

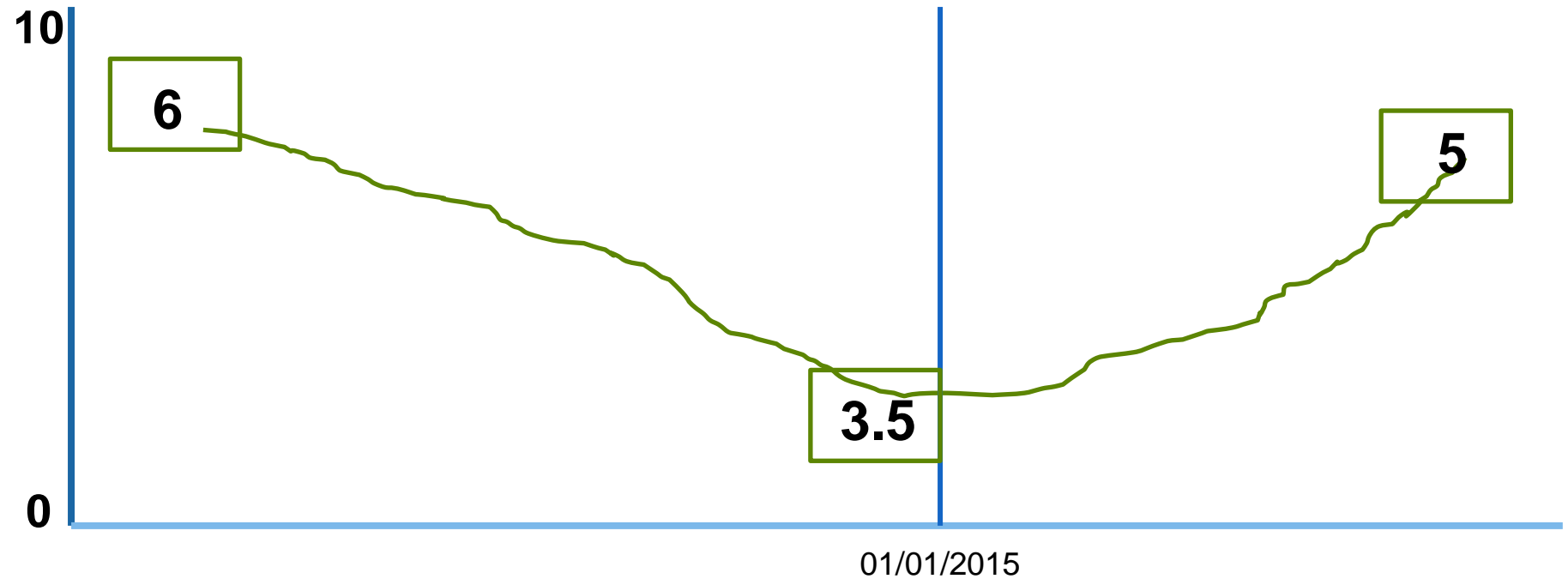
Tax News to Invest in Perú

CASAHIERRO Abogados

November 2014

Percy Castle

Investing in Peru: GDP Growth 2014-2015



Investing in Perú: Main Industries of Foreign Investments

- **Mining, Fishing**
- **Hydrocarbons (Oil, Gas)**
- **Construction and Sale of Private Real State**
- **Construction of Public Infrastructure (Bid)**
- **Construction Procurement (Bid)**
- **Energy (generation) (Bid)**
- **Technology (Government) (Bid)**
- **Agriculture**

ECONOMIC Measures Adopted by the Government

GOALS:

- 1) PUT MORE LIQUIDITY ON INVESTORS HANDS
- 2) FACILITATE AND EXPEDITE INFRAESTRUCTURE INVESTMENTS

TAX: Related Measures Adopted by the Government

- 1) Reduce Income Tax and VAT withholdings methods.
- 2) Reduce customs taxes.
- 3) Facilitate VAT financing.
- 4) Allow acceleration of depreciation deductions (Construction).
- 5) Boost Construction In Exchange of Taxes (Schools Hospitals).

Menu of Tax Rules

- **Anti-Avoidance General Rule:** (Substance over form principle)
- Transfer Price Rules: (OECD)
- Fiscal Transparency Tax (Since 2013)
- Tax Heavens Jurisdictions (Expenses and Loans)
- Indirect Transfer of Shares (Capital Gains)
- Thin Capitalization: (Related Parties Transactions)
- **Double Taxation Treaties (Few)**
- TIEA's (Increasing)