resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Denmark-source income only. An individual is deemed resident in Denmark if they occupy accommodation in Denmark as their permanent place of abode or remain in the country for a period of six months or more.

- Expat scheme: Under certain conditions, an expatriate who is employed in Denmark for a maximum period of 60 months may choose to be subject to a final tax on gross salary instead of ordinary income tax. The tax rate is 26% plus Labour Market Contributions of 8%, which is deductible before the 26% tax calculation.

- The tax year in Denmark runs from 1 January to 31 December (a calendar year). Each year an individual must complete an annual preliminary tax assessment and inform the tax authorities of their expected income and deductions for the year, which also includes a tax card (which the employer uses for withholding taxes). They must also complete an annual tax return and file this with the tax authorities before 1 May of the following year (or it may be postponed to 1 July). Penalties apply for filing a tax return late.

- Employment income includes all remuneration received from the taxpayer's employer, whether in cash or kind, such as free lodging, free use of a car, free use of the telephone, etc. Employment income (gross salary) is subject to a mandatory Labour Market Contribution of 8%. After the Labour Market Contribution, an employee’s remaining gross salary is subject to income tax at a maximum tax rate of 51.68% (2017), as follows:
  - A basic charge of 24.6% (average) on taxable income is due to the municipality and church, in which the taxpayer lives;
  - Health Contributions of 2% on taxable income;
  - The basic State tax rate is 10.08% on taxable personal and positive interest income; and,
  - An additional higher rate of 15% is levied on gross income exceeding DKK 521,304 (2017).

- Social security contributions are a fixed monthly amount of DKK 284, and are paid one third by the employer. The employee pays DKK 94.65 and the employer pays DKK 189.35. An employer must withhold Labour Market Contributions, tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Denmark, they are required to surrender their national health insurance card (sygesikringsbevis), complete an export form (if departing to a non-EU country), and file a final tax return by the normal due date.
KEY POINTS

- To legally work in Dominican Republic, a foreign national must obtain an entry visa and a work permit (work authorisation).
  - Visas: A foreign national may not require an entry visa to enter the Dominican Republic and so this should be confirmed with a local consulate or embassy (especially as the entry visa requirements vary on a case-by-case basis).
  - Work permits (visas): A work authorisation is granted to a foreign national with specialist knowledge or experience in a certain area. It is advisable to confirm the requirements and conditions of a work authorisation as they vary on a case-by-case basis. A foreign national meeting certain conditions and wishing to work in the Dominican Republic may also apply for a resident visa.
- The tax authority in the Dominican Republic is the Dirección General de Impuestos Internos (Tax Administration of the Dominican Republic, or DGII). The Dominican Republic’s taxation system is broadly based on the territoriality principle of taxation where resident and non-resident individuals are subject to income tax on Dominican-sourced income only (although for resident individuals, certain foreign investment income is also subject to tax). An individual is deemed resident in Dominican Republic if they stay for at least 182 days in any fiscal year.
- The tax year in Dominican Republic runs from 1 January to 31 December (a calendar year).
- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.
- An employee who receives income from other sources, as well as employment income, must complete and file an annual tax return by 31 March following the tax year-end (31 December). Penalties and interest apply if the tax return is filed late (or a tax return is not filed).
- Employment income includes salaries, bonuses (except Christmas bonus), allowances, benefits in kind and any other amounts, in cash or in kind, paid or provided to an employee.
- Employment income is taxed at progressive income tax rates up to 25% on amounts exceeding DOP 867,123.01 per annum (2017). An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.
- Social Security Contributions: An employee pays 5.91% of their gross salary (pensions and family healthcare contributions). The employer pays 14.19% of the employee’s gross salary (pensions and family healthcare) and an amount between 0.1% and 0.3% of contributable gross salaries (for labour risks insurance contributions) based on the category of the risk. An upper limit applies in calculating contributions based on multiples of the minimum salary. Employee and employer contribution rates are based on the benefits covered and an upper cap (limit) often applies at a maximum rate of 20 times the minimum wage.
- A payroll tax is payable which funds training workers and technical instruction. An employer must pay 1% of the total monthly payroll (and employees pay 0.5% of bonuses received).
- When employment ends, and the internationally mobile employee permanently leaves the Dominican Republic, the local employer must comply with the necessary formalities in informing the relevant authorities and surrendering any documentation. The employee’s work authorisation visa or resident visa should be cancelled.
KEY POINTS

- To legally work in Ecuador, an employee of the home country must obtain a work visa:
  - A ‘work visa under labour contract’ will enable an expatriate (foreign national) to work in an Ecuadorian company under a local contract and be part of the payroll;
  - A ‘work visa under assignment letter’ will enable an assignee (foreign national) to work in an Ecuadorian company and receive compensation (their salary) from a foreign company and maintain a labour relationship with the foreign company;
  - A ‘work visa for temporary legal representation’ will allow an expatriate (foreign national) to undertake temporary legal representation activities in an Ecuadorian company such as acting as a general manager, president or lawyer (designated by an appointment or a power of attorney).

- If the foreign national is likely to remain for an indefinite time working for an Ecuadorian company, branch or subsidiary they should obtain an immigrant visa and become a resident of Ecuador (permanent residence permit).

- The tax authority in Ecuador is the Servicio de Rentas Internas (Internal Revenue Service, or SRI). Ecuador resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Ecuadorian-source income only.

- An individual is deemed resident in Ecuador if they are present in Ecuador for more than 183 days in a calendar year (or more than 183 days within a 12-month period in two consecutive calendar years).

- The tax year in Ecuador runs from 1 January to 31 December (a calendar year). An employee is not required to submit an annual tax return if their only income consists of employment income from which tax has been withheld at source.

- Employment income includes salaries, wages, allowances, and any other compensation paid in cash, in kind or in services by an employer to an employee.

- Employment income is taxed at progressive income tax rates up to 35% on amounts exceeding USD 115,140 per annum.

- Social Security Contributions: An employee pays 9.45% of their gross salary and the employer pays 11.15% of the employee's gross salary. An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Broadly, employees in Ecuador receive the following annual bonuses:
  - Christmas bonus (or 13th salary), which amounts to approximately 1/12 of an employee’s annual compensation;
  - Education bonus (or 14th salary), which amounts to one Unified Basic Remuneration (USD 375);
  - Retirement funds, which amounts to 1/12 (or 8.33%) of an employee’s annual compensation from the second year of employment for the same employer.

- A 1% payroll tax is required to be paid by an employer (0.5% of payroll to a national training fund and 0.5% to an education credit program).

- When employment ends, and the internationally mobile employee permanently leaves Ecuador, the local employer must comply with the necessary formalities in informing the relevant authorities and surrendering any documentation or permits.
Key Points

- To legally work in Egypt, a foreign national must obtain an entry visa (if required) and a work permit:
  - Entry visa: Most business visitors obtain a 'tourist visa' which is issued for one month (but extendable to three months). The visa allows the holder to attend business meetings, conferences, etc. but not provide any services or receive any remuneration or engage in any kind of employment. Please note, temporary visas are issued under similar conditions to a tourist visa but allow the holder to remain in Egypt for one year (in some cases three years) and are normally issued to foreign nationals who enter Egypt for reasons other than tourism.
  - Work permits: To legally work in Egypt a foreign national requires a work permit issued by the Ministry of Manpower and Immigration. Work permits are issued for one year and may be renewed annually up to five years. The process to obtain a work permit should be initially commenced whilst the foreign nation is outside Egypt and comprises of two stages – the enrolment process and the work permit issuance process.

- The tax authority is the Egyptian Tax Authority (ETA). Egypt resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Egyptian-source income only.

- An individual is deemed to be a resident of Egypt if they are present in Egypt for more than 183 days in a fiscal year or their principal place of residence is Egypt. Article 2 of the Executive Regulations states that an individual is considered to have a permanent residence in Egypt if:
  - The taxpayer stays in Egypt for the majority of the year, either in his own property, in a rented property or in any other place;
  - The taxpayer has a local commercial presence, professional office, industrial site or any other place where he carries on his activities in Egypt; or,
  - The individual is an employee who performs his duties abroad and receives a salary from an Egyptian public or private source.

- The tax year in Egypt runs from 1 January to 31 December (a calendar year). An employee is not required to submit a tax return if their only income consists of employment income from which tax has been withheld at source by the employer.

- Employment income includes salaries, wages, overtime pay, compensation awards, and all cash and in-kind fringe benefits.

- Employment income is taxed at progressive income tax rates up to 22.5% on amounts exceeding EGP 200,000 per annum (please note that an annual fixed personal exemption of EGP 7,000 is available for each employee).

- Social Security Contributions: A full-time employee pays 14% of their gross monthly salary up to EGP 1,120 (and then 11% on excess up to EGP 2,110) and the employer pays 26% of the employee's gross monthly salary up to EGP 1,120 (and then 24% on excess up to EGP 2,110).

- An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit this to the tax authorities. The tax must be remitted within 15 days of the end of the month in which the payment is made (failure to pay the tax on time attracts an interest penalty).

- An employer must complete quarterly salary returns and file these with the tax authority at the end of January, April, July and October each year and file an annual reconciliation (during January of the following year).
EL SALVADOR
CAPITAL: San Salvador
CURRENCY: United States Dollar (USD)
POPULATION: 6.17 Million (2017 estimate)
LANGUAGE: Spanish

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KEY POINTS

- To legally work in El Salvador, a foreign national must obtain an entry visa (if applicable) and a work permit:
  - Entry visas: Citizens from certain countries do not require an entry visa to stay in El Salvador. If an entry visa is required it is advisable to check the requirements with the local overseas El Salvador consulate or embassy as they can often vary on a case-by-case basis;
  - Work permits: To work in El Salvador a foreign national requires a work permit. Work permits are valid for one year (renewable). Once the application documents are received by the immigration authorities a receipt is issued which acts as a temporary permit until final approval is received. Work authorisation provides a foreign national with temporary residence.
  - Residence visas: If certain requirements are met a foreign national may apply for local residency with the General Direction of Immigration and Foreigner Issues (Dirección General de Migración y Extranjería) which is normally granted for a year (renewable).

- The tax authority in El Salvador is the Ministerio de Hacienda de El Salvador – Dirección General de Impuestos Internos (Ministry of Finance of El Salvador - General Directorate of Internal Taxes, or DGII). Broadly, resident individuals and non-resident individuals are subject to income tax on their El Salvador-source income only (note: residents can also be subject to tax on certain foreign-source investment income).

- An individual is deemed resident in El Salvador if they temporarily or permanently reside in El Salvador for more than two hundred consecutive days during a calendar year or the individual’s main source of income is in El Salvador.

- The tax year in El Salvador runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and their annual earnings do not exceed USD 60,000.

- If an employee has an annual salary which exceeds USD 9,100 or receives income from other sources, as well as employment income, they must complete and file an annual tax return by 30 April of the year following the tax year. Penalties apply for the late filing or failure to file a tax return.

- Employment income includes salaries, bonuses, allowances, benefits in kind and all other amounts received by an employee, whether in cash or in kind.

- Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding USD 22,857.15 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities. There is no payroll tax for the employer.

- Social Security Contributions: An employee pays 3% of their gross salary and the employer pays 7.5% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with the employer’s contribution, to the Salvadorian Institute of Social Security.

- Private Pension Fund: The employee also pays 7.25% of their gross salary as a contribution to their private pension fund and the employer pays 7.75% of the employee's gross salary. An employer must withhold private pension fund contributions at source from an employee’s gross monthly salary. Both monthly contributions (employee’s and employer’s) are reported to the Pension Fund Administrator.
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**KEY POINTS**

- The documentation requirements (visa, residence permit) to legally work in Estonia depend on which country the foreign national is a citizen:
  - A citizen of an EU or EEA member country or Switzerland may enter and remain in Estonia for up to three months without a visa subject to providing a valid travel or identity document. If a citizen registers his or her place of residence (required after three months) they will acquire a temporary right of residence which is valid for five years and provides the holder with a right to work in Estonia.
  - Not a citizen of an EU or EEA member country or Switzerland: A foreign national must have a visa to enter Estonia or stay in Estonia. Please note that from 1 September 2013, no separate work permit is issued, and foreign nationals residing in Estonia may work on the basis of the residence permit. A residence permit is issued either for up to five years (temporary) or without a term (long-term).

If a foreign national intending to reside and work in Estonia is unsure of their tax residence status or requirements they should contact the Estonian tax authorities for confirmation. Note: Estonia is a part of Schengen visa area which includes Switzerland and all EEA countries except Bulgaria, Croatia, Cyprus, Ireland, Romania and the United Kingdom.

- The tax authority in Estonia is the Eesti Maksu ja Tolliamet (Estonian Tax and Customs Board, or EMT). Estonia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Estonian-source income only. An individual is deemed resident in Estonia if they have a permanent place of residence in Estonia or remain in Estonia for at least 183 days during 12 consecutive calendar months.

- The tax year in Estonia runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. If an individual has other income or wishes to claim certain benefits and the total income exceeds EUR 2,040 they must file an individual income tax return by 31 March of the year following the tax year. Any tax must be paid by 1 July of the year following the tax year.

- Employment income includes salaries, wages, directors’ fees and fees for personal services. Broadly, in Estonia, an employer pays the income tax on benefits-in-kind (fringe benefits) provided to an employee such as housing benefit, a company car, lunch vouchers, and similar items (such fringe benefits are not treated as taxable income of the recipient).

- Employment income is taxed at a flat 20%. From 1 January 2018 the tax-free income threshold is EUR 6,000 per annum (or EUR 500 per month).

- Social Security Contributions: New employees must be registered with the social security authorities by their Estonian employer. An employee does not pay any SSCs. An employer pays 33% of the employee’s gross salary.

- Unemployment insurance: The employee pays 1.6% of their gross salary and the employer pays 0.8% of the employee’s gross salary.

- An employer must withhold tax and unemployment insurance at source from an employee’s gross monthly salary and remit this, and its Social Security Contributions, to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Estonia, they must inform the Estonian Tax and Customs Board (tax authorities) about their resident status termination (a specific official form requires completion).
PKF CONTACT INFORMATION

For information about internationally mobile employee services in Finland, please contact Stefaan De Ceulaer (PKFI Director Tax and Legal Support) on +32 468 22 3924 or email stefaan.deceulaer@pkf.com.

Alternatively, please contact Oliver Grosse-Brauckmann (International Support Director) on +44 20 3691 2523 or email oliver.grosse-brauckmann@pkf.com.

KEY POINTS

- The documentation requirements (visa, employees’ residence permit) to legally work in Finland depend on which country the foreign national (employee) is a citizen:
  - Nordic nationals: No work or residence permit is required for citizens of Denmark, Iceland, Norway or Sweden to remain and work in Finland but they must register with the population register;
  - EU / EEA citizens: An EU / EEA national can stay and work in Finland for up to 3 months. If an EU/EEA national intends to stay longer than three months they must register their residence with the local police office. EU / EEA citizens do not need an employees’ residence permit.
  - Non-EU / non-EEA citizens normally require a Schengen visa to enter Finland (although some countries are exempt). The Schengen visa area includes Switzerland and all EEA countries except Bulgaria, Croatia, Cyprus, Ireland, Romania and the United Kingdom. A non-EU / non-EEA citizen wishing to work in Finland will normally require an employee’s residence permit (exceptions apply) and in some cases an ordinary residence permit. The initial visa application must be made outside Finland at a Finnish consulate or embassy in the applicant’s home country. An employee’s residence permit is initially granted for one year or for the duration of the employment, whichever is shorter.

- The tax authority in Finland is the Finnish Tax Administration (FTA).

Finland resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Finnish-source income only. An individual is deemed resident in Finland if they have a permanent home and habitual abode in Finland or they are present continuously in Finland for more than six months. Therefore, an international assignee staying in Finland for less than six months in total will be taxed as a non-resident. A foreign citizen becomes a non-resident when they leave the country and surrender their permanent home in Finland (a three-year rule applies to Finnish nationals).

- The tax year in Finland runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld. Employment income (earned income) is subject to national income tax, municipal income tax and church tax. It includes salaries, wages and benefits in kind. Employment income is taxed at progressive national income tax rates up to 31.50% on amounts exceeding EUR 73,100 per annum. Municipal income tax of between 16% to 23% is levied on employment income (depending on the rate set by the local town or city) and a further 1% to 2% is paid to the Church.

- Social security contributions consist of a statutory pension insurance premium, an unemployment insurance premium, an accident insurance premium, a group life insurance premium, an employer’s social security premium, a daily allowance premium, and a medical treatment premium. On average, an employee pays between 9.33% and 10.83% of their gross salary and an employer pays between 20.63% and 23.13% of the employee’s gross salary.

- An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Special expatriate tax regime: Qualifying expatriates can have their salary taxed at 35% for up to 48 months instead of at the normal progressive income tax rates.

- When employment ends, and the internationally mobile employee permanently leaves Finland, the change of address must be notified to the registration authorities and the KELA-card (if held) should be returned.
PKF CONTACT INFORMATION

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KEY POINTS

- The documentation requirements (visa, work permit, residence permit) to legally work in France depend on which country the foreign national (employee) is a citizen:
  - A citizen of an EU or EEA member country or Switzerland may enter, stay and work in France without requiring a visa, work permit or residence permit under the law of 27 November 2003. Please note, if employed long term by a French company the French employer is required to issue a statement of appointment (déclaration d’engagement) to the authorities.
  - A citizen not from an EU or EEA member country or Switzerland must have a visa to stay in France and cannot perform any salaried activity without a work permit (either a temporary assignment work permit or a local hire work permit). A temporary assignment work permit is normally used by secondees and is valid for one year (renewable up to three years). A foreign national employee working for a French company normally obtains a local hire work permit (valid for one year, renewable indefinitely). A long-stay visa, the equivalent to a residence permit, is normally issued to employees with a work contract of 12 months or more.

- The tax authority in France is the Direction Générale des Finances Publiques (French Tax Authority, or FTA). French resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on French-source income only (and on capital gains derived from the disposal of certain French assets). An individual is deemed resident in France if their (or their family’s) habitual residence is in France, their principal place of residence (staying at more than 183 days in a calendar year) is in France, or their professional activity or centre of economic interests is in France.

- The tax year in France runs from 1 January to 31 December (a calendar year). French tax residents must complete and file an annual French personal income tax return (Form no. 2042) by mid-May of the year following the tax year (if filed electronically an extension is available – depending on the exact location of the tax resident). The tax must be paid in three instalments or ten instalments (if a monthly payment election is made). Penalties apply if the tax return or a tax payment is late.

- Employment income includes salaries, wages, benefits-in-kind, allowances and any other compensation paid to an employee by an employer and is taxed at progressive income tax rates of up to 45% on amounts exceeding EUR 152,260 per annum. A favourable expatriate tax law applies to employees seconded to France where certain benefits relating to the assignment in France are not taxed (with strict requirements).

- France has a mandatory national social insurance system which funds health, retirement, housing benefits family allowances, occupational accidents and illness. There is also a mandatory system to cover extra costs of illness over the national social security system coverage. An employee pays between 15% to 24% of their gross salary (depending on the employee statute, executive or non-executive; retirement fund contributions and the level of remuneration) and an employer pays between 35% to 47% of the employee’s gross salary. The annual social security ceiling is EUR 39,228 (2017). A foreign national (new employee) must be in possession of a valid social security certificate of continued coverage or otherwise they must be affiliated with the French statutory social security regime. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities.
KEY POINTS

- To legally work in Georgia, a foreign national must obtain an entry visa (if required) and a work residence permit:
  - Entry visas: Citizens from many countries can stay in Georgia for up to a year without requiring an entry visa, however, it should be confirmed with the local overseas Georgian consulate, embassy or the website: www.geoconsul.gov.ge whether the foreign national is from such a country. Such citizens do however require a travel document (and an identity card if from an EU member state).
  - Work residence permit: A citizen arriving from a visa free country does not have to obtain a work residence permit for up to a year (otherwise they must apply for a work residence permit at least 40 days before the expiration of the visa-free period). A citizen that requires an entry visa must also obtain a work residence permit from the Legal Entity of Public Law Civil Registry Agency (under the Ministry of Justice) before commencing any work in Georgia.

- The tax authority in Georgia is the Revenue Service of Georgia (RSG). Georgia resident individuals and non-resident individuals are subject to tax on Georgian-source income only.

- An individual is deemed resident in Georgia if they are present in Georgia for more than 183 days in any continuous 12-month period ending in a tax (calendar) year (or if an individual was in the Georgian State service overseas during the tax year).

- The tax year in Georgia runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.

- An employee who receives income from other sources, as well as employment income, must register with the tax authorities and file an annual tax return by 1 April following the tax year (and also pay any tax due by that date). Penalties apply for failure to register with the tax authorities, late filing or failure to file a tax return, under stating the tax liability, or the late payment of tax.

- Employment income includes salaries, bonuses and any other compensation paid to employees, including benefits-in-kind, subject to certain exceptions, whether received in cash or in any other form. Employment income is taxed at a flat rate of 20% per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities. Tax returns are filed monthly.

- There are no social security contributions to be made by an employer or employee in Georgia and there is no payroll tax for the employer.

- A foreign national (employee) may drive a car (vehicle) legally in Georgia if they have an international driver’s license. If an international driver’s license is not held by the foreign national they are eligible to drive a car legally in Georgia up to one year, but before the expiration date of the home-country driver’s license. A foreign national has a right to exchange a driver’s license issued by the home-country to the Georgian driver’s license or obtain an international driver’s license.

- When employment ends, and the internationally mobile employee permanently leaves Georgia, the local employer must comply with the necessary formalities in informing the relevant authorities and surrendering any documentation or permits (work residence permit).
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KEY POINTS

- The documentation requirements (visa, residence permit) to legally work in Germany depend on which country the foreign national (employee) is a citizen:
  - EU / EEA / preferred country citizens: No visa or work permit is required to stay and work in Germany for up to three months (if staying longer they must register with the registration office).
  - Non-EU / non-EEA / non-preferred country citizens require an entry visa and can then apply for a residence visa for work purposes (national visa) before starting to work regularly in Germany.

- The responsible tax authority depends on the place of residence or place of abode of the individual. German resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on German-source income only. An individual is deemed resident if they have a residence in Germany or their place of abode is in Germany (more than six months is spent in Germany).

- The tax year in Germany runs from 1 January to 31 December. An employee does not have to file an annual tax return if they do not have a residence or place of abode in Germany and their only income is employment income from which tax has been withheld at source.

- Employment income includes salaries, wages, benefits and any other remuneration received by an employee. It is taxed at progressive income tax rates of up to 45% on amounts exceeding EUR 256,304 per annum (single tax payer). 5.5% of the income tax rate is also levied as a solidarity surcharge (45% x 5.5% = 2.475%). An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: The employer and employee each contribute approximately 20% each of the employee’s gross salary. If a German tax resident is a member of a registered church in Germany a church tax is levied at a rate of 8% or 9% of their annual income tax liability; it varies according to the district of residence. Social security contributions are collected by authorised health insurance organisations.

- When employment ends and the internationally mobile employee permanently leaves Germany, the tax office should be informed and he/she should de-register at the local town hall.
KEY POINTS

- To legally work in Ghana, a foreign national must obtain an entry visa (although some exemptions apply), a work visa and residence permit:
  - A work visa is sponsored by the employing company and is normally issued for one year (renewable annually), however, where the applicant has worked consistently in Ghana for at least three years, a long-term work permit (two years or more) may be issued.
  - A residence permit is sponsored by the employing company and initially valid for one year (renewable annually). Residence permits are issued under the immigration quota system by the Ghana Immigration Service to expatriate personnel employed by companies.

- The tax authority in Ghana is the Ghana Revenue Authority (GRA). Ghana resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Ghana-source income only. Please note however that employment income is tax exempt where a Ghana resident individual receives income from employment exercised in a foreign country with either a non-resident employer or with a resident employer if the individual is continuously present in the foreign country for 183 days or more during the year of assessment.

- An individual is deemed resident in Ghana if an employee or official of the Ghana government on posting abroad, or present in Ghana for a total of 183 days or more in any 12-month period commencing or ending during the year of assessment, or they are a citizen of Ghana other than a citizen who has a permanent home outside Ghana and live in that home for the whole year of assessment, or they have a permanent home in Ghana and are temporarily absent from Ghana for no longer than 365 successive days.

- The tax year in Ghana runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.

- Employment income includes salaries, wages, allowances, gifts, benefits and any other amounts paid in cash or in kind by an employer to an employee either directly or indirectly.

- Employment income is taxed at progressive income tax rates of up to 25% on amounts exceeding GHS 38,880 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the GRA within 15 days following the month in which the tax is withheld.

- Social Security Contributions: Ghana levies a mandatory social security tax at a rate of 18.5%. The employee pays 5.5% of their gross salary and the employer pays 13% of the employee's gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit 13.5% to the Social Security and National Insurance Trust and 5% to the trustees appointed to manage the employees’ occupational pension schemes.

- Monthly tax returns must be filed by an employer on behalf of its employees. By 30 April following the end of a year of assessment, an employer must file a return disclosing every person employed that has received assessable employment income. A year-end annual reconciliation of the taxes withheld on a monthly basis must also be prepared by the employer and any tax short-fall paid within 15 days i.e. on or before 15 January.

- When employment ends, and the internationally mobile employee permanently leaves Ghana, a notification of cessation must be completed and submitted to the GRA and a notification letter sent to the Ghana Immigration Service informing them that the individual has ceased employment with the company and has left the country (with documentary evidence attached).
KEY POINTS

- The documentation requirements (entry visa, work permit) to legally work in Gibraltar depend on which country the foreign national is a citizen. Gibraltar classifies citizens between 'entitled' workers (workers from an EEA country) and 'non-entitled' workers:
  - Entitled workers may stay in Gibraltar for up to three months, and, if they have employment they will be granted a renewable residence permit for five years;
  - Non-entitled workers must obtain a work permit to work in Gibraltar and are also granted an annual residence visa (renewable) subject to a valid work permit.

