

This guide provides an overview of the response to COVID-19 by each country as it relates to tax relief and other provisions implemented by local governments. This guide includes information as it pertains to specific countries on general measures, corporate income tax measures, tax payments, tax reporting, and VAT in specific countries as provided by the member and collaborating firms of Andersen Global.

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# Angola

• **General measures:** Angola entered a state of emergency as of March 27, 2020, declared by the president after consultation of the Council of the Republic and unanimous Parliamentary vote, will last for 15 days initially, ending on April 11, 2020. This period can be extended considering the situation on the ground.

This state of emergency has a direct impact on Angolan business and people's movements ruled by Presidential Decree 82/20, the main relevant measures of are:

- o Lockdown (limited movements of people)
- o No international movements allowed, except for humanitarian reasons.
- o In-country movements are limited to the province people are located (except for movement of essential goods, patients and humanitarian help).
- Sanitary fences will be prepared between provinces borders to avoid spreading of the virus.
- Mandatory quarantine for people with the virus or deemed suspicious to have the virus.
- Business will be closed except for pharmacies, food retailers, banks, telecoms radio, press, tv, hotels, fuel stations, restaurants for take away only, car repair shops and funeral support businesses.
- o Any other businesses deemed crucial can also remain open.
- o Public and administrative services will be closed.

All businesses that are open should be fully equipped to comply with mandatory sanitary requirements in order to protect employees and clients. Work from home is mandatory for all businesses and functions possible.

All industrial activities will be closed, except for:

- Production of food and beverages
- Essential health services products
- Oil industry and support services
- Mining
- Production of coal, glass and plastic

- Agriculture (both industrial and subsistence)
- o Others deemed essential by authorities

To what concerns economic and fiscal measures, even if further measures are communicated, the following are relevant:

- o No residential tenants can have their lease contracts terminated during this period.
- o Employees cannot be dismissed for not showing up to work.
- Exceptional licensing regimes for importation of medical equipment, food, and other items aimed at fighting the virus outbreak are implemented (payment of customs duties is deferred to later in the process).
- o No changes regarding taxes in general until today.
- **Corporate income tax measures:** Delay on the deadline for submission of annual tax return until August 2020.
- **Individual taxes and labor:** Same as above
- Other taxes (local taxes, procedures): Same of above
- **Tax payments**: Same as above
- **Tax reporting:** Same as above
- Value Added Tax (VAT): Same as above

### **Links & Resources:**

## **NOTÍCIAS**

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Oliveira & Associados is a collaborating firm of Andersen Global.

# Argentina

#### • General measures:

- Argentina announced a sanitary emergency and ordered a mandatory quarantine from March 20, 2020 to March 31, 2020, which was later extended to April 13, 2020 (the term). Argentina also closed its border and suspended flights.
- During the term, federal and local authorities have suspended time limits related to federal/local tax, social security, customs and administrative procedures.
   Notwithstanding some exceptions, these measures do not include an extension on regular deadlines previously established for federal tax returns filings and payments.
- Federal and local justice have also suspended time limits during the term on all legal procedure.
- Federal and local tax authorities have limited on-site attention to taxpayers until April 13, 2020, rescheduling the appointments already planned. Other Government agencies (i.e., Inspection Board of Legal entities) are limiting/restricting on-site attention.
- Federal government prohibited the suspension and termination of all labor contracts for 60 days.
- **Corporate income tax measures:** No information.

#### • Individual taxes and labor:

- Extension of deadline on filing Form 572 TY 2019 to April 30, 2020 for employees to inform their employers on general and personal deductions for income tax applicable.
- Extension of deadline on filing Employer Tax Return related to withholdings made during tax year 2019 to May 29, 2020.
- Repatriation of finance assets in order to pay a reduced tax rate on Personal Tax on Assets has been extended to April 30, 2020.
- The prepayment of Tax on Assets for taxpayers with assets located abroad has been extended until May 6, 2020.

### • Other taxes (local taxes, procedures):

- Social Security contributions for employers on essential activities such as health, security or first necessity has been reduced on 95% for 90 days.
- o General tax rates on debits and credits in bank accounts of 0.6% and 1.2% have been reduced to 0.25% and 0.5% for employers on health activities for 90 days.

- Until June 30, 2020 it will be mandatory to use electronic filings before the Federal Tax authorities on certain proceedings and formalities.
- Companies on non-essential activities can decide either to postpone or reduce up to 95% employer social security contributions to pension plan.
- The Argentine State would pay a special retribution to employees of private companies with up to 100 employees.
- The Argentine State would pay a special retribution to employees of private companies with more than 100 employees. This retribution will not be considered for the pension plan calculations.

## • Tax payments:

- o Regular deadlines previously established for payments has not been extended yet.
- o Turnover tax: Third Turnover Tax pre-payment for Buenos Aires Province has been extended from April to May.

## • Tax reporting:

- o Transfer Pricing filings for Tax Year 2018 and Tax Year 2019 (with closing until September) have been extended to May 18, 2020 and May 22, 2020 respectively.
- o Regular deadlines previously established for tax returns filings has not been extended yet.
- o Annual Turnover Tax Return TY 2019 filing due date has been extended to June 2020.
- Value Added Tax (VAT): No information.

### **Links & Resources:**

Preguntas frecuentes por el COVID-19. Respuestas actualizadas hasta el 29.03.20

Normas al 01/04/2020 — Nueva Reglamentación del Ministerio de Trabajo, Empleo y Seguridad Social — Repatriación — Precios de Transferencia

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## Austria

#### • General measures:

- Hardship Fund for small businesses and self-employed; government fund for shortfalls in revenues:
  - Strict criteria have been set but these are to be loosened (depending on income and shortfalls)
  - More details to be published soon
  - Aid up to EUR 500 or EUR 1,000 per individual which is paid out within days
  - Fund volume will be increased from EUR 1 billion to EUR 2 billion
- o Scheme of shorter working hours:
  - Government pays the proportion of the wages up to the number of hours the workers are not needed
  - Measure against mass-dismissal of workers
  - Criteria are very flexible (range from 10 % minimum presence up to 90%) according to the workload given
- Special leave of absence for parents: employer is reimbursed for one-third of the payroll
  costs by the government for the absence of employees who have the obligation of
  childcare (up to three weeks).
- Emergency Fund: government is currently preparing the regulations for the emergency fund for mid-sized and larger businesses which will be available soon.

## • Corporate income tax measures:

- o Reduction of corporate income tax advances to the minimum corporate income tax
- o Legally required prepayments are put to zero if taxpayer claims to be affected by the crisis

## • Individual taxes and labor:

- Deferred payment of payroll tax
- Personal income tax prepayments are put to zero
- Other taxes (local taxes, procedures): No information

### • Tax payments:

- Refund of income tax prepayments of CIT and individual taxes due to the lowered expectation of profits in 2020
- Deferred payment of all other taxes:
  - employer contribution
  - employer-contribution surcharge
  - VAT
- Application for waiver of late payment interest due to financial difficulties

## Tax reporting:

- o Reporting (VAT, monthly contribution base notification) remains unchanged
- Deadline for submission of annual tax returns extended until August 30, 2020 (from June 30, 2020)

### • Value Added Tax (VAT):

- Handing in of VAT-filings is still obligatory meaning VAT-reporting system remains unchanged
- Deferred payment, respite possible
- o Respite of payments is possible upon application

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## **Bahrain**

- **General measures:** The Bahrain Government has announced various measures to support the local economy. From a tax perspective, these measures include a three-month exemption from municipal fees and tourism starting April 2020.
- Corporate income tax measures: No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information
- **Tax payments:** No information
- Tax reporting: No information
- Value Added Tax (VAT): No information

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# Bosnia and Herzegovina

- **General measures:** On March 17, 2020, the Council of Ministers of Bosnia and Herzegovina issued a decision declaring natural or other disasters in the territory of Bosnia and Herzegovina. According to the decision, entry of foreign nationals to BIH is forbidden, with certain exceptions, and all public gatherings are forbidden. In addition, a curfew is introduced from 8 PM to 5 AM. Citizens over the age of 65 are mandated to stay at home, but also with some exceptions. Any person entering the country, as well as those who have been in contact with infected persons, are subject to a quarantine measures. A certain category of business entities is prohibited, while the rest have limited hours of work, in particular from 7 AM to 6 PM. The authorities work with reduced capacities. The number of border crossings with neighboring countries is reduced and special rules have been introduced for drivers in international road transport.
- **Corporate income tax measures:** The difference to be paid in relation to income tax for 2019, which earlier had the payment deadline by March 31, 2020, in these circumstances is extended until June 30, 2020 (i.e., at the request of a taxpayer the Tax Administration will enable taxpayers to pay the difference in income taxes and any fees arising from the 2019 Annual Accounts in installments by the end of 2020).
- Individual taxes and labor: No measures have been adopted yet. The Tax Administration has
  approved the 2019 income tax to be paid in installments by the end of 2020 based on a taxpayer
  request.
- Other taxes (local taxes, procedures): No information.
- **Tax payments:** The Tax Administration has approved the 2019 income tax to be paid in installments by the end of 2020 based on a taxpayer request.
- **Tax reporting**: All reports are submitted electronically as before.
- Value Added Tax (VAT): There are no reliefs or measures adopted so far.

### **Links & Resources:**

COVID-19 – DECISION ON THE DECLARATION OF A STATE OF EMERGENCY FOR THE TERRITORY OF THE REPUBLIC OF SRPSKA

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SAJIĆ Law Firm is a collaborating firm of Andersen Global

## Botswana

#### • General measures:

- o State of emergency declared from April 2, 2020 to April 30, 2020. Only movement of those in essential services and who hold a valid COVID-19 certificate allowed.
- o Travel restrictions in place. Only citizens and residents allowed to enter Botswana. Movement at the designated borders will only be for goods.
- o Air travel suspended indefinitely.
- Economic stimulus package of BWP 2 billion put in place by the government, with private companies expected to also contribute to this fund.
- Corporate income tax measures: No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information
- Tax payments: No information
- Tax reporting: No information

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## **Brazil**

• **General measures:** After Senate has passed the *Public Calamity Status Decree*, which allows the government to disregard Congress' previously-approved-budgets, Congress has been working on voting on certain specific provisions that will affect the labor/social security, economic, tax and customs areas.

Up to now, the labor/social security and customs areas have been the most affected, in terms of efforts of mitigating financial damage effects of COVID-19, specifically by reducing companies' costs related to employees and import tax/custom duties.

- **Corporate income tax measures:** No information
- **Individual taxes and labor:** Provisional Measure No. 927 (MP 927) has been passed in order to preserve employment and income for individuals. Among the new provisions, the mandatory contributions to the Severance Assistance Fund (FGTS) have been suspended up to May 2020 and will be paid in up to six monthly installments, starting from July 2020.
- Other taxes (local taxes, procedures): The Import Tax and the IPI Tax (federal tax on imported and industrialized products) rates have been temporarily reduced up to zero, regarding goods that could enhance efforts to slow down the COVID-19's pandemic. Current requirements for the import licenses granting of disposable plastic syringes and plastic tubes for vacuum blood collection have been suspended. Brazilian Central Bank has simplified/relaxed current requirements for loan/credit structures from foreign residents.
- **Tax payments:** Payment due dates regarding federal taxes for companies under the *Small Companies Tax Regime (Simples Nacional)* have been extended for the months of March, April and May of 2020. General debts owed to the Government have been allowed to be negotiated or paid under temporary extraordinary terms, including total debts' liquidation up to 81 months for companies and 97 months for individuals.
- **Tax Reporting:** No information
- Value Added Tax (VAT): No information

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# Bulgaria

• **General measures:** On March 13, 2020 Bulgaria declared State of Emergency. As of that date, the public life and events are banned.

Bulgaria is currently under quarantine; all travels are limited.

On March 24, 2020 the Parliament has adopted the State of Emergency Act where measures in the area of tax, labor, immigration, etc. were introduced. Various legal terms and procedures were suspended.

## • Corporate income tax measures:

#### Extensions until June 30, 2020:

- The deadline for reporting and payment of corporate income tax for 2019, including expenses tax, under the Corporate Income Tax Act.
- The deadline for reporting and payment of the personal income tax under the Income Taxes of the Physical Persons Act, applicable only to the persons performing business activities under the Commercial Act (i.e. sole traders) and agricultural manufacturers who have chosen to be taxed as sole traders.
- The right to enjoy 5% deduction on local tax (real estate and vehicles) upon payment for the whole year.
- o The deadline for reporting the absence of operations during the reporting period.

## Extensions until May 31, 2020:

- The deadline to enjoy a 5% deduction provided in the Income Taxes of the Physical Persons Act and the additional tax payment, applicable to persons performing business activities under the Commercial Act (i.e., sole traders) and agricultural manufacturers who have chosen to be taxed as sole traders.
- All other taxable persons under the Income Taxes of the Physical Persons Act should, as
  usual, report and pay the due tax until April 30, 2020, respectively enjoy 5% deduction
  from the additional due tax until March 31, 2020.
- The deadlines for reporting of the advance payments and their settlement remain the same.

#### Extension until September 30, 2020:

• The deadline for publishing of the Annual Financial Statements, the Consolidated Financial Statements and the Annual Reports.

## Extensions until April 15, 2020:

- The advance tax payments for January 2020 June 2020 should be declared applicable only for those who did not submit Annual Tax Declaration before March 13, 2020.
- The monthly advance payments for the first quarter (January, February and March) of 2020 should be paid until April 15, 2020, and for the months from April until December until the 15th of the month, for which they are due. The three-month advance payments for the first and second quarter of 2020 should be paid until the 15th of the month, following the quarter, respectively April 15, 2020 and July 15, 2020, and for the third quarter until December 15, 2020. Advance payment for the fourth quarter is not due.
- o The Annual Financial Statements can be signed electronically.
- Individual taxes and labor: No information
- Labor: 60% compensation of the insurable earnings
  - Only applies to labor agreements
  - Unconditional for employers, whose operations have been discontinued by order for the duration of the State of emergency
  - For the rest of the businesses in case of a minimum of 20% decrease in revenue compared to March 2019
- Other taxes (local taxes, procedures): No information
- Tax payments: No information
- Tax reporting: No information
- Value Added Tax (VAT): No changes

### **Links & Resources:**

**COVID-19 Banner on Website** 

State of Emergency Measures Act

Compensation of 60 of Insurable Earnings during the State of Emergency

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## **Burkina Faso**

#### • General measures:

- o Automatic remission of penalties and fines due
- o Suspension of on-site fiscal control operations with the exception of proven cases of fraud
- Issuance of tax status certificates to companies not in compliance with their tax obligations until June 30, 2020
- o Direct tax rebates as part of an individual examination of requests, in extreme cases
- o Business license: Reduction of 25% of the business license for the benefit of companies in the passenger transport, hotel and tourism sectors. Companies that have already paid the business license may opt for compensation with other local taxes.

### • Corporate income tax measures:

- o Exemption from the contribution of micro-enterprises in the informal sector
- Suspension of proceedings for the recovery of tax debts and the collection of the flat-rate minimum tax for establishments in the transport of persons, hotel, catering and tourism sector
- Cancellation of charges and taxes applicable for the organization of cultural activities

#### Individual taxes and labor:

- Suspension of the Employers' Apprenticeship Tax (TPA) on wages for the benefit of companies in the passenger transport and hotel industry
- Other taxes (local taxes, procedures): No information.

#### • Tax payments:

- o Postponement of the deadline for payment of the vehicle tax to the end of June 2020
- Tax reporting: No information

#### Value Added Tax (VAT):

- o Exemption from VAT on the sale of products used in the fight against COVID-19
- Exemption from taxes and customs duties on pharmaceuticals, medical consumables and equipment used in the fight against the coronavirus

o Application of a reduced rate of VAT of 10% to the hotel and restaurant sector

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## Canada

- General measures: No information
- **Corporate income tax measures:** The Federal Government of Canada announced a new Canada Emergency Wage Subsidy in efforts to help businesses to keep and return workers to the payroll. This would provide a 75% wage subsidy to eligible employers for up to three months, retroactive to March 15, 2020.
  - o This subsidy would be available to eligible employers, Non-Profit Organizations (NPO) and other taxpayers included that see a drop of at least 30% of their revenue.
- **Individual taxes and labor:** For individuals, the return filing due date will be deferred until June 1, 2020.

For trusts having a taxation year ending on December 31, 2019, the return filing due date will be deferred until May 1, 2020.

