

# **Madeira Free Trade Zone**



#### Introduction

Madeira is presently one the best locations in the E.U. for companies with operations in the European single market and worldwide.

With reduced taxation, adequate infrastructures, competitive operational costs, safety and quality of life, Madeira is positioned to provide investors with a unique package of benefits, offering a wide range of solutions to enhance the efficiency and performance of various forms of investment.

Moreover, Madeira's preferential tax regime has not only been approved by Portugal but also by the European Union as a valid form of State aid for regional development, providing the IBC of Madeira with a stable and fully regulated and supervised business environment, thus adding to its international image of credibility and transparency.



#### The International Business Center of Madeira

It consists of a set of incentives, mainly of a tax nature, granted with the objective of attracting inward investment into Madeira, recognized as the most efficient mechanism to modernize, diversify and internationalize the regional economy.

The decision to create the International Business Centre of Madeira was the result of a thorough process of analysis and study. Other small island economies, with similar geographical and economic restraints, had successfully implemented projects of attraction of foreign direct investment based on international services activities, becoming therefore examples of successful economic policies.



## MAR - Madeira's International Shipping Register

- All international conventions ratified by Portugal are fully applicable to and respected by MAR and, as a result, MAR has never been considered as a "flag of convenience".
- With the exception of fishing vessels, MAR accepts the registration of all types of commercial vessels, including oil rig platforms, as well as commercial and pleasure yachts.
- It also offers a very <u>competitive tax regime</u>, <u>applicable to both vessels and</u>
   <u>shipping companies licensed within the legal framework</u> of the International
   Business Centre of Madeira.

# **Ship Register Operational and Tax Advantages**

### **Shipping companies**

- Full application of the tax regime of the IBC of Madeira to duly licensed shipping companies, with or without vessels registered in MAR;
- Vessels registered in Madeira may be owned and managed by a company based abroad, not being mandatory to incorporate a company in Madeira's IBC to proceed with the registration of a ship. In this case, a legal representative in Madeira must be nominated with sufficient powers to ensure full representation before the State and the Regional authorities.

NOTE: The registration process is exempt from any form of taxation.

#### Yacht owning companies

 These entities will benefit from reduced corporate tax rates until the end of the 31st of December, 2028, as well as have access to the network of Double-Taxation Treaties ratified by Portugal.

# Tax Regime and E.U. Status

- The IBC of Madeira has therefore been fully integrated in the Portuguese and E.U. legal systems and, as a consequence, it is <u>regulated and supervised</u> by the competent Portuguese and E.U. authorities in a <u>transparent and stable</u> <u>business environment, marking a clear difference from the so-called "tax havens" and "offshore jurisdictions"</u>, since its inception.
- In 2015, the European Commission authorized the new State aid regime for new companies incorporated between 2015 and 2023 and the extension of the deadline of the tax reductions until the end of 2028.



#### **TAX BENEFITS**

- The present tax regime allows the incorporation of new entities within the legal framework of the IBC until the 31st of December, 2024, granting a reduced corporate tax rate of 5%, applicable on the taxable income, until the 3st of December, 2028.
- In the case of international services activities, the reduced rate is applicable
  to profits derived from operations exclusively carried out with non-resident
  entities or with other companies operating within the ambit of the IBC of
  Madeira.
- There are no restrictions, nevertheless, on the development of business activities with Portuguese companies which will be taxed at the general corporate tax rate in Madeira, currently 14,7%.
- Production and assembling activities carried out by companies in the Industrial Free Trade Zone of Madeira, on the other hand, will benefit from the tax reductions also in operations with Portuguese residents.

## **Shareholding activities**

Madeira's IBC companies qualify for the Portuguese participation exemption regime, applicable to both dividends and capital gains, for which the following conditions must be fulfiled:

- A minimum shareholding of 10% held for 12 consecutive months;
- The subsidiary must be subject to taxation at a rate of at least 60% of the Portuguese general rate;
- The subsidiary must not be resident in a jurisdiction included in Portugal's "blacklist".