- The tax authority in Gibraltar is the Commissioner of Income Tax (CIT). Gibraltar (ordinary) resident individuals are broadly subject to tax on their worldwide income. Non-resident individuals are subject to tax on Gibraltar-source income only. An individual is deemed (ordinarily) resident in Gibraltar if they are present in Gibraltar for at least 183 days in a year or 300 days in any three consecutive years.

- The tax year in Gibraltar runs from 1 July to 30 June.

- Employment income includes salaries, bonuses, allowance, benefits in kind and all other remuneration received by an employee either in cash or in kind. Employment income is taxed and withheld from an employee’s gross salary in accordance with an employee’s tax code. The employee has a choice of being taxed between an allowance-based system or a gross income-based system:
  - The allowance-based system taxes gross employment income at progressive income tax rates up to 39% on amounts exceeding GIP 16,000 per annum.
  - The gross income-based system taxes gross employment income of residents with taxable income of up to GIP 25,000 at progressive income tax rates up to 28% on amounts exceeding GIP 17,000 per annum. For residents with taxable income over GIP 25,000 a year, a different tax system applies i.e. gross employment income is taxed as follows:
    The first GIP 17,000 16%
    The next GIP 8,000 19%
    The next GIP 15,000 25%
    The next GIP 65,000 28%
    The next GIP 395,000 25%
    The next GIP 200,000 18%
    The remainder 5%

- Executives holding a special tax HEPSS (High Executives Possessing Specialist Skills) status are limited to tax on the first GIP 120,000 of assessable income.

- Social Security Contributions: The employee (up to 60 years old) pays 10% of their gross salary (up to GBP 119.17 a month) and the employer pays 20% of the employee's gross salary (up to GBP 158.17 a month). There is no payroll tax for the employer. An employer must withhold income tax and social security contributions at source from an employee's gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities by the 15th day of the following month.

- An employer must complete an Employers Annual Declaration (Form P8), a Benefit-in-Kind Declaration / Benefit-in-Kind Tax Paid Declaration (Forms P10/P10A), and a Pension Scheme Contribution form (Form P12). These must be filed with the Income Tax Office by 31st July following the tax year. In addition, a Certificate of Pay, Tax Deducted and Social Insurance Contributions (Form P7) must be completed and filed at the end each tax year.
KEY POINTS

- The documentation requirements (entry visa, residency permit) to legally work in Greece depend on which country the foreign national is a citizen:
  - EU citizens do not require an entry visa (temporary visa) to stay in Greece or a residence permit to live and work in Greece. If an EU citizen intends to stay longer than three months they must obtain a registration certificate from the appropriate local Police Department or the Foreign Citizens Bureau. After five years of continuous presence, a citizen has the right to apply for permanent residency.
  - Citizens of the United States and countries that have signed reciprocity treaties with Greece do not require an entry visa (temporary visa) to stay in Greece. If they intend to work in Greece (and obtain a Greek residence permit) they must however arrive in Greece with a special type of Schengen visa from the overseas Greek consulate or embassy, and when in Greece, obtain a residency permit.
  - Non-EU citizens require an entry visa (temporary visa) to stay in Greece. If the foreign national wishes to work they must arrive in Greece with a special type of Schengen visa from the overseas Greek consulate or embassy, and when in Greece, obtain a residency permit.

Please note, under Greek law, a specific type of residency permit enables a foreign national to stay and work in Greece (and work permits are not required).

- The tax authority in Greece is the Independent Authority for Public Revenue (IAPR). Individuals of a particular level of wealth however are dealt with by the “Tax Audit Centre for Taxpayers with Great Wealth”. Greece resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Greece-source income only. An individual is deemed resident in Greece if they are present in Greece for more than 183 days in any 12-month period (some exceptions apply).

- The tax year in Greece runs from 1 January to 31 December (a calendar year). Each employee must register with the tax office, obtain a tax registry number (ΑΦΜ) and file a tax return. To legally work, an employee must obtain a social security number (ΑΜΚΑ).

- An employer must submit an end of year report to the General Secretariat of Information Systems which details the employment income, social security contributions and tax relating to each employee and from this an employee will be issued a tax return with the information already entered into it. The annual personal income tax return must be filed by 30 June of the year following the year of income.

- Employment income includes salaries, wages, pensions, allowances, the market value of any benefit in kind, and any other amount received in cash or in kind for employment services. Employment income (after deducting the social security contributions) is taxed at progressive income tax rates of up to 45% on amounts exceeding EUR 40,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn system (PAYE) and remit this to the tax authorities.

- Social Security Contributions are payable at a rate of 41.06% of an employee's gross salary to the ‘Unified Social Security Fund’ (EFKA). The employee pays 16% of their gross salary and the employer pays 25.06% of the employee's gross salary.

- Special Solidarity Tax Contributions (SSTCs) are calculated annually by reference to an employee’s monthly salary at progressive rates up to 10% on amounts exceeding EUR 220,000 per annum. An employer will deduct monthly SSTCs from an employee’s gross salary when making the other deductions above and remit to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Greece, their residency visa should be cancelled, if applicable.
GUATEMALA
CAPITAL: Guatemala City
CURRENCY: Guatemalan Quetzal (GTQ)
POPULATION: 17.01 Million (2017 estimate)
LANGUAGE: Spanish

PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in Guatemala, a foreign national must obtain an entry visa (although some exemptions apply), a temporary residence permit and a work permit.
  - A temporary residence permit must be obtained before an application for a work permit can proceed. The temporary residence permit is issued by the immigration authorities to foreign nationals wishing to reside and work in Guatemala and is valid for two years (renewable for equal periods);
  - An application for a work permit must be submitted by the employer to the General Direction of Employment of the Labour Ministry once a foreign national has a temporary residence permit. A work permit is valid for one year (renewable).

Once a foreign national (employee) is the holder of a work permit they should be included in the payroll and treated as a Guatemalan resident employee.

- The tax authority in Guatemala is the Superintendencia de Administración Tributaria (Tax Administration Superintendence, or SAT).

- Guatemalan tax law relies almost exclusively on the source principle, and consequently, Guatemalan resident and non-resident individuals are subject to tax on their Guatemala-source income only. An individual is deemed resident in Guatemala if they stay in Guatemala for more than 183 days during the calendar year or their centre of economic interests is in Guatemala.

- The tax year in Guatemala runs from 1 January to 31 December (a calendar year).

- Generally, an employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.

- An employee who receives income from other sources must complete and file an annual tax return by the third month after the close of the previous tax year (31 March). Any tax liabilities due must also be paid by this date. A penalty is levied of up to 100% of any unpaid tax liability.

- Employment income includes salaries, wages, bonuses, pensions, allowances, and any other type of remuneration or payment earned by employed resident individuals.

- Employment income is taxed at progressive income tax rates up to 7% on amounts exceeding GTQ 300,000 per annum. Several tax deductions are available against employment income including a personal allowance of GTQ 48,000.

- Social Security Contributions: The employee pays 4.83% of their gross salary and the employer pays 12.67% of the employee's gross salary. There is no weekly, monthly or annual upper limit with respect to earnings (employee's gross salary) subject to social security contributions.

- An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit this to the tax authorities.

- An end of year summary return must be filed with the tax authorities by the employer disclosing the salaries and withholding tax deducted during the year for all its employees (due in January following the tax year).

- When employment ends, and the internationally mobile employee permanently leaves Guatemala, a formal letter should be sent to the tax authorities (and Work Ministry) informing them that the person will be leaving the country. If applicable, a final tax return should be filed with the tax authorities.
KEY POINTS

- To legally work in Honduras, a foreign national must obtain an entry visa, a work visa and residence permit:
  - Entry visas (temporary visas): Citizens of some countries do not require an entry visa on arrival in Honduras. Other citizens should obtain an entry visa before arriving in Honduras from an overseas Honduras consulate or embassy. Because visa conditions and requirements often vary, it is advisable to confirm the entry visa requirements on a case-by-case basis.
  - A Working Special Permit is required by a foreign national wishing to work in Honduras. The permit is granted from one to five years and is renewable for similar time periods. Following the submission of the required documents to the immigration authorities, it normally takes approximately three months for a Working Special Permit to be granted.

- The tax authority in Honduras is the Servicio de Administración de Rentas (Revenue Administration Service of Honduras, or SAR). Honduras resident and non-resident individuals are subject to tax on Hondurassource income only.

- An individual is deemed resident in Honduras if they live in Honduras for more than three consecutive months during a tax year i.e. for tax purposes, after three months a non-resident becomes a resident.

- The tax year in Honduras runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, as well as employment income, must complete and file an annual tax return by 30 April of the year following the tax year (and any tax due should also be paid by this date).

- Employment income includes salaries, wages, bonuses, commissions, allowances, and any other amounts received by way of employment in cash or in kind. Employment income is taxed at progressive income tax rates up to 25% on amounts exceeding HNL 500,000 per annum.

- Social Security Contributions: The employee pays 6.5% of their gross salary and the employer pays 11% of the employee's gross salary. Social security tax contributions cover welfare insurance for sickness and maternity (2.5% for employees and 5% for employers), health care insurance for invalidity, old age and death (2.5% for employees and 3.5% for employers), and Administration of the Pension Fund and Solidarity Benefits (1.5% for employees and from 1.5% to a maximum 4% for employers). Maximum ceilings apply to contributions in each case. An employer also pays 1% in respect of Professional Formation Institute (Instituto Nacional de Formación Profesional, or INFOP) contributions (employees do not pay any contributions for INFOP).

- An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit this to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Honduras, their working special permit should be cancelled. If applicable, a final tax return should be filed with the tax authorities before the departure.
KEY POINTS

- To legally work in Hong Kong, a foreign national must obtain an entry visa or a work permit. A work permit is sponsored by the employing company and all applications should be sent with the required supporting documentation to the Hong Kong Immigration Department, Receipt and Despatch Sub-unit, 2/F, Immigration Tower, 7 Gloucester Road, Wan Chai, Hong Kong. If a foreign national remains in Hong Kong for more than 180 days he/she must obtain an Identity Card.

- The tax authority is the Hong Kong Inland Revenue Department (IRD). A tax year runs from 1 April to 31 March. The basis of taxation in Hong Kong is territorial. An individual is subject to Salaries Tax on income earned which arises, or is derived from, a Hong Kong office or Hong Kong employment. However, no account is taken of services rendered in Hong Kong during visits of 60 days or less in any tax year.

- An employer is required to notify the IRD of each new employment within three months of its commencement date. Upon receipt of the notice, the IRD may issue a provisional tax return form to the employee which provides an estimate of their income to the following 31 March to enable an assessment to be raised for provisional Salaries Tax. Shortly after the end of each year (31st March) an employer must file an employer’s return with the IRD disclosing all the taxable remuneration paid or accrued to each employee (and provide a copy of the respective return to the employee for reference).

- The IRD will issue a tax return to each employee (normally on 2 May following the end of the tax year) which must be completed one month from the date of issue (an extension is possible on application). No tax payment is due when the return is filed. Upon submission of the tax return the IRD will raise an assessment and the tax shown should be paid in two instalments. The first instalment will be the final net tax for the year assessed and 75% of the provisional tax for the next tax year (normally payable in January following the end of the tax year). The 25% balance of the provisional tax charge should be paid three months after the first instalment.

- Employment income includes salaries, bonuses, gratuities, benefits in kind and any other amounts received by an employee from an employer either directly or indirectly. Apart from cases where employees are about to leave Hong Kong permanently, employers are not required to withhold Salaries Tax for their employees. Salaries tax is charged on individuals in respect of all income arising in or derived from Hong Kong in relation to any office, employment, pension or payments for services rendered in Hong Kong. The tax charge is calculated at the lower of 15% of chargeable income after allowable deductions, or, net chargeable income after allowable deductions and personal allowances taxed at progressive Salaries Tax rates of up to 17% on amounts exceeding HKD 135,000 per tax year from 2017/18 onwards.

- No social security tax exists in Hong Kong, however, contributions into a Mandatory Provident Fund are required. Only employees with monthly income of HKD 7,100 or more contribute. An employee pays 5% of their gross monthly salary and an employer pays 5% of the employee’s gross monthly salary. Both contributions are capped at HKD1,500 per month. An employer withholds contributions at source from an employee’s gross monthly salary and remits this, together with its contributions, to the Fund.

- When employment ends and the individual permanently leaves Hong Kong, the employer must notify the IRD a month before and withhold all money or money's worth for one month from the date of the notification unless a letter of release is issued by the IRD. A final tax return should be completed and submitted to the IRD, which will issue an assessment. Upon settlement of any assessed tax liability, the IRD will issue a letter of release to enable the employer to pay the employee any money due or held against the employee.
KEY POINTS

- The documentation requirements (visa, work permit, residence permit) to legally work in Hungary depend on which country the foreign national (employee) is a citizen:
  - EEA citizens (EU, Switzerland, Norway, Island, Lichtenstein): No work permit is required and the individual can remain and work in Hungary for up to three months (and commence work immediately). If an EEA national intends to stay longer than three months (within a 180-day period) they must register their residence, obtain an address card, and obtain an EEA Registration Certificate.
  - Non-EEA citizens require an entry visa and a work permit to legally work in Hungary. They also require either a single or normal residence permit. They cannot work until they have obtained a work permit.

- The tax authority in Hungary is the Nemzeti Adó-és Vámhivatal (National Tax and Customs Administration, or NTCA). Hungarian resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Hungarian-source income or on income which is taxable in Hungary according to the relevant Double Tax Treaty.

- An individual is deemed resident in Hungary for personal income tax purposes if they are a Hungarian citizen, or a citizen of any member state of the EEA whose stay exceeds 183 days in Hungary or a third-country citizen who has permanent resident status, or is a stateless person. Furthermore, permanent residence, habitual residence and centre of vital interests might influence tax residency in Hungary. Prescriptions of double tax treaties override the Hungarian national regulations.

- The tax year in Hungary runs from 1 January to 31 December (a calendar year). Foreign nationals employed in Hungary must register with the competent tax authority, obtain a personal tax identification number (card) and file an annual personal income tax return (and pay taxes).

- An employee must file the personal income tax return by 20th May of the year following the tax year, however, if certain conditions set out in the Personal Income Tax Act are met, the NTCA will prepare a draft tax return, which can be accepted by the employee. The employer can also undertake the reporting obligation of an employee’s annual personal income tax return if certain criteria are met. Any balance of personal income tax exceeding the tax withheld and paid by the employer should also be paid by the employee by 20th May of the year following the tax year.

- Employment income includes salaries, bonuses, allowances, benefits in kind and any other compensation received in-cash or in-kind. An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities. An employer must pay the tax by the 12th day of the following month.

- Employment income is taxed at a flat tax rate of 15 percent. A certain range of fringe benefits are taxed at a rate of 17.7% and include certain vacation contributions and cash benefits up to HUF 100,000 per annum.

- Social Security Contributions: An employer withholds 18.5% of an employee’s gross salary (employee contribution) and pays an additional 22% (employer’s contribution). In 2018 the employer’s contribution will reduce to 20%. With certain exceptions, an additional 1.5% contribution is payable by a Hungarian employer for the training fund.

- Resident expatriates are taxed on 100% of their remuneration. A social security contribution exemption is available for secondments under 2 years.

- The NTCA should be informed at least 30 days before a secondment ends and the internationally mobile employee permanently leaves Hungary.
PKF CONTACT INFORMATION

For information about internationally mobile employee services in Iceland, please contact Stefaan De Ceulaer (PKFI Director Tax and Legal Support) on +32 468 22 3924 or email stefaan.deceulaer@pkf.com.

Alternatively, please contact Oliver Grosse-Brauckmann (International Support Director) on +44 20 3691 2523 or email oliver.grosse-brauckmann@pkf.com.

KEY POINTS

- The documentation requirements (entry visa, work permit, residency visa) to legally work in Iceland depend on which country the foreign national is a citizen. A citizen from a Schengen member country (Switzerland and all EEA countries except Bulgaria, Croatia, Cyprus, Ireland, Romania and the United Kingdom) can stay in Iceland for up to three months without requiring an entry visa. Generally, citizens from all other countries are required to have an entry visa.
  - Nordic nationals: No work or residence permit is required for citizens of Denmark, Norway or Sweden to remain and work in Iceland but they must register with the National Registration Office;
  - EU / EEA citizens can stay and work in Iceland for up to three months without requiring a work permit. If they intend to stay and work longer than three months they must register their right to residency with the National Registration Office.
  - Non-EU / non-EEA citizens require a work permit and residence permit to stay and work in Iceland. A foreign national may be granted a permanent work permit subject to certain conditions e.g. holding a permanent residence permit, having a written contract of employment, etc.

- The tax year in Iceland runs from 1 January to 31 December (a calendar year). The tax authority in Iceland is the Ríkisskattstjóri (Directorate of Internal Revenue, or DIR). Iceland resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Iceland-source income only. An individual is deemed resident in Iceland if they stay for more than 183 days during any 12-month period.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources must file an annual tax return by, normally, the end of March (the Director of Internal Revenue determines when tax returns are to be filed at the beginning of each tax year). Following the submission of a tax return, any tax liability owing is then collected by an assessment (which is raised by 30 June following the tax year).

- Employment income includes salaries, wages, bonuses, pensions, directors’ fees, and all other compensation for services rendered. Employment income is taxed under two levels of taxation and depending on where in Iceland an employee works, their employment income will be subject to progressive income tax rates from 44.24% to 46.34% on amounts exceeding ISK 10,016,488 per annum:
  - Income up to ISK 10,016,488 is taxed at 22.5% and income over ISK 10,016,488 is taxed at 31.8%;
  - In addition, Municipal Tax applies and ranges from 12.44% to 14.52%. An individual may deduct a personal allowance (tax credit) of ISK 634,880 per year from employment income (and any other applicable deductions or reliefs) with the balance then subject to taxation. An employer must withhold tax at source from an employee’s gross monthly salary via the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities.

- Social Security Contributions: Only the employer pays social security contributions at a rate of 8.65% of the employee's gross salary. The employee does not pay any social security contributions. If a foreign national holds an E101 certificate, the employee does not have to pay any social security contributions but their employer must pay 0.632% of their income to the Bankruptcy Fund.

- Pension Fund Contributions: The employee pays 4% of their gross salary and the employer pays at least 8% of the employee’s gross salary. An employee can also pay up to 4% to an alternative pension fund and, if such payments are made, an employer must pay an extra 2% to the alternative pension fund. Contributions must be paid by the 14th of the month following the month in which the contributions are due.
KEY POINTS

To legally work in India, an employee of the home country must obtain a valid visa and register with the respective authorities:

- Employment Visa (EV): An EV is granted to skilled and qualified foreign individuals wishing to work under a contract of employment with a salary exceeding USD 25,000 per annum (and the position should not be one which is available for many Indian nationals or a routine or ordinary job). It is normally issued for the duration of the employment contract for up to five years (including the initial issue and renewals).

- Registration: A foreign national entering India with an EV valid for more than 180 days, or intending to stay in India for more than 180 days, must, within 14 days of their arrival, register with the Foreigners Regional Registration Office (FRRO) except where the foreign national is an OCI card holder.

- The tax authority in India is the Central Board of Direct Taxes (CBDT). India resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Indian-source income only. Resident taxpayers are classified as either ‘ordinarily resident’ or ‘not ordinarily resident’. An individual is resident in India if they spend at least 182 days in India during the tax year, or, 60 days in India during the year (and at least 365 days in the preceding four years). An individual is “not ordinarily resident” if they have been a non-resident in nine out of the ten preceding years, or have been in India for less than 730 days during the preceding seven years.

- The tax year in India runs from 1 April to 31 March (the fiscal year). An employee must obtain a Permanent Account Number (PAN) from the tax authorities and must complete and file a tax return for salary income by 31 July following the end of the respective tax year. The tax authorities will either accept the self-assessed tax liability or issue an assessment. A rectification can be applied for where a tax payer does not agree with an assessment. Before filing a tax return, the self-assessment tax (and any interest) must be paid. Interest is charged for a delay in filing a return.

- Employment income includes salaries, fees, bonuses, allowances, commissions and all other amounts, whether in cash or in kind, arising from an office of employment. Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding INR 1 million per annum. A 10% income tax surcharge applies if taxable income exceeds INR 5 million and 15% income tax surcharge applies if taxable income exceeds INR 10 million (surcharge marginal relief is provided for border line cases).

- Social security contributions ( Provident Fund): The employee pays 12% of their gross salary and the employer pays 12% of the employee’s gross salary. A foreign national (subject to certain conditions) may not be liable for social security contributions ( Provident Fund contributions) in India if India has entered into a social security agreement with the foreign national’s country. The accumulated contributed balance in the scheme can be withdrawn after the service period in the Indian entity ceases, or on retirement from service at any time after the age of 58.

- An employer must withhold tax and social security ( Provident Fund) contributions at source from an employee’s gross monthly salary and remit this to the tax authorities. The tax should be paid to the government’s treasury within seven days from the end of the month in which the salary is paid (for March the time deadline is extended to 30 April).

- When employment ends, and the internationally mobile employee permanently leaves India, they are required to obtain a “no objection certificate” from the Indian tax authorities, which requires an undertaking from the employer that any outstanding tax liability of the employee will be paid by them.
KEY POINTS

- To legally work in Indonesia, a foreign national must obtain an entry visa (although many exemptions apply), a work permit and a residence card:
  - Work permits are normally issued for a 12 month period (and are extendable). Each expatriate position must be justified on a case-by-case basis to demonstrate that the role cannot be currently filled by an Indonesian national. The employer must also provide necessary education and training programs so that Indonesians can eventually replace the expatriates within a reasonable time. Obtaining a work permit can be a protracted and complex process so it is advisable that the prospective employer works closely with a local agent.
  - Residence card: An expatriate working in Indonesia on a work permit must obtain a residence card (a limited-stay permit card or Elektronik Kartu Izin Tinggal Terbatas, or E-KITAS). An E-KITAS is issued for one year and may be renewed up to five times.

- The tax year in Indonesia runs from 1 January to 31 December (a calendar year). The tax authority in Indonesia is the Indonesian Tax Office (ITO), and its head is the Director General of Tax (DGT).

- Indonesia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Indonesian-source income only. An individual is deemed resident in Indonesia if they are present in Indonesia for more than 183 days in any 12-month period or present in Indonesia during a fiscal year and/or intend to reside in Indonesia.

- Each employee must register with the ITO and obtain a tax identification number (NPWP) unless their total income from all sources falls below the annual non-taxable income threshold. An employee with annual income below the non-taxable income threshold (with no NPWP) is not required to file a tax return if this income consists of only employment income from which tax has been withheld at source. An employee with NPWP who receives income from other sources, as well as employment income, must complete and file an individual annual income tax return by 31 March following the end of the tax year.

- Employment income includes salaries, pensions, directors’ fees and any other compensation for work performed. Generally, benefits in kind (fringe benefits) received by employees, including discounted or free housing, are not included in employment income (and are not taxable on the employee) nor are they deductible for the employer. Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding IDR 500 million per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- An employer must file a monthly (payroll) tax return by the 20th day of the following month. The December monthly (payroll) tax return serves as the annual return (as it reports the cumulative gross salaries and related income tax for the respective calendar year).

- Social Security Contributions: Employers must register themselves and their employees under a social security program managed by the Social Security Agency (BPJS). Social security contributions are normally withheld at source from an employee’s gross monthly salary and consist of BPJS Employment Insurance and BPJS Health Insurance contributions. For BPJS Employment Insurance, the employee pays 2% (for old age savings) of their gross salary and the employer pays between 4.24% and 5.74% (for old age savings, death insurance and working accident coverage) of the employee's gross salary (depending on the level of an employer’s working accident coverage). As for BPJS Health Insurance, the employee pays 1% of their gross salary, while the employer pays 4% of the employee's gross salary. In addition, an employee pays 1% of their gross salary and the employer pays 2% of the employee's gross salary in respect of a BPJS Pension contribution.
KEY POINTS

• The documentation requirements (visa, employment permit (EP), residence permit) to legally work in Ireland depend on which country the foreign national is a citizen:
  ▪ EU / EEA / Swiss citizens do not require an entry visa or an EP to stay or work in Ireland.
  ▪ A non-EU / non-EEA / non-Swiss citizen requires an entry visa (although there are exceptions) and an EP to stay and work in Ireland (of which there are nine different types). If the individual wishes to reside in Ireland for more than 90 days they must obtain an Irish residence permit by registering with the Irish immigration authorities and a multiple entry EP. Where it has not been possible to obtain an EP, there is an Atypical Working Scheme introduced by the Department of Justice which may still allow the foreign national to be legally employed in Ireland.

• The tax authority in Ireland is the Office of the Revenue Commissioners (ORC). Ireland resident and domiciled individuals are subject to tax on their worldwide income. Ireland resident but not domiciled individuals are subject to tax on Irish source income, foreign employment income to the extent duties of the employment as performed in Ireland, and other foreign income (including UK investment income) to the extent that it is remitted into Ireland. Non-resident individuals are subject to tax on Ireland-source income only.

• A new employee must register with the Department of Social Protection to obtain a Personal Public Service (PPS) number and following this, register (with the PPS number) for tax purposes with the tax authorities, who will then issue a ‘Certificate of Tax Credits’ which will be used by the employer in calculating the deduction of tax from the employee’s salary.

• The tax year in Ireland runs from 1 January to 31 December (a calendar year). Employment income includes salaries, bonuses, allowances, and all other amounts, whether in cash or non-cash benefits, arising from an office or employment. Employment income for an individual (single person) is taxed at progressive income tax rates up to 40% on amounts exceeding EUR 33,800 per annum.

• Social security contributions are known as Pay Related Social Insurance (PRSI) contributions. Contributions are divided into categories known as classes or rates of contribution. An employee pays based on which category applies to the nature of their work. Categories are based on the progressive amount of weekly income (less available credits) up to EUR 424 taxed at 4% (without any PRSI credit) for an employee and taxed at a rate of 10.75% for the employer.