The Canada Revenue Agency will allow all taxpayers to defer until after August 31, 2020, payment of any income tax amounts that are currently owed, after today and before September 2020. This relief would apply to tax balances due as well as installments.

- Other taxes (local taxes, procedures): No information
- **Tax payments:** The federal government is allowing all businesses to defer, until after August 31, 2020, payment of any income tax amounts that are currently owed, after March 18, 2020 and before September 2020.
- Tax reporting: No information
- Value Added Tax (VAT):

Deferral of the goods and services tax/harmonized sales tax (GST/HST) Payments:

- The federal government will allow businesses, including self-employed individuals, to defer payments of GST/HST until June 30, 2020 as well as unpaid custom duties on their imports.
- The deferral will apply to GST/HST remittances for the February, March and April of 2020 reporting periods for monthly filers, the reporting period for quarterly filers between January 1, 2020 through March 31, 2020, and for annual filers with the amounts collected and payments for their previous fiscal year as well as installments of GST/HST in respect of the filer's current fiscal year.

Deferral of customs duty: Payments for custom duties and sales tax for accounts of March, April and May has been extended to June 30, 2020.

• Quebec Government is aligning with Federal measures for Quebec sales tax (QST).

o British Columbia is extending filing and payment deadlines for the Provincial sales tax

(PST) until September 30, 2020.

Saskatchewan businesses who are unable to remit their PST due to cashflow concerns will

have three-months relief from penalty and interest charges.

The Manitoba province will extend the April and May filing deadlines for small and

medium-sized businesses with monthly remittances of no more than \$10,000.

**Links & Resources:** 

COVID-19 U.S. and Canadian Small Business Subsidies – A Comparison

COVID-19 Pandemic: Assorted U.S. Corporate and Business Tax Relief Provisions

U.S. Federal and State Tax Filing Deadlines Under COVID-19

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## Colombia

- **General measures:** The government declared a general emergency in the country, which allows the government to issue decrees that have the capacity to modify existing laws in the country (including taxes), as long as such decrees are issued to help solve the COVID-19 related crisis.
- **Corporate income tax measures:** The general treatment (taxable base, applicable rates, etc.) of taxpayers (corporations and individuals) has not been modified so far.
- **Individual taxes and labor:** There are no changes in an individual's income tax. Regarding labor, there are no modifications to payroll taxes.
- Other taxes (local taxes, procedures): A 0% customs tariff *ad valorem*, for certain imports (medical supplies, among other items), as well as for air cargo or passenger transport companies operating in and from Colombia, on products for health emergency COVID-19. (Decree 410 of 2020).
  - o Some municipalities have issued modifications to deadlines to file local taxes (industry and commerce tax, real estate taxes).
- **Tax payments:** The deadlines to file and pay the income tax of the taxpayers were modified because they were postponed a week (eight days). Taxpayers who, as of March 31, 2020, apply to the mechanism of *obras por impuestos* (public works per taxes) might file and pay the first or second installment until May 29, 2020, depending on taxpayer qualification, and transferring the public works resources to a trust by May 29, 2020, following the rules set for the mechanism.
- **Tax reporting:** The deadlines for filing the annual return of assets held abroad are modified, which must be presented by Large Taxpayers between April 21, 2020 and May 5, 2020, and by other taxpayers between April 21, 2020 and May 19, 2020. (Decree 435 of 2020).
- Value Added Tax (VAT): There is an exemption of VAT for certain products (selected medical supplies). This exemption does not give the right to request a balance in favor before the tax authority, it just allows to sell the goods with VAT at 0% rate and take the corresponding input VAT.

#### **Links & Resources:**

<u>Actualidad Aduanera: Las siguientes son algunas noticias de Aduanas, Comercio exterior e Impuestos indirectos que pueden ser de su interés</u>

Actualidad tributaria: Las siguientes son algunas noticias de actualidad tributaria, cambiaria, aduanera y legal que pueden ser de su interés

Actualidad tributaria: Las siguientes son algunas noticias de actualidad tributaria, cambiaria, aduanera y legal que pueden ser de su interés

Actualidad Aduanera: Las siguientes son algunas noticias de Aduanas, Comercio exterior e Impuestos indirectos que pueden ser de su interés

Actualidad tributaria: Las siguientes son algunas noticias de actualidad tributaria, cambiaria, aduanera y legal que pueden ser de su interés

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## Costa Rica

- **General measures:** Through an executive decree issued on March 16, 2020, the Government of Costa Rica decreed a State of Emergency.
- **Corporate income tax measures:** VAT exemption on commercial rentals, for services provided in April, May and June. Two perspectives must be kept in mind, the first is that the exemption is for services provided for commercial rental, therefore it does not apply to residential rentals that exceed the threshold.
- Individual taxes and labor: Elimination of partial payments of the Income Tax, only for those taxpayers whose payment corresponds in April, May and June as long as they are not obliged to pay taxes registered in special periods. In accordance with Decree 41818, Transitory I, for all taxpayers who have had a fiscal period ending as of September 30, 2019, the new fiscal period for 2020 extends from October 1, 2019 to December 31, 2020.
- Other taxes (local taxes, procedures): Moratorium on the payment of the March, April and May consumption tax that must be paid in April, May and June respectively; this tax can be paid in December 2020, without surcharges, penalties, or delays. It applies the same as point one of this document.
- **Tax payments:** Any payment arrangement must be authorized before December 31, 2020 for this regulation to be applicable to it. The taxpayers must keep in mind that these measures do not generate any cash flow, since they are not part of new income, customer cancellations or previous settlements; rather, we are facing the generation of a non-extinguishable tax liability that must be canceled or renegotiated in December 2020 at the latest.
- **Tax reporting:** Any payment arrangement must be authorized before December 31, 2020 for this regulation to be applicable to it. The taxpayers must keep in mind that these measures do not generate any cash flow, since they are not part of new income, customer cancellations or previous settlements; rather, we are facing the generation of a non-extinguishable tax liability that must be canceled or renegotiated in December 2020 at the latest.
- Value Added Tax (VAT): Moratorium on the payment of VAT taxes for March, April and May that must be paid in April, May and June respectively; the taxes can be canceled in December 2020, without surcharges, penalties, or delays.

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# Cyprus

### • General measures:

- Evictions for tenants not being able to pay rent are banned until May 31, 2020.
- A EUR 300 on-the-spot fine is implemented for people contravening the quarantine orders issued by the Minister of Health.
- o Teleconferencing is utilized as a lawful process to hold meetings and make decisions.
- Curfews:
  - Special SMS and forms are required for those individuals still working in order to travel to their place of work.
  - After 6 PM, no moving around is permitted unless it involves exceptional circumstances such as going to supermarkets, pharmacies, etc.
  - From 9 PM until 6 AM, no movement is allowed.
- Partial Suspension of business operations and Support Scheme
- o Special parental leave for childcare with payment of salary
- Corporate income tax measures: No information
- Individual taxes and labor: Contributions to the General Healthcare System are reduced.
- Other taxes (local taxes, procedures): No information
- **Tax payments:** The deadline for submissions of Income Tax Returns and Self-Employed persons for the tax year 2018 are extended from March 31, 2020 to June 1, 2020.
- Tax reporting: The deadline for submission extended from March 31, 2020 to June 1, 2020.
- Value Added Tax (VAT): The deadline for payments extended from April 10, 2020 to November 10, 2020

### **Links & Resources:**

Cyprus: Registrar of Companies Announcement

Cyprus: Coronavirus Measures Issued by the Government

COVID-19: Cyprus' legislative enactments

For questions on Cyprus' response to COVID-19, please reach out below:

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## **Ecuador**

 General measures: The declaration of health emergency caused by COVID-19 was done on March 17, 2020. Since then, the government has implemented measures to continue economic activities through telecommuting and to help Ecuadorian individuals and entities by emitting certain facilities of payment.

Temporary modifications including extraordinary deferral of credit obligations in banks has been issued. These deferred payments of capital and interest on financial obligations shall not cause default interests, expenses, surcharges or fines during the health emergency period or during the duration of time agreed with the debtor.

- Corporate income tax measures: Corporate income tax payments from fiscal year 2019 will be deferred only if the taxpayers are small businesses, entities domiciled in Galapagos, tourism entities, in the agricultural sector, or exporters of goods that represents more than 50% of their revenues. The payments can be made in six monthly installments starting in April with 10% in the first two months and 20% in the next four months. The terms and deadlines of all tax administrative processes and collection action limitation periods are suspended until April 5, 2020. For the filing of tax litigations claims and the time limits within which the judicial proceedings are conducted, the suspension will be implemented for all duration of the health emergency. Deadlines in administrative and tax proceedings are also suspended in response to the pandemic.
- **Individual taxes and labor:** Individual Taxpayers submitted their income tax return normally in the month of March. No tax relief in payments.
- Other taxes (local taxes, procedures): No information
- **Regarding labor:** New regulations allow employers to reduce the weekly working hours from 40 to 30 per week with the proportional payment, for a period no longer than six months. After the health emergency period, employers may schedule a recovery period of 12 hours for a week. In addition, it is possible to suspend the workdays, and employees must recover them, otherwise they must return compensations received from their employers.
- **Tax payments:** See information in other sections
- **Tax reporting:** The schedule for corporations to submit income tax return has been deferred only a few days in the same month of April.

• Value Added Tax (VAT): Only small businesses, entities domiciled in Galapagos, tourism entities, those in the agricultural sector, and exporters of goods that represent more than 50% of their revenues can defer VAT payments that are due initially in April, May and June to the months of September, October and November respectively.

For questions on Ecuador's response to COVID-19, please reach out below:

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# **Egypt**

#### • General measures:

- Curfew is implemented from 7 PM to 6 AM for two weeks from March 25, 2020 to prevent the spread of coronavirus.
- o Partial freeze of government activities is done except for essential works.
- Most of other private sector companies are to work-from-home or temporary reduces in the work force are applied.
- o All educational activities frozen or adapted to online platforms.
- All court activities have been frozen.
- The official interest rate is reduced by 3% to minimalize the harmful impact on economy.
- Due dates for all types of consumer and small-business loans including mortgages and car loans are delayed for six months, but the move does not extend to credit card payments.
- Limitation on manual withdrawals for money by individuals or corporations are applied.
- All Hotels and Resorts activities in addition to entertainment places are ceased temporarily.
- o The civil aviation activities are ceased temporarily.
- For governmental sector and general sector, all females who have a child or children less than 12 years old are to work from home or to be given a vacation.
- **Corporate income tax measures:** As for the corporation, which their financial year-end is December 31, 2019, and their corporate income tax return should be presented to the tax authority by end of April 2020, we believe that there will be an extension for the tax returns that may be issued by an amendment law as well.
- **Individual taxes and labor:** As for the individual taxpayers whom tax returns should be presented to the tax authority by the end of March 2020, the Head of the Tax Authority issued instructions for them to be extended to April 16, 2020. We believe that a tax law should be issued in order to formalize such instruction issued by the Head of the Tax Authority. In addition, the individual taxpayers are encouraged to use the web-based tax returns.

Private sectors are encouraged to provide paid vacation for the employees, but there is no specific enforcement. They are also mandated to pay salaries in full to all employees.

• Other taxes (local taxes, procedures): The Prime Minister has issued a series of resolutions – to be issued for laws to be enforced - to support the economy such as:

Reducing Gas and Electricity prices for the industrial sector

Fixing of electricity prices for three to five years

More financial supports for exporters

Deferral of real estate taxes for the tourism and industrial sector for three months

Cancellation of admin seizures made to some taxpayers as a result of real estate tax under

some conditions

Reducing stamp duty on the sale of securities to non-resident foreigners to 0.125% and for Egyptians to 0.5%

o 50% reduction for tax on dividends related to stocks listed in the Egyptian Stock Exchange to

be 5%

Permanent exemption of non-residents from capital gains tax and deferral of same tax on

residents until January 1, 2022

**Tax payments:** The deferral of real estate taxes for the tourism and industrial sector for three

months is implemented.

**Tax reporting**: No information

• Value Added Tax (VAT): No information

**Links & Resources:** 

COVID-19 Update

For questions on Egypt's response to COVID-19, please reach out below:

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## El Salvador

• **General measures:** On March 20, 2020, the Legislative Assembly approved a special and transitory law on the modality of payment of the income tax applicable to small taxpayers, tourism, electric energy, television services, internet, telephony, and about the special contribution for the promotion of tourism.

The mainly benefited economic sectors are: tourism; small taxpayers; electric power, including its four phases: generation, transmission, distribution, and commercialization; telecommunications, notwithstanding the payment extensions granted to the indicated sectors, the formal obligation to file the Annual Income Tax declaration must be fulfilled within the legal term established in article 48, first paragraph of the Income Tax Law, which expires on April 13, 2020.

- **Corporate income tax measures:** Notwithstanding the payment extensions granted to the indicated sectors, the formal obligation to file the Annual Income Tax declaration must be fulfilled within the legal term established in article 48, first paragraph of the Income Tax Law, which expires on April 13, 2020.
- **Individual taxes and labor:** Small taxpayers that must pay Income Tax equal or less than \$10,000.00, can make the corresponding payment up to in eight monthly installments. To access this benefit, the taxpayer will have to request authorization from the General Treasury Directorate and pay the 10% of the Income Tax self-assessed.
- Other taxes (local taxes, procedures): Small taxpayers that must pay Income Tax equal or less than \$10,000.00, can make the corresponding payment up to in eight monthly installments. To access this benefit, the taxpayer will have to request authorization from the General Treasury Directorate and pay in May 2020, the 10% of the Income Tax self-assessed.
- **Tax payments:** Taxpayers in the tourism industry that must pay Income Tax, equal or less than \$25,000.00, can make the payment up to May 31, 2020. The extension is not applicable to taxpayers that have valid tax incentives granted according to the Tourism Law. The payment of the Special Tax on tourism has been suspended for three months.
- **Tax reporting:** Taxpayers that generate, transmit, distribute and sale electric power can make the payment of the Income Tax up to in eight monthly installments. To access to this benefit, the taxpayer will have to request authorization to the General Treasury Directorate and pay in May 2020, the 10% of the Income Tax self-assessed.
- Value Added Tax (VAT): Notwithstanding the payment extensions granted to the indicated sectors, the formal obligation to file the Annual Income Tax declaration must be fulfilled within the legal term established in article 48, first paragraph of the Income Tax Law, which expires on April 13, 2020.

For questions on El Salvador's response to COVID-19, please reach out below:

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# Germany

- General measures: These measures are all time limited for three to six months, depending on the respective measure which may be extended if necessary.
  - No curfews implemented, yet gatherings of more than two people are prohibited with exceptions made for family members and people living together in a household.
  - O Shops and restaurants are closed except for drugstores, pharmacies and groceries.
  - The German parliament has approved a EUR 600 billion stimulus package for medium and large enterprises, as well as a EUR 50 billion package for small enterprises.
  - A state aid in the amount of EUR 3 billion has been made available for those who are selfemployed.
  - O State funded short-time compensations granted to employees and workers with up to 60% (67% for households with at least one child) of their net salary.
  - Further measures include the possibility of obligors to suspend rent payments and other current payment obligations, deferment of insolvency filing duties, as well as payment stops on mortgages and other borrowings.
- **Corporate income tax measures:** No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information
- Tax payments: For the year 2020, reduction of tax prepayment for corporate and individual income taxes and interest free deferment of tax payment obligations can be granted upon application. For these purposes, substantiated applications referring to economic damages suffered as a result of the Coronavirus crisis must be filed until December 31, 2020 the latest. Enforcement of taxes can be suspended until December 12, 2020 upon reasoned application. All measures also apply to trade tax.
- **Tax reporting:** Only in some federal states the 2018 filing deadline imposed on taxpayers represented by tax advisors and accountants can be extended upon application for individual income and corporate income taxes as well as trade tax (2019 fiscal year is not yet due for filing).
- Value Added Tax (VAT): Reporting deadlines for monthly, quarterly or annual VAT returns can be extended upon application. VAT payables can be deferred interest free upon application.