#### **Tax benefits for Shareholders**

- Non-resident single and corporate shareholders of Madeira's IBC companies will benefit from a full exemption from withholding tax on dividend remittances from the Madeira companies, provided that they are not resident in jurisdictions included in Portugal's "blacklist".
- Portuguese corporate shareholders will also <u>be exempt if holding a</u>
   participation of at least 10% for 12 consecutive months.

# Other tax benefits and exemptions

- Documents, contracts and other operations carried out by IBC companies will benefit from an 80% exemption on stamp (capital) duty, provided that other parties involved are not resident in Portuguese territory or are also companies operating within the legal framework of the IBC of Madeira.
- Companies licensed in the IBC of Madeira will also benefit from an exemption of 80% applicable to municipal property tax and property transfer tax, regional and municipal surtax as well as any other local taxes.

New Patent Box System introduced Carry forward of losses extended up to a 12 years period limited to 70% of taxable profit New Participation Exemption introduced for inbound and outbound dividends

#### **Trusts in Madeira's IBC**

# What are "Chameleon" Trusts?

- By means of the Decree-Law 352-A/88 the Portuguese Government authorised the establishment of Trusts exclusively devised to off-shore activities within the institutional framework of the IBC.
- In accordance with the applicable Decree-Law which allowed for the creation
  of Madeiran Trusts, the Settlor shall espressly designate the law that will
  regulate the Trust.
- If desired it is possible to susbtitute the chosen law at nay time during the Trust's existence.
- Any meterial change in the elected Law, will allow that the Trust Deed simply amended and another Law preferred to regulate the same.
- If the Trust is actually located in the initial jurisdiction this would mean that the Trust would have to be re-domiciled (if permitted) or extinguished.

#### **Taxation of a Madeiran Trust**

- The Trust is fully exempt from taxation on dividends received from shares, royalties or interest received on the deposits.
- Trusts, however, are not allowed to háve directly pure financial activity.
- All non-financial income distributed from the Trustee to the Trust's Beneficiaries is fully exempto of taxation provided thesw Beneficiaries are corporate entities licensed to operate within the Madeira IBC or non-Portuguese resident entities/individuals.

# **Double Taxation Agreements**

 All companies licensed to operate in the International Business Centre of Madeira may also benefit from the large network of international treaties to avoid double taxation ratified by Portugal.

#### **EUROPE**

				MA	XIMU	M RATE	%	
COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION/ENTRY INTO FORCE	DIVI	DENDS	INT	EREST	ROY	ALTIES
		RATIFICATION ENTRY INTO FORCE	Art.	Rate	Art.	Rate	Art.	Rate
AUSTRIA	DL no. 70/71 of the 8th of March	"Notice published on 08-02-1972 In force since 28-02-1972"	10°	15%	110	10%	12°	"5% 2) 10% 3)
ANDORRA	"Resolution of the Portuguese Assembly no. 22/2017 of the 14th of February"	"Notice published on 22-05-2017 In force since 23-04-2017"	100	"5% 24) 15% 2)"	110	10%	12°	5%
BELGIUM	"DL no. 619/70, of the 15th of December Additional Convention (Res. Port. Assembly. no. 82/2000 of the 14th of December)"	"Notice published on 17-02-1971 In force since 19-02-1971. Additional Convention in force since 05-04-2001"	100	15%	110	15%	12°	10%
BULGARIA	"Resolution of the Portuguese Assembly no. 14/96 of the 11th of April"	"Notice no. 258/96 published on 26-08-1986 In force since 18-07-1996"	10°	"10% 5) 15% 2)"	110	10%	12°	10%
CROATIA	Resolution of the Portuguese Assembly no. 3/2015, of the 12th of January	"Notice no. 15/2016 published on 19-04-2016 In force since 28-02-2015"	10°	"5% 23) 10% 2)"	110	10%	12°	10%
CYPRUS	"Resolution of the Portuguese Assembly no. 89/2013 of the 1st of July"	"Notice no. 87/2013 published on 1-08-2013 In force since 16-08-2013"	10°	10%	110	10%	12°	10%
CZECH REPUBLIC	"Resolution of the Portuguese Assembly no. 26/97 of the 9th of May"	"Notice no. 288/97 published on 08-11-1997 In force since 01-10-1997"	10°	"10% 5) 15% 2)"	110	10%	12°	10%
DENMARK	"Resolution of the Portuguese Assembly no. 6/2002 of the 23rd of February"	"Notice no. 53/2002 published on 15-06-2002 In force since 24-05-2002 with effects after 01-01-2003"	100	10%	110	10%	12°	10%
ESTONIA	"Resolution of the Portuguese Assembly no. 47/2004 of the 8th of July"	"Notice no. 175/2004 published on 27-11-2004 In force since 23-07-2004 with effects after 01-01-2005"	100	10%	110	10%	120	10%
FINLAND	DL no. 494/70 of the 23rd of October	"Notice published on 22-08-1980 In force since 14-07-1971"	10°	"10% 6) 15% 2)"	110	15%	12°	10%
FRANCE	DL no. 105/71 of the 26th of March	"Notice published on 13-11-1972 In force since 18-11-1972"	110	15%	12°	"10% 8) 12% 2)"	13°	5%
GEORGIA	"Resolution of the Portuguese Assembly no. 23/2015 of the 5th of March"	"Notice no. 16/2016 published on 03-05-2016 In force since 18-04-2016"	10°	"5% 29) 10% 2)"	110	10%	12°	5%
GERMANY	Law no. 12/82 of the 3rd of June	"Notice published on 14-10-1982 In force since 08-10-1982"	10°	15%	110	"10% 1) 15% 2)"	120	10%