• The Universal Social Charge (USC) is a tax payable on gross income at progressive rates up to 8% on amounts exceeding EUR 70,044 per annum for individuals who pay tax through the payroll system. Where income is received outside the PAYE system the USC charge increases to 11% on amounts exceeding EUR 100,000 per annum. The USC applies to all individuals whose gross income exceeds the threshold of EUR 13,000 per annum. An employer must withhold tax, PRSI and USC at source from an employee’s gross monthly salary and remit this to the tax authorities.

• A Special Assignment Relief Programme (SARP) applies to certain employees assigned to work in Ireland for 12 months or longer. For qualifying individuals, 30% of employment income over EUR 75,000 will be exempt from tax and certain payments or reimbursements will be received tax free.

• When employment ends, and the internationally mobile employee permanently leaves Ireland, the employer must provide Form P45 to the employee which summarises their earnings in the tax year to date and the tax deducted.
PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in Israel, a foreign national must obtain an entry visa (unless from a country that does not require an entry visa from an Israeli citizen) and a work visa:
  - B1-visa: Employment (and work) in Israel is permitted under the appropriate B-1 Visa which is normally valid for one year (renewable for a year; up to five years and three months).
  - B2-visa: This visa allows the holder to stay in Israel for a brief time i.e. a business meeting, a course, etc. It does not entitle the holder to undertake any employment or work whilst in Israel.

- The tax authority in Israel is the Israeli Tax Authority (ITA). Israel resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Israeli-source income only.

- An individual is deemed resident in Israel if their centre of vital interests is in Israel, or they are present in Israel for 183 days or more in a tax year, or have been present in Israel during the tax year for 30 days or more and have been present in Israel for a total of 425 days or more during that tax year and the two previous tax years (in total).

- The tax year in Israel runs from 1 January to 31 December (a calendar year). An employee is not required to register with the tax office or file a tax return if their only income consists of employment income from which tax has been withheld at source.

- The employer normally registers each new employee with the social security authorities (if an employee remains covered under their home country social security scheme they must provide a ‘certificate of coverage’ issued by the foreign competent authorities).

- Employment income includes salaries, bonuses, allowances, benefits in kind (fringe benefits), and any other amounts received by way of employment. Deductions from employment income include pension fund contributions and various personal allowances and credits. Employment income is taxed at progressive income tax rates up to 47% (plus a 3% surtax) on amounts exceeding ILS 640,000 per annum.

- Social security contributions in Israel consist of contributions to National Insurance (NI) and Health Insurance (HI) at a progressive top rate of 19.5% applied to an employee’s gross monthly salary between ILS 5,687 and ILS 43,240. Within this top band, the employee pays NI of 7% of their gross salary and the employer pays NI of 7.5% of the employee’s gross salary; only the employee pays HI at a rate of 5% of their gross salary. No contributions are collected on the amount of monthly income which exceeds ILS 43,240.

- An employer must withhold tax and social security contributions at source from an employee’s gross monthly salary and remit this to the tax authorities, together with their amount, by the 15th day that following month.

- A foreign national (expert) may be deemed an ‘approved specialist’ by the Israeli Investment Centre where no Israeli resident is able to perform the job or has the necessary skills to undertake it. Approved specialists are subject to a lower beneficial tax rate of 25% on their income for a period of three tax years, with a possible five-year extension.

- When employment ends, and the internationally mobile employee permanently leaves Israel, generally they are not required to notify the tax authorities upon departure.
PKF CONTACT INFORMATION

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KEY POINTS

- The documentation requirements (visa) to legally work in Italy depend on which country the foreign national is a citizen:
  - EU citizens do not require a visa to enter and work in Italy for up to three months, however, they must have a valid identity document issued by their Country of origin (valid for expatriation). If an EU citizen intends to stay longer than three months they must register with the Municipal Registry of Residency (‘Anagrafe’).
  - A non-EU citizen requires a work permit to work in Italy and, following this, a work visa (subject to ‘Quotas’ allowing for employment of non-EU citizens or “extra-Quotas” allowing for specific cases listed in Section 27 Legislative Decree no. 286 of 25 July 1998). Within eight days of entering Italy the holder of a work visa must sign a “Sojourn contract” (“Contratto di soggiorno”) with the Italian employer to make his entry and employment official and apply for a Stay Permit for work reasons.

- The tax authority in Italy, within the Ministero dell’Economia e delle Finanze (Italian Ministry of Economy and Finance), is the Amministrazione Finanziaria (Administration of Finance and Revenue Authority, or AFRA). Italy resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Italian-source income only. An individual is deemed resident in Italy if they are registered at the official Register of Population, or their principal place of business and economic and social interests are in Italy, or if they remain in Italy for more than six months (more than 183 days) in any calendar year.

- The tax year in Italy runs from 1 January to 31 December (a calendar year). A foreign national (employee) must apply for, and obtain, a Fiscal Code (called “codice fiscale/tessera sanitaria”) from the tax authority and register at the Office of Records of the Resident Population (‘Anagrafe della Popolazione Residente’). The employer must register the new employee for social security contribution purposes with the National Social Security Institution (INPS). If the employee is to remain covered by his home country while working in Italy (within certain time limits), they must provide Form A1 (or a similar Certificate of Coverage).

- Employment income includes salaries, bonuses, allowances, benefits-in-kind and all other compensation received by the employee in relation to his employment services. Employment income is taxed at progressive income tax rates up to 43% on amounts exceeding EUR 75,000 per annum. In addition, a regional surcharge (variable rate from 0.7% to 3.33%) is payable and possibly a municipal tax ranging from 0% to 0.9% depending on the employee’s municipality (charged and fixed locally).

- Social security contributions are varied and complex and there are many criteria which set the contribution rate for an employee (and employer). The employee’s contribution ranges from 9.19% to 10.49% of their gross salary and the employer’s contribution ranges from 29% to 32% of the employee's gross salary.

- An employer must withhold tax and social security contributions at source from an employee's gross monthly salary and remit to the tax authorities. Each year (in March), an employer must issue an annual earnings statement (Model CU) certifying the income paid to the employee and the taxes withheld. At the end of each year, approximately one month’s salary for each employee is set aside as severance indemnity to be paid at the end of the respective employee’s working period. The amount is subject to a different rate of taxation calculated at the medium rate of taxation of the last years of employment.

- When employment ends, and the individual permanently leaves Italy, they must cancel their residence registration with the local municipality (Comune) and return their Stay Permit to the border police.
JAPAN
CAPITAL: Tokyo
CURRENCY: Japanese Yen (JPY)
POPULATION: 126.76 Million (2017 census)
LANGUAGE: Japanese

PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in Japan, a foreign national must obtain the appropriate visa from a Japanese embassy or consulate in their home country (which normally takes approximately six to eight weeks).
  - After obtaining an entry visa, a foreign national wishing to work in Japan must also obtain a work permit (visa) at a Japanese embassy or consulate. To obtain a work permit, the foreign national must first obtain a Certificate of Eligibility (CoE) from the Japanese Immigration Authority (issued by the Ministry of Justice in Japan). A CoE confirms that the requirements have been met to attain a certain status of residency in Japan.
  - A residence permit should be obtained from the Immigration Authority to permit the holder to conduct certain activities while residing in Japan based on the categories of residence status available in Japan i.e. business manager, legal/accounting services, engineer/specialist in humanities or international services, intra-company transferee, skilled labour, etc.

- The Japanese tax authority is the Kokuzei-cho (National Tax Agency, or NTA). Japan resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Japanese-source income only. Foreign nationals are considered to have established residence when arriving in Japan unless their employment contract, or other documentation, clearly indicates they will be in Japan for less than one year (residence is deemed on the basis they will maintain a residence ('jusho') or maintain a temporary place of abode ('kyosho') continuously for at least one year).

- The tax year in Japan runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and total annual compensation is less than JPY 20 million. If over JPY 20 million, an employee may have to file a tax return by March 15th of the following year.

- Employment income includes salaries, wages, directors’ fees, bonuses, benefits in kind and other compensation of a similar nature. An employer must withhold tax and social insurance premiums at source from an employee’s gross monthly salary and remit this to the tax authorities. Employment income is taxed at progressive income tax rates up to 45% on amounts exceeding JPY 40 million per annum (less a deduction of JPY 4,796,000). In addition, there is a surcharge of 2.1% of the national personal tax liability (which applies for 25 years from January 2013).

- Social insurance premiums (based on an employee’s monthly gross salary) comprise:
  - Health insurance contributions - employee pays 4.955%, employer pays 4.955%, capped at JPY 68,874.5 a month. (If 40 years old or older the employee pays 5.78%, employer pays 5.78%, capped at JPY 80,342 a month);
  - Welfare pension contributions – employee pays 9.15%, employer pays 9.15%, capped at JPY 56,730 a month; and,
  - Employment insurance contributions - employee pays 0.3%, employer pays 0.6%, no limit.

- Social insurance premiums are also payable on an employee’s bonuses and comprise:
  - Health insurance contributions - employee pays 4.955%, employer pays 4.955%, capped at JPY 283,922 a year (If 40 years old or older the employee pays 5.78%, employer pays 5.78%, capped at JPY 331,194 a year);
  - Welfare pension contributions - employee pays 9.15%, employer pays 9.15%, capped at JPY 137,250 a year; and,
  - An employer also pay’s workmen's accident compensation insurance based on the total annual payroll from 0.25% to 2.60% (for manufacturing) and from 0.25% to 8.80% (for other business).

- When employment ends, and the individual permanently leaves Japan, they are required to deregister their residency (and their family’s, if applicable) at their local ward office before permanent departure from Japan. They must also surrender their Residence Card to the immigration authorities at the airport.
To legally work in Kazakhstan, a foreign national must obtain a work permit and then a work visa.

- A work permit is obtained through the submission of the documents to the local authorities (Akimats) and is issued in accordance with the annual quota for the foreign labour force. The work permit is issued for up to three years (renewable for a year). A ‘permit for employment’ is another form of work permit which is issued in accordance with a quota and covers a foreign national arriving independently in Kazakhstan to work as an employee in a specialist area.
- A work visa application should be submitted to the Department of Consular Service of the Ministry of Foreign Affairs and should include a valid work permit and other stipulated documents. A state duty is charged to employers with foreign employees for the grant or extension of a work permit.

- The tax authority in Kazakhstan is the State Revenue Committee of the Ministry of Finance (SRC). Kazakhstan resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Kazakh-source income only.

- An individual is deemed resident in Kazakhstan if the centre of their vital interests is in Kazakhstan or by virtue of remaining in Kazakhstan for 183 or more days (including arrival and departure dates) in any 12-month rolling period, ending in the reporting tax year. An individual has the centre of their vital interests in Kazakhstan if they hold a Kazakhstan citizenship or permanent residence permit, or their family or close relatives are living in Kazakhstan, or the individual (or their family) own real estate in Kazakhstan, which is available to stay in at any time for the individual or family members.

- A foreign national (new employee) is required to register with the local tax authorities and must obtain an Individual Identification Number for tax purposes.

- The tax year in Kazakhstan runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.

- Employment income includes salaries and all other amounts received in cash or in kind, subject to some minor exceptions, and is taxed at a flat tax rate of 10%. An employer must withhold the appropriate amount of tax from each employees’ gross income and pay this to the tax authorities by the 25th day of the month following the month in which the income was paid. An employer must report the income and tax deducted on a quarterly basis by the 15th day of the second month following the reporting quarter.

- Social security contributions comprise of:
  - Employers (only) must pay social tax at a rate of 11% of gross employee income (the minimum tax base for social tax per employee is the minimum monthly salary).
  - An employer must pay social insurance for each employee at a rate of 5% of the employee's gross salary (income capped at KZT 244,590 per month). Social insurance contributions paid can reduce the amount of social tax due.
  - An employer must pay social medical insurance contributions to the Social Medical Insurance Fund at a rate of 2% of the employee's gross salary (taxable income capped at KZT 366,885 per month).
  - Pension fund contributions: An employee pays 10% of their gross salary (capped at 75 minimum monthly salaries) as obligatory contributions to the United National Pension in Kazakhstan.

- When employment ends, and the internationally mobile employee permanently leaves Kazakhstan, they are required to submit a de-registration application to the tax authorities and return the original copy of their Individual Identification Number.
KEY POINTS

- To legally work in Kenya, a foreign national must obtain an entry visa (although some exemptions apply), a work visa and residence permit:
  - Entry visa (temporary visa): Whether a foreign national requires an entry visa to stay in Kenya depends on which country the foreign national is a citizen, for example, East African citizens do not require any entry visa. If required, an ordinary visa is issued for up to three months for single or multiple entries (extendable up to three months). If foreign nationals wish to stay in Kenya for longer than six months they must have an entry permit.
  - A work permit is required by a foreign national wishing to work in Kenya. It must be obtained by an employer on behalf of the foreign national (prospective employee). Normally, a Class D (work) permit is issued to a foreign national who is offered specific employment by a specific employer.

- The tax year in Kenya runs from 1 January to 31 December (a calendar year). The tax authority in Kenya is the Kenya Revenue Authority (KRA). Kenya resident individuals are subject to tax on their worldwide employment income. Non-resident individuals are subject to tax on Kenyan-source income only. All income accruing in, or derived from, Kenya, is subject to tax in Kenya.

- An individual is deemed resident in Kenya if they are present in Kenya for at least 183 days in a tax year or they average 122 days in Kenya in the tax year and the previous two tax years. An individual is also deemed resident in Kenya if they have a permanent home in Kenya (and they are present in Kenya at any time during the year).

- New employees must be registered with the KRA, the National Social Security Fund (NSSF) and the National Hospital Insurance Fund (NHIF) to obtain their Personal Identification Number (PIN), NSSF number and NHIF number respectively.

- An employee whose only income consists of employment income from which tax has been withheld at source is still required to complete and file a self-assessment tax return by 30 June following the end of the preceding (calendar) tax year. The tax deducted under the Pay-As-You-Earn (PAYE) system should mean that an employee has no further tax to pay, however, any balance of tax due should be paid by 30 April following the end of the preceding (calendar) tax year.

- Monthly employment income includes salaries, bonuses, commissions, director's fees, leave pay, sick pay, payment in lieu of leave, overtime, gratuity, any amount received in cash, and, non-cash benefits when the aggregate value exceeds KES 3,000 per month.

- Employment income is taxed at graduated income tax rates up to 30% on amounts exceeding KES 513,372 per annum. An individual’s employment income is reduced by pension contributions to a registered pension scheme of up to KES 20,000 per month (maximum) before being subjected to PAYE. A resident individual is entitled to a personal tax relief of KES 15,360. An employer must deduct tax at source from an employee’s gross monthly salary under the PAYE system and remit this to KRA by 9th day of the subsequent month.

- Social security contributions include National Social Security Fund (NSSF) and National Hospital Insurance Fund (NHIF) contributions. For NSSF, an employee contributes KES 200 per month with a similar amount contributed by the employer. NSSF contributions should be remitted by the 15th day of the following month. For NHIF, an employee contributes to the NHIF at graduated amounts up to a maximum of KES 1,700 on gross salary exceeding KES 100,000 and a minimum of KES 150. An employer does not contribute to the NHIF. An employer must deduct and remit NHIF contributions by the 9th day of the subsequent month.
KEY POINTS

- To legally work in south Korea, a foreign national must obtain certain documents:
  - A foreign national must have a valid passport and obtain the appropriate (temporary) entry visa before arrival unless it is waived under a visa waiver agreement with the Korean government. Broadly, an entry visa (temporary) is issued to a foreign national with a stay of 90 days. If a foreign national intends to stay in Korea for 90 days or more, they must obtain a valid visa as well as an Alien Registration Card from the District Immigration Office.
  - Work permit: a foreign national can only legally work in Korea when they have an appropriate work permit (i.e. work visa). A work permit can be issued to a foreign national with a residency period from six months to five years depending on the circumstances and the position of the visa applicant.

- The tax year in Korea runs from 1 January to 31 December. The tax authority is the National Tax Service (NTS) under the Ministry of Strategy and Finance. Korean resident individuals are subject to income taxes on their worldwide income while non-resident individuals are subject to income taxes on their Korean-source income only. In case that a foreign national has resided in Korea for five years or less out of the past 10 years, he or she is taxed on foreign-source income only when such income is paid in or remitted to Korea. Further, an individual is deemed a resident in Korea if they have a domicile or place of residence in Korea for 183 days or more.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, as well as employment income, must complete and file an annual tax return by 31st May of the following year (and pay any tax due by this date).

- Employment income includes salaries, wages, bonuses, allowances, and any other compensation received in relation to services rendered by an employee to an employer. Employment income is taxed at progressive tax rates up to 44% including local income tax, which is applicable to the tax base (i.e. taxable employment income less allowable tax deductions) exceeding KRW 500 million. A foreign national can opt for the flat tax regime, being taxed at a flat tax rate of 20.9% on Korea-sourced earned income without claiming any tax deductions for five years from the year of his or her first employment in Korea, provided that they commence employment in Korea by 31 December 2018. An employer must withhold income taxes from monthly gross salaries paid to employees and remit these to the tax authorities by the 10th day of the following month in which the compensation was paid. Further, an employee is required to settle their annual tax liabilities and file their “Receipts for Wage & Salary Income Tax Withholding” by the 10th March of the following year.

- There are four types of social security contributions in Korea, namely, the National Pension (NP), Worker’s Accident Compensation Insurance (WCI), National Health Insurance (NHI), and Employment Insurance (EI). In respect of the NP, an employee is required to contribute 4.5% of his or her gross salary and the employer must make a matching contribution of 4.5% of the employee’s gross salary (a monthly cap applies to their contributions). An employer must also make contributions for WCI, the contribution rates of which range from 0.7% to 34% depending on the employee’s gross salary (employees do not make any WCI contributions). An employee and employer each make contributions for NHI of 3.26% of the employee’s gross salary (a monthly cap applies). Employees must enrol in EI unless exempted under the relevant laws and regulations. In relation to EI, an employee is required to contribute 0.65% of their gross salary, whilst the employer must contribute between 0.9% and 1.5% of the employee's gross salary.
KEY POINTS

- To legally work in Kuwait, a foreign national must obtain a work visa (entry visa) and a work permit:
  - An entry visa allows the holder to stay up to one month in Kuwait (extendable for a further two months) and should be obtained by the foreign national before arrival in Kuwait (please note, a national of a GCC member country is not required to have an entry visa). Foreign nationals entering Kuwait for employment purposes must have a work visa arranged by their prospective Kuwait employer and they must enter Kuwait under this visa as it is no longer possible to convert any other visa to a work permit for work purposes. After the employee has entered Kuwait on a work visa, the employer should convert the work visa into a work permit.
  - A work permit must be held by a foreign national to legally work in Kuwait and it is activated when the foreign national (employee) arrives to take up residence in Kuwait. The work permit is obtained by the employer from the Ministry of Social Affairs and Labour. It normally takes one month to obtain a work permit, subject to all the documentation being in order and they are valid for one to three years from the date of issue (renewable).
  - A residence permit must be obtained from the Department of Immigration by a foreign national with a work permit. A residence permit is valid for one to three years (renewable).

- Once a residency permit is obtained, a foreign national (employee) must obtain an identity card (Civil ID) from the Public Authority for Civil Information and must have government medical insurance, normally costing approximately KWD 50 per year.

- Please note that regulations from the Ministry of Social Affairs require salaries to be paid to employees through local bank accounts in Kuwait. Non-compliance with these regulations carries penalties and may affect the ability of an employer to obtain future work visas or permits for foreign nationals (expatriate employees).

- The tax authority in Kuwait is the Department of Income Taxes (DIT) within the Ministry of Finance.

- Kuwait resident and non-resident individuals are not subject to tax on their income. No income taxes are imposed on individuals in Kuwait. The concept of tax resident or non-tax resident is not defined under Kuwait tax law.

- The tax year in Kuwait is not stipulated but in general it runs from 1 January to 31 December (a calendar year).

- There are no compliance obligations for an employee in Kuwait and they are not required to file a tax return.

- Employment income is not taxed in Kuwait. There is no payroll tax for the employer.

- Social Security Contributions: Under the Social Security Law, a Kuwaiti employee pays 10.5% of their gross salary and the employer pays 11.5% of the employee's gross salary (a ceiling applies).

- For foreign workers (expatriates), terminal indemnity payments are provided (after five years of service) for when they leave employment. They are calculated at 15 days’ salary-per-year for the first five years of employment and one month’s salary-per-year for subsequent years.
KEY POINTS

- The immigration documentation requirements to legally work in Latvia depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens do not require a residence permit to stay and work in Latvia. However, if they intend to stay and work in Latvia longer than 90 days (during a six-month period) they must register and obtain a residence card or permanent residence card (some exceptions apply).
  - Non-EU / non-EEA / non-Swiss citizens must obtain the appropriate entry / Schengen visa (if applicable) and a residency permit (work permit) if they wish to stay and work in Latvia. A long-term visa (residency permit) must be obtained if they wish to stay and work longer than 90 days (during a six-month period) and it is normally valid for up to five years.

- The tax year in Latvia runs from 1 January to 31 December (a calendar year). The tax authority in Latvia is the Valsts Ienemumu Dienests (State Revenue Service, or SRS).

- Latvia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Latvia-source income only. An individual is deemed resident in Latvia if they stay in Latvia for 183 days or more in a 12-month period beginning or ending in a tax year, or their registered (declared) place of residence is in Latvia, or they are a citizen of Latvia employed overseas by the Latvia government.

- An employer must register each foreign national working in Latvia with the SRS to obtain their tax code number. An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee receiving income from other sources, or where tax has not been withheld at source, must complete and file an annual tax return by 1 June following the tax year. Any tax liability due must be paid within 15 days after the tax return is submitted (although a three-payment instalment option may be available). A daily interest penalty of 0.05% is levied on unpaid tax.

- Employment income includes salaries, wages, bonuses, commissions, fringe benefits, benefits-in-kind and any other type of remuneration or benefit, directly or indirectly, received by an employee from their employer for services rendered.

- Employment income is taxed at a flat rate of 23% (2017). An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities. From 1 January 2018 the flat rate of 23% is replaced by progressive annual tax rates, as follows: 20% on income up to EUR 20,000, 23% on income over EUR 20,000, and a 31.4% effective rate (consisting of 23% income tax and 10.5% solidarity tax) on income over EUR 55,000. The principle of solidarity tax – after income has exceeded a maximum amount of the State social insurance contributions (EUR 55,000), employer payments continue at a rate of 35.09%, of which 10.5% will be transferred to the state budget as personal income tax.

- Social security contributions are paid by both the employer and employee at a standard rate is 34.09%. (2017). The employee pays 10.50% of their gross salary and the employer pays 23.59% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities. From 1 January 2018 the total rate of social security contributions is 35.09% (24.09% employer contribution; 11% employee contribution).

- A foreign national may be exempt from paying Latvian social security contributions if they remain within their home countries’ social security system under either a totalization agreement with Latvia or the European Union (EU) / European Economic Area (EEA) rules.
KEY POINTS

- To legally work in Lebanon, a foreign national must obtain an entry visa (if required), a work permit and residence visa:
  - A work permit is obtained from the Ministry of Labour and must be applied for by the prospective employer on behalf of the employee. Certain documents must accompany the application including a certified copy of the employment contract, a quittance (discharge or clearance certificate) from the Social Security National Fund, a medical report, and passport or the identity card of the foreign national. A work permit (employment visa) is issued for a specific position/job.
  - Residence permit: A foreign national wishing to work in Lebanon must also apply for, and obtain, a temporary residence visa. A temporary residence visa is obtained from the Immigration Division of the Ministry of Labour and must be applied for by the employer on behalf of the employee. Certain documents must accompany the application which are similar to the work permit documentation requirements but also include a criminal record check, and certified copies of relevant qualifications and certificates evidencing the professional skills and experience of the foreign national.

- The tax authority in Lebanon is the Ministry of Finance (MoF). Lebanon resident and non-resident individuals are subject to tax on Lebanon-source income only (although certain professions in Lebanon, such as agricultural workers, are exempt from tax). An individual is deemed resident in Lebanon if they stay in Lebanon for 183 days or more within 12 consecutive months, or they have a fixed place for doing business in Lebanon, or maintain a permanent home (usual residence) in Lebanon for themselves or for their family, or register as a licensed professional.

- The tax year in Lebanon runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who also receives income from other sources must file an annual tax return by 1 April of the following year (and pay any tax due by this date).

- Employment income includes salaries, wages, allowances, commissions, indemnities, bonuses, gratuities, benefits in kind and any other type of remuneration, in cash or in kind, received by an employee for services rendered. Employment income is taxed at progressive income tax rates up to 20% on amounts exceeding USD 80,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities quarterly, by the 15th day of the month following the end of the respective quarter. The employer must file an annual declaration by 28th February of the following year.

- Social security contributions are paid by both the employer and employee and cover sickness and maternity, end-of-service indemnity, and family allowances. Total contributions amount to 25.5%; the employee pays 3% of their gross salary (medical scheme contribution) and the employer pays 22.5% of the employee’s gross salary. The employer’s contribution represents 8% (maternity and sickness benefit), 6% (family benefit), and 8.5% (end-of-service indemnity). An employee gross salary cap applies to all contributions except the employer’s contribution to the end-of-service indemnity which is based on total annual earnings and has no cap (ceiling limit).

- An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the tax authorities on a quarterly basis. A foreign national may be exempt from paying Lebanese social security contributions if they remain within their home countries’ social security system under a totalization agreement with Lebanon.
KEY POINTS

- To legally work in Lesotho, a foreign national must obtain an entry visa (unless Southern African) and a work permit:
  - Entry visas: A single or multiple entry visa must be obtained (if required) before arriving in Lesotho. Visas can be obtained online at www.evisalesotho.com
  - Work permits: A work permit is required by a foreign national wishing to legally work in Lesotho. Working in Lesotho without a work permit carries a penalty (fine) or six months imprisonment or both (for the employee and the employer). To obtain a work permit, the completed application form (and supporting documentation) should be submitted to the Commissioner of Labour in the Ministry of Employment and Labour. If a work permit is granted, the applicant must go in person to the Central Police Station in Maseru where the formal work permit will be issued.