## **Links & Resources:**

## COVID 19 – All you need to know

For questions on Germany's response to COVID-19, please reach out below:

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# Ghana

- **General measures:** To mitigate the impact of COVID-19 on businesses and households and ensure that economic activities are sustained while minimizing job losses, the government of Ghana has announced the establishment of a Coronavirus Alleviation Program (CAP). CAP will focus on areas that will provide maximum results in alleviating the impact of the COVID-19 pandemic with a focus on protecting against job losses, protecting livelihoods, supporting small businesses and ensuring the program is efficiently and sustainably implemented. Additionally, the government of Ghana is engaging with the Central Bank, Commercial Banks and Telco's to adopt measures aimed at reducing the impact of the COVID-19 pandemic.
- **Tax measures:** The Ghana Revenue Authority will provide some reliefs to businesses and households including:
  - $\circ\quad$  Extension of due dates for filling of taxes from four months to six months after the end of the basis year
  - o Taxpayers encouraged to pay their taxes by bank transfers
  - Grant a remission of penalties on principal debts to Taxpayers who redeem, their outstanding debts due GRA up to June 30, 2020
  - Waive VAT on donations of stock of equipment and goods for fighting the Covid-19 Pandemic
  - Waive taxes on selected Third-Tier Pension withdrawals
  - Permit the deduction of contributions and donations towards COVID-19 as allowable expense for tax purposes
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information
- Tax payments: No information
- **Tax reporting:** No information
- Value Added Tax (VAT): No information

For questions on Ghana's response to COVID-19, please reach out below:

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## Greece

#### • General measures:

- On March 10, 2020, the government decided to suspend the operations of educational institutions for all levels.
- On March 13, 2020, it decided to close all coffee shops, bars, museums, shopping centers, sports facilities and restaurants in the country.
- On March 22, 2020, the Greek authorities announced significant restrictions on all non-essential transport and movement across the country, starting at 6 AM on March 23, 2020.
- O Movement outside the home is permitted only for specific reasons related to essential needs (supermarket, doctors, aid to people with special needs, etc.).
- **Corporate income tax measures:** For businesses whose activities have been heavily affected by the COVID-19, as per the code number (*KA*Δ), main activities are to be suspended, and consequently, the employment contract of the employees are to be handled accordingly for a period of 45 days in total.
- Individual taxes and labor: A special leave of absence is provided for employees who have children and work in the private sectors. Such a leave will be granted specifically for the period during which the academic institutions have been shut down up until April 10, 2020. Out of any four days of the leave granted, three of them will be considered as the special leave, while one will be perceived and registered as part of the employee's annual leave. The duration of the leave is at least three days under the condition that one day out of the employee's annual leave will be added to the three-day period. Employees may request and be granted the special leave for the period starting in March 12, 2020 to April 10, 2020, which may be extended. For two of the three days of the special leave, the employer is required to grant the employee his/her remuneration, while for the remaining day the employee's remuneration will be covered by the State. For the fourth day, the employee is entitled to payment for annual leave.

Employees will receive, as special financial compensation/allowance of EUR 800, which is tax exempt and cannot be offset with any debt for a period of 45 calendar days.

• Other taxes (local taxes, procedures): No information

#### • Tax payments:

- Extension of payments for debts assessed and due to the Tax Authorities on August 31,
   2020 for several payments (installments, partial payments etc.).
- Installments of regulated tax debts that expires between March 30, 2020 and April 30,
   2020 can be paid by affected businesses and individuals at a 25% discount rate (except

from Value Added Tax and withholding taxes).

- Collection of debts assessed and due on March 11, 2020 is suspended until August 31, 2020.
- For a period of three months and up until June 30, 2020, a suspension, regarding the payment of social security contributions and installments of payments of any kind of arrangements, is provided for all payments due by March 31, 2020, in reference to sectors and regions, where business operation has been shut down following an order by the government for more than 10 days.
- Tax reporting: Tax reporting continues on a regular basis (only tax payments are deferred).
- Value Added Tax (VAT):
  - Suspension of the payment for VAT due between March 11, 2020 and April 30, 2020 until August 31, 2020
  - Reduction of VAT from 24% to 6% on pharmaceutical products such as gloves, masks and antiseptics

#### **Links & Resources:**

New provisions on companies' General Meetings

Post-dated checks: New legislative act

Coronavirus and personal data: Guidance issued by data protection authorities

Emergency Coronavirus (COVID-19) Measures issued by the Greek Government: Special Leave Absence

Emergency Coronavirus (COVID-19) Measures issued by the Greek Government

For questions on Greece's response to COVID-19, please reach out below:

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# Guatemala

• General measures: The Superintendence of Tax Administration (SAT) has agreed to extend the required measure which includes the dates for compliance with tax obligations from March 24, 2020 to April 14, 2020 because of COVID-19. Therefore, with all the disqualifications, the SAT will not be able to carry out inspection and verification procedures, nor will it be able to require the taxpayer to fulfill its obligations.

### • Corporate income tax measures:

- Annual Income Tax or Impuesto Sobre la Renta (ISR) period starting from January until December 2019 is to be presented on April 15, 2020.
- o ISR Withholdings period for March 2020 is to be presented on April 28, 2020.
- **Individual taxes and labor:** No information
- Other taxes (local taxes, procedures):
  - o The quarterly Income Tax and Solidarity Tax are delayed until May 14, 2020.
  - o Payment of Solidarity Tax (ISO) corresponding to the quarter of April to June 2020 can be extended until September 30, 2020 without any penalty.
  - o Transfer Price Report for the year 2019 is to be presented on April 15, 2020.
  - o Audit processes and presentation of files to obtain exemption from Solidarity Tax 2020, includes audited Financial Statements with the deadline to present on April 15, 2020.
  - Records of application for withholdings of Value Added Tax is to be filed by the deadline of April 15, 2020.
- **Tax payments:** The legal terms to deliver information to the Tax Authority, administrative hearings, and the filing of appeals before administrative authorities as well as other processes are suspended until April 15, 2020.
- Tax reporting: No information
- Value Added Tax (VAT):
  - VAT corresponding to the month of February must be presented on April 15, 2020.
  - o VAT Withholding on the period of March 2020 must be presented on May 6, 2020.

#### **Links & Resources:**

Fiscal Bulletin 5-2020 Changes in Deadlines for Compliance with Tax Obligations

Fiscal Bulletin 6-2020 COVID-19 Emergency Support Measures

Provisions Issued by the Executive Agency in the Face of Emergency Related to the Pandemic COVID-19

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# Honduras

- **General measures:** This report is made regarding the Tax & Labor panorama in Honduras, due to the measurements taken by the Honduran government in response to the COVID-19 pandemic. The Honduran state responded with said measurements to alleviate job losses and to incentivize the remainder jobs during the emergency, this and other measurements have been taken to avoid a further economic recession.
- **Corporate income tax measures:** The presentation of the Annual Informative Affidavit on Transfer Prices has been postponed until July 31, 2020. For businesses who keep their employees on payroll for the rest of the year, the employees' wages, acquired rights and obligations will be considered as an additional deductible expense 10% of 100% of the payment.
- **Individual taxes and labor:** In the case of workers who were suspended and are participants in the Private Contribution Regime (RAP), it is proposed that a solidarity contribution for temporary income maintenance for workers be made up of contributions from the RAP, Employers and the Government. This solidarity contribution will be HNL. 6,000.00 for the period of one month.
- Other taxes (local taxes, procedures): Businesses that are working and their CAI number has expired will be able to continue using the fiscal documents which expiration date is during the state of emergency, there will be no restriction on their CAI number. Also, a municipal ordinance was approved that during the crisis period municipal taxes will not generate any interest.
- Tax payments: As a first measurement the government decided to postpone until June 30, 2020, the declaration and payment only and exclusively for micro, small and medium sized businesses and independent professionals, (without fines and interest) of Income Taxes, Solidarity Contribution and Net Assets, Contribution of the Social Sector of the Economy, Rentals, Surpluses of Operations of the Educational Sector and the Social Contribution of the Cooperative Sector for fiscal period 2019 for Small and Medium Tax Obligors. In the case of horizontal property rentals, these are excluded from the previous extension, having to pay their corresponding tax on April 30, 2020. In relation to the previous paragraph, micro, small and medium businesses who submit their tax declaration and payment on April 30, 2020, will receive an 8.5% discount of the total payment. Moreover, the three installments of Account Payment Tax ("Impuesto de Pago a Cuenta") corresponding to the fiscal year 2020, must be calculated on a 75% basis on the total tax amount of the fiscal period 2019 (not on a 100% base) and their payment dates are postponed as follows:
  - o First installment, as of August 31, 2020
  - Second installment, October 31, 2020
  - o Third installment, December 31, 2020
- **Tax reporting:** Same as above
- Value Added Tax (VAT): In the cases of businesses who do not operate within the months decreed by virtue of the state of emergency, they are granted an extension of the deadlines for

filing and paying their ISV/VAT (Impuesto sobre Ventas) Declaration. For those Taxpayers who are operating, with or a safe-conduct (special permission), they must present their ISV/VAT (Impuesto sobre Ventas) declaration and pay their obligations within the periods established by Law.

For questions on Honduras's response to COVID-19, please reach out below:

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# Hungary

#### • General measures:

- For certain sectors (such as tourism, restaurant services, film productions, sport
  activities, entertainment) leases for non-residential premises may not be terminated until
  June 30, 2020. The rent may not be increased during the emergency period, even if it is
  permitted by the contract.
- The capital and interest payment obligations of businesses (and individuals) to financial institutions will be suspended until the end of the year. The moratorium applies to all credit and loan agreements and financial leasing agreements concluded until March 18, 2020.
- o For new loans the total credit fee index is maximized.
- There is also a moratorium on the repayment of employers' loans and on the collection of tax debts.
- Corporate income tax measures: No information

#### Individual taxes and labor:

- Specific measures for industries, most effected by the crisis (i.e., tourism, restaurant and hotel services, film production, artistic activities, entertainment, broadcasting, sport activities, newspaper publishing, events organization, gambling services, taxi services, tour operator activities):
  - Social security contribution is not payable for the months of March, April, May and June 2020.
  - Only the 4% in-kind health insurance contribution is payable by the employees, and the payable monthly amount may not exceed the monthly health care contribution of HUF 7,710 in March, April, May, and June 2020.
  - Contribution to vocational training is not payable for the months of March, April, May and June 2020.
  - For those liable to pay the rehabilitation contribution, the amount of the rehabilitation contribution is reduced, and only two-thirds of the required contribution are payable.
  - Personnel costs are not considered as tax base for small business tax in the months of March, April, May, and June 2020.
- Partial tax and contribution exemptions are granted to certain KATA (small taxpayers itemized lump sum tax) taxpayers.

- Other taxes (local taxes, procedures): No information
- Tax payments:
  - Contribution for tourism development is not payable for the months of March, April, May and June 2020.
  - The taxpayers can apply for tax payment facilitation based on the general rules. Due to the extraordinary circumstances, the Tax Authorities' intention is to treat such requests fairly and to avoid imposing any late payment penalty. (Reliable taxpayer rating or public debt taxpayer status is not affected if the taxpayer receives the decision of the Tax Authority authorizing deferred payment or installment payment by the date of rating).
- **Tax reporting:** No information
- **Value Added Tax (VAT):** A three-month grace period will be given to taxpayers, to use the 2.0 version of the Online Invoice System. The new deadline is July 1, 2020.

#### **Links & Resources:**

Coronavirus: the government's emergency package

Further Details on the Extraordinary Tax Measures Released by the Government

New state aid opportunities due to coronavirus

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# India

#### • General measures:

- The Government issued directives for complete lockdown of the entire country for a period of three weeks up to April 14, 2020.
- The Government has asked the industries to pay full wages to employees during the lockdown period.
- o Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (*PM CARES Fund*) is set up for economic relief to labor workforce and daily wage earners.
- Relief package worth \$30 billion including a mix of food security and direct cash transfer benefits
- o Government announced a Rs 1.7 lakh crore relief package to take care of the poor, workers, and those who need immediate help amid the lockdown.
- The Reserve Bank of India (RBI) allowed banks to put on hold EMI payments on all term loans for three months and made a steep cut on interest rates and cash reserve ratios to increase the liquidity for the banks to lend at lower interest rates.
- Deep policy interest rate is cut of 75 basis points with reduction of cash reserve ratio and introduction of long-term repo operations to improve transmission and supply of durable liquidity.

#### • Corporate income tax measures:

- An ordinance called *The Taxation and Other Laws (Relaxation of Certain Provisions) Ordinance* for 2020 has been issued on March 31, 2020 to relax the following compliances for a period of three months:
  - Option for Taxpayers to defer payment of taxes/levies under the Income Tax and related laws by paying concessional interest
  - Relaxation of time limit for making all statutory compliances, including filing tax returns, appeals, filing of reports, documents, etc.
  - Relaxation of time for making investment/deposit in any tax saving instruments
  - Relaxation of time limit for completion of proceedings, passing any order, issuance of notice/notification, etc., by the relevant Tax and Other Authorities.
- The Supreme Court of India vide judgment dated for March 23, 2020 is indefinitely extended in the limitation period for filing appeals, petitions, etc. until further orders.

- o Business commencement date for approved units in Special Economic Zones is extended until June 30, 2020 from March 31, 2020.
- o Contribution towards PM CARES fund is made eligible for income tax benefits for corporates and considered as a part of corporate social responsibility related spends.
- The timeline for filing of Advance Pricing Agreements which was due on March 31, 2020 is extended to June 30, 2020.

#### Individual taxes and labor:

o Timeline for making investments, deposits and other payments for claiming deductions on salary income for the Fiscal Year 2019-2020 is extended to June 30, 2020.

### • Other taxes (local taxes, procedures):

- o Foreign Trade Policy (FTP): Extension of the 2015-2020 FTP for another year (i.e., up to March 31, 2021).
- Timeline for mandatory linking of Aadhaar with the permanent account number (PAN) is extended to June 30, 2020.
- Bankruptcy trigger threshold under the Insolvency and Bankruptcy Code is increased to \$0.13 million.
- The extension of time limit for realizing export receivables from nine months to 15 months is implemented.

## • Tax payments:

- The extension of last date for payment towards amnesty scheme "Vivad Se Vishwas Scheme" without additional charge of 10% is implemented until June 30, 2020.
- A similar extension is allowed for payments under Sabka Vishwas Scheme to June 30, 2020.
- The reduction in rate of interest to 9% from 12% or 18% on delayed payment of income tax and equalization levy is implemented.
- Validity of lower/nil withholding tax certificates for the Fiscal Year 2019-2020 us extended until June 30, 2020.

#### • Tax reporting:

Oue date for filing tax returns towards income earned in the Fiscal Year 2018-2019 is postponed to June 30, 2020.

- Registered person with aggregate annual turnover more than \$0.69 million can file Goods and Services tax returns due in March, April and May 2020 by the last week of June 2020 (reduced rate of interest at 9% per annum would apply).
- Registered person with aggregate annual turnover less than \$0.69 million can file Goods and Services tax return in Form GSTR-3B due in March, April and May 2020 by the last week of June 2020.
- Date for filing Goods and Services Tax annual returns of the Fiscal Year 2018-2-19 due on March 31, 2020 is extended to the last week of June 2020.

#### Customs duty and Foreign Trade Policy:

- o 24/7 Custom clearance until end of June 30, 2020
- o Foreign Trade Policy due to expire on March 31, 2020 extended until March 31, 2021
- Extension of time limits to avail prescribed exemptions and fulfilment of obligations

#### • Value Added Tax (VAT): No information

#### • Indirect Tax:

- o In terms of the Ordinance mentioned above, following reliefs have been given under various indirect tax enactments:
  - Due date for filing Central Excise returns due in March, April and May of 2020 is extended to June 30, 2020.
  - Due date for filing of appeal, refund applications, etc., where the earlier due date was between March 2, 2020 to June 29, 2020 under the excise, customs or service tax laws is extended to June 30, 2020.
  - Due date for making payment, under the tax amnesty scheme named Sabka Vishwas - (Legacy Dispute Resolution) Scheme for 2019, is extended to June 30, 2020.
- o In addition to the above, Sec. 168(a) has been newly inserted in *the Central Goods and Services Tax Act*, 2017 (the Act), emancipating the government to extend due dates for compliances under the Act as below:
  - Extension of due date for filing of certain returns to June 30, 2020
  - Extension of due date for opting of composition scheme to June 30, 2020

#### **Links & Resources:**

**CATEGORY: COVID-19** 

## **EXTENSION OF LOWER WHT ORDERS**

## <u>COVID 19 IMPACT – GOVERNMENT EXTENDS DUE DATE OF COMPLIANCES</u>

For questions on India's response to COVID-19, please reach out below:

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# Ireland

• **General measures:** All employees working remotely can be paid EUR 3.20 per day by their employer without the deduction of Pay As You Earn (PAYE), Pay Related Social Insurance (PRSI) or Universal Social Charge (USC) to cover additional expenses of working from home.