				MA		MAXIMUM RA		ATE %	
COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF			ENDS	IN	TEREST	R	DYALTIES
		RATIFICATION/ENTRY INTO FORCE		Art.	Rate	Art	t. Rate	e Ar	t. Rate
GREECE	"Resolution of the Portuguese Assembly no. 25/2002 of the 4th of April"	"Notice no. 85/2002 published on 24-09-20 In force since 13-08-2002 with effects after 01-01-2003"	02	10°	15%	11	• 159	6 1	2° 10%
HUNGARY	"Resolution of the Portuguese Assembly no. 4/99 of the 28th of January"	"Notice no. 126/2000 published on 30-06-20 In force since 08-05-2000"	000	10°	"10% 5) 15% 2)"	11	• 109	6 1.	2º 10%
IRELAND	"Resolution of the Portuguese Assembly no. 29/94 of the 24th of June (Res. Port. Assemb no. 64/2006 of the 6th of December)"	"Notice no. 218/94 published on 24-08-199 ly. In force since 11-07-1994 Additional Convention in force since 18-12-20		10°	15%	11	• 159	6 1.	2º 10%
ICELAND	"Resolution of the Portuguese Assembly no. 16/2002 of the 8th of March"	"Notice no. 48/2002 published on 08-06-20 In force since 11-04-2002 with effects after 01-01-2003"	02	10°	10% 13) 15% 2)	11	° 109	6 1.	2º 10%
ITALY	Law no. 10/82 of the 1st of June	"Notice published on 07-01-1983 In force since 15-01-1983"		10°	15%	11	° 159	6 1	2º 12%
LATVIA	"Resolution of the Portuguese Assembly no. 12/2003 of the 28th of February"	"Notice no. 138/2003 published on 26-04-20 In force since 07-03-2003"	003	10°	10%	11	• 109	6 1	2º 10%
LITHUANIA	"Resolution of the Portuguese Assembly no. 10/2003 of the 25th of February"	"Notice no. 123/2003 published on 22-03-20 In force since 26-02-2003"	003	10°	10%	11	• 109	6 1.	2º 10%
LUXEMBOURG	"Resolution of the Portuguese Assembly no. 56/2000 of the 30th of June Additional Convention (Res. Port. Assembly. no. 45/2012 of the 12th of April)"	"Notice no. 256/2000 published on 30-12-2000 In force since 30-12-2000. Additional Convention in force since 18-05-2012"	100	15	96 1	10	"10% 14) 15% 2)"	120	10%
MALTA	"Resolution of the Portuguese Assembly no. 11/2002 of the 25th of February"	*Notice no. 33/2002 published on 96-04-2002 and ratified on 30-04-2002. In force since 05-04-2002 with effects after 01-01-2003*	100		6 13) 6 2)	10	1096	12°	10%
MONTENEGRO	"Resolution of the Portuguese Assembly no. 50/2017 of the 21st of March "	"Notice no. 144/2018 published on 10-12-2018 In force since 07-12-2017"	10°		24) 1	10	10%	120	*5% 24) 10% 24)*
MOLDOVA REP.	"Resolution of the Portuguese Assembly no. 106/2010 of the 2nd of September"	"Notice no. 300/2010 published on 08-11-2010 In force since 18-10-2010"	10°		24) i 2)"	1=	10%	12°	8%