- The tax authority in Lesotho is the Lesotho Revenue Authority (LRA). Lesotho resident individuals are subject to tax on their worldwide income and gains (subject to certain exemptions). Non-resident individuals are subject to tax on Lesotho-source income only (and gains arising on assets situated in Lesotho). A foreign national (new employee) should register with the LRA and obtain a Tax Identification Number (TIN).

- An individual is deemed resident in Lesotho if they are present in Lesotho for any part of the year of assessment (and have a normal place of abode in Lesotho), or they are present in Lesotho for more than 182 days in any consecutive 12 month period.

- The tax year in Lesotho runs from 1 April to 31 March.

- A taxpayer (employee) is not required to file a tax return when their annum employment income is equal or less than LSL 50,000; or when their income consists solely of pension income. Otherwise, an employee must complete and file a tax return within three months after the end of the tax year i.e. by 30 June.

- Fringe Benefit Tax (FBT) is paid by an employer who provides fringe benefits to employees. The total of all taxable values provided to an employee in the year of assessment is divided by 0.7 to gross it up to the taxable amount. The employer pays 30% of the taxable amount. Employers are required to make quarterly returns (and pay the respective FBT) within 14 days of each quarter end.

- Employment income includes salaries, wages, bonuses, commissions, director’s fees, allowances, benefits in kind (but not fringe benefits which FBT applies) and any other amount received, in cash or in kind, by an employee.

- Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding LSL 56,964 per annum. An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities.

- Social Security Contributions: Lesotho does not impose any social security taxes on an employee or employer. However, an employer is liable to pay a severance entitlement to an employee at the end of their contract. Severance pay is the equivalent of two week’s pay for every twelve months of continuous service by the employee.

- When employment ends, and the internationally mobile employee permanently leaves Lesotho, the tax authorities should be informed in writing and confirmation sought that all tax affairs are in order.
PKF CONTACT INFORMATION

For information concerning internationally mobile employee services in Lithuania, please contact Stefaan De Ceulaer (PKFI Director Tax and Legal Support) on +32 468 22 3924 or email stefaan.deceulaer@pkf.com. Alternatively, please contact Oliver Grosse-Brauckmann (International Support Director) on +44 20 3691 2523 or email oliver.grosse-brauckmann@pkf.com.

KEY POINTS

- The documentation requirements (entry visa, work permit, temporary residency visa) to legally work in Lithuania depend on which country the foreign national is a citizen:
  - Entry visa: An EU citizen does not require an entry visa to stay in Lithuania for up to 90 days. Citizens from other countries may require an entry visa (stamped into their travel document).
  - EU citizens: An EU citizen does not require a work permit to stay and work in Lithuania. However, an EU citizen intending to stay and work longer than 90 days in Lithuania (during a six-month period) must obtain a temporary residence permit from the migration authorities. A temporary residence permit is valid up to five years.
  - Non-EU citizens: A non-EU citizen requires a work permit to legally work in Lithuania (although there are some exemptions). Work permits are issued by the State Labour Exchange and are normally valid for two years (renewable). A non-EU citizen must also obtain a temporary residence permit on the grounds they are to legally work in Lithuania. The temporary residence permit issued to a non-EU citizen is valid for one year (renewable).

- The tax authority in Lithuania is the Valstybine mokesciu inspekcija (the State Tax Inspectorate, or STI). Lithuania resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Lithuania-source income and income derived from activities through a fixed base in Lithuania, including foreign-source income attributable to that fixed base.

- An individual is deemed resident in Lithuania if:
  - Present in Lithuania for at least 183 days during the tax period;
  - Present in Lithuania for at least 280 days during two consecutive tax periods and has stayed in Lithuania for at least 90 days in either of the tax periods;
  - They do not meet the ‘days present in Lithuania’ (previous two criteria) but receive employment-related remuneration or their costs of living in another country are covered by the state budget or municipal budgets of Lithuania (e.g. consuls, diplomats, etc.);
  - They have a permanent place of residence in Lithuania during the tax period; or,
  - They have personal, social or economic interests in Lithuania, rather than abroad, during the tax period.

- The tax year in Lithuania runs from 1 January to 31 December (a calendar year).

- An employee is not required to file an individual tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, as well as employment income, must complete and file an individual tax return by 1 May following the end of the taxable year.

- Employment income includes salaries, wages, bonuses, allowances, awards, benefits in kind and any other amount received, in cash or in kind, by an employee. Employment income is taxed at a flat rate of 15% per annum. There is no payroll tax for an employer. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: The employee pays 9% of their gross salary and the employer pays 30.98% of the employee's gross salary. An employee may also pay optional additional contributions to a pension accumulation plan at a rate of 2% of their gross salary. Employer’s pay 0.2% of the employee's gross salary to a Guarantee fund. Please note, if a foreign national remains in their home countries’ social security system then under the European Union regulations, or a totalization agreement with Lithuania, it is unlikely that they would be liable for Lithuanian social security.
PKF CONTACT INFORMATION

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KEY POINTS

- The documentation requirements (entry visa, work permit) to legally work in Luxembourg depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens can stay and work in Luxembourg for up to three months without requiring an entry visa or work permit (residence authorisation) as long as they have a valid identity card or passport. If an EU / EEA / Swiss citizen wishes to stay and work longer than three months they must register with the communal administration to obtain a registration certificate.
  - Non-EU / non-EEA / non-Swiss citizens with an employment contract, and valid passport, must obtain a residence authorisation (visa / work permit) to work in Luxembourg before entry into the country. The residence authorisation is valid for one year for a single profession and a single business activity (renewable for two years).

- The tax authority in Luxembourg is the Administration des Contributions Directes (Luxembourg Tax Authority, or LTA). Luxembourg resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Luxembourg-source income only. An individual is deemed resident in Luxembourg if they are domiciled in Luxembourg or their customary place of abode is in Luxembourg i.e. the individual has been present in Luxembourg for more than six months.

- The tax year in Luxembourg runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and they earn less than EUR 100,000 a year. An employee who receives income from other sources, or who earns more than EUR 100,000 a year, must complete and file an annual tax return by 31 March of the following year. Late filing or failure to file a tax return carries a penalty of 10% of the tax due and a fine of up to EUR 25,000. An automatic default interest penalty applies where tax is paid late of 0.6% per month.

- Employment income includes salaries, wages, bonuses, benefits in kind and any other type of remuneration or benefit received directly or indirectly by an employee for services rendered. Employment income is taxed at progressive income tax rates up to 42% on amounts exceeding EUR 204,000 per annum. In addition, there is a 7% contribution to the employment fund (9% for income exceeding EUR 150,000) and a 1.4% dependency contribution. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: Total social security contributions are levied up to ceilings (adjusted periodically) and range from 24.62% to 27.53%. An employee pays between 12.20% and 12.45% of their gross salary and the employer pays between 12.42% and 15.08% of the employee's gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with their contributions, to the tax authorities.

- When employment ends, and the internationally mobile employee permanently leaves Luxembourg, they must report their departure at the office of the municipality in which they were resident. In addition, the employer must inform the social security authorities (re: cancellation of their contribution payments) and the tax authorities of any change in address (and the employee may have to appoint a representative in Luxembourg to deal with any tax matter in their absence).
KEY POINTS

- To legally work in Malaysia, a foreign national must obtain an entry visa and an Employment Pass (work permit):
  - Entry visa: Certain nationalities require a visa to enter Malaysia (a stamp or endorsement sticker in their travel document or passport) which is obtained from Malaysian foreign missions abroad (subject to conditions). A foreign national wishing to work in Malaysia normally obtains a Multiple Entry Visa (MEV), valid for 12 months (renewable).
  - A work permit (Employment Pass, or EP) is required by a foreign national who is to work for a Malaysian company or firm, irrespective of the duration. A EP is issued by the Malaysian Immigration Department, with the MEV, for a period of one to five years (renewable). It is illegal to work in Malaysia without a valid work permit (EP) which must be endorsed in a foreign national’s passport.
  - Highly qualified foreign nationals wishing to stay and work in Malaysia on a long-term basis may be eligible to obtain a Residence Pass-Talent (RP-T) visa which is valid for 10 years.

- The tax year in Malaysia runs from 1 January to 31 December (a calendar year). The tax authority in Malaysia is the Lembaga Hasil Dalam Negeri (Inland Revenue Board, or IRB). Malaysia resident and non-resident individuals are subject to tax on Malaysian-source income only. An individual is deemed resident in Malaysia if they stay in Malaysia for 182 days or more in a calendar year or are physically present in Malaysia for a day in a calendar year (if it can be linked to a period of residence of at least 182 consecutive days in an adjoining year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and the monthly tax deduction is treated as the final tax paid. An employee who receives income from other sources, or tax has not been deducted at source, must complete and file an annual tax return by 30 April in the following calendar year. Any tax liability must also be settled by this date.

- Employment income includes salaries, wages, bonuses, gratuities, commissions, allowances, benefits in kind and any other type of remuneration or benefit received by an employee for services rendered. Employment income is taxed at progressive income tax rates up to 28% on amounts exceeding MYR 1 million per annum. An employer must withhold tax at source from an employee’s gross monthly salary under the Monthly Tax Deduction Scheme (MTDS) and remit this to the tax authorities by the 15th day of the following calendar month.

- Social security contributions are paid to the Social Security Organization (SOCSO) which provides employee benefits in cases of injury, occupational diseases, invalidity, etc. and the Employees Provident Fund (EPF), which provides retirement benefits to Malaysian employees. The employee pays 11.51% of their gross salary and the employer pays 13.77% of the employee’s gross salary. A foreign national (expatriate employee) does not pay SOCSO contributions and has a reduced rate of EPF contribution.

- When employment ends, and the internationally mobile employee is to permanently leave Malaysia, the employer is required to complete and file Form CP21 with the IRB reporting the employment income from 1 January to the date of cessation of employment. Any money withheld from the employee from the time of submission of Form CP21 should be released when the tax authorities issue the employee’s tax clearance. The employee’s Employment Pass and any dependant passes must be cancelled (30 days before the expected departure date) and the EPF notified (if relevant).
The documentation requirements (entry visa, work permit (employment license), residence document / visa) to legally work in Malta depend on which country the foreign national is a citizen:

- EU / EEA / Swiss citizens can stay and work in Malta for three months and do not require an entry visa or employment license (work permit) as long as they hold a valid identification document. If they wish to stay and work (be employed) for longer than three months they are required to obtain a residence document from the Principal Immigration Officer.

- Non-EU / non-EEA / non-Swiss citizens must apply for a Single Permit (including Residence and Work) at the Department for Citizenship and Expatriate Affairs to be legally able to reside and work in Malta. Single Permit applications are subject to assessment by the Police Immigration Office as well as Jobsplus which provides guidance on labour market testing. Endorsement by the employer concerned is necessary and the employment licence will cease to have effect once the applicant is no longer in employment. The licence's validity period depends on the nature of the employment and the contract signed between the employer and the prospective employee. A residence document is valid for up to five years and is automatically renewable.

The tax year in Malta runs from 1 January to 31 December (a calendar year). The tax authority in Malta is the Commissioner for the Inland Revenue (CIR). Malta ordinarily resident and domiciled individuals are subject to tax on their worldwide income. Non-ordinarily resident or not domiciled individuals are subject to tax on Malta-source income only (and on foreign income remitted to, or received in, Malta). Broadly, an individual is deemed resident if they spend more than 183 days in Malta in a calendar year and ordinarily resident if they have their habitual residence in Malta.

An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source under the final settlement system. An employee will receive a Tax Statement following the end of the year which shows their gross employment income and the tax deducted. If they disagree with the Tax Statement they should complete the form attached to it and send this to the Commissioner of Inland Revenue.

An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must complete and file an annual tax return by 30 June following the end of the tax year (basis year). Any tax liability due must also be paid by this date.

Employment income includes salaries, wages, bonuses, commissions, director's fees, benefits in kind and any other gains or profits from any employment or office. Employment income is taxed at progressive income tax rates up to 35% on amounts exceeding EUR 60,000 per annum. The first EUR 9,100 of employment income is tax free (single computation rate). An employer must withhold tax at source from an employee’s gross monthly salary under the Final Settlement System (FSS) and remit this to the tax authorities. There is no payroll tax for the employer.

Social security contributions are payable in respect of all employees aged between 16 and 65 and regulated by the Social Security Act. The employee pays 10% of their gross salary and the employer pays 10% of the employee's gross salary (a cap of 10% applies and maximum amount payable is EUR 43.85 per week). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the government.

Employment income derived from activities carried on outside Malta: Income from employment exercised outside Malta can be taxed at a favourable rate of 15% under a scheme provided by Article 56 (17) of the Income Tax Act (specific conditions and exemptions apply).
PKF CONTACT INFORMATION

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<thead>
<tr>
<th>City</th>
<th>Name</th>
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KEY POINTS

- To legally work in Mauritius, a foreign national must obtain an entry visa (exemptions apply), and an occupation permit:
  - Entry visa: Citizens of certain countries do not require a temporary visa (entry visa) to stay in Mauritius. If an entry visa is required this should be obtained from an overseas Mauritius consulate or embassy before entering the country. If the foreign national is to work in Mauritius then they must also obtain a work permit and residence permit.
  - Occupation permit: The Occupation Permit (OP) is a combined work and residence permit that allows a foreign national to reside and work in Mauritius. A non-citizen can apply for an OP under any of the following categories: 1) Investor, 2) Professional, and 3) Self Employed. The non-citizen should apply for the OP under a category which best reflects the nature of his activities in the country. An Occupation Permit is granted for a maximum period of three years, renewable thereafter subject to established criteria.

- The tax authority in Mauritius is the Mauritius Revenue Authority (MRA). Broadly, Mauritius resident individuals are subject to tax on their worldwide income (income derived from outside Mauritius is taxed on a remittance basis). Non-resident individuals are subject to tax on Mauritius-source income only.

- An individual is deemed resident in Mauritius if they are present in Mauritius for an aggregate period of 180 days or more during a tax year, or have been present in Mauritius during that income year and the two preceding income years for an aggregate period of 225 days or more, or have their domicile in Mauritius (unless their permanent place of abode is outside Mauritius).

- The tax year in Mauritius runs from 1 July to 30 June.

- An employee whose emoluments have been subject to tax under the Pay-As-You-Earn (PAYE) system is still required to file an annual tax return by 30 September following the end of the tax year (in respect of the year ending 30 June just past) i.e. for the year ended 30 June 2018, the annual tax return should be filed by 30 September 2018.

- Employment income includes salaries, wages, bonuses, commissions, allowances, benefits in kind and any other amount, directly or indirectly, received by an employee for services rendered. Any expenditure which is wholly, exclusively and necessarily incurred by an employee in the performance of his or her employment duties are deductible from gross employment income. Employment income is taxed at a single flat income tax rate of 15%. An employer must withhold tax at source from an employee’s gross monthly salary under the PAYE system and remit this to the tax authorities. There is no payroll tax for the employer.

- Social Security Contributions: The employee pays 4% of their gross salary and the employer pays 10% of the employee's gross salary. The employee’s contribution comprises 3% for the National Pension Fund and 1% for the National Solidarity Fund (capped). The employer’s contribution comprises 6% for the National Pension Fund, 2.5% for the National Solidarity Fund, and 1.5% for the HRDC Levy (the monthly salary is capped for NPF and NSF contributions). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.

- When employment ends, and the internationally mobile employee permanently leaves Mauritius, they should provide their employer with their occupation permit to be deregistered with the authorities. If applicable, the employee should file a final tax return with the MRA and pay any tax due before leaving Mauritius.
KEY POINTS

- To legally work in Mexico, a foreign national must obtain the proper visa and immigration document (if applicable), a resident visa and a work permit. An individual entering Mexico will be classified under one of three immigration categories (either a visitor (authorised to perform remunerated activities in Mexico or not authorised), a temporary resident, or a permanent resident):
  - A work permit must be obtained where the individual is to work in Mexico. Please note, an employer which is to employ foreign nationals must request a mandatory employer registration file from the National Immigration Institute (Instituto Nacional de Migración, or INM) in Mexico.
  - Resident Visas: If a visitor category visa is issued which authorises the holder to perform remunerated activities in Mexico, they can stay and receive remuneration in Mexico for up to 180 days. A temporary resident category visa allows the holder to stay and receive remuneration in Mexico for up to four years (renewable) and a permanent resident category visa provides this for an indefinite period. To be able to work in Mexico, the resident visa must bear a “work permit” legend.

- The tax authority in Mexico is the Servicio de Administracion Tributaria (Tax Administration Service, or SAT). Mexico resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Mexican-source income only. An individual is deemed resident in Mexico if their permanent home is in Mexico. If the individual has a home in Mexico and another country, they will be deemed resident in the country which has the centre of their vital interests i.e. broadly, where over 50% of their income arises or the principal place of their professional activities.

- A foreign national (new employee) should obtain a tax ID number (RFC) from the Mexican authorities and a CURP (Uniform Population Control Number) from the Immigration Authorities. In addition, an employer is required to register each foreign national working in Mexico with the Mexican Social Security Institute (IMSS) to enable the employee to obtain a social security medical service card.

- The tax year in Mexico runs from 1 January to 31 December (a calendar year).

- An employee is not required to file an annual tax return if their only income consists of employment income from which tax has been withheld at source (and their income and interest in a year does not exceed MXN 400,000). An employee who receives income from other sources, or receives income and interest exceeding MXN 400,000 in the year, must complete and file an annual tax return by 30 April of the following year.

- Employment income is widely defined and generally includes salaries, wages, bonuses, commissions, allowances, benefits in kind and any other amount received by an employee in cash or in kind. Employment income is taxed at progressive income tax rates up to 35% on amounts exceeding MXN 250,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities. Payroll tax is additionally paid by the employer in certain states, at a rate from 1% to 3% of the payroll each month.

- Social Security Contributions are made by the employee and employer which cover contributions to the Social Security Fund (IMSS), Retirement Fund (SAR) and Housing Fund (INFONAVIT). Broadly, the employee effectively pays 2.727% of their gross salary and the employer pays between 16.934% and 31.434% of the employee’s gross salary (a salary cap applies); the employer’s contribution depends on their (industrial) risk classification.
For information about internationally mobile employee services in Montenegro, please contact Stefaan De Ceulaer (PKFI Director Tax and Legal Support) on +32 468 22 3924 or email stefaan.deceulaer@pkf.com.

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KEY POINTS

- To legally work in Montenegro, a foreign national must obtain an entry visa (if required), a work permit and a residence permit:
  - Entry visas: Citizens from many countries will require a valid passport and transit visa to stay in Montenegro for up to five days. An individual wishing to stay in Montenegro for up to 90 days (in a six-month period) must obtain a short-stay visa.
  - A work permit for an employed foreign national is issued as an employment permit and is issued for one year (renewable).
  - Residence permit: A foreign national wishing to work in Montenegro must, as well as an employment permit, have either a temporary residence permit or a permanent residence permit. A temporary residence permit is issued by the Ministry of Internal Affairs to individuals who wish to stay longer than 90 days in Montenegro (subject to certain conditions including holding a valid employment permit (work permit) and having adequate health insurance). A temporary residence permit is valid for one year (renewable). Where a foreign national has spent five years continuously in Montenegro under a temporary residence permit he/she may then be granted a permanent residence permit.

- The tax authority in Montenegro is the Tax Administration of Montenegro (TAM). Montenegro resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Montenegro-source income only.

- An individual is deemed resident in Montenegro if they are in Montenegro for 183 days or more in a calendar year or if their domicile, residence or centre of vital interests is in Montenegro.

- The tax year in Montenegro runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and they only have one employer.

- An employee who receives income from other sources, or has more than one employer, must complete and file an annual tax return by 30 April following the tax year-end (and pay any tax due by this date). A penalty for the late payment of tax is levied of 0.03% per day.

- Employment income includes all types of remuneration and taxable benefits received by an employee. Employment income up to EUR 750 per month is taxed at a rate of 9% and employment income exceeding EUR 750 per month is taxed at a rate of 11%. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- In addition, a surtax of up to 15% of an employee’s salary may be levied on an employer by the municipal authorities and additional labour fund contributions at a rate of 0.2% on the gross salary.

- Social Security Contributions: The employee pays 24% of their gross salary and the employer pays 10.3% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.

- A foreign national (expatriate) may be exempt from paying Montenegro social security contributions under a totalization agreement between their home country and Montenegro if they remain within their home countries’ social security system.
KEY POINTS

- To legally work in Morocco, a foreign national must obtain an entry visa (if required), a work permit and a residence permit:
  - A foreign national wishing to work in Morocco must have a valid work permit which requires approval from ANAPEC (a government agency) and the Ministry of Work. The work permit is normally valid for one year (renewable).
  - A residence permit is required by a foreign national wishing to reside (and work) in Morocco. The permit is issued for one year (renewable an indefinite number of times for one or two years). A residence permit may only be obtained once the foreign national has a work permit.
- The tax authority in Morocco is known as the ‘Direction Générale des Impôts’ (DGI).
- Morocco resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Moroccan-source income only.
- An individual is deemed resident in Morocco if they have habitual residence in Morocco. Habitual residence exists if they have a place of permanent abode in Morocco, their professional activities or centre of economic interests are in Morocco or they are in Morocco for 183 days or more within any 365-day period.
- An employer is required to register each foreign national working in Morocco with the Moroccan Social Security Fund (Caisse National de Sécurité Sociale, or CNSS).
- The tax year in Morocco runs from 1 January to 31 December (a calendar year).
- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.
- An employee who also receives income from other sources must complete and file an annual tax return before either 1 March, 1 April or 1 May depending on the type of income being received.
- Employment income includes salaries, wages, bonuses, allowances, pension annuities, the market value of fringe benefits and all other amounts received by an employee in cash or in kind.
- Employment income is taxed at progressive income tax rates up to 38% on amounts exceeding MAD 180,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the Treasury by the 10th day of the following month. An employer must also pay a payroll tax (Professional Training Tax) at a rate of 1.6% of the gross monthly remuneration of their employees.
- Social Security Contributions: The employee pays 6.74% of their gross salary and the employer pays 21.09% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the CNSS.
- A foreign national (expatriate) may be exempt from paying Moroccan social security contributions under a social security agreement between their home country and Morocco if they remain within their home countries’ social security system.
- When employment ends, and the internationally mobile employee permanently leaves Morocco, they are required to obtain tax clearance “Quitos fiscal” from the tax authority. The employer should also notify the tax authority and CNSS.
KEY POINTS

- To legally work in Namibia, a foreign national must obtain an entry visa (if required), a work permit and temporary residence permit:
  - A work visa is issued to a foreign national wishing to work in Namibia for up to six months (and can be renewed for a further three months). A work visa must be obtained before entry into Namibia from an overseas Namibian consulate or embassy in the foreign national's home country. In addition, the holder of the work visa must also enter Namibia with a residence permit.
  - A work permit (multiple-entry visa) must be obtained by a foreign national wishing to work longer than six months. Work permits are issued by the Ministry of Home Affairs and are normally valid for either 12 or 24 months (renewable, but please note that a renewal application must be accompanied by a good-standing certificate (tax clearance certificate) from the tax authority. Work permits are not transferable and issued specifically for the employment detailed in the application.
  - Residence permit: A foreign national wishing to stay (whilst they work) in Namibia must have a residence permit. A temporary residence permit (renewable) is issued at the same time as a work permit and enables the worker (foreign national employee) to legally stay in Namibia whilst employed.

- The tax authority in Namibia is the Directorate Inland Revenue (DIR). Namibia resident individuals and non-resident individuals are subject to tax on Namibia-source income only. Although the taxation system of Namibia is source based, the meaning of ‘source’ is not defined within the Income Tax Act and reference is taken from case law which regards it to be the ‘originating cause’ i.e. where a resident or non-resident receives employment income from services rendered within Namibia (the ‘originating cause’), then the income will be subject to Namibian tax. Residence is similarly not defined within the Namibia legislation but with reference to case law it is generally regarded as where an individual’s real home is located i.e. their permanent place of abode (allowing for temporary absences).

- The tax year in Namibia runs from 1 March to the last day of February in the next calendar year. An employee is required to register with the tax office and file a tax return by 30 June of each year i.e. four months after the end of the tax year.

- Employment income includes salaries, wages, bonuses, commissions, fees, gratuities, certain non-cash benefits and any other taxable amount, either in cash or in kind, received by an employee. Employment income is taxed at progressive income tax rates up to 37% on amounts exceeding NAD 1.5 million per annum. An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities.

- Employers are also required to contribute toward workmen's compensation for each employee earning less than NAD 81,300 a year. The contributions cover industrial injury, disability, and death. The rate of contribution is based on the level of occupational risk of the employer and it ranges from 1% to 8% depending on the industry and risks involved. In addition, an employer is also liable to pay 1% of gross remuneration to the Namibia Training Authority which promotes vocational training in the country, however the employee has no deduction in this regard.