No benefit-in-kind (BIK) will occur during the COVID-19 health emergency for the following circumstances where an employer:

- Provides office equipment for home working spaces
- Pays for taxi to transport an employee to and from work due to health and safety concerns
- o Provides temporary accommodation to mitigate risk against transmission

Normal rules of BIK are to be applied when employees undertake business travels in vehicles provided by the employer.

The requirement of one voucher issue consisting EUR 500 is waived for the year 2020 where an employer wishes to recognize efforts of staff working during COVID-19 crisis with certain conditions applied.

Corporate income tax measures: In instances where an individual is located in the State or
outside of State due to travel restrictions related to COVID-19, revenues confirmed to disregard
such presence in relation to Corporation tax purposes for a company to which the individual is
related.

Due to the COVID-19 health emergency and subject to appropriate checks, payments of any installments regarding excess Research and Development (R&D) tax credit due in 2020 will be expedited.

• **Individual taxes and labor:** *Temporary Wage Subsidy Scheme* is available for employers who keep employees on their payroll throughout the crisis.

Key features of the scheme:

- Initially, employers are to be refunded up to a maximum of EUR 410 for each qualifying employee. Staring from April, the scheme will move to subsidy payments based on 70% of the average weekly net pay up to a maximum of EUR 410.
- Employers should pay no more than the normal weekly net pay of the employee.
- Subsidy is capped at EUR 350 for those with earnings in between EUR 38,000 and EUR 76,000.

Certain conditions regarding eligibility must be met.

Sick individuals who are out of work due to COVID-19 can claim increased sick pay from EUR 305 to EUR 350 per week. Certain conditions apply.

- Other taxes (local taxes, procedures): No information
- Tax payments:

Measures in place to assist taxpayers:

- o All debt enforcement activities are suspended until further notice.
- o Interests on late payments are suspended for all Small and Medium Enterprises (SME) in respect of the January and February Value Added Tax (VAT) as well as the February and March PAYE taxes.

SME is a business with turnover of less than EUR 3 Million who is not dealt with either Revenue's Large Cases Division or Medium Enterprises Division.

- **Tax reporting:** The filing deadline for all 2019 Share Scheme Returns is to be extended from March 31, 2020 to June 30, 2020. The filing deadline for Foreign Tax Credits provided through payroll in 2019 will revert to October 31, 2020. The 90-day employer filing obligation required for an employee to be eligible for Special Assignee Relief Programmer, is extended for a further 60 days. The 30-day notification requirement for PAYE dispensations will not be strictly enforced.
- Value Added Tax (VAT): Same as above

For questions on Ireland's response to COVID-19, please reach out below:

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# Israel

• **General measures:** As a show of commitment to the high-tech industry, the State of Israel will grant over 1,000 Israeli applicant high tech companies an initial approximate amount of \$200 million as a way of coping with the challenges due to the COVID-19 pandemic. Additional money aids are expected to be transferred.

The Israel Innovation Authority intends to apply expedited work procedures to accelerate the handling of the applications in order to rapidly transfer the grants to the companies.

- **Corporate income tax measures:** There is no change in the general corporate income tax rate which remains at 23%. However, the Tax Authority has postponed annual income tax filing by two months.
  - The annual 2019 income tax report for companies and nonprofits is postponed until Thursday, July 30, 2020.
  - The annual 2018 reports that was initially due to be filed by March 31, 2020 is postponed for a period of two months.
- **Individual taxes and labor:** Self-employed and business owners whose income has been affected by the coronavirus crisis may be eligible for a special grant of up to NIS 6,000.

Variable criteria were set, among others:

- An income test from all sources, including exempt income, does not exceed NIS 240,000 and an annual report for 2018 is submitted.
- The joint income of the two spouses from all sources shall not exceed the amount of NIS 340,000, including exempt income, and offsetting losses. This does not include capital gain and land appreciation.
- The business cycle of March to April 2020 will be compared against the business cycle of March to April of 2019, and there must be no less than a 25% reduction in turnover between these periods. If these criteria have not been met by the end of April 2020, the grant will have to be repaid.
- Other taxes (local taxes, procedures): No information
- **Tax payments:** Payments of Value Added Tax (VAT) for the months of January and February are postponed until April 27, 2020.
- Tax reporting: The Tax Authority has postponed annual income tax filing by two months.
  - o Annual online income tax report for individuals: Thursday, 30 July 2020

- Annual income tax report for individuals who are not liable for an online report: Tuesday, 30, June 2020.
- **Value Added Tax (VAT):** Reporting of VAT for the months of January and February are postponed until April 27, 2020.

According to Israeli law, VAT can only be offset against the original or digital invoice. In light of the current situation, email tax invoices will be excepted as well. This emergency relief will apply for transactions made from March 1, 2020 to May 31, 2020.

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# Italy

• **General measures:** The Decree-Law no. 18/2020 - known as *Cura Italia*- introduces some support measures to counter the impact of the health emergency caused by COVID-19. The Government has ordered the closure of all non-essential activities while allowing companies to work in reasonable working modes.

The suspension for payment of duties and Value Added Tax (VAT) relating to the imports of goods functional to the COVID-19 emergency by public law or charitable entities is implemented. With regards to judicial activity, the deadlines are suspended, and court hearings are postponed. The decree states that companies may call the shareholders' meeting for the approval of the financial statements until 180 days from the end of the financial year.

The government has allocated the following financial measures:

- o Expansion of the Central Guarantee Fund for small and medium enterprises "PMI"
- o Suspension of leasing, mortgage and other loan installments until September 30, 2020
- Implementation of the *first home* loan fund
- Export credit measures
- Suspension of the deadlines for repayment of the Fund 394/81
- Conversion of prepaid tax assets relating to tax losses into a tax credit

#### • Corporate income tax measures:

- o Tax credit for workplace sanitation expenses
- Tax credit on a percentage of rent for shops and stores in March
- **Individual taxes and labor:** For certain categories of self-employed workers and professionals, a one-off allowance of EUR 600 is foreseen. A baby-sitting bonus of EUR 600 is available, and a parental leave is granted to workers who are parents to children at the age of 12 years or younger.

The redundancy fund by way of derogation applies to employers in the private sector, regardless of the number of employees, for whom no other protection is applied with regard to reduction or suspension of working hours and is granted exclusively by direct payment of the benefit provided by the Istituto Nazionale della Previdenza Social (INPS), the largest social security and welfare institute in Italy.

During the period of the emergency, the employer cannot interrupt the relationship with the employee, and the quarantine period is considered as an illness.

- Other taxes (local taxes, procedures): No information
- **Tax payments:** To deal with the COVID-19 emergency, payments of Value Added Tax (VAT), withholding tax, social security contributions and compulsory insurance premiums are suspended for companies with a turnover of less than EUR 2 million, to help aid those most affected by the emergency and for enterprises in red zones. In addition, the payment terms for the loads entrusted to the Collection Agents are suspended.
- **Tax reporting:** The deadlines for submitting the data necessary to prepare the tax return for all taxpayers are extended. The deadlines for sending the precompiled model and 730 precompiled tax return are extended respectively to May 5, 2020 and September 30, 2020.
- **Value Added Tax (VAT):** The time limits for submitting the annual VAT return is extended by 60 days.

#### **Links & Resources:**

## **COVID-19 Updates**

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# Jordan

- **General measures:** As of March 18, 2020, the filing deadlines for general and special sales tax declarations have been extended without imposing any penalties or interest for the duration of the public holiday imposed by COVID-19.
- Corporate income tax measures: No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information
- **Tax payments:** As of March 1, 2020, general and special sales tax due date has been postponed to upon receiving payment and not the earlier payment date or invoice date. This will apply to all local sectors and only in relation to the following foreign sectors which includes food supplies, health and pharmaceuticals. Potentially, payment may also be postponed without any interest, as an additional step to be adopted at a later stage.
- **Tax reporting:** As of March 18, 2020, the filing deadlines for general and special sales declarations for the months of January and February have been extended without imposing any penalties or interest for the duration of the public holiday imposed by COVID-19.
- **Value Added Tax (VAT):** As of March 18, 2020, the tax declaration filing deadline has been extended without imposing any penalties or interest.

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# Kenya

- **General measures:** Kenya, just like many other countries, has been highly affected by the Coronavirus pandemic. This has sent shock waves through the economy, forcing businesses to take tough measures in order to stay in operation. Companies have announced staff lay-offs and employees are encouraged to take unpaid leave, while some businesses had to close down operations. The Government of Kenya (GoK) has taken immediate measures to help stabilize the situation. The GoK has issued a stay-at-home order. However, the ordinance may not be very effective since the largest employer is the informal sector whose workers may not be able to afford the luxury of working from home.
- **Corporate income tax measures:** The GoK has introduced two measures to offer relief to companies and businesses:
  - $\circ~$  A reduction of Corporate Tax from 30% to 25%. However, this is only applicable to resident companies.
  - Turnover Tax on Micro, Small and Medium Enterprises (MSMEs) has reduced from 3% to 1%.
- Individual taxes and labor:
  - o 100% relief for persons earning up to KShs 24,000 monthly.
  - o The highest Income Tax Rate has been reduced from 30% to 25%.
- Other taxes (local taxes, procedures): No information
- Tax payments:

There has not been any directive or communication from the government regarding timelines for tax payments and tax reporting. However, Kenya's Parliament will gather on April 8, 2020, to deliberate the details on tax incentives and possibly implement more incentives and reliefs.

- **Tax reporting:** No information
- Value Added Tax (VAT):
  - VAT has been reduced from 16% to 14%.
  - The GoK has further instructed the Kenya Revenue Authority (KRA) to expedite the payment of VAT refund claims amounting to KShs 10 billion.

For questions on Kenya's response to COVID-19, please reach out below:

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# Kingdom of Saudi Arabia

- **General measures:** The GAZT (General Authority of Zakat & Tax) has deferred all tax returns and payments to keep up with current economic conditions related to COVID-19 crises.
- **Corporate income tax measures:** The maturity date for filing Zakat & Corporate Income Tax Returns and payments for the 2019 tax period was revised from April 29, 2020 to July 31, 2020.
- **Individual taxes and labor:** No individual taxes are applied to Saudi Citizen or foreign residents in Saudi Arabia. However, Withholding Tax is applied to all income generated by non-residing business entities or individuals that generate income in the Kingdom of Saudi Arabia.
  - The original and new maturity dates for withholding taxes filing and payments are as followed:
    - o March 2020 tax period:
      - Original maturity date: April 10, 2020
      - New maturity date: July 10, 2020
    - o April 2020 tax period:
      - Original maturity date: May 10, 2020
      - New maturity date: August 10, 2020
    - May 2020 tax period:
      - Original maturity date: June 10, 2020
      - New maturity date: September 10, 2020
- Other taxes (local taxes, procedures): Please defer to explanation above for locally known Zakat Taxes in the Kingdom of Saudi Arabia filling and payments
- Tax payments: No information
- Tax reporting: No information
- Value Added Tax (VAT):

All related monthly or quarterly returns are deferred accordingly.

- o Feb 20 tax period:
  - Original maturity date: March 31, 2020
  - New maturity date: June 30, 2020
- o March 20 tax period:
  - Original maturity date: April 30, 2020
  - New maturity date: July 31, 2020
- April 20 tax period:
  - Original maturity date: May 31, 2020
  - New maturity date: August 31, 2020
- o May 20 tax period:
  - Original maturity date: June 30, 2020
  - New maturity date: September 30, 2020
- o 1st Quarter 2020 tax period:
  - Original maturity date: April 30, 2020
  - New maturity date: July 31, 2020
- Excise Taxes: The maturity date for filing all related returns for the March/April 2020 tax period was revised from May 15, 2020 to August 15, 2020.

For questions on the Kingdom of Saudi Arabia's response to COVID-19, please reach out below:

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# Kuwait

• **General measures:** Kuwaiti authorities announced a nationwide partial curfew starting March 22, 2020 implemented between 5 PM to 4 AM, until further notice. The closure of offices has been extended to April 8, 2020, as of March 22, 2020.

The Kuwait Central Bank has announced the following measures:

- o Reduction in discount rate from 2.5% to 1.5%
- o An establishment of a KWD 10 million fund to support COVID-19 containment efforts
- o Three months deferral of the collection of payments from affected customers
- Removal of charges imposed on ATMs, online transactions and POS transactions for a period of three months

The Kuwait Banking Association has announced the following measures as of March 25, 2020:

- A six-month postponement for payments regarding credit card installments, loans and interest for all citizens
- o A six-month postponement for payments of loans and interest for SMEs
- No interest or fines in respect of the above postponements

The Ministry of Interior's (MOI's) General Department for Residence Affairs has made the following announcements as March 29, 2020:

- Kuwaiti national business owners (i.e., sponsors of employee residency permit) have been granted exemption with respect to fines applicable on the expiry of employee's residency permits during the period of state administration disruption.
- Sponsors are requested utilize the official online portal of MOI to renew the residency permit of their registered and domestic employees.
- Amnesty scheme visitors with commercial, tourist or family visas that have expired during the holiday period in Kuwait can exit the country without paying fines once the airport commences flight operations.
- The Public Authority for Manpower (PAM) has announced their decision to open the doors of government contracts and project managements for two hours throughout the week except Fridays, from 10 AM to 12 PM.
- Corporate income tax measures: No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information

- Tax payments: No information
- Tax reporting: No information
- Value Added Tax (VAT): No information

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# Lebanon

• **General measures:** A set of different measures and decisions were taken by the Lebanese Government to deal with the emerging COVID-19 pandemic to protect Lebanese citizens.

The Lebanese Government has issued a decision dated March 15, 2020, *Announcing a General Mobilization to confront the COVID-19 pandemic*as from March 16, 2020, up and until March 29, 2020, and was extended afterward until April 12, 2020 (the decision). Under the provisions of the decision, COVID-19 pandemic was considered a health emergency.

Subsequently, the Ministry of Finance has issued decision No. 125/1 dated March 23, 2020, whereby it suspended all deadlines relating to all tax obligations applicable to taxpayers (declarations, payments, tax reviews, objections, etc.) which were not previously extended by virtue of Ministerial decisions, and that are or would become due during the period starting on March 1, 2020, and ending upon the issuance of a decision by the Council of Ministers confirming the end of the general mobilization (the MOF Decision).

- **Corporate income tax measures**: The MOF Decision also covers the suspension of the following:
  - o Declaration and payment of income taxes
  - o Tax reviews and objections
- Individual taxes and labor: All such taxes have also been suspended as per the MOF Decision.
- Other taxes (local taxes, procedures): In general, all tax declarations, payments and reviews of all kinds have been suspended as per the MOF Decision.
- **Tax payments:** Any payments of taxes whether in total settlement of the taxes or those by installments have been suspended until the issuance of a decision by Council of Ministers confirming the end of the general mobilization.
- **Tax reporting:** All tax reporting has been suspended until the issuance of a decision by Council of Ministers confirming the end of the general mobilization.
- Value Added Tax (VAT): The declaration and payment of VAT have been suspended as per the MOF Decision.

#### Links & Resources:

An announcement issued by the Ministry of Finance

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# Luxembourg

- **General measures:** The Luxembourg Government has declared a state of emergency in accordance with the Luxembourg Constitution which gives the Government the possibility to set up emergency measures in order to face crisis. Besides the tax measures below, various temporary measures such as providing guarantees, grant financial aid, postpone/suspend repayment of loans, extent the possibility of partial-work and family vacation were introduced.
- **Corporate income tax measures:** Upon request, the payment of corporate income tax, municipal business tax and net wealth tax due after February 29, 2020 can be deferred to four months without late interest payment accrual which is normally at the rate of 0.6% per month. The extension only applies to the extent, that the tax amount is paid in full at the latest upon the expiry of the four months period starting from the original due date of the taxes. Wage tax is explicitly excluded, as are withholding taxes such as for dividends and director's fees.
- Individual taxes and labor: In relation to social contributions liabilities, there will be a suspension for the calculation of default interests for late payments, the initiation of proceedings for the forced collection of contributions, the enforcement of constraints by bailiff, and of fines to be pronounced against employers who are late in making declarations to the Social Security Centre (CCSS).
- Other taxes (local taxes, procedures): No information
- **Tax payments:** Taxable persons with profits from commercials, agricultural/forestry activities, or self-employed professions may request the cancellation of the (corporate) income tax and municipal business tax prepayments of the first and second quarter 2020 if they have liquidity issues due to the coronavirus crisis. Alternatively, a reduction of the direct tax prepayments may be requested.
- **Tax reporting:** The legal deadline for filing the 2019 income tax return and the 2019 corporate income tax, municipal business tax and net wealth tax return is postponed to June 30, 2020.
- Value Added Tax (VAT): VAT credit balances below EUR 10,000 will be reimbursed. Failure to file VAT returns within the normal applicable deadlines will not be fined. This will apply until further notice.

