

Malta Companies and the Portuguese Non-Habitual Residency Regime

MALTA

- Applicability of participation exemption in Malta on dividends from subsidiaries;
- Malta does not impose withholding taxes upon dividend payments;
- Malta Trading Company taxed at a 5% effective tax rate with System of Tax refunds

PORTUGAL

- Exemption in Portugal on dividends from Malta under the NHR Scheme for 10 years;
- Portugal considers Malta as white listed

BENEFITS

- Malta is an EU country; Malta has a DTA with Portugal
- No thin capitalization rules
- Flexible transfer pricing rules
- Low registration and maintenance costs
- Advance rulings on international transactions
- Possibility of migration of companies to and from Malta
- Relative ease of incorporation for non-regulated entities
- No capital duties - low registration fees
- No withholding taxes on payments of dividends, interest and royalties to non-residents
- Share capital, accounting and tax can be denominated in a foreign currency
- Over 10 signed double tax treaties

