

Status: 4/2023

	Belgium	Czech Republic	France	Germany	Italy	Malta	Poland	Spain	Sweden	UK
General										
1.1. CIT rate	25%	19%	25%	30% with trade tax	27,9% with region tax	5 -10% if foreign owners	19%	25%	20.6%	25%
1.2. Dividend tax (individuals)	10 to 30%	15% withholding tax	Cap 30%	About 26%	26%	Cap 35%	20%	Dividends and capital gains taxed from 19% to 28%	Standard rate is 30% but could range 20 - 53%	8.75% to 39.35%
1.3. Tax losses carried over	No limit	5 years forward and 2 backward	No time limit / yearly capping	No time limit / yearly capping	No time limit / yearly capping	No limit	5 years forward with some limits	No time limit / yearly capping	No limit	No time limit / yearly capping
1.4. Possible tax pooling	Yes	Not for CIT	Yes	Yes, for domestic entities	Yes	Yes	Yes	Yes	Yes	Yes
2. Innovation										
2.1. Income from IP rights	CIT partial exemption		Reduced CIT rate: 10%		Increased tax deduction	CIT partial exemption	CIT limited to 5 or 10%	Possible 60% reduction of income from IP transfer		Reduced CIT rate: 10%
2.2. R&D expenses		Extra deduction (100%)	Tax credit (30%)	Tax credit of 25% of sponsored costs	Tax credit (5 to 10%)	Tax credit of 45 to 80%	Extra deduction (100%)	Tax credit (8 to 42%)	Social charges reduction (33%)	Extra deduction of 86%
2.3. Other			Specific exemptions for start-up		Tax credit on "Industry 4.0" training.		50% tax deduct. for robotiz. exp			
3. Industrial projects										
3.1. Capex	Possible tax deduction	Possible 10 years CIT exemption		Accelerated depreciation	Tax credit on exp. for "Industry 4.0"		Possible 15 years CIT exemption	Accelerated depreciation	Accelerated depreciation	Accelerated depreciation
4. Small business	Reduced CIT rate		Reduced CIT rate		Reduced CIT rate	Tax credit on costs		Reduced CIT rate		Reduced CIT rate
5. Financial investments / company acquisitions	Gains exempted for individuals	EU dividends exempted (mother/daughter)	Tax exempt. on dividends / gains for corps		Tax deduction for investments	Gain exempt. for foreign shareholders	Tax exemption on gains for corps	Tax exempt. on dividends / gains for corps	Tax exempt. on subs dividends / capital gains	Tax exemption on dividends / gains for trade corps
6. Company capitalization	Thin cap rules		Thin cap rules	Interest limitation to 30% of EBITDA	Deduction of notional interest	Deduction of notional interest		Thin cap rules		Thin cap rules
7. Coverage of bilateral tax treaties	Extended	100 countries	126 countries	96 countries	100 countries	70 countries	91 countries	92 countries	80 countries	130 countries
8. Impatriate regime	New expat-regime since 01.01.2022		Tax exemptions		Tax exemptions			Limited tax rate	25% tax cut	
9. Other	Deduction of foreign losses tightened	Aid on energy costs (one off)	Aid on energy costs (one off)		Aid on energy costs (one off)	No WHT divid., interest, royalt.				No WHT on dividends