For questions on Luxembourg's response to COVID-19, please reach out below:

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# Mexico

• **General measures:** The spread of COVID-19 is forcing governments in different countries around the world to take health emergency measures that have great impacts not only on companies but also on the entire population.

Mexico's Government had implemented an Economic Reactivation Plan to counteract the impact of COVID-19 on April 5, 2020. With this regard, Senate went ahead and mentioned that amendments to the Federal Labor Law might be part of the plan. Mexico's President also plan vows to help the poor and create jobs through governmental investments and cutting salaries from top level bureaucrats.

- **Corporate income tax measures:** A tax benefit is expected to allow accelerated depreciation on the purchase of assets bought during March through May 2020 (not applicable for office furniture and equipment, automobiles, among others specified).
- **Individual taxes and labor:** For individuals, it has been suggested to extend benefit related to automatically refund Annual Income Tax balances in favor determined by individuals filing its Annual Tax Return on time with the due date of April 30, 2020.

Concerning labor matters, it has been decreed a state of sanitary emergency, through which was determined through the suspension of non-essential activities and a 100-person limit for meetings or congregations for essential activities. Once the suspension of non-essential activities is over, there will be issued guidelines for their reincorporation to operations.

- Other taxes (local taxes, procedures): Local States Authorities have issued some relief programs such as payroll tax payment reduction and extended due date period as economic supports for people with informal economic activities (self-employment or underemployed), among others which depends on each State.
- **Tax payments:** It has been proposed to defer the deadlines for monthly advance Income Tax payments and Withholdings during the 2020 fiscal year.
- **Tax reporting:** No extension to present Annual Tax Return for 2020 was provided (due date for Corporate tax was March 31, 2020). Concerning individuals, no deadline extension has been granted (due date still April 30<sup>th</sup>).
- Value Added Tax (VAT): A deferral for monthly payments due date (from March to May 2020) has been proposed.

## **Links & Resources:**

COVID - 19 "Health Contingency"

Measures to be implemented against "COVID-19"

For questions on Mexico's response to COVID-19, please reach out below:

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# Morocco

#### • General measures:

- The setting up of a special fund for the management of the COVID-19 pandemic, which receives donations and contributions from different actors in the country.
- Speeding up the payment process for suppliers to public institutions and companies.
- Postponement of bank loans and leasing maturities until June 30, 2020 without payment of fees or penalties. This measure is granted to companies, SMEs and professionals in difficulty.

#### • Corporate income tax measures:

- o Suspension of tax inspections and Third Party Notices (TNN) until June 30, 2020.
- o The contributions granted to the Pandemic Special Fund *COVID-19*, which is qualified as being of public utility, are treated as donations in the nature of tax-deductible expenses.

#### • Individual taxes and labor:

- The granting of a net monthly lump-sum indemnity of MAD 2,000 throughout the period from March 15, 2020 to June 30, 2020 in addition to the benefits relating to Compulsory Health Insurance and family allowances.
- Suspension of the payment of social security contributions due to the CNSS for the period from March 1, 2020 to June 30, 2020 without the application of late payment surcharges. The later payment of contributions could be spread over a period of 18 months.

### • Other taxes (local taxes, procedures): No information

## Tax payments:

- Companies whose turnover for fiscal year 2018 is less than MAD 20 million may, if they so wish, benefit from a postponement, from March 31, 2020 to June 30, 2020, of the tax payments relating to:
  - The remaining amount of corporate income tax for the year 2019
  - The first provisional installment of the corporate income tax for 2020
- Companies whose turnover for fiscal year 2018 is over MAD 20 million, which are suffering enormous economic damage due to the drastic drop in activity and that are facing financial difficulties, may benefit from a relief measure enabling them to obtain from the tax authorities the possibility of deferring the payment of tax.

## • Tax reporting:

- Companies whose turnover for fiscal year 2018 is less than MAD 20 million may, if they so wish, benefit from a postponement of the tax deadlines from March 31, 2020 to June 30, 2020 related to the reporting of the income tax return for fiscal year 2019.
- Value Added Tax (VAT): There are no specific measures relating to VAT.

#### **Links & Resources:**

Covid-19 relief measures

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# Mozambique

- General measures: State of Emergency (SE) for the next 27 days
- Corporate income tax measures: No information
- **Individual taxes and labor:** During SE, it's not mandatory to pay taxes and there's no fines for that.
- Other taxes (local taxes, procedures): No information
- **Tax payments:** Same as above
- **Tax reporting:** There's no obligation to report during the SE.
- Value Added Tax (VAT): Is payable on the transactions, however, the report, claim and pay is not mandatory during the SE.

For questions on Mozambique's response to COVID-19, please reach out below:

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# Namibia

#### • General measures:

- On March 14, 2020, to curb the spread of COVID-19, Namibia suspended all inbound and outbound travel to and from Qatar, Ethiopia and Germany as well as all big gatherings (50 people or more) with immediate effect for a period of 30 days. All schools and institutions of higher learning were also closed.
- The President on March 17, 2020, declared a State of Emergency as a measure to contain the spread of COVID-19. On March 24, 2020, the Cabinet decided to strengthen the national response from March 14, 2020 by adopting the following measures:
  - Announced a partial lockdown from March 28, 2020 to April 17, 2020
  - All employees are required to work from home during the partial lockdown except for those providing critical services.
  - Travel ban is extended to all countries around the world for a period of 30 days.
  - An internal travel ban was imposed with respect to travel to and from the Khomas and Erongo regions during the lockdown.
- With the primary objective of assisting various companies in the economy to alleviate cashflow problems, ensure business continuity and safeguard jobs, the Bank of Namibia introduced the following regulatory and policy relief measures:
  - Loan payment moratorium in regard to customers of banking institutions, banks
    can grant payment holidays based on a thorough assessment of the economic and
    financial difficulties experienced by the borrowers.
  - Liquidity relief measures the Bank of Namibia will relax the Determination on Liquidity Risk Management such that the expected cash flow may exceed the inflow but not more than the excess liquidity above the regulatory limit.
  - Capital conservation buffer the Bank of Namibia reduced the capital conversation buffer rate to 0% for at least 24 months to support banking institutions to supply credit to the economy.
  - Concentration risk limit/single borrower limit the Bank of Namibia postponed the effective date of implementation of the 25% single borrower limit and concentration risk to allow banking institutions a wider scope.
- Corporate income tax measures: No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information

- Tax payments: No information
- **Tax reporting:** No information
- Value Added Tax (VAT): No information

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 $\label{lem:continuous} \textit{Dr Weder, Kauta \& Hoveka Inc. is a collaborating firm of Andersen Global.}$ 



# Netherlands

- **General measures:** On March 17, 2020, the Dutch Ministry of Finance published tax relief measures in order to support Dutch businesses that are affected by the COVID-19. The purpose of the measures is to help businesses continue to meet their payment obligations towards their employees and prevent them from getting into liquidity and continuation challenges.
- **Corporate income tax measures:** Commonly companies receive a preliminary corporate income tax assessment that is based on the average taxable results of previous years. This assessment is raised in the beginning of the financial year and can be reduced at the request of the taxpayer, should the expected taxable result for the given year be significantly lower.
- **Individual taxes and labor:** Employers who are faced with an expected loss of at least a 20% of their turnover can apply to the Employment Administration Agency (UWV) for a compensation in wage costs for a period of 24 weeks. The compensation amounts to a maximum of 90% of the salary costs. The amount of compensation depends on the loss of turnover:
  - o If 100% of the turnover is lost, the allowance amounts to 90% of the salary costs of an employer.
  - o If 50% of the turnover is lost, the allowance amounts to 45% of the salary costs of an employer.
  - o If 25% of the turnover is lost, the allowance amounts to 22.5% of the salary cost of an employer salary.
  - o If less than 20% of the turnover is lost, there will be no compensation.

The following conditions have to be met in order to benefit from the wage tax compensation:

- o The compensation applies to turnover losses which are incurred as of March 1, 2020.
- The applicant expects the loss of turnover of at least 20% during a period varying from two weeks to a maximum of 24 weeks.
- o The employer continues to pay 100% of the salary to the employee.
- The employer does not dismiss employees for budget reasons during the period the compensation is received.
- Other taxes (local taxes, procedures): No Information
- **Tax payments:** In order to facilitate entrepreneurs with liquidity problems, it is possible to request for a deferral of payment of Dutch taxes. This deferral will be granted instantly upon requesting the deferral and will be applicable to payment of Dutch corporate income tax, VAT,

personal income tax and wage tax. Regarding taxes that are due on assessment (corporate income tax and personal income tax), after assessment a request for deferral can be filed. For taxes due on filing the return (VAT and wage tax), upon filing the return a separate request for deferral should be filed.

- **Tax reporting:** No information
- Value Added Tax (VAT): No information

For questions on the Netherlands' response to COVID-19, please reach out below:

### www.taxture.com

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Taxture is a collaborating firm of Andersen Global.

# Nicaragua

- **General measures:** The government of Nicaragua has not declared an emergency nor has it adopted special measures and/or a tax relief package of any sort.
- Corporate income tax measures: Same as above
- Individual taxes and labor: Same as above
- Other taxes (local taxes, procedures): Same as above
- Tax payments: Same as above
- Tax reporting: Same as above

For questions on Nicaragua's response to COVID-19, please reach out below:

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Central Law is a collaborating firm of Andersen Global.



# Nigeria

• **General measures:** International and domestic flights into and within Nigeria have been restricted for the time being. Some states including Lagos and the Federal Capital Territory, Abuja (which have the most reported cases), are experiencing a lock down while restrictions on public gatherings are implemented for other states.

The Central Bank of Nigeria (CBN) has extended moratorium on all principal repayments to one more year, effective on March 1, 2020. Interest rate on applicable CBN intervention facilities is reduced from 9% to 5%. Additionally, a ₹50 Billion targeted credit facility for distressed households as well as small and medium enterprises (SMEs) is created, providing credit intervention facilities to the healthcare industry and increasing the existing interventions to agricultural and manufacturing sectors. The Ministry of Humanitarian Affairs, Disaster Management and Social Development has also begun conditional cash transfers to poor and vulnerable households.

• Corporate income tax measures: Filing date for Companies Income Tax returns has been extended to one more month. Taxpayers who wish to file their returns with the Federal Inland Revenue Service (FIRS) without an audited account is permitted to do so with the requirement that the audited accounts are subsequently submitted within two months of the extended filing date. The FIRS has also extended the date for filing of Withholding Tax returns to the last working day of each month, following the month of deduction as opposed to the required period of 21 days after the month of deduction.

The country's parliament is currently considering on enacting a law that provides reliefs for corporate tax liability to employers that do not lay-off their staff between March 1, 2020 and December 31, 2020.

- Individual taxes and labor: Some state tax authorities have issued directives extending the deadline for filing individuals' Personal Income Tax (PIT) annual returns, which statutorily elapses on March 31, of every year. For example, the Lagos State Internal Revenue Service has issued a public notice extending the deadline for filling individuals' annual returns to May 31, 2020. The Federal Capital Territory Internal Revenue Service has also announced the extension of deadline for filing PIT returns by three months until June 30, 2020.
- Other taxes (local taxes, procedures): No information
- **Tax payments:** Same as above
- **Tax reporting:** Same as above
- Value Added Taxes (VAT): The FIRS has extended the due date for filing VAT returns to the last working day of the month, following the month of deduction as opposed to the statutory period of 21 days after the month of deduction.

### **Links & Resources:**

COVID-19: FIRS Extends CIT, VAT & WHT Filing Deadlines

House of Representatives Passes Emergency Economic Stimulus Bill in Response to COVID-19 Pandemic

COVID-19 Update: LIRS Extends Deadline for Filing Annual Returns

For questions on Nigeria's response to COVID-19, please reach out below:

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Andersen Tax in Nigeria is a member firm of Andersen Global.



# North Macedonia

- **General measures:** On March 18, 2020, the Government of the Republic of North Macedonia passed a decision with which it declared state of emergency (published in the *Official Gazette of RNM no. 68/20*). In such condition, the Government is allowed to pass decrees with force of law. In the field of taxation, the government adopted the following measures:
  - o Decreased rate of the penalty interest
  - Extension of the term for convening and holding an annual meeting of shareholders
  - Exemption of certain categories of taxpayers from payment of advance instalments for corporate income tax and personal income tax purposes
  - Additional measures (possibility of applying for loans through the Development bank of RNM and more beneficial conditions for loans from banks and savings houses)
- **Corporate income tax and Personal income tax measures:** The measures will apply with regard to taxpayers conducting business activities in affected sectors: activities for preparation and service of food; tourist agencies, travel organizers (tour operators) and related activities; accommodation facilities; land transport and transport via pipelines; water transport; and code 51: air transport.

In order for the above exemption to apply, the taxpayer should not decrease the number of its employees for the period starting from the date the respective decrees enter into force until the expiry of three months after the decrees' effect has expired, except in cases of death, retirement or in the case of termination of the employment by the employee.

In respect to corporate income taxpayers, there are certain additional requirements introduced that should be considered such as: (i) no dividend are paid to shareholders, and (ii) no award for business success (profit participations, bonuses) or other type of annual awards are paid to employees and members of management and supervisory bodies, from the date the decree entered into force until the day the exemption from advance installments applies (June 15, 2020).

The above measure is also to apply to other taxpayers who have been affected, who in addition to the previously noted requirements, fulfil one of the following conditions: the taxpayer's total revenues have been reduced for at least 40% in a current month in comparison to February 2020, or its total revenues for 2020 have been reduced for more than 40% compared with the same period of last year, or the number of employees who cannot be actively involved in the taxpayer's business activities due to the measures, is more than 25% from the total number of employees in February 2020, or the taxpayer has closed at least 50% of its points of sale through which its activities are carried on (branch offices, selling facilities).

- Individual taxes and labor: Same as above
- Other taxes (local taxes, procedures): No information

- **Tax payments:** The decree with the force of law concerning the Law on Tax Procedure provides that the penalty interest for public liabilities is reduced by 50%, (i.e., from 0.03% to 0.015%). Also, it has been enacted that the Public Revenue Office will not publish the list of debtors with overdue tax liabilities for April, May and June 2020.
- Value Added Tax (VAT): The decree with the force of law concerning the law on VAT provides the possibility of submitting electronic invoices.

For questions on North Macedonia's response to COVID-19, please reach out below:

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Pepeljugoski Law Office is a collaborating firm of Andersen Global.

## **Oman**

#### • General measures:

- O Suspension of all local and international flights in Oman beginning March 29, 2020 and suspension of tourism visas for 30 days beginning March 15, 2020.
- Reduction in number of employees present in workplaces in government agencies to not more than 30% to complete the necessary work and in private sector companies to a minimum to keep essential work running efficiently.
- Stoppage of the printing, sale and circulation of newspapers, magazines and publications of all kinds.
- Central Bank of Oman has lowered the Capital Conservation Buffers (CCB) by 50% to
   1.25%, increasing the Lending Ratio/Financing Ratio by 5% to 92.5% to be utilized for lending/financing to productive sectors of the economy.
- o Board of Directors of the Public Establishment for Industrial Estates has announced the following measures to mitigate the impact of the COVID-19 outbreak:
  - Suspending financial claims due from the companies during March, April and second quarter of 2020.
  - Exemption from financial penalties which were registered on the companies as of January 1, 2020.
  - Rescheduling the financial dues of the companies to the second half of 2020, with the possibility of further rescheduling to 2021.
  - Stopping claims for correcting violations with the exception of those related to the public health.
  - Postponing levying fees of activity licenses to the second half of 2020, no suspension of activity license due to nonpayment of rent until the end of 2020.
  - Companies with expired licenses not to be stopped from practicing their activities.
  - Extending the allowed period to commence construction work for new investors from six months until the end of 2020.
  - Extending all deadlines granted to companies to commence operations until the end of 2020.