- Social security contributions are paid by both the employee and employer and cover maternity leave, sick leave, and a death benefit fund. The employee pays 0.9% of their gross salary and the employer pays 0.9% of the employee's gross salary (capped at NAD 81 per month per employee). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the Commissioner of Social Security.
KEY POINTS

- The documentation requirements (entry visa, work permit, residency permit) to legally work in the Netherlands depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens may stay and work in the Netherlands and do not require a work permit or residence permit.
  - Non-EU / non-EEA / non-Swiss citizens must, if required, obtain an entry visa from the overseas Netherlands consulate or embassy in their home country. If they intend to stay beyond 90 days, they must complete an Admission and Residence (GVVA) application and obtain a D-visa or MVV (temporary residence permit) from the overseas Netherlands consulate or embassy (exceptions apply). On arrival, they should obtain a residency permit from the Immigration and Naturalisation Service. Certain specialised foreign nationals may work in the Netherlands under specialised procedures such as the EU Blue Card or highly skilled migrant procedure (special rules apply).
- All individuals staying in the Netherlands more than four months (in a six-month period) must notify the local Population Registrar and obtain a National Identification Number.
- The tax year for personal income tax and wage tax purposes runs from 1 January to 31 December (a calendar year). The tax authority in Netherlands is the Belastingdienst (Dutch Tax Administration, or DTA). Netherlands resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Netherlands-source income only. An individual is deemed resident in Netherlands based on actual circumstances such as whether the individual has permanent personal or economic ties with the Netherlands (permanent home, centre of economic interests, family location, where assets / bank accounts are located, and the nature and length of stay, etc.).
- An employee is obligated to file a tax return if requested by the DTA (an ‘invitation’ is sent) or if income tax is due. If an employee only receives employment income it is likely that the correct tax has been withheld at source and there is no further income tax due. If applicable, a tax return must be filed before 1 May of the following calendar year. If an employee is entitled to a refund and no invitation is sent, they can file a tax return.
- Employment income is taxed at progressive income tax rates up to 52% on amounts exceeding EUR 67,072 per annum (2017). There are however multiple discounts and all Dutch resident employees are entitled to the general discount and the labour discount, which results in a maximum discount of EUR 5,477. An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities. If a foreign national works for a worldwide group and is sent to the Netherlands for less than 60 days in a 12-month period, under certain conditions, no Dutch taxes are levied. Foreign employees (expatriates) can be paid out 30% of their wage tax free, if certain conditions are met (30% ruling).
- Social security contributions are paid by both the employee and employer and cover national insurance, employee insurance and medical insurance. Broadly, the employee pays 27.65% of their gross salary and the employer pays 18% to 19% of the employee’s gross salary depending on the industry sector (caps apply to both employee and employer contributions). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.
To legally work in New Zealand, a foreign national must obtain an entry visa (if required), a work visa and a residence visa:

- To obtain a work visa, the applicant (foreign national potential employee) must follow the ‘Essential Skills’ instructions, meet the health and character requirements and evidence that they are suitably qualified and experienced for the role by providing evidence of qualifications and/or work experience (and a job offer). Such a work visa is normally valid for up to three years (up to five years if a high skilled job and the salary is above an annual threshold). A valid passport must be held by the foreign national for the duration of their intended stay.
- Residence permit: A foreign national intending to work in New Zealand should obtain a residence visa through the ‘skilled employment’ or ‘working for an accredited employer’ route. The holder of a residence visa has multiple-entry for 24 months (after 24 months, a permanent residence visa can be applied for which has no time restrictions on travel in and out of New Zealand).
- Foreign nationals should be aware that immigration legislation is currently the subject of political and social interest. It should be expected that any rules and regulations could be updated without warning from time to time.

The tax year in New Zealand runs from 1 April to 31 March. The tax authority in New Zealand is the Inland Revenue Department (IRD). New Zealand resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on New Zealand-source income only. An individual is deemed resident in New Zealand (subject to any Double Tax Agreement) if they are physically present in New Zealand for more than 183 days in any 12-month period or if the individual has a ‘permanent place of abode’ in New Zealand. The latter is a subjective test and should be carefully analysed due to recent court cases.

An employee is not usually required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee receiving income from other sources, or tax has not been withheld at source from their income, must file a tax return by 7 July following the income year end (unless a tax agent is utilised to obtain an extension of time to the following 31 March).

Employment income includes salaries, bonuses, allowances, retirement payments and any other type of remuneration received directly or indirectly by an employee. Employment income is taxed at progressive income tax rates up to 33% on amounts exceeding NZD 70,000 per annum. An employer must withhold tax at source from an employee’s gross salary under the Pay-As-You-Earn (PAYE) system and remit this to the IRD. Fringe Benefits Tax (FBT) is paid by employers on the benefits provided to employees up to 49.25% of the taxable value of the benefit provided.

There is no compulsory social security system in New Zealand for an employee or employer. However, a voluntary workplace savings scheme – KiwiSaver – exists to help New Zealanders save for their retirement. The employee pays either 3%, 4% or 6% of their gross salary and the employer pays 3% of the employee’s gross salary. The government then contributes a ‘member tax credit’ amounting to NZD 0.50 for each NZD 1 contributed by members, up to NZD 521.43 per annum.

Accident Compensation (ACC) Levies: Employers and employees must pay an ACC earner’s levy on employment income of up to NZD 126,286 (2018/19). The employee pays 1.39% of their gross salary and the employer pays a rate based on their relevant industry classification.
NIGERIA
CAPITAL: Abuja
CURRENCY: Nigerian Naira (NGN)
POPULATION: 191.84 Million (2017 estimate)
LANGUAGE: English

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KEY POINTS

- To legally work in Nigeria, a foreign national must obtain an entry visa and work permit (exemptions apply):
  - An entry visa will be required unless a foreign national is from a country which is a member of the Economic Countries of West African States (ECOWAS) which entitles them to a five-year residence card as long as the assignee has a valid Nigerian sponsor or employment.
  - A short-term assignee (less than 3 months) who is not an ECOWAS citizen must obtain a Temporary Work Permit (TWP) to allow them to work on projects or special assignments. It is a three-month, single-entry visa.
  - A long-term assignee (more than 3 months) who is not an ECOWAS citizen must enter Nigeria on a “Subject to Regularization (STR)” visa (on an expatriate quota). On arrival, the employer will then apply for a ‘Combined Expatriate Resident Permit and Alien Card’ (CERPAC).

All work permits and business visas require a Nigerian employer or sponsor.

- The tax authority in Nigeria is the Federal Inland Revenue Service (FIRS). Nigeria resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Nigeria-source income only. An individual is deemed resident in Nigeria if they are domiciled in Nigeria, are physically present in Nigeria for at least 183 days in any 12-month period, or serve as a diplomat or a diplomatic agent of Nigeria in a country other than Nigeria.

- The tax year in Nigeria runs from 1 January to 31 December (a calendar year). An employee is not required to register with the tax office or file a tax return if their only income consists of employment income from which tax has been withheld at source.

- An employer must submit an annual declaration (Form H1) to the tax authorities by 31st January following the tax year, which shows the preceding year income of each employee and the respective tax deducted and remitted. In addition, a schedule of monthly payments made to the tax authority during the tax year together with the supporting payment receipts issued by the authority must also be submitted. When Form H1 and accompanying schedule are submitted, an employer can then apply for the employee individual tax clearance certificates for the taxes remitted in the preceding year.

- Employment income includes salaries, wages, fee, benefits in kind, allowances, gratuities, superannuation and any other income derived solely by reason of employment. Employment income is taxed at progressive income tax rates up to 24% on amounts exceeding NGN 3.2 million per annum. Certain reliefs and exemptions may be available before the tax is calculated depending on the circumstances of the employee in accordance with paragraphs 1 and 2 of the Sixth Schedule to the Personal Income Tax (Amendment) Act 2011. An employer must withhold tax monthly under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities on or before the 10th day of the month following the salary payment month.

- Social Security Contributions: Nigeria operates a national contributory pension scheme. An employee pays 8% of their gross salary and the employer pays 10% of the employee’s gross salary.

- When employment ends, and the internationally mobile employee permanently leaves Nigeria, the employer must apply for immigration deletion of the employee and submit the original resident permit (CERPAC) and departure ticket with the application for deletion.
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KEY POINTS

- The documentation requirements (visa, work permit, permanent residence permit) to legally work in Norway depend on which country the foreign national (employee) is a citizen:
  - EU / EEA / Nordic citizens: No work permit is required and an EU / EEA / Nordic citizen can remain in Norway for up to three months. If an EU / EEA / Nordic citizen intends to stay longer than three months they must notify the National Registry (folkeregister) within eight days after arrival and register with the police in Norway. A Nordic citizen is a citizen of Denmark, Finland, Norway, Iceland, or Sweden.
  - Non-EU / non-EEA / non-Nordic citizens generally require a visa to enter Norway and a work permit and a residence permit from the Department of Immigration (Utlendingsdirektoratet) to legally remain and work in Norway. There are several types of work permit such as the skilled worker / specialist permit. A permanent residence permit entitles the holder to live and work in Norway indefinitely however to apply the applicant must have lived in Norway for three consecutive years and have been locally employed during that period.

- The tax authority in Norway is the Skatteetaten (Norwegian Tax Authority, or NTA). Norway resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Norwegian-source income only. An individual is deemed resident in Norway by domicile or if they stay in Norway for more than 183 days in any 12-month period or 270 days in any 36-month period.

- Foreign nationals (new employees) must meet the requirements of an ID check and apply for a tax card (RF-1209) with the local tax office (which is an electronic tax deduction card / tax table based on an estimate of the employee's gross salary that becomes available to their employer once the registration is complete).

- The tax year in Norway runs from 1 January to 31 December (a calendar year). An individual will receive a pre-drafted tax return from the tax authorities which must be checked, corrected and submitted back to them by 30 April. Please note, residents do not have to submit the pre-drafted tax return back to the tax authorities if no correction is required and on that basis “passive acceptance” is made, and the tax assessment will be based on the pre-drafted tax return.

- Employment income includes salaries, wages, bonuses, benefits in kind, annuities and any other income from employment, whether in cash or in kind. Employment income is subject to national and municipal income tax at a general combined rate of 24%. A lower rate of 20.5% applies for the counties of Finnmark and Nord-Troms. In addition, employment income is also taxed at progressive income tax rates up to 14.52% on amounts exceeding NOK 934,050 per annum. The top marginal income tax rate is therefore 38.52% (24% + 14.52%). A personal allowance of NOK 78,300 is available for jointly assessed married couples and for single people with dependents. The allowance for a single person without dependents, and married people assessed separately, is NOK 53,150.

- Social Security Contributions: The contribution rates to the Norwegian National Insurance Scheme (NIScheme) are set annually by Parliament. For 2017, an employee pays 8.2% of their gross salary and, differentiated regionally, the employer pays between 0% to 14.1% of the employee's gross salary.

- When employment ends, and the internationally mobile employee permanently leaves Norway, they must notify the National Registry of their departure within seven days of leaving and notify the social security authorities if they receive any social security benefits. The obligation and deadline for filing a (final) tax return will also apply.
KEY POINTS

- To legally work in Oman, a foreign national must obtain an entry visa (if required), an employment visa and resident card:
  - Employment visa: A prospective employer of a foreign national (expatriate) must apply to the Ministry of Manpower (MoM) for labour clearance, which is requirement to obtain an employment visa for the expatriate. The MoM reviews the application and whether the approval criteria is met, which also considers the company and its level of Omanization (ratio of employment of Omani nationals to expatriates). An employment visa is valid for two years from the date of entry (renewable) and an expatriate cannot work in Oman until he/she has this visa, and once obtained, the holder cannot stay outside Oman for more than six months.
  - Resident cards: when a foreign national has an employment visa they must apply for a resident card from the Directorate General of Civil Status. A resident card is valid for two years (renewable) and must be obtained within 30 days of entry into Oman.

- The tax authority in Oman is the Secretariat General for Taxation (referred to as the ‘Tax Department’, or ‘SGT’), which is part of the Ministry of Finance.

- Oman resident and non-resident individuals are not subject to tax on their income.

- The tax year in Oman runs from 1 January to 31 December (a calendar year).

- Since there is no Personal Income Tax (PIT) law enacted in Oman, and no personal tax compliance obligations, an employee is not required to file an annual tax return.

- Employment income is not taxed in Oman.

- Social Security Contributions: Expatriate employees do not pay any social security contribution. Contributions are however paid by both the employer and employee in respect of Omani employees between the ages of 15 and 59 who are permanently employed in the private sector. The contributions cover old age, disability and death benefits. The Omani national employee pays 7% of their gross salary and the employer pays 10.5% of the employee’s gross salary.

- In addition, an employer must also pay 1% of the employee’s gross salary as a contribution to cover work related injuries. The total social security contribution paid is therefore 18.5% (Omani national employee 7%; employer 11.5%).

- Under the social security law, the definition of “monthly wage” is: ‘All amounts paid to the insured in cash or in kind or periodically or regularly for his work whatever the method used for its determination, or is the sum of basic wages plus allowances which shall be determined by a decision of the Minister after the approval of the Board of Directors.’

- An employer must withhold social security contributions at source from a relevant employee’s gross monthly salary and remit this, together with its contributions, to the tax authorities.

- A private sector employer must pay a vocational training levy (VTL) in respect of each expatriate employee in the amount of OMR 300 every two years for each employee.

- When employment ends, and the internationally mobile employee permanently leaves Oman, they are required to surrender their resident card and have their employment visa cancelled.
KEY POINTS

- To legally work in Pakistan, a foreign national must obtain an entry visa (if required) and a work visa. A work visa must be obtained by a foreign national (expatriate) in order to legally exercise employment in Pakistan. A work visa is normally issued for one year (renewable) and specifically for the foreign national to work for the named employer only. An overseas Pakistan consulate or embassy in the home country of the foreign national can grant a multiple-entry work visa on the recommendation of the Board of Investment (BOI). The BOI normally processes a work visa application within four weeks.
  - A business visa is issued for business purposes and allows the holder to remain in Pakistan for a period of up to one month, however, the activities that may be performed under a business visa are restricted although permissible activities do include attending business meetings, conducting training or delivering lectures / presentations of a short duration, inspecting goods that an entity intends to purchase from Pakistan, etc. Business visas may be issued for a longer period.

- The tax authority in Pakistan is the Federal Board of Revenue (FBR).

- Pakistan resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Pakistan-source income only.

- An individual is deemed resident in Pakistan if they stay in Pakistan for 183 days or more in a tax year.

- The tax year in Pakistan runs from 1 July to 30 June.

- Where the employer has filed an annual statement of withholding of taxes, an employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source.

- Where an employee receives income from other sources and there is other taxable income, they must complete and file an annual tax return by 31 August following the tax year end. Any tax due should also be paid by 31 August following the tax year end.

- Employment income includes salaries, wages, bonuses, director's fees, certain benefits in kind and any other remuneration from employment.

- Broadly, where income of the individual from salary exceeds 50% of their taxable income, employment income is taxed at progressive income tax rates up to 30% on amounts exceeding PKR 7 million per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social security contributions are paid by the employee and employer and cover death, disability, injury, medical expenses and pensions. The employee pays 1% of their gross salary and the employer pays 5% of the employee’s gross salary (limited to a salary amount of PKR 15,000 per month). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the government.

- In addition, generally, an employer must contribute PKR 780 per month in respect of employees’ old age benefits and PKR 100 a year in respect of workers’ children (education).
KEY POINTS

- To legally work in Panama, a foreign national must hold the required visa / permit:
  - A foreigner enters the country as a tourist. The tourist visa does not allow work. The passport must have a validity of 6 months. Once in Panama, they must apply for a visa or immigration permit and a work permit (there are two procedures).
  - Depending on which country the foreign national is a citizen will determine whether a visa is required to enter Panama. The requirements for obtaining an entry visa often vary on a case-by-case basis and so it is advisable to contact the overseas Panama consulate or embassy to confirm the position.
  - A foreign national may work in Panama only if they hold a work visa (permit) but first they are required to obtain a permanent or temporary resident visa that allows them to work. A work permit can only be granted by the Ministry of Labour following commencement of the Department of Immigration and Naturalization (DIN) procedures. Normally a work permit is valid for one year (renewable) although there are circumstances where a five-year visa may be issued. No work permit is required for foreigners with a Multinational Seat Visa or naturalized foreigners (with ID card). There are beneficial visas for executives of a multinational enterprise headquarters and Panama Pacific area workers.
  - Residence visa: A permanent or temporary resident visa must be requested from the DIN in Panama. Panama publishes a list of countries from which foreigners are eligible for permanent residence. Residence visa requirements may vary from case to case so it is necessary to confirm these with the DIN before the application is made. Minimum salary USD 850.

- The tax year in Panama runs from 1 January to 31 December. The tax authority in Panama is the Dirección General de Ingresos (Tax Administration of Panama, or DGI). Panama resident and non-resident individuals are subject to tax on their Panama-source income only. An individual is deemed resident in Panama if they stay in Panama for 183 days or more in a calendar year, or they have established permanent residence in Panama i.e. the centre of their economic and family interests is in Panama.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources or more than one employer, or tax has not been withheld at source from their income, must complete and file an annual tax return by 15th March following the end of the tax year (the filing deadline may be extended by a month on request). Penalties (interest and surcharges) apply for late filing or failure to file a tax return or the late or delayed payment of tax.

- Employment income includes salaries, wages, bonuses, benefits in kind and any other amount received in cash or in kind by an employee. Employment income is taxed at progressive income tax rates up to 25% on amounts exceeding USD 50,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities. An employer must also file an annual end of year form (return) by 31st May following the end of the tax year providing information on each employee’s gross remuneration and the tax deducted and remitted during the tax year.

- Social Security Contributions: The employee pays 9.75% of their gross salary and the employer pays 12.5% of the employee's gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.

- An employer must pay workers’ compensation insurance premiums from 0.56% to 7% of an employee's gross salary (depending on the occupational risk of the employer).

- Education Tax: The employee pays 1.25% of their gross salary and the employer pays 1.5% of the employee’s gross salary.
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KEY POINTS

- To work in Peru, a foreign national must obtain an entry visa (if required), work visa and residence visa:
  - Work visa: A foreign national must have a work visa to legally work in Peru. Work visas are issued for 90 days and renewable for up to one year. The work visa is issued in respect of an employer and agreed services (although it is possible to change employers). There are restrictions to the issue of work visas to protect the employment of Peru Nationals; salaries paid to foreign nationals cannot exceed 30% of the total payroll and their employment should not exceed 20% of the total personnel.
  - Residence visa: A foreign national (expatriate) holding a work visa may then obtain a residence visa which is valid for up to one year (renewable). The residence visa will either be issued as a temporary visa or a resident visa, depending on the term of the work in the contract with the Peruvian company. If the employment contract term is one year then a resident (work) visa will be issued, if the employment contract term is for less than one year then a temporary (work) visa will be issued.

- UIT (Tax Unit): Various tax rates, deductions and limits are set in Peru by reference to a tax unit (Unidad Impositiva Tributaria, or UIT). The applicable tax unit for 2017 is equal to PEN 4,050 and it is set annually by the tax authorities.

- The tax year in Peru runs from 1 January to 31 December (a calendar year). The tax authority in Peru is the Superintendencia Nacional de Administración Tributaria (National Superintendency of Tax Administration, or SUNAT). Peru resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Peruvian-source income only. An individual is deemed resident in Peru if they are physically present in Peru for more than 183 days in any 12-month period

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must file an annual tax return within three months of the end of the tax year i.e. by 31 March following the end of the tax (calendar) year.

- Employment income includes salaries, wages, bonuses, certain allowances, benefits in kind and any other type of remuneration received by an employee. Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding UIT 45 (tax units) per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Contributions:
  - Health contributions: An employer pays 9% of the employee's gross salary to the Health Care Fund (HCF). An employee does not pay any HCF contributions, only the employer.
  - State Pension Fund: An employee pays 13% of their gross salary to the government-sponsored national pension fund (Oficina de Normalizacion Previsional, or ONP). An employer does not pay ONP contributions. An employer must withhold ONP social security contributions at source from an employee's gross monthly salary and remit them to the authorities.
  - Private pension funds: As an alternative to the State Pension Fund, an employee can pay approximately 12% of their gross salary to the Private Pension Funds Trustee (Administradora de Fondo de Pensiones, or AFP). An employer does not pay AFP contributions. An employer must withhold AFP social security contributions at source from an employee’s gross monthly salary and remit them to the authorities.
PKF CONTACT INFORMATION

City | Name | Telephone | Email
--- | --- | --- | ---
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KEY POINTS

- To legally work in the Philippines, a foreign national must obtain an entry visa (if required), an alien employment permit and employee 9(g) visa:
  - Entry visa: Broadly, as part of the application process for an entry visa, every foreign national wishing to enter the Philippines must submit a medical examination report (from a duly authorised physician) to the Philippines Quarantine Office to obtain a medical certificate or clearance from the Bureau of Quarantine.
  - Alien Employment Permit (AEP): Unless specifically exempted, every foreign national wishing to work in the Philippines must obtain an AEP from the Department of Labour and Employment (DOLE). The AEP application must be made with the Philippines overseas consular office or embassy in the home country of the foreign national. An AEP is normally valid for one year (extendable up to five years). Once an AEP is obtained, under Section 9(g) of the Philippine Immigration Act, a foreign national may then be granted a pre-arranged employee 9(g) visa for employment purposes if a bona fide employer-employee relationship exists. A 9(g) visa is normally valid for one year (extendable up to five years). Special non-immigrant visas and special resident visas are also available depending on the circumstances, qualifications and experience (type of work / profession) of a foreign national.

- The tax authority in the Philippines is the Bureau of Internal Revenue (BIR). Individuals resident in the Philippines are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Philippine-source income only. Broadly, an individual is deemed resident in the Philippines if they stay in the Philippines for 180 days or more (in total) in a calendar year.

- The tax year in the Philippines runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if they have a single source of income which consists of employment income from which tax has been withheld at source, and due to their employer's annual information return (BIR Form No. 1604CF), they are able to claim a 'substituted filing’ i.e. the employer, in its return, provides all the information that would otherwise be provided in an individual’s tax return. An employee who receives income from other sources, or who is not covered by the 'substituted filing’ of their employer, must complete and file an annual tax return by 15 April of the year following the tax year (calendar year). Any tax due should also be paid by this date.

- Employment income consists of income arising from an employee/employer relationship and includes salaries, wages, commissions, certain allowances, taxable pensions and retirement pay, and any other income or benefit of a similar nature received in cash or in kind. Employment income is taxed at progressive income tax rates up to 32% on amounts exceeding PHP 500,000 per annum. An employer must withhold tax at source from an employee's gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: Both the employer and employee make social security and employees’ compensation contributions under the Philippines Social Security System (SSS). The employer pays approximately 3.69% of their gross salary and the employer pays approximately 7.67% of the employee's gross salary (a cap applies to the monthly / annual contributions of an employee and employer). An employer must withhold social security contributions at source from an employee's gross monthly salary and remit this, together with its contributions, to the respective fund / authorities.

- A foreign national (expatriate) may be exempt from paying Philippine social security contributions if they remain within their home countries' social security system under a bilateral social security agreement between their home country and the Philippines.
KEY POINTS

- The documentation requirements to legally work in Poland depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens may enter, live and work in Poland for up to three months without a visa subject to having a valid passport or identity document. If such a citizen wishes to remain in Poland for more than 90 days they must register their address in Poland with the relevant district municipal office. Such citizens do not require a work permit or residence permit to stay and work in Poland and acquire ‘permanent resident’ status after five years if they continue to fulfill the relevant conditions.
  - Non-EU / non-EEA / non-Swiss citizens should obtain an entry visa from the overseas Poland consulate or embassy in their home country. If intending to stay beyond 90 days, the foreign national must obtain a temporary residence permit or long-term visa and demonstrate ‘good cause’ for remaining in Poland, such as employment. To work in Poland, the foreign national must hold a work permit, which is applied for by his prospective employer. When the work permit is granted, the individual must then obtain a visa with the right to work. Following five years of residence in Poland, a foreign national may apply for an EU long-term residence permit which enables him or her to remain and work in Poland and not require a work permit or permission to undertake employment in Poland (and serves as an identity card).

- The ‘tax authority’ in Poland comprises of two departments within the Ministry of Finance. One department (comprising of fiscal offices) administers and collects tax whilst another department (comprising of fiscal chambers) administers appeals against tax liabilities.

- Poland resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Polish-source income only. An individual is deemed resident in Poland if they stay in Poland for 183 days or more in the tax year, or their centre of personal or economic interests is in Poland.

- The tax year in Poland runs from 1 January to 31 December (a calendar year).

- An employee is required to register with the tax office and file an annual tax return by 30 April following the end of the tax year. Employment income includes salaries, wages, bonuses, and any other type of remuneration or taxable benefit received from employment, either paid in cash or in kind. Employment income is taxed at progressive income tax rates up to 32% on amounts exceeding PLN 85,528 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities within 20 days following the month in which the income was earned (paid / available).

- Social security contributions are paid by both the employer and employee and cover health and maternity insurance, old age pension, sickness benefits, accident insurance and disability insurance. The employee pays 22.71% of their gross salary and the employer pays between 16.93% and 20.12% of the employee’s gross salary depending on the level of accident insurance. An employer must withhold social security contributions at source from an employee’s gross monthly salary. A foreign national who remains within their home countries’ social security system may be exempt from paying Polish social security contributions under either a reciprocal agreement between their home country and Poland or EU / EEA rules.

- When employment ends, and the internationally mobile employee permanently leaves Poland, they should deregister with the Polish tax authorities and return their residence card to the Voivodship Office. Their employer should deregister them with the social security authorities and return their work permit to Voivodship Labour Office.
KEY POINTS

- The documentation requirements (entry visa, temporary residence authorisation, employment visa) to legally work in Portugal depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens may enter, live and work in Portugal for up to three months without a visa subject to having a valid passport or identity document. If such a citizen wishes to remain and work in Portugal for more than 90 days they must register with the local City Hall. Such citizens do not require an employment visa (work visa or residence visa) to remain and work in Portugal.
  - A non-EU / non-EEA / non-Swiss citizen must obtain a valid entry visa from the overseas Portuguese consulate, or embassy, in their home country. Within four months of their arrival in Portugal they must obtain temporary residence authorisation (autorização de residência) if they are to stay longer than 90 days. To legally work in Portugal, a foreign national must obtain an employment visa, which their prospective employer must apply for on their behalf. An initial requirement for an employment visa is that the employer must obtain a Declaration from the Instituto de Emprego e Formação Profissional confirming the job is still available and within quota limits (which normally takes approximately three months). Once an employment visa (residence visa for employment reasons) is granted, it is initially valid for one year (renewable).