NETHERLANDS	"Resolution of the Portuguese Assembly no. 62/2000 of the 12th of July"	"Notice no. 167/2000 published on 24-08-2000 In force since 11-08-2000"	10°	10	196	10	10%	120	10%
NORWAY	DL no. 504/70 of the 27th of October	"Notice published on 15-10-1971 In force since 01-10-1971"	10°		% 6) 6 2)* 1	lo.	15%	120	10%
POLAND	"Resolution of the Portuguese Assembly no. 57/97 of the 9th of September"	"Notice no. 52/98 published on 25-03-1998 In force since 04-02-1998"	10°	HOLE WAS A 1970	96 5) 6 2)*	10	1096	12°	10%
ROMANIA	"Resolution of the Portuguese Assembly no. 56/99 of the 10th of July"	*Notice no. 96/99 published on 18-08-1999 In force since 14-07-1999*	10°		6 2)	10	10%	12º	10%
RUSSIA	"Resolution of the Portuguese Assembly no. 10/2002 of the 25th of February"	"Notice no. 32/2003 published on 30-01-2003 In force since 11-12-2002 with effects after 01-01-2003"	10°		6 2) 1	10	1096	120	10%
SAN MARINO	Signed on 10-11-2010	"Notice no. 61/2017 published on 27-06-2017 In force since 03-12-2015"	10°	ALTERNATION OF THE	6 29) 6 2)*	10	1096	12°	10%
SLOVAKIA	"Resolution of the Portuguese Assembly no. 49/2004 of the 13th of July"	"Notice no. 191/2004 published on 04-12-2004 In force since 02-11-2004 with effects after 01-01-2005"	10°		% 2) 13)"	10	1096	12º	10%
SLOVENIA	"Resolution of the Portuguese Assembly no. 48/2004 of the 10th of July"	"Notice no. 155/2004 published on 31-08-2004 In force since 13-08-2004 with effects after 01-01-2005"	10°		6 6) 6 2)* 1	10	1096	12°	596
SPAIN	"Resolution of the Portuguese Assembly no. 6/95 of the 28th of January"	"Notice no. 164/95 published on 18-07-1995 In force since 28-06-1995"	10°		% 6) i 2)* 1	10	15%	120	5%
SWEDEN		"Notice no. 3/2004 published on 02-01-2004 and Notice no. 32/2004, of 10-04-2004. In force since 19-12-2003 with effects after 01-01-2000"	10°	10	96 1	10	10% 17)	120	10%
SWITZERLAND	DL no. 716/74 of the 12th of December	"Notice published on 26-02-1976 In force since 17-12-1975"	10°	"109 15%	% 6) (2)" 1	10	10%	12°	5%
TURKEY	"Resolution of the Portuguese Assembly no. 13/2006 of the 21st of February"	"Notice no. 2/2007 published on 10-01-2007 In force since 18-12-2006"	10°	"5% 15%	21)	10	"10% 22) 15% 2)"	120	10%
UKRAINE	"Resolution of the Portuguese Assembly no. 15/2002 of the 8th of March"	"Notice no. 34/2002 published on 11-04-2002 and ratified on 30-04-2002. In force since 11-03-2002 with effects after 01-01-2003"	100	10%	(13) (6 2)	10	10%	120	10%
UNITED KINGDOM	DL no. 48497 of the 24th of July,1968	"Notice published on 03-03-1969 In force since 20-01-1969"	10°	"109 15%	% 6) (2)" 1	10	10%	12°	5%