### Corporate income tax measures:

- Tax return filing and payment of tax due has been allowed to be deferred by a period of up to three months for taxpayers who have been adversely affected due to the precautionary measures imposed by the Supreme Committee in Oman.
- Levy of fines and penalties have been waived on such taxpayers who could not file their returns and pay the taxes within the prescribed due dates on account of the precautionary measures imposed by the Supreme Committee in Oman.
- Donations or contributions made by taxpayers for the purpose of dealing with the COVID-19 pandemic in Oman will be treated as tax deductible.
- **Individual taxes and labor:** No information
- Other taxes (local taxes, procedures):
  - Option to taxpayers to reach an agreement with the Tax Authority for allowing the settlement of outstanding taxes in installments.
  - Further, additional tax (interest) leviable of 1% per month on such outstanding taxes has been exempted provided the taxpayer is able to justify with reasons or prove circumstances that resulted in delayed payment of taxes.
- **Tax payments:** All taxpayers whose financial year ended on December 31, 2019, should submit their provisional return on or before March 31, 2020 and final returns of income with the financial statements on or before June 30, 2020.
- **Tax reporting:** Tax returns of income to be submitted electronically from March 15, 2020.
- Value Added Tax (VAT): No information

For questions on Oman's response to COVID-19, please reach out below:

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# **Palestine**

- **General measures**: On March 5, 2020, President Mahmoud Abbas declared a National Emergency for 30 days. On March 23, 2020, a general curfew for two weeks was put in place.
- **Corporate income tax measures**: The Ministry of Finance issued several measures to ease business' situations, such as adopting electronic filling for employees' income statements and deduction at source with no late fines.

### • Individual taxes and labor:

- Tax return report deadline for 2019 has been pushed to end of June 2020 instead of the end of April with no late fines.
- As for labor, private business that has been affected by the Coronavirus pandemic, shall pay 50% of its employees' income for March and April, the remaining income will be paid later.

## • Other taxes (local taxes, procedures):

- Each operator will deliver its periodic statements according to its own estimations with no late fees.
- o Postponing the claim for professional licenses fees until the emergency period ends.
- Postponement of field follow-up procedures on income tax issues or issues pending by customs and VAT until the emergency period ends.
- All donations for the benefit of the Ministry of Health for the purpose of anti-Coronavirus are deemed acceptable to download from taxable income.
- o Loan payments will be postponed for four months.
- o Loan Payments for business in the tourism sector will be postponed for six months.
- o No legal actions will be taken in case of returned checks for insufficient funds.
- Tax payments: No information
- **Tax reporting:** Tax return report deadline for 2019 has been pushed to end of June 2020 instead of end of April with no late fines.
- Value Added Tax (VAT): No change has been made regarding VAT. Extension of the period of validity of the clearance issued by VAT, which ends on March 1, 2020 until April 15, 2020.

For questions on Palestine's response to COVID-19, please reach out below:

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# Panama

- **General measures:** Executive Decree No. 251 of March 24, 2020 approved certain tax measures to defer income tax payments and the filing of income tax returns, without resulting in fines or surcharges for the fiscal year 2019 for companies and individuals.
- Corporate income tax measures: Annual Income Tax for 2019 due on March 31, 2020 has been extended for a period of 120 calendar days from the enactment day of Law 134 of March 20, 2020, that is, until July 17, 2020, as well as supplementary tax and notice of operation.
- **Individual taxes and labor:** Corporations as withholding agents for income taxes of their employees, must continue to withhold and pay to the tax authority; however, the effects of the labor contracts can be suspended, or the work scheduled can be reduced in order to reduce the salary.
- **Administrative procedures:** Resolution No. 201-2270 of March 16, 2020, orders the suspension of terms in administrative remedies competence of the DGI from March 16, 2020 to April 3, 2020, a measure that can be extended as suggested by the health authorities.
- The estimated tax measures: For the fiscal year 2020, must be paid in two terms during fiscal period 2020, the first one by September 30, 2020 and the second by December 31, 2020. Taxpayers will be able to determine by 2020 the estimated tax payable, an amount not less than 70% of the tax caused on their income returns in the period 2019 not subject to investigation by the tax authorities.
- Other taxes (local taxes, procedures): No information
- **Tax payments**: No information
- **Tax reporting**: Resolution No. 201-2401 of March 30, 2020, extended until June 30, 2020, the deadline for submitting the reports and tax compliance forms for the reporting periods of February, March and April 2020.
- Value Added Tax (VAT): Corresponding VAT (ITBMS) payments for the months of March, April and June 2020, were extended until July 17, 2020.
- Tax amnesty: Law No. 134 of March 17, 2020, Amending Law 99 of 2019, on General Tax Amnesty for the Payment of Taxes Administered by the Tax Authority (DGI), has been extended until June 30, 2020.
- **Small business entities:** Small business entities are granted an extension of one additional year to maintain the tax benefit of exemption on their income tax (AMPYME).

For questions on Panama's response to COVID-19, please reach out below:

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# Peru

- **General measures:** Peruvian Congress has delegated in Executive Power, the capacity to issue legal provisions to modify the tax system.
  - Deadlines for administrative procedures have been suspended for 30 business days, beginning March 16.
  - Judicial procedures are suspended until April 13.
  - Corporations may receive a subsidy up to 35% of payroll for workers earning \$430.00 or less per month.
  - Withdrawal from pension funds up to \$580.00 have been granted for workers.
  - Creation of a relief fund for small corporations.

### • Corporate income tax measures:

Corporate income taxpayers receiving dividends from non-resident companies, must fill
out an e-form to report such income to the Tax Administration, in order to be able to use
foreign tax credit.

### • Individual taxes and labor:

o Automatic refund of Income Tax 2019 paid in excess for individuals.

### • Other taxes (local taxes, procedures):

• Temporary rate of 0% customs duties to the import of medical supplies, during 90 calendar days from March 12. (Dec. Sup. 051-2020-EF).

### • Tax payments:

o Tax obligations from February, March and April have been deferred to June 2020, for taxpayers with net revenues up to \$6,110,000.00 during 2019.

## • Tax reporting:

- Filing of Income Tax Return 2019 has been deferred to June 2020 for taxpayers with net revenues up to \$6,110,000.00 during 2019.
- No tax penalties will be applied for tax obligation breaches incurred during the Emergency State in Peru.

## • Value Added Tax (VAT): No information

For questions on Peru's response to COVID-19, please reach out below:

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Picon & Asociados and Hernández & Ugarelli are collaborating firms of Andersen Global.



# **Poland**

• **General measures:** The Polish Government introduced several measures in response to the effects caused by the COVID-19 pandemic. One of the main measures implemented is the Anti-Crisis Shield which consist a set of laws aiming to mitigate the negative impacts in the economic sphere. The main instruments of Anti-Crisis Shield include various types of public subsides, tax reliefs and reliefs related to fulfilling formal obligations. The total value of aid is estimated to be around 10% of Poland's Gross Domestic Product (GDP). Most forms of public aids depend on the decrease in turnovers as a result of the pandemic.

## • Corporate income tax measures:

- Taxpayers who will suffer a loss in 2020 are enabled to deduct from the income earned in 2019.
- There is a possibility of making a one-time write-off on the value of fixed assets purchased for the production of goods related to counteracting COVID-19.
- Other instruments include reliefs to debtors related to bad debts and deductions of donations made for the anti-COVID purposes.

### • Individual taxes and labor:

In the area of personal tax income, the changes are similar as ones mentioned above:

- o Subsidies to remuneration or to the cost of remuneration for entrepreneurs who are employers when the decrease in the turnover have reached a certain level
- o Subsides for self-employed and contractors
- Facilities for employers in shaping the durations of work as well as working conditions
- Extending the validity of work permits for foreigners
- Three-month exemption from social security contributions for small entrepreneurs
- Other taxes (local taxes, procedures): No information

### • Tax payments:

- The deadline for payments involving taxes on incomes from buildings for the months of March until May is postponed until July 20, 2020.
- The date of the monthly advanced payments on remuneration for March until April is postponed until June 1, 2020.

- Small taxpayers may possibly to refrain from paying simplified advances for the month of March until December 2020.
- o Individual requests for deferred payment of tax, payment in installments, remission of tax payments and advance tax waiver may be submitted.

### • Tax reporting:

- Deadline for tax settlement and submission of Personal Income Tax (PIT) and Corporate Income Tax (CIT) returns for 2019 is extended until May 31, 2020. For Non-Governmental Organization (NGO), the deadline is extended to July 31, 2020.
- Deadlines for submitting information on contracts concluded with non-residents (ORD-U) and information on income subject to withholding tax in Poland (IFT-2R) are extended until the end of the fifth month following the end of the tax year.
- o Deadline for mandatory tax schemes reporting are extended.

## • Value Added Tax (VAT):

- Submission of the new Jednolity Plik Kontrolny VAT (PJPK\_VAT) file is postponed from April 1, 2020 to July 1, 2020 for all taxpayers.
- o Application of the new VAT rate matrix is postponed from April 1, 2020 to July 1, 2020.
- Entry into force of the provisions for Binding Information on VAT rates is postponed until July 1, 2020.
- o There is a possibility of issuing e-receipts.
- Deadline for submission of a notification for payment to an account not included in the White VAT List is extended from three to 14 days for the duration of the state of pandemic emergency.

#### **Links & Resources:**

Anti-Crisis Shield – information for Employers

Anti-Crisis Shield – tax reliefs

Covid-19: our services remain uninterrupted

The Protection Package prepared by the Government for business in connection with the epidemic

New regulations on coronavirus infection – powers of public authorities, employers and workers



## The state of epidemic threat as a case of force majeure

Possible relief or write-off of tax arrears for entrepreneurs due to the coronavirus

For questions on Poland's response to COVID-19, please reach out below:

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# **Portugal**

#### • General measures:

- o Special measures approved to support employers, workers and teleworking
- Simplified lay off regime workers shall get two-thirds of their salaries (with a limit of EUR 1,905), 30% of which paid by the employers and the remaining 70% by the Social Security
- o Subsidies for companies given by the State for each remaining worker
- o Suspension of judicial litigation and tax foreclosure

### • Corporate income tax measures:

- Extension of the deadline for the submission of the Income Tax Return, and payment of the Corporate Income Tax (CIT) due, from May 31, 2020 to July 31, 2020
- Postponement of the first special payment on account of CIT from March 31, 2020 to June 30, 2020
- Extension of the first payment on account and of the additional payment on account (State Surcharge) from July 31, 2020 to August 31, 2020
- Situations of infections or prophylactic isolations (quarantine) declared or determined by a health authority are considered as sufficient conditions for the application of fair impediment in the fulfilment of tax reporting obligations, in relation to taxpayers or certified accountants

### • Individual taxes and labor:

Social Security contributions include the following:

- A possibility in reducing one-third of any Social Security contributions due between
   March and May of 2020 for companies, and April and June off 2020 for self-employed
- o In lay-off situations, contributions are suspended.
- Other taxes (local taxes, procedures): No information

### • Tax payments:

 Taxes related to the second quarter of 2020 (Value Added Tax or VAT and withholding taxes) can be paid in three to six installments with no interest or the need of providing guarantees. This is applicable to companies with less than EUR 10 million in revenues in 2018, that have initiated their activities on or after January 1, 2019, and whose activities are closed under the State Emergency Rule. Companies that do not meet these conditions may require the same flexibility in payments if there is at least a 20% decrease in the average invoicing for the months of March, April and May compared to the same period of last year.

- o Stamp Duty: Extension of Monthly Stamp Tax Declaration that becomes only mandatory for facts as from January 1, 2021 onwards. Stamp Tax assessment and payment obligations referring to 2020 can still be fulfilled through the former procedures and with deferral for the first months.
- **Tax reporting:** No information
- Value Added Tax (VAT):
  - VAT exemption for donations of goods to the state, Private Social Solidarity Institutions and non-profit non-governmental organizations for subsequent distribution to people in need
  - o Simplification procedures for filing of VAT declarations until June and an exceptional recognition of PDF invoices as electronic invoices in the months of April, May and June

For questions on Portugal's response to COVID-19, please reach out below:

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Andersen Tax & Legal in Portugal is a member firm of Andersen Global.



# Puerto Rico

• **General measures:** Small and medium-sized businesses (less than 51 employees and less than \$10 million gross income) operating in Puerto Rico with valid merchant certificate on March 15 (and not have received the \$500 self-employment cash incentive) may receive \$1,500.

Self-employed individuals with valid merchant certificates on March 15 may receive \$500.

Income tax withholding on professional services for invoices paid between March 23 and June 30 is suspended for such period.

Income tax exemption on Qualified Payments to employees or independent contractors during the Qualified Period.

Income tax benefits for Eligible Individuals on certain Special Distributions from PR qualified retirement plans or PR IRA accounts to cover qualified expenses.

Certain tax overpayments pending to be refunded may be used to offset certain other tax liabilities.

No sales tax on processed foods from March 20 through April 19.

Filing deadlines for monthly sales and use tax returns reporting months February through May were postponed.

Bi-monthly sales and use tax remittance requirement due in the months of March through June is suspended and taxpayers may remit in lumpsum with the timely filing of the monthly return.

- Corporate income tax measures: No information
- **Individual taxes and labor:** Workmen's compensation insurance coverage extended until April 30.
- Other taxes (local taxes, procedures): Between April 6 and June 30, exemption on import tax for taxable products imported by certified resellers for resale or acquired locally by them for resale.

Second installment 2019-2020 for real property tax due by March 31 postponed until May 29.

• **Tax payments:** First and second 2020 estimated tax installments for individuals and corporations may be remitted with the third and fourth installments.

Taxpayer experiencing economic hardship may request payment plan for 2019 income tax liability if income return is timely filed without extension and if taxpayer has no debts outstanding with PR Treasury.

## • Tax reporting:

Some changes to filing deadlines:

- o Entity returns due between March 16 and June 15 were postponed
- o Individual income tax returns were postponed to July 15
- o Annual reports to PR Department of State were postponed to May 15
- Volume of business declarations were postponed to July 22
- o Personal property tax returns were postponed to August 1
- o Informative returns (480's) were postponed to May 15
- o Monthly import returns for the months of March through May were postponed
- o Quarterly returns for unemployment, disability and chauffeurs were postponed 30 days

## • Value Added Tax (VAT): No information

### **Links & Resources:**

<u>Puerto Rico Updates</u>

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# Qatar

#### • General measures:

- All incoming flights to Doha stopped beginning March 18, for a renewable period of 14 days, with the exception of air cargo and transit flights. In addition, any Qatari citizens coming from any destination in the world will be subject to a 14-day quarantine.
- All modes of public transportation will be stopped, including metro and Karwa buses, beginning March 15 at 10 PM.
- The following categories are allowed to work remotely: employees over the age of 55; pregnant women; and people suffering from chronic diseases such as, diabetes, heart disease, kidney disease, and blood pressure disease.
- o A package of incentives for economic and financial sector:
  - To support and provide financial and economic incentives amounting to QR 75 billion to the private sector. The central bank to put in place a mechanism to encourage banks to postpone loan installments and obligations of the private sector with a grace period of six months.
  - Directing Qatar Development Bank to postpone the installments of all borrowers for a period of six months.
  - Directing government funds to increase their investments in the stock exchange by 10 billion riyals.
  - The Central Bank to provide additional liquidity to banks operating in the country.
  - Exempting food and medical goods from customs duties for a period of six months, provided that this is reflected in the selling price to the consumer.
  - Exempting the following sectors from electricity and water fees for a period of six months: Hospitality and tourism sector, retail sector, small and medium industries sector, commercial complexes in exchange for providing services and exemptions to tenants and logistics areas.
  - Exemption from rents for the logistical areas and small and medium industries for a period of six months.
- **Corporate income tax measures:** Targeted measures include to defer taxes and government fees, defer loan payments, and increase concessional financing for small and medium-sized enterprises.
- **Individual taxes and labor:** Anyone older than 55 years old, pregnant women and people with chronic disease or illness are eligible to work from home.

The Ministry of Commerce and Industry of Qatar has announced that the Industrial Area and Messaied Industrial Zone are exempt from rental obligations for a period of six months, effective March 15.

- Other taxes (local taxes, procedures): Several sectors such as hospitality, tourism, retail, small and medium industries, commercial complexes and logistical areas are exempt from water and electricity fees for six months.
- **Tax payments:** The General Tax Authority (GTA) has announced extending the period for tax returns by two months. The new deadline date to file returns is June 30, 2020.
- Tax reporting: No information
- Value Added Tax (VAT): No information

For questions on Qatar's response to COVID-19, please reach out below:

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Al-Khalifa Law Firm is a collaborating firm of Andersen Global.