- The tax authority in Portugal is the Autoridade Tributária e Aduaneira (Portuguese Tax and Customs Authority, or ATA). Portugal resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Portuguese-source income only. An individual is deemed resident in Portugal if they are physically present in Portugal for 183 days or more in any 12-month period, or if present for less than 183 days but having a place of abode in any day of this period, "in a way that may lead to the supposition of an intention to keep and occupy it as a habitual home" (this may be real estate the taxpayer has invested in or just rented accommodation).

- The tax year in Portugal runs from 1 January to 31 December (a calendar year).

- An Employee who receives employment income (as well as income from other sources) must file a personal income tax return between 1 April and 31 May following the tax year.

- Employment income includes salaries, wages, bonuses, commissions, fringe benefits and any other amount received in cash or in kind for employment (some exemptions may apply). Employment income is taxed at progressive income tax rates up to 48% on amounts exceeding EUR 80,640 per annum. An additional solidarity surcharge of 2.5% is paid on income between EUR 80,000 and EUR 250,000, and 5% on income over EUR 250,000. All employers must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities on a monthly basis.

- Social Security Contributions: The employee pays 11% of their gross salary and the employer pays 23.75% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross salary and remit this, together with its contributions, to the authorities on a monthly basis. A foreign national (expatriate) may be exempt from paying Portuguese social security contributions if they remain within their home countries’ social security system under either a totalization agreement with Portugal or the multilateral Ibero-American social security agreement.

- There is a special tax regime for non-habitual residents (individuals becoming resident in Portugal that were not resident for tax purposes in the past five years) whereby certain foreign-sourced income is exempt from Portuguese tax for 10 years if certain conditions are met, and a reduced tax rate of 20% may apply on Portuguese-sourced employment income (for high value-added activities).
PKF CONTACT INFORMATION

For information about internationally mobile employee services in Puerto Rico, please contact Stefaan De Ceulaer (PKFI Director Tax and Legal Support) on +32 468 22 3924 or email stefaan.deceulaer@pkf.com. Alternatively, please contact Leo Parmegiani (TP Regional Representative) on +1 212 867 8000 (Ext. 426) or email lparmegiani@pkfod.com.

KEY POINTS

- To legally work in Puerto Rico, a foreign national must obtain the required authorisation (visa):
  - Entry visas: If required, an entry visa should be obtained from a Puerto Rico overseas consulate or embassy before arrival. Puerto Rico immigration distinguishes between foreign nationals seeking temporary admission (non-immigrants) and those intending to remain permanently (immigrants).
  - A non-immigrant individual wishing to work in Puerto Rico must obtain the correct ‘work’ visa, which may depend on the country that he or she is a citizen and their circumstances. Puerto Rico visas allowing work include visas for intra-company transferees (visa L-1), visas issued for Trade North American Trade Agreement Professionals (TN visas) and visas for extraordinary ability (visa O-1).
  - An immigrant visa holder may stay and work in the Puerto Rico with few restrictions. There are five categories of employment-based immigrant visas, namely: First preference (priority workers), Second preference (professionals holding advanced degrees and aliens of exceptional ability), Third preference (skilled workers, professionals holding basic degrees and other workers), Fourth preference (special immigrants), and Fifth preference (immigrant investors).

- The tax authority in Puerto Rico is the Departamento de Hacienda (Treasury Department, or DDH).

- Puerto Rico resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Puerto Rico-source income only. An individual is deemed resident in Puerto Rico if they are domiciled in Puerto Rico. Broadly, an individual is presumed resident for tax purposes if they are physically present in Puerto Rico for 180 days or more in a calendar (tax) year.

- The tax year in Puerto Rico runs from 1 January to 31 December (a calendar year).

- Broadly, an employee must file an annual tax return with the Bureau of Returns Processing (Treasury Department) by the 15th day of the fourth month following the end of the tax year i.e. normally by 15th April (and any tax due also paid by this date). Any tax due in excess of amount withheld at source must be paid with the return when filed.

- Employers are required to withhold income taxes, Medicare and social security from an employee's salary and remit to the government periodically. Employment income includes wages, salaries, and all other employee compensation (although some exceptions apply). Employment income is taxed at progressive income tax rates up to 33% on amounts exceeding USD 61,500 per annum. If an individual's net taxable income exceeds USD 500,000 then a surtax of 5% is levied on the income over this amount.

- The United States federal social security rules apply to Puerto Rico. Social security tax (FICA) is paid by both the employer and the employee and consists of two parts; hospital insurance (Medicare Tax) and old-age, survivors, and disability insurance (OASDI):
  - For Medicare Tax contributions, the employer and employee each pay 1.45% of the employee's gross salary (without a cap). The employee also pays an additional 0.9% on their gross salary which exceeds USD 200,000 (USD 250,000 for couples filing joint returns, or USD 125,000 for a married person filing separately). The additional Medicare Tax is not paid by an employer.
  - For OASDI contributions, the employee pays 6.2% of their gross salary and the employer pays 6.2% of the employee's gross salary up to USD 127,200 (2017).

A foreign national (expatriate) may be exempt from paying Puerto Rico social security contributions if they remain within their home countries' social security system under a totalization agreement with the United States (which also covers Puerto Rico).
QATAR
CAPITAL: Doha
CURRENCY: Qatari Riyal (QAR)
POPULATION: 2.34 Million (2017 estimate)
LANGUAGE: Arabic

PKF CONTACT INFORMATION
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KEY POINTS
• To legally work in Qatar, a foreign national must obtain an entry visa (if required), an employment (work) visa and residence visa:
  ▪ Entry visa: Except for citizens from the GCC states (nationals from the Gulf Cooperation Council (GCC) states i.e. Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates) all foreign nationals must have a valid entry visa to enter Qatar.
  ▪ Employment (work) visa: To obtain an employment (work) visa, a foreign national must have a valid employment contract (sponsored by a Qatar company) which has been approved by the Ministry of Labour. An employment (work) visa is valid from one to five years (renewable).
  ▪ Residence visa: Once a foreign national (employee) has a valid employment (work) visa, they should obtain a residence visa. A residence visa is valid from one to five years (renewable).
  ▪ A foreign national who wishes to transfer his or her employment from one sponsor (Qatar employer) to another (Qatar employer) will require the approval of the Department of Immigration at the Ministry of Interior.

• Business visas are granted to visitors for business purposes and are valid for one month (please note: there is a ‘pre-application in Qatar’ process).

• Qatar has two separate tax authorities; the Qatar Public Revenues and Taxes Department (PRTD, or State) and the Qatar Financial Centre (QFC). The QFC is also referred to as the QFCA.

• Qatar resident and non-resident individuals are not subject to tax on their income.

• An individual is deemed resident in Qatar if they have been physically present in Qatar for 183 days or more during any 12-month period, or has a permanent home in Qatar, or the centre of their vital interests is in Qatar.

• The tax year in Qatar runs from 1 January to 31 December (a calendar year).

• Since there is no Personal Income Tax (PIT) law enacted in Qatar, and no personal tax compliance obligations, an employee is not required to file an annual tax return.

• Employment income is not taxed in Qatar.

• There is no payroll tax for the employer.

• Social insurance contributions are paid by both the employee and employer in respect of old age, disability and death. Only Qatari employees (insured individuals) pay social insurance contributions, non-Qatari employees do not contribute. The Qatari employee (insured individual) pays 5% of their gross salary and the employer pays 10% of the Qatari employee’s gross salary.

• When employment ends, and the internationally mobile employee permanently leaves Qatar, they must obtain an exit permit from the Ministry of Interior before leaving Qatar (valid for seven days). A multiple-exit visa can be issued to senior staff (valid for one year). The employment (work) visa and residency visa should be cancelled.
KEY POINTS

• The documentation requirements (work authorisation, temporary residency permit, long-term residence visa) to legally work in Romania depend on which country the foreign national is a citizen:
  ▪ EU / EEA / Swiss citizens may enter, live and work in Romania for up to three months without a visa subject to having a valid passport or identity document. If such a citizen wishes to remain in Romania for more than 90 days they must obtain a registration certificate in accordance with the purpose of their stay from the Romanian Office for Immigration. A personal numerical code is issued when the registration certificate is issued and this code is the individual's reference number for the payment of income tax. Otherwise, EU / EEA / Swiss citizens do not require a work authorisation (work visa) or a residence permit to stay and work in Romania.
  ▪ Non-EU / non-EEA / non-Swiss citizens wishing to stay and work in Romania must obtain a Romanian work authorisation for a permanent worker (where an employment contract exists) before applying for a temporary residency permit to then obtain a long-term residence visa. These applications should be made to an overseas Romanian consulate or embassy in the home country of the foreign national. When the work authorisation and residence visa are issued, the immigration documents will contain the personal numerical code of the individual for the payment of income tax when employed.

• A Romanian employer is required to notify the tax and social security authorities of each (new) foreign national working in Romania (and they will be issued with a social security number).

• The tax authority in Romania is the National Agency for Fiscal Administration (ANAF), Ministry of Finance. Romania resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Romania-source income only. An individual is deemed resident in Romania if they have their domicile in Romania, or their centre of vital interests is in Romania, or they are physically present in Romania for 183 days or more in any 12-month period.

• The tax year in Romania runs from 1 January to 31 December (a calendar year).

• Broadly, an employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source by their Romanian employer. An employee who receives income from other sources must complete and file an annual tax return by 15th May following the end of the tax year (calendar year).

• Employment income includes salaries, wages, bonuses, allowances and all types of remuneration and benefits received by an employee directly or indirectly, in cash or in kind, unless specifically exempt. Employment income (less allowable personal deductions and any other permitted deduction) is taxed at a flat rate of 16% per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the authorities (Romanian State Budget) by the 25th of the following month.

• Social Security Contributions: The employee pays 16.5% of their gross salary and the employer pays from 22.75% to 33.45% of the employee's gross salary depending on the working conditions and accidents at work and professional diseases insurance cover (caps apply). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities by the 25th day of the following month.

• A foreign national (expatriate) may be exempt from paying Romanian social security contributions if they remain within their home countries’ social security system under either a totalization agreement with Romania or the European Union (EU) / European Economic Area (EEA) rules.
KEY POINTS

- To legally work in Russia, a foreign national must obtain an entry visa (if required), a patent or work permit and residence visa:
  - Patent: A foreign national who does not require a visa to enter Russia for work purposes must obtain a patent instead of a work permit. To maintain the validity of a patent the foreign national must make fixed advance tax payments (which vary by region). If the advance payments are not made the patent (and authority to work) is annulled. A patent is issued for one month (and can be renewed up to 12 months subject to a valid signed employment or civil contract).
  - Work permit: A foreign national wishing to work in Russia (who requires an entry permit) must obtain a work permit (exemptions apply) and the employer must hold a valid employer permit.
  - Residence permit: Once a work permit is obtained, the individual should obtain a temporary residence permit. A temporary residence permit is valid for three years. A permanent residence permit may be issued to an individual holding a temporary residence permit (the application should be made six months before the temporary residence permit expires). A permanent residence permit is valid for five years (extendable for an unlimited number of times).

- A certificate confirming knowledge of the Russian language, its history and basic Russian law is required from anyone applying for a patent, work permit, temporary residence permit or permanent residence permit.

- The tax authority in Russia is the Federal Tax Service (FTS). Russia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Russian-source income only. An individual is deemed resident in Russia if they are physically present in Russia for more than 183 days in a continuous 12-month period.

- The tax year in Russia runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must file a tax return by 30 April of the year following the tax year (year of assessment). Any tax liability must be paid by 15 July of the year following the tax year (year of assessment).

- Employment income includes wages, bonuses, commissions, allowances, benefits in kind and any other amount received by an employee in-cash, in-kind, or in the form of imputed income. Employment income is taxed at a flat rate of 13% per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social security contributions: An employee does not pay social security deductions, only the employer:
  - Pension contributions: The employer pays 22% of an employee’s gross salary up to RUB 876,000. If the employee’s salary exceeds RUB 876,000 then the employer pays 10% of the excess.
  - Social insurance contributions: The employer pays 2.9% of an employee’s gross salary up to RUB 755,000. A lower rate of 1.8% of the employee’s gross salary applies if the employee is a foreign national temporarily staying in Russia.
  - Medical insurance: The employer pays 5.1% of an employee’s gross salary.
  - Accident insurance contributions: An employer must also pay accident insurance contributions at a rate which can range from 0.2% to 8.5% of an employee's gross salary based on the occupational risk of the employee’s job. Accident insurance contributions are paid to the Russian Social Insurance Fund.
**KEY POINTS**

- To legally work in Saudi Arabia, a foreign national must obtain an entry visa (if required), a work permit and residence permit:
  - Entry visa: Except for citizens from the GCC states (nationals from the Gulf Cooperation Council (GCC) states i.e. Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates) all foreign nationals must obtain a valid entry visa to enter Saudi Arabia.
  - Work permit: A foreign national wishing to work under an employment contract with a local Saudi employer must obtain a work permit. A work permit is initially valid for two years (renewable by the Ministry of Labour subject to a valid employment contract). The application should be made to the overseas Saudi Arabia consulate or embassy in the home country of the foreign national. After entering Saudi Arabia with a work permit, the employer should make an application for the employee’s residence permit.
  - Residence permit: A residence permit (called an ‘iqamas’) is issued after the foreign national has arrived in Saudi Arabia and obtained a work permit. The foreign national may work in Saudi Arabia when they have a work permit and awaiting the iqamas.

- The tax authority in Saudi Arabia is the General Authority of Zakat and Tax (GAZT).

- Saudi Arabia resident and non-resident individuals are not subject to tax on their income.

- An individual is deemed resident in Saudi Arabia if they physically reside in in Saudi Arabia for 183 days or more in the tax year, or have a permanent residence in Saudi Arabia and physically reside in Saudi Arabia for 30 days or more in the tax year. For the purposes of ‘physically residing in Saudi Arabia’, physically being in the country for part of a day is considered present for the whole day.

- The tax year commonly adopted by taxpayers in Saudi Arabia runs from 1 January to 31 December (a calendar year).

- Since there is no Personal Income Tax (PIT) law enacted in Saudi Arabia, and no personal tax compliance obligations, an employee is not required to file an annual tax return.

- Employment income is not taxed in Saudi Arabia.

- Social security contributions are paid by both the employee and employer in respect of old age, unemployment, disability and death. Only Saudi employees pay social security contributions, non-Saudi employees do not contribute:
  - Pension contribution (GOSI): The Saudi employee pays 9% of their gross salary and the employer pays 9% of the Saudi employee’s gross salary. No contribution is made by the employee or employer in respect of a non-Saudi employee.
  - Unemployment contribution (SANID): The Saudi employee pays 1% of their gross salary and the employer pays 1% of the Saudi employee's gross salary. No contribution is made by the employee or employer in respect of a non-Saudi employee.
  - Occupational hazards insurance contribution: An employee does not pay any contribution for occupational hazards insurance, only the employer pays at a rate of 2% of the Saudi and non-Saudi employee's gross salary.

- When employment ends, and the internationally mobile employee permanently leaves Saudi Arabia, their work permit and residency permit should be cancelled.
KEY POINTS

- To legally work in Serbia, a foreign national must obtain an entry visa (if required), a temporary residence permit and work permit:
  - Entry visa: On arrival in Serbia, a foreign national must have an entry visa (unless exempted) and a valid passport (or passport substitute document). If intending to stay in Serbia for longer than three months the foreign national must obtain a residence permit from the local Republic Police Department.
  - Residence permit: A foreign national wishing to work in Serbia must first obtain a temporary residence permit from the Republic Police Department and only then can they apply for a work permit. A temporary residence permit is issued for one year (renewable). When the holder of a temporary residence permit has lived in Serbia continuously for at least five years they can apply for a permanent residence permit.
  - When a foreign national holds a valid temporary residence permit (or permanent residence permit) he or she can apply for a work permit. A work permit is valid for the duration of the residence permit.

- The tax authority in Serbia is the Tax Administration (TA), Serbian Ministry of Finance. Serbia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Serbia-source income only. An individual is deemed resident in Serbia if they are physically present in Serbia for 183 days or more in a 12-month period (beginning or ending in the tax year concerned), or they have a residence in Serbia, or the centre of their vital interests is in Serbia.

- The tax year in Serbia runs from 1 January to 31 December (a calendar year).

- An employer must register the foreign national (new employee) with the Pension and Insurance Fund and Health Insurance authority within one month from them commencing employment.

- An employee who receives income over a certain level must complete and file an annual tax return by 15th May in the year following the tax year.

- Employment income includes salaries, wages, bonuses, allowances, benefits-in-kind and any other amount received from permanent or temporary employment, in cash or in kind (unless exempted or limited). Employment income is taxed at progressive income tax rates up to 15% on amounts exceeding six times the average annual salary (which is published by the Government). An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities.

- Social security contributions are paid by an employee and employer and cover pension and disability insurance, health insurance and unemployment insurance. The employee pays 19.9% of their gross salary and the employer pays 17.9% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.

- A foreign national (expatriate) may be exempt from paying Serbia social security contributions if they remain within their home countries’ social security system under either a totalization agreement with Serbia or under a bilateral convention.

- When employment ends, and the internationally mobile employee permanently leaves Serbia, they do not have to obtain tax clearance on departure. They should however notify the Republic Police Department so that their residence permit may be cancelled.
PKF CONTACT INFORMATION

City | Name       | Telephone   | Email
---|------------|-------------|------
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KEY POINTS

- To legally work in Singapore, a foreign national must be sponsored by a Singapore entity and obtain an entry visa (if required), a residence permit, and either a work permit or an employment pass:
  - A work permit is issued to a skilled or unskilled foreign national based on the requirements of the company and whether it is necessary to hire a non-local. A work permit (renewal) may be issued for any period not exceeding two years, which is the maximum.
  - An employment pass is issued to a foreign national with an acceptable qualification and a fixed monthly salary of SGD 3,600 or more. It is valid for two years (renewable for three years each time).
    - **S Pass**: A work pass (known as an ‘S Pass’) is issued to foreign nationals with a minimum fixed monthly salary of SGD 2,200 where they have acceptable tertiary qualifications. An S Pass is valid for a maximum period of up to two years (renewable), although in practice it is issued for shorter periods.
    - **Personalised employment pass (PEP)**: A PEP may be issued to a foreign national who has a fixed monthly salary of at least SGD 12,000. It may be issued for any period not exceeding three years (which is the maximum) and is non-renewable. The advantage of a PEP is that the foreign national is not tied to one employer (conditions apply).

- The tax authority in Singapore is the Inland Revenue Authority of Singapore (IRAS). Broadly, Singapore resident and non-resident individuals are subject to tax on Singapore-source income only i.e. on income accrued in, or derived from, Singapore (some exceptions apply, for example, foreign income received through a partnership in Singapore will be taxable). An individual is deemed resident in Singapore if they have been physically present or employed in Singapore (other than as a company director) for 183 days or more in the tax year (calendar year before the year of assessment), or they ordinarily reside in Singapore. A foreign national may be considered resident even if they have spent less than 183 days in Singapore if, for example, the employment period in Singapore has covered at least three consecutive years of assessment or their employment in Singapore will straddle two consecutive calendar years and they expect it to be for a continuous period of at least 183 days.

- The tax year in Singapore runs from 1 January to 31 December (a calendar year).

- An employee is required to file an annual personal tax return and following the end of the tax year IRAS will send a tax return to the employee. The personal tax return should be completed and filed by 15th April of the year following the tax year. When the IRAS has received and processed the tax return a Notice of Assessment will be issued. Any balance of tax owing over that deducted at source by the employer must be paid within one month from the Notice of Assessment date (an instalment option is available).

- Employment income includes salaries, wages, bonuses, allowances, benefits-in-kind and any other amount received from employment, in cash or in kind (unless exempted or limited). Employment income less any applicable reliefs or allowances (such as the personal tax relief) is taxed at progressive income tax rates up to 22% on amounts exceeding SGD 320,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.
  - Non-resident employees employed in Singapore for a period of 61 to 182 days will be taxed at the higher of 15% (without personal tax reliefs) or the progressive resident rates (with personal tax reliefs).

- Social Security Contributions: Both the employee and employer pay Central Provident Fund (CPF) contributions (social security contributions). Currently, the employee pays 20% of their gross salary and the employer pays 17% of the employee’s gross salary (an earnings cap applies). Lower rates apply to employees over 55 years old. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the fund authorities.
KEY POINTS

- The documentation requirements (entry visa, work permit, residency permit) to legally work in the Slovak Republic depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens may enter, live and work in the Slovak Republic for up to three months without a visa subject to having a valid passport or identity document. If such a citizen wishes to remain in the Slovak Republic for more than 90 days they must register with the Oddelenie Cudzineckej Policie (Alien Police) within 30 days following the end of the 90-day period. Such citizens do not require a visa or work permit to stay and work in the Slovak Republic.
  - Non-EU / non-EEA / non-Swiss citizens should obtain an entry visa from the overseas Slovak Republic consulate or embassy in their home country (if required). Within three days of arrival they should register with the Alien Police (if staying in a hotel they will automatically be registered). If intending to stay beyond 90 days, the foreign national must obtain a temporary residence permit. To work in the Slovak Republic, the foreign national requires a work permit issued by the Office of Labour, Social Affairs and Family of the Slovak Republic (applied for by his prospective employer). When granted, an application for a permanent residence permit should be made (valid up to five years and renewable).

- The tax authority in the Slovak Republic is the Slovak Financial Directorate (SFD), Ministry of Finance and local tax authorities. Slovak Republic resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Slovak Republic-source income only. An individual is deemed resident in Slovak Republic if they are physically present in the Slovak Republic for 183 days or more in a tax year (calendar year), or have a permanent residence in Slovakia.

- The tax year in Slovak Republic runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must file an annual tax return within three months after the end of the respective tax year i.e. by 31st March of the following year (and pay any tax due by this date). Penalties apply for late filing or failure to file a tax return or the late or delayed payment of tax.

- Employment income includes salaries, wages, bonuses, allowances, benefits-in-kind and any other amount received in cash or in kind from employment, in cash or in kind (unless exempted or limited). Employment income is taxed at progressive income tax rates up to 25% on amounts exceeding EUR 35,022.31 per annum. An employer must withhold tax at source from an employee's gross monthly salary and remit this to the tax authorities.

- Social security contributions are paid by both the employer and employee and cover retirement, disability, sick leave, unemployment, guaranty, injury, and health care insurance (and a reserve fund payment (4.75%) paid by the employer). The employee pays 13.40% of their gross salary and the employer pays 35.20% of the employee's gross salary. A cap applies to all the contributions except for the injury insurance contribution. An employer must withhold social security contributions at source from an employee's gross monthly salary and remit this, together with its contributions, to the Slovak social system authorities.

- A foreign national (expatriate) may be exempt from paying Slovak Republic social security contributions if they remain within their home countries' social security system under either a totalization agreement with the Slovak Republic or the European Union (EU) / European Economic Area (EEA) rules.
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KEY POINTS

- The documentation requirements to work in Slovenia depend on which country the individual is a citizen:
  - EU / EEA / Swiss citizens may stay and work in Slovenia for up to three months without a visa subject to having a valid passport or identity document. If such a citizen wishes to remain in Slovenia for more than 90 days they must register with the local authorities and obtain a certificate of residence registration. Such citizens do not require a work permit or residence permit to stay and work in Slovenia and after holding a certificate of residence registration for five years they may be granted a permit for permanent residence (with no time restriction).
  - Non-EU / non-EEA / non-Swiss citizens should obtain an entry visa from the overseas Slovenia consulate or embassy in their home country (if required). To work in Slovenia, the foreign national must have a work permit (issued at the employer's request and supported by the employment contract). A work permit is valid for one year (renewable). A temporary residence permit must also be obtained from the Regional Department of Internal Affairs, which will either be issued at the same time as the work permit or following the work permit. A temporary residence permit is valid for one year (renewable). If a foreign national holds a temporary residence permit for five years or more, and meets certain conditions, they may apply for a permanent residence permit.

- The tax authority in Slovenia is the Finančna Uprava Republike Slovenije (Financial Administration of the Republic of Slovenia, or FURS). Slovenia resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Slovenia-source income only. An individual is deemed resident in Slovenia if they are physically present in Slovenia for 183 days or more in a tax year, or have a habitual abode in Slovenia, or the centre of their personal and economic interests is in Slovenia, or they have a formal residential tie with Slovenia.

- The tax year in Slovenia runs from 1 January to 31 December (a calendar year).

- By 31 May following the end of the tax year, each foreign national (employee) will receive a tax calculation from the tax authorities which shows their total gross income and tax liability for the year less the tax deducted at source. Consequently, there is normally no further amount of tax to pay and if the employee does not object to the calculation within 30 days it is deemed to be the final tax assessment for that year and any right to appeal is considered waived. If an employee disagrees with the calculation however they have 30 days to object and submit a tax return. If an employee does not receive a tax calculation by 31 May they must file a tax return by 31 July. Any resulting tax liability should be settled within 30 days following the receipt of the subsequent tax assessment issued by the tax authorities.

- Employment income includes salaries, wages, allowances, benefits-in-kind and any other amount or benefit received from employment (unless exempted or limited). Employment income is taxed at progressive income tax rates up to 50% on amounts exceeding EUR 70,907.20 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social security contributions cover pension, health, unemployment, and maternity leave. The employee pays 22.10% of their gross salary and the employer pays 16.10% of the employee's gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities. A foreign national may be exempt from paying Slovenia social security contributions if they remain within their home countries' social security system under either a totalization agreement with Slovenia or the European Union (EU) / European Economic Area (EEA) rules.