# NORTH AND SOUTH AMERICA

COUNTRY				M	AXIM	JM RATE9	ITE%		
	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION / ENTRY INTO FORCE	DIVI	DENDS	INT	INTEREST	INTEREST		ALTIES
		NATIFICATION / ENTRY INTO TORCE	Art.	Rate	Art.	Rate	Art.	Rate	
BARBADOS	Resolution of the Portuguese Assembly no. 91/2014 of the 12th of November	"Notice no. 107/2018 published on 24-08-2018 In force since 7-10-2017"	10°	5% 29) 10% 2)	110	10%	12°	5%	
BRAZIL (4)	"Resolution of the Portuguese Assembly no. 33/2001 of the 27th of April"	"Notice no. 131/2001 published on 14-12-2001 In force since 05-10-2001 with effects from 01-01-2000"	10°	10% 13) 15% 2)	110	15%	12°	15%	
CANADA	"Resolution of the Portuguese Assembly no. 81/2000 of the 6th of December"	"Notice no. 111/2001 published on 17-10-2001 In force since 24-10-2001"	10°	10% 13) 15% 2)	110	10%	120	10%	
CHILE	"Resolution of the Portuguese Assembly no. 28/2006 of the 6th of April"	"Notice no. 243/2008 published on 29-12-2008 In force since 25-08-2008"	10°	10% 6) 15% 2)	110	5% 18) 10% 19) 15% 2)	12°	"5% 20 10% 2)"	
COLOMBIA	"Resolution of the Portuguese Assembly no. 46/2012 of the 13th of April"	"Notice no. 2/2015 published on 23-01-2015 In force since 30-01-2015"	100	10%	110	10%	120	10%	
CUBA	"Resolution of the Portuguese Assembly no. 49/2001 of the 13th of July"	"Notice no. 187/2006 published on 23-01-2006 In force since 28-12-2005"	100	5% 6) 10% 2)	110	10%	12°	5%	
MEXICO	"Resolution of the Portuguese Assembly no. 84/2000 of the 15th of December"	"Notice no. 49/2001 published on 21-05-2001 In force since 09-01-2001"	10°	10%	110	10%	120	10%	
PANAMA	"Resolution of the Portuguese Assembly no. 48/2012, of the 16th of April"	"Notice no. 69/2012 published on 09-08-2012 In force since 10-06-2012"	100	10/15%	110	10%	12°	10%	
PERU	"Resolution of the Portuguese Assembly no. 88/2013, of the 27th of June"	"Notice no. 48/2014 published on 03-04-2014 In force since 12-04-2014"	10°	10% 27) 15% 2)	110	"10% 1) 15% 2)"	12°	"10% 11 15% 2)"	
URUGUAY	"Resolution of the Portuguese Assembly no. 77/2011, of the 5th of April "	"Notice no. 30/2013 published on 18-02-2013 In force since 13-09-2012"	10°	5% 6) 10%	110	10%	120	10%	
USA	"Resolution of the Portuguese Assembly no. 39/95 of the 12th of October"	"Notice no. 35/96 published on 09-01-1996 In force since 01-01-1996"	10°	5% 7) 10% 7) 15% 2)	110	10%	13°	10%	
VENEZUELA	"Resolution of the Portuguese Assembly no. 68/97 of the 5th of December "	"Notice no. 15/98 published on 16-01-1998 In force since 08-01-1998"	10°	10% 9) 15% 10)	110	10%	120	10% 11) 12% 12)	