# Republic of Kosovo

- **General measures:** On March 15, 2020, the Government of the Republic of Kosovo passed Decision No. 1/11 with which it declared a public health emergency. On March 30, 2020, the Government passed Decision nN.01/19 for the Emergency fiscal package, with the following measures:
  - o Additional payments to beneficiaries of the social and pension assistance scheme
  - o Financial support for business organization under financial distress due to the downfall of their business activity that resulted from the public health emergency situation
  - Additional payment for a broad category of public and private sector employees exposed directly to the risk of infection in their work
  - Provision of financial liquidity for micro-enterprises, self-employed and business organizations
  - Additional measures through increased budget for grants and subsidies to respective ministries
- Corporate income tax measures: For business organizations under financial distress due to
  the downfall of their business activity that resulted from the public health emergency situation,
  receive financial support for two months as follows:
  - Covering of expenditures for the monthly employee salaries in the amount of EUR 170 rent subsidy up to 50% of the rent value for small and medium enterprises;
  - o Covering of the value of pension contributions with regard to the measures foreseen under the decision

Provision of interest-free loans to publicly owned enterprises facing financial difficulties due to the public health emergency situation, aiming to ensure their temporary liquidity, with maturity period until December 31, 2020. Provision of financial liquidity is foreseen for: Micro-enterprises and the self-employed through certain programs of the Kosovo Credit Guarantee Fund, in the amount of EUR 10,000 for a period of 24 months, and Business Organizations/Companies authorized to provide basic services on return by December 31, 2020.

Payment of monthly assistance in the amount of EUR 130 is foreseen to citizens who lose their jobs due to the public health emergency situation for April, May and June. Whereas the government will give financial support to business organizations registering employees with at least one year employment contract during the period of public health emergency situation, with one EUR 130 for the following two months after registration.

The government will give also double payment of the social assistance scheme to all beneficiaries of social assistance schemes and an additional payment per month to all beneficiaries of pension schemes who receive only basic payment. Field workers and those exposed directly to the risk of

infection in their work will receive a salary top-up in the amount of EUR 300, for two months. Criteria, terms, condition and manner of implementation of measures are not specified yet.

- Individual taxes and labor: Same as above
- Other taxes (local taxes, procedures): No information
- **Tax payments:** As to the payment of taxes no specific measure has been envisioned yet except the fact that the deadline for payment of taxes has been extended from April 15, 2020, to April 30, 2020.
- Tax reporting: No information
- Value Added Tax (VAT): Imports of flour and wheat were temporarily exempt from VAT payment.

For questions on Republic of Kosovo's response to COVID-19, please reach out below:

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# Romania

• **General measures:** The state of emergency was declared in Romania as of March 16, 2020. Since then, military and government emergency ordinances were enforced to mitigate the social and economic impact of the COVID-19 outbreak. For tax liabilities due starting with March 21, 2020 and up to 30 days after the state of emergency is lifted (currently scheduled for April 16, 2020), no late payment interest and penalties will be computed. Such obligations will not be deemed as outstanding and enforcement measures will be suspended or not be initiated. Separately, state authorities issue upon request Emergency Situation Certificates which may be used by companies affected by the COVID-19 outbreak to obtain certain relief or support from the authorities, or in relation to their business partners.

The Romanian State also provides loan guarantees for SMEs, micro-enterprises and small businesses.

- **Corporate income tax measures:** Facilities for taxpayers applying the advance payments system for CIT purposes were established. Taxpayers which decide to pay on time the CIT due on April 25, 2020 will receive a bonus of 5% or 10%.
- Individual taxes and labor: All employees who have children under 12 years of age, which are affected by the close-down of schools, are entitled to paid days off. During the state of emergency, the validity of collective labor agreements is prolonged and labor inspections are suspended. Employees may move for job-related purposes based on certificates issued by employers.

Indemnities due to the employees whose employment contracts were suspended as a result of the COVID-19 outbreak will be accepted, at least in part, from the State unemployment insurance budget. The indemnity accepted by the Romanian State during the state of emergency (technical unemployment) is of 75% of the base salary, without however exceeding 75% of the average gross salary established in Romania.

- Other taxes (local taxes, procedures): No information
- **Tax payments:** Postponement up to June 30, 2020 of the payment deadlines of certain tax obligations (i.e., tax on buildings, land and means of transportation) normally due on March 31.
- **Tax reporting:** Taxpayers still need to submit monthly, quarterly and annual statements on time. Since no reporting deadlines were extended, related fines and non-declaration penalties are applicable.
- Value Added Tax (VAT): VAT is no longer payable for imports of goods used for the prevention and treatment of COVID-19. Implementation of a new VAT reimbursement mechanism started with April 1, 2020 and aims to expedite the procedure for settling VAT returns.

#### **Links & Resources:**

**COVID-19 Legal Insights** 

For questions on Romania's response to COVID-19, please reach out below:

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Țuca Zbârcea & Asociații is a collaborating firm of Andersen Global.

# Rwanda

• **General measures:** The Prime Minister's office released an official statement asserting all unnecessary movements and visits outside homes with the exception of essential services such as health care, food shopping, or banking are prohibited; all employees (public and private sector) are to work from home except those from the essential services listed above and all borders are closed except for goods and cargos returning Rwandan citizens and legal residents (to be quarantined for 14 days). On April 1, 2020, another statement from the Office of the Prime Minister was issued extending the shutdown until April 19, 2020.

RRA issued a public notice in which it indicated that all communications, declarations and payments were to be done online using e-tax filing system or mobile declaration and payments. It published a list of designated personnel and their contact details to handle any queries from the public.

- **Corporate income tax measures:** Deadline for filing and payment of income tax for 2019 which is normally due on March 31 of every year was extended to April 15, 2020 for large taxpayers and April 30, 2020 for small and medium taxpayers.
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): There have been no notifications from Rwanda Revenue authority regarding withholding tax on employment income (PAYE) or other allowable deductions such as social security payments.
- **Tax payments:** All tax payments are to be made as usual with the exception of income tax for 2019.
- **Tax reporting:** All employers are still expected to submit their tax declarations as set out in the law which is on the 15<sup>th</sup> day of the subsequent month and make the necessary payments.
- **Value Added Tax (VAT):** As of the date of this update, there have been no notifications from Rwanda Revenue authority regarding value added tax declarations and payments.

For guestions on Rwanda's response to COVID-19, please reach out below:

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# Senegal

- **General measures**: Partial remission of the tax debt recorded on December 31, 2019 due by companies and individuals, for a total amount of \$200 billion.
- Corporate income tax measures: No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information
- **Tax payments**: No information
- Tax reporting: No information
- Value Added Tax (VAT): No information

For questions on Senegal's response to COVID-19, please reach out below:

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 $Updated\ on\ April\ 2,\ 2020$ 

# Serbia

- General measures: All subsidies are applicable only for employers, which did not reduce workforce for more than 10% or stopped working before the state of emergency was declared. In order to maintain liquidity and cash-flow for SMEs (small to mid-size enterprise), the Government of Serbia announced the loan program through Serbia's Development Fund and a guarantee scheme through bank loans guarantees. The National Bank of Serbia imposed a minimum 90-day delay on bank loan repayments and leasing repayments applicable to all businesses and reduced the default interest rate on underpaid or overpaid tax to be equal to the National Bank of Serbia annual reference rate.
- **Corporate income tax measures:** Suspension of corporate income taxes payment (as of April 1, 2020 and only for second quarter of this year).
- Individual taxes and labor: Direct aid to entrepreneurs and SMEs in the amount of minimal wages for their employees during the state of emergency, at least three months' amount of minimal wages. Aid for large enterprises in the amount of 50% of minimal wages during the state of emergency, for employees prevented to work without their fault during the state emergency. Direct cash grant to every individual citizen of Serbia in the amount of EUR 100.
- Other taxes (local taxes, procedures): No information
- **Tax payments:** Suspension of payments of employment taxes and social contributions for the private sector during the state of emergency (with repayments by Q1 of 2021 at soonest). Tax relief for legal persons, entrepreneurs, farmers, and natural persons who are participating in the deferred tax payment schemes.
- **Tax reporting:** During the state of emergency, the parties may not be affected due to the absence of their actions within prescribed deadlines in general and special administrative procedures, but this measure is limited in establishing, payment and collection of taxes and custom duties only to the legal remedies, so the tax reporting should be regular.
- Valued Added Tax (VAT): Exemption from VAT only for donations in general. The delivery of masks by the National Health Insurance Fund is also exempted.

For questions on Serbia's response to COVID-19, please reach out below:

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 ${\it Joksovic, Stojanovic, and Partners is a collaborating firm of Andersen~Global.}$ 

# Sierra Leone

- **General measures:** No information
- Corporate income tax measures: No information
- Individual taxes and labor: No information
- Other taxes (local taxes, procedures): No information
- Tax payments: No information
- **Tax reporting:** No information
- Value Added Tax (VAT): No information

For questions on Sierra Leone's response to COVID-19, please reach out below:

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# Slovakia

• **General measures:** A missed period which has elapsed during the pandemic period shall be forgiven if the taxable person performs the missed act no later than the end of the calendar month following the end of the pandemic; this does not apply to filing the tax return and paying the tax.

Interruption of tax controls and tax proceedings.

No need to pay administrative fees for actions to be carried out as a result of a pandemic.

Postponement of tax execution.

Not updating lists of tax debtors and VAT payers that have violated their obligations.

Measures for the third sector to receive the assigned funds (2% of the tax paid).

• **Corporate income tax measures:** Postponement of income tax deadlines (including filing tax returns) until June 30, 2020 (September 30, 2020 in the event its income includes taxable income from sources abroad) with the extension possibility for three months.

Postponement of deadlines for annual employee bills, notifications and payments of non-monetary income to healthcare providers and motor vehicle taxes in specific cases until the end of the month following the end of the pandemic.

Postponement of deadlines for filing financial statements, annual reports and auditors' reports and their imposition in the register of financial statements and fulfilment of accounting obligations until the deadline of filing tax returns.

The deadline for paying income tax advance payments for those with a revenue decrease of more than 40% will be postponed. Entrepreneurs will start paying the advance payments as of October.

The state will provide bank guarantees for loans of EUR 500 million per month.

Businesses and entrepreneurs will be able to offset the unused tax loss from 2014 onwards.

• **Individual taxes and labor:** State contribution to the employers and whose operations are mandatory closed (applicable also to self-employed persons as employers):

The state will reimburse these employers with 80% of the gross salary of each employee with a maximum of EUR 1,100 per person under the condition that the employment relationship remains. This contribution can reach a maximum of EUR 800,000 per one applicant.

The state contribution also shall compensate the decrease of revenues (to employees and self-employed person) with an amount of EUR 180-540, depending on the decrease of revenues from 20% - 80%.

The State will pay 55% of the gross salary for employees in quarantine.

• Other taxes (local taxes, procedures): No information

• **Tax payments:** The tax will be paid in prolonged tax income deadline as mentioned above.

• **Tax reporting:** No information

• Value Added Tax (VAT): Relief from import duties and VAT on medical supplies from third

countries.

#### **Links & Resources:**

<u>Legal Aspects of the Coronavirus</u>

For questions on Slovakia's response to COVID-19, please reach out below:

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# Slovenia

- **General measures:** Slovenian legislator adopted Intervention Measures in the Fiscal Area Act (ZIUJP), which came into force on March 29, 2020. Additional intervention act is envisaged to be adopted (MEGA Act); however, only a governmental proposal is available as per the date of this update.
- **Corporate income tax measures:** According to the Slovenian Tax Procedure Act (ZDavP-2) tax payments of corporate income tax must be made in advance on a monthly or quarterly basis. According to ZIUJP, the taxable person may demand the reduction of advance tax payments only based on of the yearly tax assessment and evidence proving the assessment. According to proposed MEGA Act, advance payments shall not be charged until May 31, 2020.
- Individual taxes and labor: According to ZDavP-2, an individual (self-employed) person is obliged to pay a self-employed income tax by way of withholding during the tax year. According to ZIUJP individuals may demand the reduction of the amount of the installments withheld. According to ZIUJP, the taxable person may demand the reduction of the withholding based on of the yearly tax assessment and evidence proving the assessment. According to the proposed MEGA Act withholdings shall not be charged until May 31, 2020. According to ZDavP-2 individuals receive a preliminary annual income tax calculation issued by Tax Authority (FURS) by May 31, 2020. According to ZUIJP the deadline for the issuance of a preliminary annual income tax calculation is extended to June 30, 2020. Pursuant to ZDavP-2 an individual must file for his/her income tax return by July 31, 2020, in case he/she does not receive a preliminary annual income tax calculation by June 15, 2020; ZUIJP extends this deadline until August 31, 2020. Deadlines for the declaration of determining the tax base based on flat rate expenses is prolonged from to May 31, 2020 or until the expiration of the period for submission of the assessment of personal income tax or self-employment income tax prepayment.
- Other taxes (local taxes, procedures): No information
- **Tax payments:** According to ZUIJP, FURS may allow the deferral of tax payment for up to two years or allow the payment of tax in a maximum of 24-monthly installments over 24 months due to the loss of ability to generate income due to an epidemic. Deferral of tax may also apply to advance payments or withholding tax. In the case of deferral and/or payment by installments no statutory interests for late payment are charged.
- Tax reporting: According to ZUIJP, a deadline for a tax return of an individual self-employed person that is to be submitted to FURS is extended from March 31, 2020 to May 31, 2020. According to ZUIJP, a deadline for a tax return in case of corporate tax income that is to be submitted to FURS is extended from March 31, 2020 to May 31, 2020 (in case a tax period corresponds to the calendar year) or is extended for two months the after expiry of the deadline for the submission of the tax return (in case a tax period does not correspond to the calendar year).
- Value Added Tax (VAT): There are no changes planned.

## **Links & Resources:**

## Covid-19 Tax

For questions on Slovenia's response to COVID-19, please reach out below:

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# South Africa

- **General measures:** Limited relief is to be granted to tax compliant companies with annual turnover of less than ZAR 50 million (see below). No relief is granted to companies with annual turnover of more than ZAR 50 million. Draft legislative provisions are still being drafted. National Treasury is considering the granting of further tax relief details of which are not yet known. Finally, the already existing Employment Tax Incentive (ETI) to promote the employment of young workers will be expanded.
- Corporate income tax measures: Deferral of a portion of the payment of the first and second provisional tax payments to the South Africa Revenue Service, with no imposition of administrative penalties and interest for late payment of the deferred amount. The first provisional tax payment due from April 1, 2020 to September 30, 2020 will be based on 15% of the estimated total liability, whilst the second provisional tax payment from April 1, 2020 to March 31, 2021 will be based on 65% of the estimated total tax liability. Provisional taxpayers with deferred payments will be required to pay the full tax liability when making the third provisional tax payment in order to avoid interest charges.
- **Individual taxes and labor:** The relief provides for a deferral of 20% of the employees PAYE (Pay As You Earn) (employees' tax) liability for the period April 1, 2020 to July 31, 2020. No interest or penalties will be charged. The PAYE so deferred must be settled in equal installments over a period of six months commencing August 1, 2020.
- Other taxes (local taxes, procedures): No information
- **Tax payments:** Same as above
- Tax reporting: No legislative provisions contemplated to date as a result of the COVID-19 virus.
- Value Added Tax (VAT): No information

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# **Spain**

- **General measures:** The Nationwide State of alert declared on March 14, 2020 will continue until April 11, 2020 at the least. These general measures include:
  - o Land, open air and maritime border controls
  - Closure of restaurants, hotels, cultural buildings (such as cinema theatres and sport stadiums), and other companies providing non-essential services
  - o Traffic restrictions, both for public and private transport, and for citizens' circulation
  - Measures to guarantee staple food supply, assure other essential supplies and to guarantee telecommunication services
  - o In general terms, no global tax holiday has been approved, but small and medium businesses (those whose net value of turnover is less than EUR 6 million) may apply for a tax payment deferment. This deferment includes debts that under the normal circumstances cannot be deferred (such as withholding taxes, Value Added Tax or custom duties). Deferment is granted for a maximum period of six months, up to EUR 30,000 per company. During the first three months of the deferment, no interests shall accrue.
  - o The extension of deadlines for tax proceedings has been approved.
- **Corporate income tax measures:** No specific measures have been approved, just the deferment of tax liabilities for small companies.