PKF Worldwide Internationally Mobile Employee Guide 92
KEY POINTS

- To legally work in South Africa, a foreign national must obtain an entry visa (if required) and a work visa:
  - Work visas have four categories, namely, a critical skills work visa (valid up to five years, renewable), a general work visa (valid up to five years, renewable), an intracompany transfer work visa (for secondments, valid up to four years, non-renewable), and a corporate work visa (valid up to three years, renewable). Each work visa has its own requirements and the holder (and employer) must ensure they comply with the immigration legislation and conditions of the respective work visa. It is illegal for a foreign national to work in South Africa without a work visa (unless an exemption applies). A work visa conveys the legal right to work in South Africa and is also a temporary residence visa.
  - A foreign national who has held a South African work visa for five continuous years and has an offer of permanent employment may apply for a permanent residence visa.

- The tax year in South Africa runs from 1 March to 28 February (29 February). The tax authority in South Africa is the Commissioner of the South African Revenue Services (SARS). South Africa resident individuals are subject to tax on their worldwide income (subject to certain exemptions). Non-resident individuals are subject to tax on South Africa-source income. Non-resident individuals are also subject to tax on gains arising on the disposal of immovable property situated in South Africa and on the disposal of assets of a permanent establishment in South Africa.

- An individual is deemed resident in South Africa if they are ordinarily resident in South Africa, or physically present in South Africa for 91 days or more in the current tax year and in each of the preceding five tax years, and for a total of 915 days or more in those preceding five tax years. A person’s place of ‘ordinarily resident’ is regarded as where they naturally, and as a matter of course, return to from their wanderings.

- An employee is not required to file a tax return if their only income consists of employment income (single source) from which tax has been withheld at source and the total income is below ZAR 350,000. If required, a tax return must be filed by a date fixed each year by Government Notice i.e. by November 2017 (for non-provisional taxpayers).

- Employment income includes all types of remuneration and benefits, received directly or indirectly by an employee for services rendered (subject to certain exceptions). Employment income is taxed at progressive income tax rates up to 45% on amounts exceeding ZAR 1.5 million per annum. An employer must withhold tax at source from an employee's gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities.

- Social Security Contributions: South Africa does not have a standalone social security contribution system, however, it does have contributions that are similar, such as Unemployment Insurance Fund contributions and Compensation Commission contributions.
  - Unemployment Insurance Fund: An employee pays 1% of their gross salary and the employer pays 1% of the employee's gross salary.
  - Compensation Commission: An employer must register with the Compensation Fund and pay an annual assessment fee based on its employees’ earnings to cover employees against industrial accidents or illnesses that result in death or disability (certain employers are exempt). The amount of contribution that an employer pays is determined each year by the Compensation Commissioner following the submission of a report by the employer disclosing the total annual remuneration of its employees (a contribution cap applies).

- Payroll tax: An employer must pay a 1% payroll levy (‘Skills Development Levy’). Companies with annual payroll costs below ZAR 500,000 are exempt.
PKF CONTACT INFORMATION

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KEY POINTS

- The documentation requirements to work in Spain depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens may enter, live and work in Spain for up to three months without a visa subject to having a valid passport or identity document. If such a citizen wishes to remain (and work) in Spain for more than 90 days they must register their address in Spain with the Central Registry for Foreigners (Registro Central de Extranjeros) and obtain a Certificate which contains their identification number. Such citizens do not require a residence permit or work permit to stay and work in Spain.
  - Non-EU / non-EEA / non-Swiss citizens who wish to reside and work in Spain require a valid residence permit and work permit respectively. The residence and work permit are made under the same application and approved at the same time by the Spanish labour and police authorities. A temporary residence permit allows the holder to reside in Spain for more than 90 days (up to five years) and is initially issued for one year (renewable). Once issued, the holder will automatically be sent a residency card which contains their identification number. A work permit is normally issued for one year (renewable), unless the contract of employment is less than one year.

- The tax year in Spain runs from 1 January to 31 December. The tax authority in Spain is the Agencia Estatal de Administración Tributaria (State Agency of Tax Administration, or AEAT). (Note - the Tax Law in the Basque Country and Navarra may vary because these territories have autonomy for tax purposes).

- Spain resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Spanish-source income only. An individual is deemed resident in Spain if they stay in Spain for more than 183 days in a calendar year, or the centre of their vital interests is in Spain (Note - residence may be presumed if their family live in Spain).

- On arrival, each (new) foreign national working in Spain is required to register with the AEAT and their employer is required to register them with the Social Security authorities. Their work residency permit number is also their tax identification number (NIE).

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source and they earn less than EUR 22,000 (for joint and separate returns), or if they have more than one source of employment income and in total they earn less than EUR 12,000 (and each additional payer exceeds EUR 1,500). Otherwise, an employee (foreign national) is required to complete and file an annual tax return between 2 May and 30 June following the end of the tax year.

- Employment income includes salaries, wages, bonuses, pensions, certain allowances, benefits in kind and any other amount received in cash or in kind for employment services. Employment income is taxed at progressive income tax rates up to 45% on amounts exceeding EUR 60,000 per annum. Please note that this maximum rate can vary according to the region where the foreign national is a resident. An employer must withhold tax at source from an employee's gross monthly salary and remit this to the tax authorities.

- Social Security Contributions: The employee pays 6.35% of their gross salary and the employer pays 29.9% of the employee’s gross salary (plus a contingency rate depending on the company’s activities). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.

- A foreign national (expatriate) may be exempt from paying Spanish social security contributions if they remain within their home countries’ social security system under either a totalization agreement with Spain or the European Union (EU) / European Economic Area (EEA) rules.
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KEY POINTS

- To legally work in Sri Lanka, a foreign national must obtain an entry visa (if required), a residence visa and work permit:
  - Entry visa: A single-entry or multiple-entry visa must be obtained by the foreign national (expatriate) from the overseas Sri Lanka consulate or embassy in their home country (if required).
  - Residence visa: A residence visa must be obtained from the Department of Immigration and Emigration by each foreign national (expatriate) wishing to work in Sri Lanka. The visa is normally valid for one year (renewable) and should be applied for within a month of the foreign national (expatriate) arriving in Sri Lanka (by the employer on behalf of its expatriate employee).
  - Work permit: To legally work in Sri Lanka a foreign national (expatriate) must obtain a work permit. The application is made by the employer on behalf of the expatriate employee (the sponsor). Work permits are issued by the Department of Immigration and Emigration. A work permit is normally valid for one year (renewable).

- The tax authority in Sri Lanka is the Department of Inland Revenue (IRD). Sri Lanka resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on income derived from Sri Lanka only. An individual is deemed resident in Sri Lanka if they are physically present in Sri Lanka for 183 days or more in a tax year.

- The tax year in Sri Lanka runs from 1 April to 31 March.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources (other than dividends or income from interest on which tax has been deducted), or tax has not been withheld at source from their employment income, must complete and file an annual tax return by 30th November following the end of the tax year (year of assessment).

- Employment income is calculated on a gross basis and includes salaries, allowances, benefits-in-kind and any other amount or benefit received either directly or indirectly, in cash or in kind, from employment (unless exempt or limited).

- Employment income is taxed at progressive income tax rates up to 24% on amounts exceeding LKR 3 million per annum. Tax deducted under the Pay-As-You-Earn (PAYE) withholding tax system is considered the final tax on employment income. An employer must withhold tax at source from an employee’s gross monthly salary under the PAYE system and remit this to the tax authorities.

- Social security contributions are paid by both the employee and employer and consist of payments to an Employees’ Provident Fund and an Employees’ Trust Fund:
  - Employees’ Provident Fund (EPF): Total contributions are 20%. The employee pays 8% of their gross salary and the employer pays 12% of the employee’s gross salary. An employer must withhold EPF contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the Employees’ Provident Fund.
  - Employees’ Trust Fund (ETF): Only an employer pays contributions to the ETF (no contribution is paid by an employee). The employer pays a minimum of 3% of the employee’s gross salary. An employer must withhold ETF contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the Employees’ Trust Fund.

SRI LANKA
CAPITAL: Colombo (Commercial)
CURRENCY: Sri Lankan Rupee (LKR)
POPULATION: 20.91 Million (2017 estimate)
LANGUAGES: Sinhala, Tamil, English
KEY POINTS

- The documentation requirements to legally work in Sweden depend on which country the foreign national is a citizen:
  - Nordic nationals: No work or residence permit is required for citizens of Denmark, Finland, Iceland, or Norway to remain and work in Sweden;
  - EU / EEA / Swiss citizens: An EU / EEA citizen can remain in Sweden without the need to register their right of residence with the Swedish Migration Agency (Sw. Migrationsverket). Swiss citizens who wish to stay in Sweden for more than three months however must apply for a residence permit. No work permit is required by an EU / EEA / Swiss citizen who wishes to work in Sweden.
  - Non-EU / non-EEA / non-Swiss citizens should obtain an entry visa from the overseas Swedish consulate or embassy in their home country (if required). If the foreign national wishes to stay in Sweden for longer than three months they require a residence permit (valid for two years, renewable) and this should be obtained before their arrival in Sweden (the residence permit is normally applied for within the application for a work permit and both are normally granted at the same time). To legally work in Sweden, the foreign national must hold a work permit issued by the Swedish Migration Agency. A work permit is valid for two years (renewable). Where a foreign national has held a work permit for four years he or she may apply for permanent residence.

- The tax authority in Sweden is the Skatteverket (Swedish Tax Agency, or STA). Sweden resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Sweden-source income only (including certain capital gains and pension income). An individual is deemed resident in Sweden if they are physically present in Sweden for six months or more (and regularly stay overnight), or have permanent ties with Sweden i.e. family or a permanent home.

- The tax year in Sweden runs from 1 January to 31 December (a calendar year).

- Generally, by 15th April in the year following the income year a pre-completed printed tax return is sent to each employee by the tax authority showing their gross employment income, allowances and tax deducted at source. Any additional information should be added to the return and it should be signed and filed with the tax authorities by 2nd May. The tax return can also be confirmed via the telephone or over the internet.

- Employment income includes salaries, wages, pensions, fringe benefits, allowances, and any other amount or benefit received from employment (unless exempt or limited). Broadly, employment income is taxed at progressive income tax rates up to 58% on amounts exceeding SEK 638,500 per annum. This represents a national income tax rate of approximately 25%, an average municipal income tax rate of approximately 32%, and a church tax of 1%. An employer must withhold tax at source from an employee’s gross monthly salary under the PAYE (Pay-As-You-Earn) system and remit this to the tax authorities.

- Social security contributions are paid by an employer (and not by an employee) and cover basic old-age pension insurance, general sickness insurance, and supplementary pension insurance. The employer pays 31.42% of the employee’s gross salary although a lower rate applies for individuals born before 1950. An employee does however pay pension insurance at a rate of 7% of their net earned income (capped at a maximum contribution SEK 32,100 per year). A foreign national (expatrate) may be exempt from paying Swedish social security contributions if they remain within their home countries’ social security system under a totalization agreement with Sweden.
KEY POINTS

- Unemployed European Union (EU) / European Free Trade Association (EFTA) citizens may stay in Switzerland for up to three months without a visa. Those EU/EFTA nationals who are in possession of an employment contract of less than three months’ duration within a calendar year are not obliged to apply for a permit; such short-term employment contracts are regulated via a notification procedure. EU-27/EFTA nationals are entitled to the L permit provided they are in possession of an employment contract valid from three up to twelve months. Furthermore, L EU/EFTA permits without gainful employment are granted to job seekers from all EU/EFTA states. The residence B permit for EU-27/EFTA nationals is issued if the foreign national has an employment contract of at least twelve months’, or unlimited, duration and is valid for five years (after five years, an EU/EFTA citizen may obtain a permanent residence ‘C’ permit).

- Non-EU / non-EFTA citizens should obtain a Schengen entry visa from the overseas Switzerland consulate or embassy (if required). If intending to work for up to four consecutive months the non-EU / non-EFTA citizen should apply for a short-term work permit (category one L permit). Provided they are in possession of an employment contract valid from one up to two years, non-EU / non-EFTA nationals are entitled to a category two L permit. If intending to work under an employment contract for more than two years the foreign national citizen should apply for a long-term work permit (B permit) which is valid for one year (then two years). After 10 years the foreign national may apply for a permanent residence permit (C permit).

- The tax year in Switzerland runs from 1 January to 31 December (a calendar year). The tax authority in Switzerland is the Eidgenössische Steuerverwaltung (Swiss Federal Tax Administration, or SFTA) and the Cantonal Tax Administrations. Broadly, Switzerland resident individuals are subject to tax on their worldwide income (exceptions apply). Non-resident individuals are broadly subject to tax on Switzerland-source income only. An individual is deemed resident in Switzerland if they are physically present in Switzerland for at least 90 days (or at least 30 days if undertaking a professional activity), or they intend to remain in Switzerland permanently (centre of their vital interests in Switzerland).

- Switzerland has three levels of government; federal, cantonal and municipal. Federal taxes are levied uniformly throughout Switzerland, however, each of the 26 cantons have a separate law for their taxes and municipal taxes are levied as a multiple of the cantonal taxes. Employment income up to CHF 755,200 per annum (for an unmarried person) is taxed at progressive federal income tax rates, however, if the income exceeds CHF 755,200 then the entire amount is subject to a flat rate of 11.5%. Employment income is also subject to canton and municipal income taxes (rates vary).

- Social security contributions cover old age, survivors’, unemployment, and maternity insurance and a children allowance. The total contribution is 12.45% (2017) of the employee’s gross salary and an employee and an employer each pay half (an employer however may pay more than half). An employer also pays an obligatory employee accident insurance (rates vary) as well as (in the majority of cantons) the costs of a family allowance (rates vary but mostly around 1.2%). Employees paid a salary exceeding CHF 21,150 by one employer are subject to compulsory insurance (capped) against death and invalidity.

- A foreign national may be exempt from paying Swiss social security contributions if they remain within their home country’s’ social security system under either a totalization agreement with Switzerland or the EU/EFTA rules (for compliance obligations Form A1 is required).
KEY POINTS

- To legally work in Taiwan, a foreign national must obtain an entry visa (if required), an employment authorisation (work permit) and a residence visa:
  - Entry visa: An entry visa must be obtained by the foreign national (expatriate) from the overseas Taiwan consulate or embassy in their home country (if required) although the Ministry of Foreign Affairs does allow citizens from certain countries to obtain a visa on arrival (a landing visa).
  - Work permit: A foreign national (expatriate) accepting employment in Taiwan must be granted an employment authorisation (work permit) from the Workforce Development Agency. The application for the work permit is made by his or her employer in Taiwan in accordance with the Measures for Regulations on the Permission and Administration of the Employment of Foreign Workers (Employment Rules). A work permit is normally valid for up to one year (renewable).
  - Residence visa: Once a work permit has been granted, a foreign national must obtain a residence visa from the National Immigration Agency and apply for an Alien Resident Certificate (ARC) within 15 days of their arrival in Taiwan. A residence visa is normally valid for up to one year (renewable).

- The entry, departure and residence of foreign nationals (expatriates) working in Taiwan is supervised by the National Immigration Agency.

- The tax authority in Taiwan is the National Tax Bureau (NTB), Ministry of Finance (MOF). Taiwan resident and non-resident individuals are subject to consolidated (personal) income tax on their Taiwan-source income only i.e. on income derived or earned from Taiwan sources only. An individual is deemed resident in Taiwan if they are physically present in Taiwan for 183 days or more in a calendar year, or they have a registered household in Taiwan and are either physically present in Taiwan for 31 days or more in a calendar year or the centre of their vital interests is in Taiwan.

- The tax year in Taiwan runs from 1 January to 31 December (a calendar year).

- An employee must complete and file an annual tax return by 31 May of the year following the tax year. Any additional tax due (less that withheld at source by their employer) should be paid at the time of filing, before 31 May of the following year. Penalties apply for late filing or failure to file a tax return or the late or delayed payment of tax.

- Employment income includes salaries, wages, annuities, pensions, benefits in kind and any other type of remuneration or benefit received in cash or in kind from employment (unless exempted or limited). Employment income is taxed at progressive income tax rates up to 45% on amounts exceeding NTD 10.31 million per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social security contributions are paid by both the employee and employer and consist of payments for national health insurance and labour insurance:
  - National Health Insurance: Total contributions are 7.5509%. The employee (single person) pays 2.2653% of their gross salary and the employer pays 4.5305% of the employee’s gross salary, and 0.7551% is paid by government.
  - Labour insurance: Total contributions are 9.5%. The employee pays 1.9% of their gross salary and the employer pays 6.65% of the employee’s gross salary, and 0.95% is paid by government. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.
KEY POINTS

- To legally work in Tanzania, a foreign national must obtain an entry visa (if required), a work permit and residence permit:
  - Entry visa: An entry visa (if required) must be obtained by the foreign national (expatriate) from the overseas Tanzania consulate or embassy in their home country or acquired at the point of entry into Tanzania (subject to having a valid passport or similar identity document).
  - Work permit: Every foreign national (expatriate) wishing to take up employment in Tanzania must obtain a work permit. The work permit must be obtained by the foreign national from an overseas Tanzania consulate or embassy in their home country (sponsored by the Tanzania employer). A work permit is valid for two years (renewable).
  - A residence permit must be obtained by a foreign national to enable them to legally stay in Tanzania. A work permit supports an application for a residence permit and, as the work permit, it should be obtained by the foreign national from an overseas Tanzania consulate or embassy in their home country before their arrival in Tanzania. A residence permit is normally valid for two years (renewable).

- The tax year (year of income) in Tanzania runs from 1 January to 31 December (a calendar year).

- The tax authority in Tanzania is the Tanzania Revenue Authority (TRA). Tanzania resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Tanzania-source income only.

- An individual is deemed resident in Tanzania if they are physically present for 183 days or more in a year of income, or physically present for 122 days or more in a year of income and in each of the two prior years of income, or they have a permanent home in Tanzania (and were physically present in Tanzania for any time during the year of income), or they were employees (or officials) of the Government of Tanzania posted overseas during the year of income.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must complete and file an annual tax return within six months of the end of the tax year i.e. by 30 June of the year following the tax year (and pay any tax due by this date).

- Employment income includes salaries, wages, bonuses, allowances, benefits-in-kind and any other benefit or amount received in cash or in kind from employment, either directly or indirectly (unless exempted or limited). Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding TZS 720,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn (PAYE) withholding tax system and remit this to the tax authorities within seven days of the following calendar month. An employer must file two returns each year, each within 30 days of the end of each six-month period.

- Social security contributions are paid by the employee to the National Social Security Fund (NSSF), Tanzania’s state social security scheme. An employer pays 20% of the employee’s gross salary but may recover up to half of this from the employee. Therefore typically, the employee pays 10% of their gross salary and the employer pays 10% of the employee's gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the NSSF. Alternative social security schemes are also available at similar rates such as the Parastatal Pension Fund (PPF) scheme, the Public Service Pension Fund (PSPF) scheme and the Local Authorities Provident Fund (LAPF) scheme.
PKF CONTACT INFORMATION

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</table>

KEY POINTS

- To legally work in Thailand, a foreign national must obtain an entry visa (a Non-Immigrant B (Non-B) residence visa) and a work permit:
  - A foreign national wishing to work in Thailand must enter Thailand on a Non-B visa, which can be obtained from an overseas Consulate or Embassy of Thailand, and is required for a work permit application. A valid Non-B visa should be maintained for the term of an employees work permit (i.e., until employment ends in Thailand). Once a work permit has been obtained, the period of the Non-B visa may be renewed at the Immigration Bureau offices inside Thailand.
  - A work permit must be held by every foreign national wishing to work in Thailand (unless exempt) and it is a criminal offense to work in Thailand without one (punishable by both fines and imprisonment). The work permit application (together with required documents) must be made to the Employment Department of the Ministry of Labour and Social Welfare by the Thai prospective employer. A work permit is normally granted for one or two years (renewable).

- The tax authority in Thailand is the Krom Sumpakom (Thai Revenue Department or TRD). Thailand resident and non-resident individuals are subject to tax on their Thailand-source income. A Thailand resident individual is also subject to tax on foreign income remitted to Thailand in the year in which it is earned / derived. An individual is deemed resident in Thailand if they are physically present in Thailand for 180 days or more in a tax year (i.e., calendar year).

- Within 60 days from starting work an employee (taxpayer) is required to obtain a Tax Identification Number from the TRD (if residing in Bangkok) or from the relevant Provincial or Amphur (District) Revenue Office (if residing outside Bangkok).

- The tax year in Thailand runs from 1 January to 31 December (a calendar year).

- An employee is required to file an annual Personal Income Tax return (PIT return) even if their only income consists of employment income from which tax has been withheld at source by their employer. The PIT return must be filed with the TRD by 31 March of the following year (and any tax due must be paid by this date). A penalty and monthly surcharge applies for the late or delayed payment of tax.

- Employment income includes salaries, wages, bonuses, allowances and any other amount or benefit (unless specifically exempt or limited) received by an employee in cash or in kind. Employment income is taxed at progressive PIT rates up to 35% on amounts exceeding THB 5 million per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social Security Fund (‘SSF’) Contributions: An employee pays 5% of their gross salary (capped at THB 15,000) and the employer pays 5% of the employee's gross salary (capped at THB 15,000) i.e. the cap provides a maximum monthly SSF contribution of THB 750 from both employee and employer. An employer must withhold SSF contributions at source from an employee’s gross monthly salary and remit this, together with their contribution, to the Social Security Office.

- When employment ends, and the internationally mobile employee permanently leaves Thailand, the work permit must be cancelled with the Labour Registrar and the foreign national’s visa cancelled by notifying the Immigration Bureau. If applicable, a Tax Clearance Certificate should be obtained from the Thai Revenue Department, for which it is the employer’s obligation to ensure compliance.
KEY POINTS

- To legally work in Turkey, a foreign national must obtain an entry visa (if required), a ‘montage visa’ or a work visa and residence permit:
  - An entry visa must be obtained by the foreign national (expatriate) from the overseas Turkish consulate or embassy in their home country (if required). Depending on the country of the foreign national, an e-visa from the online Turkish government portal may be required.
  - A work visa must be obtained before the foreign national arrives in Turkey. The application should be made to the overseas consulate or embassy of Turkey in the foreign national’s home country. Work visas are issued by the Ministry of Labour and Social Security and are valid for one year (renewable). Where an individual will work less than 90 days they can obtain a ‘montage visa’, however, if the work is to last longer than 90 days they require a work visa.
  - A residence permit must also be obtained by the foreign national, applied for at the time of the work permit application or following this. A residence permit is normally valid for one year (renewable).

- The tax year in Turkey runs from 1 January to 31 December (a calendar year). The tax authority in Turkey is the Revenue Administration (RA), Ministry of Finance. Turkey resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Turkey-source income only. An individual is deemed resident in Turkey if they are physically present in Turkey for six months in any calendar year except if they are in Turkey for health care, holiday, or educational purposes.

- An employer is required to register each (new) foreign national working in Turkey with the social security scheme authorities by filing a ‘commencement of employment’ form in respect of the employee. Following registration, the new employee will be issued with a social security number.

- An employee is not required to file a tax return if their only income consists of employment income (single employer) from which tax has been withheld at source. An employee who receives income from other sources, or from more than one employer, or tax has not been withheld at source from their employment income, must complete and file an annual tax return between the first and 25th day of March in the year following the tax year. Any tax due should be paid in two equal instalments in March and July. Penalties apply for the late filing or failure to file a tax return.

- Employment income includes salaries, bonuses, commissions, allowances and any other amount or benefit received from employment, in cash or in kind (unless exempt or limited). Employment income is taxed at progressive income tax rates up to 35% on amounts exceeding TRY 110,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities by the 26th day of the month following the month of payment.

- Social security contributions (social insurance premiums) are paid by both the employee and employer and cover disability, old age, death, occupational accidents and diseases, and health. The employee pays 14% of their gross salary and the employer pays 20.5% of the employee's gross salary. In addition, an employee pays 1% for unemployment insurance and the employer pays 2%. An employer must withhold social security contributions at source from an employee's gross monthly salary and remit this, together with its contributions, to the authorities.

- A foreign national (expatriate) may be exempt from paying Turkish social security contributions if they remain within their home countries’ social security system under either a bilateral totalization agreement with Turkey or the European Social Security Agreement rules.
PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in Uganda, a foreign national must obtain an entry visa (if required), a work permit and residence permit:
  - Entry visa: An entry visa (if required) must be obtained by a foreign national from the overseas Ugandan consulate or embassy in their home country. Citizens from countries of the Common Market for Eastern and Southern Africa (COMESA) or the East African Community (EAC) are specifically exempt from requiring an entry visa on arrival in Uganda.
  - Work permit: A work permit must be held by a foreign national wishing to legally undertake employment in Uganda. Work permits are issued by the Directorate of Citizenship and Immigration Control. The foreign national should obtain a work permit from an overseas Uganda consulate or embassy. A work permit is valid for three years and renewable upon expiry. A special pass (temporary work permit) may be issued on submission of a work permit application and is valid for three months (extended up to a year).
  - Temporary residence permit (non-immigrant visa): A foreign national should obtain a temporary residence visa (immigrant visa) to allow them to legally stay in Uganda throughout their period of employment. When the foreign national has been in Uganda for ten years or more they may apply for permanent residence status (certificate of residence).

- The tax authority in Uganda is the Uganda Revenue Authority (URA). Uganda resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Uganda-source income only. An individual is deemed resident in Uganda if they are physically present in Uganda for 183 days or more in the tax year, or physically present in Uganda for an average of 122 days in the tax year and the two preceding tax years, or they maintain a permanent home in Uganda, or they are officials or employees of the government of Uganda posted abroad during the tax year.

- The tax year in Uganda runs from 1 July to 30 June.

- An employee is not required to file a tax return if their only income consists of employment income (from a single employer) from which tax has been withheld at source. An employee who receives income from other sources, or has more than one employer, must complete and file an annual final tax return within six months of the end of the year of income i.e. by 31 December. The tax authorities will review the submitted tax return and issue an assessment. Any tax due should be paid within 30 days from the date of assessment.