# **AFRICA**

				N	MAXIMUM RA	JM RATE	ATE%			
COUNTRY	REGULATION	REGULATION EXCHANGE OF INSTRUMENTS OF DIVIDEN  RATIFICATION / ENTRY INTO FORCE	DENDS	S INTEREST		ROYALTIES				
	INVESTIGATE ESTATE AND CAREE	Art.	Rate	Art.	Rate	Art.	Rate			
ANGOLA	Resolution of the Portuguese Assembly no. 23/2019 of the 14th of February	Notice no. 93/2019 published on 01-10-2019 In force since 22-09-2019	10°	8% 24) 15% 2)	110	10%	12°	8%		
ARGELIA	"Resolution of the Portuguese Assembly no. 22/2006 of the 23rd March"	"Notice no. 579/2006 published on 05-05-2006 In force since 01-05-2006"	100	10% 13) 15% 2)	110	15%	12°	10%		
CAPE VERDE	"Resolution of the Portuguese Assembly no. 63/2000 of the 12th of July"	"Notice no. 4/2001 published on 18-01-2001 In force since 15-12-2000"	100	10%	110	10%	12°	10%		
CÔTE D' IVOIRE	Resolution of the Portuguese Assembly no. 192/2016 of the 22nd of August	"Notice no. 108/2017 published on 08-09-2017 In force since 18-08-2017"	10°	10%	110	10%	120	5%		
ETHIOPIA	"Resolution of the Portuguese Assembly no. 96/2014 of the 13th of November"	"Notice no. 46/2017 published on 09-05-2017 In force since 09-04-2017"	10°	"5% 29) 10% 2)"	110	10%	120	5%		
GUINEA-BISSAU	Resolution of the Portuguese Assembly no. 55/2009, of the 30th of July	"Notice no. 94/2013 published on 11-10-2013 In force since 05-07-2012"	10°	10%	110	1096	12°	10%		
MAROCCO	"Resolution of the Portuguese Assembly no. 69-A/98 of the 23rd of December"	"Notice no. 201/2000 published 16-10-2000 In force since 27-06-2000"	10°	"10% 5) 15% 2)"	110	12%	120	10%		
MOZAMBIQUE	"Resolution of the Portuguese Assembly no. 36/92 of the 30th of December (Res. Port. Assembly. no. 36/2009 of the 8th of May)"	"Notice no. 55/95 published on 03-03-1995. In force since 01-01-1994. (Convention in force since 07-06-2009. Notice no. 45/2009 published on 21-08-2009)"	10°	10% 26)	110	10%	120	10%		
"REPUBLIC OF SOUTH AFRICA"	"Resolution of the Portuguese Assembly no. 53/2008 of the 22nd September"	"Notice no. 222/2008 published on 20-11-2008 In force since 22-10-2008"	10°	10% 13) 15% 2)	110	10%	120	10%		
SÃO TOMÉ AND PRÍNCIPE	Resolution of the Portuguese Assembly no. 182/2016 of the 5th of August	"Notice no. 109/2017 published on 08-09-2017 In force since 12-07-2017"	10°	"10% 29) 15% 2)"	110	10%	12°	10%		
SENEGAL	"Resolution of the Portuguese Assembly no. 92/2014 of the 12th of November"	"Notice no. 5/2016 published on 14-03-2016 In force since 20-03-2016"	10°	"5% 29) 10% 2)"	110	10%	12°	10%		
TUNISIA	"Resolution of the Portuguese Assembly no. 33/2000 of the 31st of March"	"Notice no. 203/2000 published on 16-10-2000 In force since 21-08-2000"	10°	15%	110	15%	12°	10%		