The Government shall provide guarantee lines on the loans that will be granted to businesses in order to ensure their access to liquidity. These guarantee lines will amount to EUR 100,000 million.

#### • Individual taxes and labor:

Main labor measures include:

- Extraordinary benefits on termination of activity for self-employed workers affected by the declaration of the State of alert.
- Exoneration of companies from social security contributions for those workers whose contracts have been suspended due to the superior force (100% for companies with less than 50 workers, and 75% for companies with more than 50 workers).

- Extraordinary allowances for self-employed workers who, as a result of COVID-19, have seen their turnover reduced by 75% in comparison with the average turnover of the previous sixmonth period.
- Recoverable paid leave for employees of non-essential services, who have been forced to stop working but whose employment contracts have not been suspended.
- Other taxes (local taxes, procedures): No information

### • Tax payments:

- Extension of deadlines to comply with certain tax obligations is implemented. It includes the
  payment of debts, both in the voluntary period and in the executive period, except for debts
  with other countries, customs and tax debts derived from foreign trade operations. This
  extension of deadlines also applies to tax proceedings.
- Extension of the deadlines for filing self-assessments and collecting regional tax debts in specifics regions, such as Madrid, Valencia, Catalonia, Andalusia or Navarra have been approved.

# • Tax reporting:

- Tax schedule has not changed. The deadlines of the Value Added Tax (VAT) and other
  periodic tax returns' reporting, as well as personal income tax reporting shall remain the
  same at the moment.
- o However, the Government has allowed an extension of the deadlines for the preparation, verifications and approvals of the Annual Accounts.
- Value Added Tax (VAT): No specific measures, just the deferment of tax liabilities for small companies and energy sector companies under specific circumstances.

### **Links & Resources:**

**COVID-19 Updates** 



For questions on Spain's response to COVID-19, please reach out below:

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# **Switzerland**

#### • General measures:

- The main measure implemented so far to support the Swiss economy consists of bridging loans for affected companies guaranteed by the Swiss Confederation in the amount of up to 10% of turnover in 2019 but not exceeding CHF 20 million. In particular, amounts of up to CHF 500.000 are 100% guaranteed by the Swiss Confederation with a current interest of 0.00%.
- Other significant measures are the extension and simplification temporarily for the health emergency duration. The payment deadlines for taxes and social security contributions mentioned below as well as for debt collections are all extended.
- These measures are valid on April 3, 2020 and will be updated when new measures are introduced.
- Corporate income tax measures: No information

### • Individual taxes and labor:

- Short time working compensation: Indemnity to employers of 80% of the loss of earnings due to reduction of working time.
- Extraordinary indemnity for the following persons:
  - Parents with children under 12 years old who cannot work because their children's care is not guaranteed
  - Persons who must suspend their gainful activity because they have been quarantined
  - Self-employed persons who incur earnings losses due to the shutdown of their activity decided by the Government
- o The company cannot impose days off during the crisis period; however, employer and employees may agree to schedule overtime compensation during the shutdown period.
- Suspension of debt collection proceedings until April 19, 2020 is also applicable to social security contributions. In addition, 0% late payment interest rate in case of deferral of payment of social security contributions or payment in installments.
- The additional time spent by cross-border commuters working in their residence country as a result of the use of smart working solutions should have no impact on currently applicable social security legislation. The applicable law should not switch to the law of the country of residence, even if he or she will work more than 25% from home in that country.

o Migration authorities have suspended the issuance of new work and residence permits including pending applications. Only few exceptions will apply such as in the health industry.

### • Other taxes (local taxes, procedures):

- o No specific measures for withholding tax and stamp duties, in particular, the 5% late payment interest rate remains applicable.
- o The Swiss Cantons can introduce additional measures (i.e., no late payment interest for cantonal and communal taxes, deferral of cantonal and communal tax payment, etc.).

### • Tax payments:

- Possibility to request an extension of the payment deadline or the payment in installments for the federal direct tax.
- o No late payment interest levied for federal direct tax payments due between March 1, 2020 and December 31, 2020 (applicable to federal income tax 2020 and previous fiscal years).
- In various Swiss Cantons, possibility for companies that expect to incur losses and for individuals who expect a reduction of income to request an adjustment of their provisional invoices for cantonal and communal taxes.

### • Tax reporting:

- o In many Swiss Cantons, the filing deadline for individual income tax returns 2019 is extended. This was initially for March 31, 2020 or April 30, 2020 depending on the Canton of residence. The new deadlines range from May 31, 2020 to September 30, 2020.
- o In some Swiss Cantons, also applicable to income tax returns of previous years and to corporate income tax returns.

### • Value Added Tax (VAT):

- o Possibility to request an extension of the payment deadline for VAT and customs duties
- o Late payment interest reduced to 0.00% between March 20, 2020 and December 31, 2020.

### **Links & Resources:**

Covid-19 Emergency



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# Ukraine

- **General measures:** Quarantine in Ukraine has been announced from March 12, 2020 until April 24, 2020. Parliament of Ukraine and other authorities have adopted several regulatory documents aimed at support of taxpayers for the period of quarantine, which include among others the following measures:
  - From March 18, 2020 until May 31, 2020, tax audits are not carried out, except for audits regarding VAT refunds, desk audits and some other kinds of audits related to fuel, ethyl alcohol, alcoholic beverages and tobacco products treatment.
  - Penalties and fines for violation of tax legislation, committed from March 1, 2020 until May 31, 2020, are not applied except for violation of reporting and payment of VAT, excise tax and some other cases.
  - o From March 18, 2020 until May 31, 2020 the limitation periods are suspended.
- **Corporate income tax measures:** For health care companies that receive donations from public healthcare providers, such donations are exempt from CIT. In general, the rules of taxation remain unchanged.
- Individual taxes and labor: Individuals can claim for the profit income tax deductions for donations granted to nonprofit organizations, national and local healthcare authorities or public healthcare providers. Previously, such deductions were capped at 4% of annual income of individual. For the period from March 1, 2020 until April 30, 2020, private entrepreneurs and self-employed individuals are exempt from assessing and paying single social contribution. Other rules of taxation and labor tax regulations remain unchanged.
- Tax payments: Tax liabilities on individual income tax shall be paid by October 1, 2020 (previous deadline was August 1, 2020). Land tax liabilities for land used for a taxpayer's business activities during March 2020 are not assessed and paid. During the same month, non-residential real estate owned by individuals and legal entities is not subject to property tax.
- **Tax reporting:** The deadline for submission of annual income tax returns for individuals for the period of 2019 has been prolonged until July 1, 2020. Other deadlines remain unchanged.
- Value Added Tax (VAT): Import in and supplies operations inside Ukraine of certain types goods for preventive measures against the occurrence and spread of coronavirus disease (medicines, medical devices, medical equipment, which are included into the list adopted by the Cabinet of Ministers of Ukraine) are exempt from VAT until last day of the month when quarantine ends.

### **Links & Resources:**

Amendments to the Tax Code of Ukraine in support of taxpayers during the coronavirus (COVID-19) pandemic

COVID-19 outbreak in Ukraine: impact on competition law enforcement

# COVID-19 outbreak in Ukraine: impact on energy sector

Legal implications of coronavirus for business: performance of obligations and judicial system

For questions on Ukraine's response to COVID-19, please reach out below:

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Sayenko Kharenko is a collaborating firm of Andersen Global.

# **United Arab Emirates**

- **General measures:** The Central Bank of the UAE (CBUAE) announces a comprehensive AED 100 billion Targeted Economic Support Scheme to contain the repercussions of the pandemic COVID-19 and reducing interest rate by 75 basis points.
  - o Easing banking for SMEs (small to mid-size enterprises)
    - The CBUAE will also issue new regulations which will limit fees banks charge to their SME customers, and stipulate that banks cannot require larger minimum account balance than AED 10,000.
    - The CBUAE will adopt new regulations with the objective to reduce fees incurred by merchants when their customers pay by debit or credit cards.
  - Extended facilities
    - Participating banks should use the funding to grant temporary relief to private sector corporate customers and retail clients for a period of up to six months and deferral of margin calls.
  - Real Estate Home Buyers
    - The CBUAE will increase the loan-to value (LTV) ratios applicable to mortgage loans for first-time home buyers by 5 percentage points.
  - Fee Waiver to Banks
    - Effective from March 15, 2020 and for a period of six months, the CBUAE has
      waived all fees which it charges for the payment services provided to banks
      operating in the UAE through its payment and settlement systems.
- **Corporate income tax measures:** UAE levies corporate tax on oil companies and foreign banks only. There is no relief to this has been announced.
- **Individual taxes and labor:** There is no individual tax in UAE.
- Other taxes (local taxes, procedures):
  - Dubai Municipality has announced reduction of municipal taxes from 7% to 3.5% for three months effective March 15, 2020 for three months.
  - Dubai government announced AED 1.5 billion of stimulus package aimed at supporting the retail, trade, tourism and energy sectors.
  - Refund of 1% of customs duty imposed on imported goods sold locally in the UAE market, which are currently subject to customs duty of 5%.

- Dubai Custom to revoke New Brokers bank or cash guarantee amounting to AED 50,000 and existing deposited will be refunded.
- **Tax payments:** There is no relief to corporate tax announced in the UAE for the oil companies and foreign banks.
- **Tax reporting:** No relief from tax filings.
- Value Added Tax (VAT): No relief from tax fillings or the VAT payment has been announced so far in the UAE.

### **Links & Resources:**

<u>Economic Update – Chartered House Tax Consultancy</u>

Economic Update (CBUAE) - Chartered House Tax Consultancy

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# **United Kingdom**

#### • General measures:

- Coronavirus Business Interruption Loan Scheme (CBILS) UK-based firms with turnover below GBP 45m may access loans of up to GBP 5m for up to six years.
   Government will guarantee 80% of the loan and will pay initial fees and interest for the first 12 months.
- Covid Corporate Financing Facility (CCFF) for larger firms the Bank of England will
  purchase commercial debt of up to one-year maturity from firms making a material
  contribution to the UK economy, which had a rating of investment grade on March 1,
  2020. All businesses eligible except for those in the financial sector.
- o 12-months automatic holiday granted from paying business rates for all retail, hospitality, leisure and nursery businesses for the whole 2020 2021 tax year.
- Automatic cash grants of GBP 10,000 to GBP 25,000 available for businesses in the retail, hospitality and leisure sectors with a measurable value of less than GBP 51,000. Cash grants of GBP 10,000 are available for certain small businesses.
- o Commercial tenants who cannot pay rent as a result of Covid-19 will be protected from eviction until June 30, 2020.
- Corporate income tax measures: No information

### • Individual taxes and labor:

- Coronavirus Job Retention Scheme government grants of 80% of the wages of non-working furloughed employees up to GBP 2,500 per month with the addition of employer National Insurance and pension contributions for three months, open to all UK employees who had a UK payroll scheme on February 28, 2020.
- Self-employed Income Support Scheme (SEISS) government grants to self-employed persons with 80% of trading profits up to GBP 2,500 per month for three months. Not available for those with self-employment earnings of GBP 50,000 or whose income from other sources exceeds their self-employment earnings.
- o *Statutory Sick Pay (SSP)* of GBP 94.25 per week payable to employers for the two weeks that the employees are off work because of COVID-19. This applies to small or medium sized businesses with fewer than 250 employees.
- o Relaxation of UK tax residency rules, a non-resident individual who are unable to leave the UK due to coronavirus may be able to exclude those UK days for the purpose of determining whether or not they have become UK resident.
- Other taxes (local taxes, procedures): No information

• **Tax payments:** Income tax self-assessment payments for the self-employed due on July 31, 2020 will be deferred until January 31, 2021. It is optional and no application is required. No interest or penalties for late payment will be charged in the deferral period.

All firms and individuals experiencing temporary financial problems may be able to negotiate additional time to pay outstanding tax liabilities. Arrangements are to be agreed on a case-by-case basis.

- Tax reporting: No information
- Value Added Tax (VAT): VAT can be deferred for all businesses with respect for the period of March 20, 2020 to June 30, 2020. Payment is deferred until March 31, 2021. It is automatic, however, businesses who pay by direct debit should cancel the direct debit.

### **Links & Resources:**

COVID-19 US relief package

COVID-19 - relaxation of UK residency rules

<u>COVID-19 – planning for US citizens</u>

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# **United States**

• **General measures:** COVID-19 stimulus legislation – *The Families First Coronavirus Response Act* and *the CARES Act* provide significant relief to both individuals and businesses.

### • Corporate income tax measures:

#### The CARES Act

- Expands net operating loss (NOL) deduction by allowing the carryback from 2018, 2019 and 2020 losses for five years and by allowing for tax years prior to 2021 NOL deductions to be taken up to 100% of taxable income.
- Eases the business interest deduction limitation, raising the adjusted taxable income limit from 30% to 50% for tax years beginning in 2019 and 2020.
- o Allows Qualified Improvement Property (QIP) to qualify for bonus depreciation.
- Makes certain corporate Alternative Minimum Tax (AMT) credits which previously was not refundable in the 2019 taxable year to be refundable in the 2019 taxable year rather than 2021.

#### • Individual taxes and labor:

The Families First Coronavirus Response Act

 Offers small employers a payroll tax credit aimed at partially reimbursing them for paying employees' emergency paid sick leave or emergency family and medical leave.

### The CARES Act

- o Suspends excess business loss limitation rule for 2018, 2019 and 2020 and expands net operating loss (NOL) deduction (see above).
- $\circ$   $\,$  Increases the limit for deducting qualified charitable contributions to 100% of the adjusted gross income.
- Eases requirements for lenders to grant Small Business Administration Loans and offers loan forgiveness to qualified borrowers for amounts spent on payroll, interest on mortgages, rent and utilities during the initial eight-week period after the loan origination date.
- Offers employers a payroll credit aimed at partially reimbursing them for paying employees who are unable to work due to a government order or a significant reduction in business operations.

### • Other taxes (local taxes, procedures): No information

- **Tax payments:** No interest or penalties will be applied to 2019 calendar year returns filed and payments made by July 15, 2020.
- **Tax reporting:** Filing deadline for 2019 calendar-year returns and extension requests deferred until July 15, 2020 for all individuals and corporations.
- Value Added Tax (VAT): No information

### **Links & Resources:**

### **COVID-19 Tax Relief Developments**

For questions on United States' response to COVID-19, please reach out below:

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# Uruguay

• **General measures:** The Labor and Social Security Ministry, by resolution dated March 20, 2020, provided companies in agreement with their workers, the possibility to advance the annual paid vacation already generated or the one to be generated in 2020.

As a consequence of the governmental preventive measures on March 13th, 2020 tending to avoid the population contagion of the COVID-19, there was an immediate decrease of the economic activity.

The Labor and Social Security Ministry has taken several measures aiming to make more bearable the economic situation of thousands of workers who have been deprived of their income source.

- Corporate income tax measures: No information
- **Individual taxes and labor:** A bill was approved at parliament, which determines benefits for payers of the single tax, Monotributo in Spanish, sole proprietorships and other entities such as partnerships, limited liability companies and corporations with up to ten employees whose contribution regime is under the category of Industry and Commerce at the Tax Administration. This tax relief will be applicable to taxes generated between March 1 and April 30, 2020.
- Other taxes (local taxes, procedures): The Free Trade Zone Regime establishes that for companies to benefit from the tax exemptions under this regime, they are to carry out activities in the free trade zone's company office.

As of the health emergency measure declared by the Executive Power and the call to public and private companies to do teleworking, the Free trade Zone regulatory agency has resolved to authorize all Free Trade Zone staff to carry out their labor activities remotely for the period between March 16 and April 10, 2020. This measure is taken temporarily and exceptionally.

• **Tax payments:** On March 20, 2020, the Tax authority in Uruguay issued Resolution No. 550/220, which established the extension of the tax and duty deadlines originally set to start on March 23, 2020 to March 27, 2020.

Likewise, the Congress of City Mayors and the Municipality of Montevideo established payments extensions.

- Tax reporting: No information
- Value Added Tax (VAT): No information

### **Links & Resources:**

**COVID-19 Effects on Annual Paid Vacations** 

Resolucion 143 Abril 2020

COVID-19 Individual Taxes and Labor Measures

**COVID-19 Tax Payment Measures** 

For questions on Uruguay's response to COVID-19, please reach out below:

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