- Employment income includes wages, salaries, bonuses, sick pay, directors’ fees, commissions, gratuities, allowances, benefits-in-kind and any other amount or benefit received from employment (unless exempted or limited). Employment income is taxed at progressive income tax rates up to 30% on amounts exceeding UGX 4.92 million per annum (and where employment income exceeds UGX 120 million per annum an additional 10% tax is levied on the excess). An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities by the 15th day of the month following the month of payment.

- Social Security Contributions: A statutory savings scheme exists in Uganda to provide retirement benefits to employees. Payments to the National Social Security Fund (NSSF) are made by both the employee and employer. The employee pays 5% of their gross salary (only cash emoluments) and the employer pays 10% of the employee’s gross salary (only cash emoluments). An employer must withhold social security contributions at source from an employee’s gross monthly salary (only cash emoluments) and remit this, together with its contributions, to the NSSF by the 15th day of the month following the month of payment.
KEY POINTS

- To legally work in Ukraine, a foreign national must obtain an entry visa (if required), a work permit and residence permit:
  - Entry visa: An entry visa must be obtained by a foreign national from the overseas Ukraine consulate or embassy in their home country (if required). The passport of each foreign national is registered at the point of entry into Ukraine.
  - Work permit: A work permit must be obtained by a foreign national from an overseas Ukraine consulate or embassy before they arrive in Ukraine. Work permits are issued by the State Employment Centre of the Ministry of Social Policy and are valid for one year (renewable). Please note that the procedure for obtaining a work permit can vary depending on the category of the employee.
  - Residence permit: Once a work permit has been obtained, the foreign national must obtain a temporary residence permit from the Ukrainian immigration authorities. The residence permit is issued for the period of the work permit’s validity (usually one year, renewable).

- The tax authority in Ukraine is the Fiscal Service of Ukraine (FSU). Ukraine resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Ukraine-source income only.

- An individual is deemed resident in Ukraine if they have a permanent home in Ukraine. If a permanent home exits in more than one country, the individual will be deemed resident in Ukraine if their centre of vital interests (closer personal and economic ties) is in Ukraine. If still undetermined, residency will be deemed in Ukraine if an individual is physically present in Ukraine cumulatively for at least 183 days during a calendar year or is a Ukraine national. In addition, the Ukraine Tax Code provides a self-recognition procedure, according to which an individual can voluntarily elect to be a Ukrainian tax resident.

- The tax year in Ukraine runs from 1 January to 31 December (a calendar year).

- A foreign national (employee) must register with the State Registry for Individual Taxpayers to obtain a personal tax identity number. This number is important for paying personal income tax, opening a bank account, etc.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source (by a tax agent i.e. their employer). An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must complete and file an annual tax return by 1 May of the year following the tax year (reporting year). Any tax due should be paid by 1 August of the year following the reporting year. Penalties apply for late or delayed payment of tax.

- Employment income includes salaries, wages, bonuses, allowances, supplementary pay, monetary awards, benefits-in-kind and any other amount or benefit received from employment, in cash or in kind (unless exempt or limited). Employment income is taxed at a flat personal income tax rate of 18% per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities. In 2017, income which is subject to personal income tax is also subject to a temporary Military Duty at a rate of 1.5% of taxable income.

- Unified Social Security Contributions (USC) are paid by employer only (an employee does not pay any social security contributions). The employer pays a flat rate of 22% of the employee’s gross salary. The maximum for the single contribution base is set at 25 times the monthly minimum subsistence. There is a special reduced USC rate of 8.41% for the payments made to individuals with physical disabilities.
PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in United Arab Emirates, a foreign national must obtain an entry visa (if required) and an employment residence permit:
  - Employment residence permits: For an employer (sponsor) located in a mainland jurisdiction, the employment residence permit application will be reviewed by the Ministry of Human Resources and Emiratisation and the General Directorate of Residency and Foreigners Affairs (GDRFA). For an employer (sponsor) located in a Free Zone jurisdiction, the employment residence permit application will be reviewed by the Free Zone authority and the GDRFA. In mainland jurisdictions, the foreign national can commence work when they have an employment entry permit or a local status amendment has been made. In Free Zone jurisdictions, the foreign national can commence work when the employment residence permit is stamped in their passport.
  - The tax authority in United Arab Emirates is the Federal Tax Authority (FTA) of the Minister of Finance.
  - United Arab Emirates resident and non-resident individuals are not subject to tax on their income.
  - The tax year in United Arab Emirates runs from 1 January to 31 December (a calendar year).
  - Since there is no Personal Income Tax (PIT) law enacted in the United Arab Emirates, and no personal tax compliance obligations, an employee is not required to file an annual tax return. Employment income is not taxed in the United Arab Emirates.
  - Social Security Contributions:
    - Neither the foreign national (expatriate) employee nor their employer pays social security contributions in the United Arab Emirates i.e. the United Arab Emirates does not levy social security taxes on foreign employees (or their employer in respect of their employment).
    - Social security contributions are payable to the General Pension and Social Security Authority (GPSSA) by both the employee and employer with respect to United Arab Emirates nationals (employees). The employee pays 5% and the employer pays 12.5% of the employee's agreed contractual salary in accordance with their employment contract. If a United Arab Emirates national is employed in a public entity, the employer's contribution is 15% of the employee's agreed contractual salary in accordance with their employment contract.
  - End-of-service benefits: Where a foreign employee (not a national of a GCC country) has been in continuous service for more than one year he or she is entitled to a ‘leaving’ gratuity:
    - Unlimited Ministry of Human Resources and Emiratisation employment contracts: Where a foreign national employee has worked between one and three years and leaves, he or she is entitled to an end-of-service gratuity of one-third of the 21 days of ‘last drawn basic wage’ gratuity per year. If they have worked between three years to five years and leave, they are entitled to two-thirds of the 21 days of ‘last drawn basic wage’ gratuity per year. If they have worked five or more years the employee is entitled to the full 21 days of ‘last drawn basic wage’ gratuity per year. The total gratuity cannot however exceed two years remuneration (24 months).
    - Limited Ministry of Human Resources and Emiratisation employment contracts: Where a foreign national employee has worked between one and five years and leaves, he or she is entitled to an end-of-service gratuity to the full 21 days of ‘last drawn basic wage’ gratuity pay per year. If they have worked five or more years the employee is entitled to the full 30 days of ‘last drawn basic wage’ gratuity pay per year. The total gratuity cannot however exceed two years remuneration (24 months).

In both cases (under limited and unlimited employment contracts), where the foreign national employee has worked for less than one year, and leaves, he or she is not entitled to any gratuity pay.
UNITED KINGDOM
CAPITAL: London
CURRENCY: Pound Sterling (GBP)
POPULATION: 65.51 Million (2017 estimate)
LANGUAGE: English

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KEY POINTS

- The documentation requirements (appropriate immigration document and/or entry clearance (visa)) to legally work in the United Kingdom (UK) depend on which country the foreign national is a citizen:
  - EU / EEA / Swiss citizens may enter, stay and work in the UK without a work permission (visa) subject to having a valid passport or identity document (exception: citizens from Croatia require work permission). On arrival, a residence document should be applied for which is normally valid for five years. Permanent residency may be applied for following five years residency.
  - Broadly, non-EU / non-EEA / non-Swiss citizens wishing to stay and work in the UK must obtain the required employment authorisation entry clearance before arrival. A five-tier Points Based System (PBS) is in operation in the UK to screen potential migrants and each has its own conditions, entitlements and entry clearance requirements. Tier 2 rules apply to the employment of foreign nationals and a potential employer must obtain a ‘sponsor license’ and satisfy a Resident Labour Market Test as part of the process. Permanent residency may be applied for following five years residency which is known as Indefinite Leave to Remain (ILR). If applicable, a biometric residence permit (identity card) must be collected by a foreign national within 30 days of arrival.

- The tax year in UK runs from 6 April to 5 April of the following year. The tax authority in the UK is Her Majesty’s Revenue and Customs (HMRC). UK resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on UK-source income only. An individual is deemed resident in UK if they satisfy a Statutory Residence Test which is based on a combination of physical presence and connection factors with the UK.

- An employee is not required to file a tax return if their only income consists of employment income from which tax has been withheld at source. An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must file a tax return by 31 October (or 31 January, if filing online) following the end of the tax year. Any tax due should be paid by 31 January following the end of the respective tax year (note: payments on account may be required on 31 January in the tax year and 31 July following the end of the tax year).

- Employment income broadly includes any amount or benefit, received directly or indirectly, in cash or in kind, by an employee. Employment income is taxed at progressive income tax rates under the Pay-As-You-Earn (PAYE) system up to 45% on amounts exceeding GBP 150,000 per annum. A Short-Term Business Visitors agreement with HMRC may eliminate PAYE operating on a business visitor’s earnings (available to a resident of a country with which the UK has a double tax agreement).

- National Insurance Contributions (NIC): An employee pays 12% (Class 1 Primary NIC) of their monthly gross salary between GBP 680 and GBP 3,750, and 2% on income exceeding this amount. The employer pays 13.8% (Secondary NIC) of the employee’s gross salary over the earnings threshold of GBP 680 per month. An employer also pays 13.8% (Class 1A NIC) on the value of any other payments and benefits in-kind received by an employee. An employer must withhold income tax and social security contributions at source from an employee’s gross weekly or monthly salary and remit this, together with its contributions, to the tax authorities (HMRC). A foreign national may be exempt from paying UK social security contributions if they remain within their home countries’ social security system under either a reciprocal agreement with the United Kingdom or the European Union / European Economic Area rules.
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KEY POINTS

- To legally work in United States (US), a foreign national must obtain the required authorisation (visa). US immigration distinguishes between foreign nationals seeking temporary admission (non-immigrants) and those intending to remain permanently (immigrants).
  - A non-immigrant individual wishing to work in the US must obtain the correct 'work' visa. Some of the most common include temporary working arrangements (H visa), intra-company transferees (visa L-1), visas issued for Trade North American Trade Agreement Professionals (TN visas) and visas for extraordinary ability (visa O-1).
  - An immigrant visa holder may stay and work in the US with few restrictions. There are five categories of employment-based immigrant (green card) visas.

Once a foreign national (employee) has a work visa they should obtain a Social Security number (Form SS-4) or Taxpayer Identification Number (Form W-7) and then complete IRS Form W-4 (for their employer).

- The tax year in the US generally runs from 1 January to 31 December. The tax authority in the US is the Internal Revenue Service (IRS). US citizens and other resident individuals are subject to tax on their worldwide income, reduced by certain adjustments, deductions, and exemptions. Non-resident individuals are generally subject to tax on their income from US sources. Certain credits are available to reduce the tax computed. A foreign national is deemed resident in the US if they hold a ‘Green Card’ (permanent resident), or they meet the substantial presence test (based on the number of days the individual has been physically present in the US).

- Employers are required to withhold income taxes, Medicare and social security from an employee's salary and remit to the government periodically. Employment income includes wages, salaries, and all other employee compensation (although some exceptions apply). Employment income is taxed at progressive income tax rates up to 39.6% on amounts exceeding USD 418,400 per annum (single person). Broadly, where employment income exceeds USD 10,300 or an employee has other sources of income, they must file a tax return by the 15th day of the fourth month following the end of the tax year i.e. by 15th April (and pay any tax due by this date). State income taxes are also assessed and returns must also be filed based on where the employee is living and working.

- Social security tax (FICA) is paid by both the employer and the employee and consists of two parts; hospital insurance (Medicare Tax) and old-age, survivors, and disability insurance (OASDI):
  - For Medicare Tax contributions, the employer and employee each pay 1.45% of the employee's gross salary (without a cap). The employee also pays an additional 0.9% on their gross salary which exceeds USD 200,000 (USD 250,000 for couples filing joint returns, or USD 125,000 for a married person filing separately). The additional Medicare Tax is not paid by an employer.
  - For OASDI contributions, the employee pays 6.2% of their gross salary and the employer pays 6.2% of the employee’s gross salary up to USD 127,200 (2017).

A foreign national (expatriate) may be exempt from paying US social security contributions if they remain within their home country’s social security system under a totalization agreement with the US.

- Employee mobility can also impact the taxability of the parent company for whom the global employee works. Activities and functionalities of the employee may result in the company, whether inbound or outbound, creating a permanent establishment in the other country. This can result in unexpected business level taxes at both the federal and state level.
URUGUAY
CAPITAL: Montevideo
CURRENCY: Uruguayan Peso (UYU)
POPULATION: 3.46 Million (2017 estimate)
LANGUAGE: Spanish

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KEY POINTS

- To legally work in Uruguay, a foreign national must obtain an entry visa (if required), a work permit and residence permit:
  - Entry visa: An entry visa (if required) must be obtained by the foreign national (expatriate) from the overseas Uruguay consulate or embassy in their home country and normally enables the holder to stay from one to three months. If the individual is to stay longer than three months they should obtain a temporary residence visa (which is normally obtained with a work permit). If the foreign national wishes to establish permanent residence in Uruguay they should apply for a permanent residence visa, subject to meeting certain conditions.
  - Work permit: A work permit must be obtained by any foreign national wishing to take up employment in Uruguay. The foreign national should obtain a work permit before arrival in Uruguay from an overseas Uruguay consulate or embassy. A work permit is normally valid for a period lasting the length of the employment contract.

- The tax authority in Uruguay is the Dirección Nacional Impositiva (General Tax Direction, or DGI). Broadly, Uruguay resident and non-resident individuals are subject to tax on Uruguay-source income only (some exceptions exist).

- An individual is deemed resident in Uruguay if they are physically present in Uruguay for 183 days or more in a calendar year, or the centre of their vital interests (economic interests, family interests, etc) is in Uruguay.

- The tax year in Uruguay runs from 1 January to 31 December (a calendar year).

- An employee is not required to file a tax return if their only income consists of employment income (from one employer) from which tax has been withheld at source. An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must complete and file an annual tax return by 31 May following the end of the tax year.

- Employment income includes salaries, wages, bonuses, allowances, fringe benefits, and any other amount received from permanent or temporary employment (unless exempt or limited).

- Employment income is taxed at progressive income tax rates up to 36% on amounts exceeding USD 14,851 per annum. An employer must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities.

- Social security contributions are paid by both the employee and employer and cover pension contributions, health insurance and payments to the Labour Reconversion fund. The employee pays between 18.125% and 23.125% of their gross salary (depending on the employee’s salary and number of dependent children covered by health insurance) and the employer pays 12.625% of the employee’s gross salary. An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.

- A foreign national (expatriate) may be exempt from paying Uruguay social security contributions if they remain within their home countries’ social security system under a social security agreement with Uruguay.

- Net worth tax: Foreign nationals may be subject to a net worth tax on the difference between assets and certain liabilities located in Uruguay as at 31 December. The tax is imposed at progressive rates from 0.7% up to 2.75% per annum.
KEY POINTS

- To legally work in Venezuela, a foreign national must obtain the appropriate work authorisation, namely, a work permit and labour visa (TR-L):
  - Work authorisation: If a foreign national is to stay in Venezuela for more than 90 days, and intends to engage in gainful employment, they must obtain a work permit (authorisation) and a labour visa (Working Transient Visa, or TR-L). The work permit must be requested by the employer from the Ministry of Labour. Following this, a multiple-entry TR-L (labour visa) may be obtained by presenting the application form and certain documents including the employment contract to the Office of Migration. A labour visa (TR-L) is valid for one year (renewable).
  - The tax authority in Venezuela is the Servicio Nacional Integrado de Administración Aduanera y Tributaria (National Integrated Tax and Customs Service Administration, or SENIAT). Venezuela resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Venezuela-source income only. An individual is deemed resident in Venezuela if they are physically present in Venezuela for 183 days or more in the current or preceding calendar year.
  - The tax year in Venezuela runs from 1 January to 31 December (a calendar year).
  - Generally, an employee is not required to file a tax return if their only income consists of employment income (from one employer) from which tax has been withheld at source. An employee who receives income from other sources, or tax has not been withheld at source from their employment income, must complete and file an annual tax return by 31 March of the following tax year. Any tax liability due must be paid in full by 31 March or in three equal instalments; the first instalment when the tax return is filed on 31 March, the second instalment within 20 days from the date of filing the return and the third instalment within 40 days from the date of filing the return. Penalties apply for late filing or failure to file a tax return or the late or delayed payment of tax.
  - Employment income includes salaries, wages, allowances, benefits-in-kind and any other amount or benefit received either directly or indirectly from employment (unless exempt or limited). Employment income is taxed at progressive income tax rates up to 34% on amounts exceeding TU 6,000 per annum.
    - Note: The tax unit (unidad tributaria, TU) is a tax adjustment index. Its value is adjusted annually by the tax authorities in accordance with inflation and amounts to VEF 300 for 2017. An employer must withhold tax at source from an employee's gross monthly salary and remit this to the tax authorities.
  - Social security contributions are paid by both the employee and employer and cover old age, survivorship, sickness, accident, disability, maternity, death, retirement, dismissal, and unemployment:
    - Social security tax: The employee pays 4% of their gross salary and the employer pays between 9% and 11% of the employee's gross salary depending on the level of (employment sector) risk.
    - Unemployment compensation: Payments are made to the unemployment compensation fund to cover any employee who becomes unemployed (and is able and willing to work) and covered by the Venezuelan Social Security Institute (IVSS). The employee pays 0.5% of their gross salary and the employer pays 2% of the employee's gross salary. An employer must withhold social security contributions at source from an employee's gross monthly salary and remit this, together with its contributions, to the authorities.
  - A foreign national (expatriate) may be exempt from paying Venezuelan social security contributions if they remain within their home countries' social security system under a social security treaty (agreement) with Venezuela.
KEY POINTS

- To legally work in Vietnam, a foreign national must obtain an entry visa (if required), a work permit and a temporary residence card:
  - On arrival in Vietnam, a foreign national must have a valid entry visa corresponding to the entry purpose (unless exempted) and a passport (or passport substitute document) which is valid for at least six months. If a foreign national is entering Vietnam for work purposes he or she must have provided the work permit in the documents submitted to obtain the relevant entry visa.
  - Work permit: A work permit must be obtained by the foreign national from an overseas Vietnam consulate or embassy in their home country (unless exempt). The Vietnam company sponsors the foreign national and it makes the work permit application to the local Department of Labour, Invalids and Social Affairs (DOLISA). A work permit is valid for two years (renewable).
  - Temporary residence card: When a foreign national (expatriate) has a valid work permit, or work permit exemption, he or she should obtain a temporary residence card. The temporary residence card is valid for the duration of the work permit (or work permit exemption).

- The tax authority in Vietnam is the General Department of Taxation (GDT), Ministry of Finance. Vietnam resident individuals are subject to tax on their worldwide income. Non-resident individuals are subject to tax on Vietnamese-source income only. An individual is deemed resident in Vietnam if, commencing from the date the individual arrives in Vietnam, they are physically present for 183 days or more in a 12-month period, or they maintain a residence in Vietnam, or have leased a residence for 183 days or more in a tax year (unless they can evidence they have been resident in another country in the respective tax year and have spent less than 183 days in Vietnam).

- The tax year in Vietnam runs from 1 January to 31 December (a calendar year). An employee is not required to file a tax return if their only income (single source) consists of employment income from which tax has been withheld at source by the employer (and the employer is authorised to finalise the employee’s personal income tax). An employee who receives income from other sources must complete and file an annual tax return by the 90th day following the end of year i.e. by 31st March or 30th March (and pay any tax due by this date). Penalties apply for late or delayed payment of tax.

- Employment income includes salaries, wages, bonuses, benefits-in-kind, allowances and similar amounts and benefits received by an employee in cash or in kind, unless specifically exempt or limited. Employment income (less applicable deductions) is taxed at progressive income tax rates up to 35% on amounts exceeding VND 960 million per annum. An employer (following the monthly declaration basis) must withhold tax at source from an employee’s gross monthly salary and remit this to the tax authorities by 20th day of the following month. If a company has revenue of VND 50 billion or less it can follow a tax quarterly basis and remit tax by the 30th day of the following quarter.

- Social security contributions are paid by both the employer and employee and cover social insurance, health insurance, and unemployment insurance. The employee pays 10.5% of their gross salary and the employer pays 21.5% (22% before 1 June 2017) of the employee’s gross salary (a gross salary cap applies). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the authorities.

- An employer is required to provide a final (year-end) tax return to the tax authorities detailing the gross salaries and tax deductions of their employees within 90 days following the end of the tax year (and any additional tax payable must also be paid within the 90 days following the end of the tax year).
PKF CONTACT INFORMATION

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KEY POINTS

- To legally work in Zambia, a foreign national must obtain an entry visa (unless exempt) and a work permit:
  - Entry visa: A single or multiple entry visa must be obtained by a foreign national from an overseas Zambian consulate or embassy in their home country unless they are a national of a country with which Zambia has signed a visa-waiver agreement or otherwise exempt.
  - Work permit: A foreign national wishing to work in Zambia must obtain a work permit to legally engage in paid employment with a Zambian employer. A work permit is processed and issued before the foreign national arrives in Zambia and the application is made to the Director General of Immigration by the Zambian employer. A work permit is valid for a minimum period of two years (renewable). Once a foreign national holds a valid work permit they do not need to apply for a separate residence permit (as the work permit also serves as a residence permit).
  - Residence permit (long-term entry permits): A residence permit issued for more than three years is available for certain categories of individual and allows the holder to remain in Zambia indefinitely, subject to meeting the permit’s specified conditions. If an individual is resident in Zambia for 10 years or more they may apply for citizenship.

- The tax authority in Zambia is the Zambia Revenue Authority (ZRA). Zambia broadly operates a sourced based tax system. Therefore, Zambia resident and non-resident individuals are subject to tax on any income from a Zambian source. In addition, Zambian residents are also subject to tax on interest and dividends from a source outside Zambia. An individual is deemed resident in Zambia if they are physically present in Zambia for more than 183 days in a tax year.

- The tax year in Zambia runs from 1 January to 31 December (a calendar year).

- A foreign national (new employee) is required to register with the ZRA and obtain a ten-digit Taxpayer Identification Number (TPIN). Their employer must also register them with the National Pension Scheme Authority (NAPSA).

- An employee is not required to file a Personal Income Tax (PIT) return if their only income (single source) consists of employment income from which tax has been withheld at source. An employee who receives income from other sources must file an annual PIT return by 21 June following the tax year end.

- Employment income (emoluments) is defined under the law as “…any salary, wage, overtime, leave pay, commission, fee, bonus, gratuity, benefit, advantage (whether or not that advantage is capable of being turned into money or money’s worth), allowance, including inducement allowance, pension or annuity, paid, given, or granted in respect of any employment in office, wherever engaged in or held.” Employment income is taxed at progressive income tax rates up to 37.5% on amounts exceeding ZMW 74,400 per annum. An employer must withhold tax at source from an employee’s gross monthly salary under the Pay-As-You-Earn (PAYE) system and remit this to the tax authorities by 10th day of the following the month.

- Social security contributions are paid by both the employer and employee to NAPSA. The employee pays 5% of their gross salary and the employer pays 5% of the employee’s gross salary (a contribution limit applies). An employer must withhold contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to NAPSA.

- An employer must pay a monthly Skills Development Levy (SDL) at a rate of 0.5% of the gross emoluments paid/payable to its employees. The SDL should be paid within 10 days following the month when the employee’s emoluments are paid or deemed to be paid or payable.
KEY POINTS

- To legally work in Zimbabwe, a foreign national must obtain an entry visa (exceptions apply), a Temporary Employment Permit (work permit) and a residence permit:
  - If a foreign national requires a single or multiple-entry visa (temporary entry permit) for Zimbabwe, they should obtain this from an overseas Zimbabwe consulate or embassy in their home country before arrival.
  - Work permit: A foreign national wishing to work in Zimbabwe must obtain a Temporary Employment Permit or TEP (work permit). A TEP is normally valid for three years (extendable up to and five years subject to the Chief Immigration Officer’s approval).
  - Residence permit: Once a TEP is obtained, the foreign national (prospective employee) must then apply for a residence permit.
- The tax authority in Zimbabwe is the Zimbabwe Revenue Authority (ZIMRA). Broadly, Zimbabwe resident individuals are subject to tax on income accrued, or deemed to accrue, from a source in Zimbabwe. Non-resident individuals are subject to tax on Zimbabwe-source income only.
- Residence is not defined within the Zimbabwe legislation but generally an individual is deemed resident in Zimbabwe if they are present for 183 days or more (in aggregate) in a calendar year i.e. there needs to be a degree of presence.
- An employer is required to register each foreign national working in Zimbabwe with the local office of ZIMRA within 10 days of their employment commencing in Zimbabwe using form REV 1 ‘Application for Registration’.
- The tax year in Zimbabwe runs from 1 January to 31 December (a calendar year).
- An employee is not required to file a tax return if their only income (source) consists of employment income from which tax has been withheld at source and if they were employed by the same employer for the full year. Each year an employee should retain their Annual Employees Certificate (Form P6) which is provided by the employer disclosing their gross earnings and deductions. An employee who receives income from other sources must complete and file an annual tax return by 30 April of the subsequent tax year i.e. within four months following the year-end.
- Employment income includes salaries, wages, bonuses, commissions, benefits in kind and any other type of remuneration or benefit, directly or indirectly, received by an employee for services rendered.
- Employment income is taxed at progressive income tax rates up to 50% on amounts exceeding USD 240,000 per annum. An AIDS levy is also applied to the tax chargeable of 3%, effectively increasing the top rate to 51.5% on amounts exceeding USD 240,000 per annum. An employer must withhold tax at source from an employee’s gross monthly salary under the Final Deduction System (FDS) or Pay-As-You-Earn (PAYE) system and remit this to the tax authorities.
- Social Security Contributions: An employee pays 3.5% of their gross salary and the employer pays 3.5% of the employee’s gross salary (capped to a monthly basic salary amount of USD 700). An employer must withhold social security contributions at source from an employee’s gross monthly salary and remit this, together with its contributions, to the National Social Security Authority (NSSA).
- When employment ends, and the internationally mobile employee permanently leaves Zimbabwe, they must surrender their Temporary Employment Permit (TEP) and residence permit to an immigration officer before leaving.