# **ASIA**

			EVELLANCE OF WEETH WELLTS OF		N	110			
	COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION / ENTRY INTO FORCE	DIVI	DENDS	40	EREST	Water Co.	ALTIES
	BAHRAIN	Resolution of the Portuguese Assembly no. 196/2016 of the 22nd of September	"Notice no. 71/2017 published on 05-07-2017 In force since 01-11-2016"	Art.	"10% 29) 15% 2)"	Art.	Rate	Art.	Rate 5%
	CHINA	"Resolution of the Portuguese Assembly no. 28/2000 of the 30th of March"	"Notice no. 109/2000 published on 02-06- 2000 In force since 08-06-2000"	10°	10%	110	10%	129	10%
	HONG KONG	"Resolution of the Portuguese Assembly no. 49/2012, of the 16th of April"	"Notice no. 53/2012 published on 01-06-2012 In force since 03-06-2012"	10°	5/10%	11°	10%	12°	5%
	INDIA	"Resolution of the Portuguese Assembly no. 20/2000 of the 6th of March"	"Notice no. 123/2000 published on 15-06-2000 In force since 05-04-2000"	10°	10% 13) 15% 2)	110	10%	129	10%
	INDONESIA	"Resolution of the Portuguese Assembly no. 64/2006 of the 6th of December"	"Notice no. 42/2008 published on 04-04-2008 In force since 11-05-2007"	109	10%	11°	10%	120	10%
	ISRAEL	"Resolution of the Portuguese Assembly n° 2/2008 of the 15th of January"	"Notice no. 94/2008 published on 13-06-2008 In force since 18-02-2008"	109	"5% 24) 10% 25) 15% 2)"	110	10%	12°	10%
	Japan	"Resolution of the Portuguese Assembly no. 50/2012, of the 17th of April"	"Notice no. 88/2013 published on 16-08-2013 In force since 28-07-2013"	10°	5/10%	11°	5%	129	5%
	QATAR	"Resolution of the Portuguese Assembly no. 51/2012 Signed on 12-12-2011"	"Notice no. 51/2014 published on 02-05-2014 In force since 04-04-2014"	10°	5% 28) / 10%	110	10%	120	10%
	KUWAIT	"Resolution of the Portuguese Assembly no. 44/2011, of the 18th of March"	"Notice no. 11/2014 published on 15-01-2014 In force since 05-12-2013"	10°	5/10%	11°	10%	120	10%
	MACAO	"Resolution of the Portuguese Assembly no. 80-A/99 of the 16th of December"	"Notice no. 72/2001 published on 16-07-2001 In force 01-01-1999"	10°	10%	110	10%	12°	10%
	PAKISTAN	"Resolution of the Portuguese Assembly no. 66/2003 of the 2nd of August"	"Notice n° 6/2008 published on 21-01-2008 In force since 04-06-2007"	10°	10% 13) 15% 2)	11°	10% 15)	12°	10% 16)
	SAUDI ARABIA	"Resolution of the Portuguese Assembly no. 127/2016 of the 18th of July"	"Notice no. 103/2016 published on 04-10-2016 In force since 01-09-2016"	10°	"5% 23) 10% 2)"	119	10%	12°	8%
	SINGAPORE	"Resolution of the Portuguese Assembly no. 85/2000 of the 15th of December (Resolution of the Portuguese Assembly no. 96/2013 of the 15th of February)"	"Notice no. 45/2001 published on 11-05-2001 In force since 16-03-2001 Notice no. 9/2014 published on 15.01.2014"	10°	10%	119	10%	12°	10%
l	SOUTH KOREA	"Resolution of the Portuguese Assembly no. 25/97 of the 8th of May"	"Notice no. 315/97 published on 27-12-1997 In force since 21-12-1997"	10°	"10% 5) 15% 2)"	110	15%	12°	10%
	SULTANATE OF OMAN	Resolution of the Portuguese Assembly no. 128/2016 of the 18th of July	"Notice no. 80/2017 published on 06-07-2017 In force since 26-07-2016"	10°	"5% 10% 15%"	110	10%	120	8%
	"UNITED ARAB EMIRATES"	"Resolution of the Portuguese Assembly no. 47/2012 of the 15th of April"	"Notice no. 59/2012 published on 11-06-2012 In force since 22-05-2012"	10°	"5% 23) 15%"	110	10%	120	5%
-	TIMOR-LESTE	Resolution of the Portuguese Assembly no. 112/2012 of the 9th of August	Awaiting notice publication	10°	5% 6) 10% 2)	110	10%	12°	10%
	VIETNAM	Resolution of the Portuguese Assembly no. 143/2016 of the 27th of July	"Notice no. 68/2017 published on 04-07-2017 In force since 09-11-2016"	10°	"5% 24) 10% 24) 15% 24)"	110	10%	12°	"10% 7,5%"



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