



TRANSNATIONAL TAXATION NETWORK
A WORLD-WIDE ORGANIZATION OF INDEPENDENT PROFESSIONAL FIRMS

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ABOGADOS / LEGAL · TAX · COMPLIANCE

Tax Transparency in Uruguay

Tax Transparency, New Regulations on AML, CFC Rules and UBO

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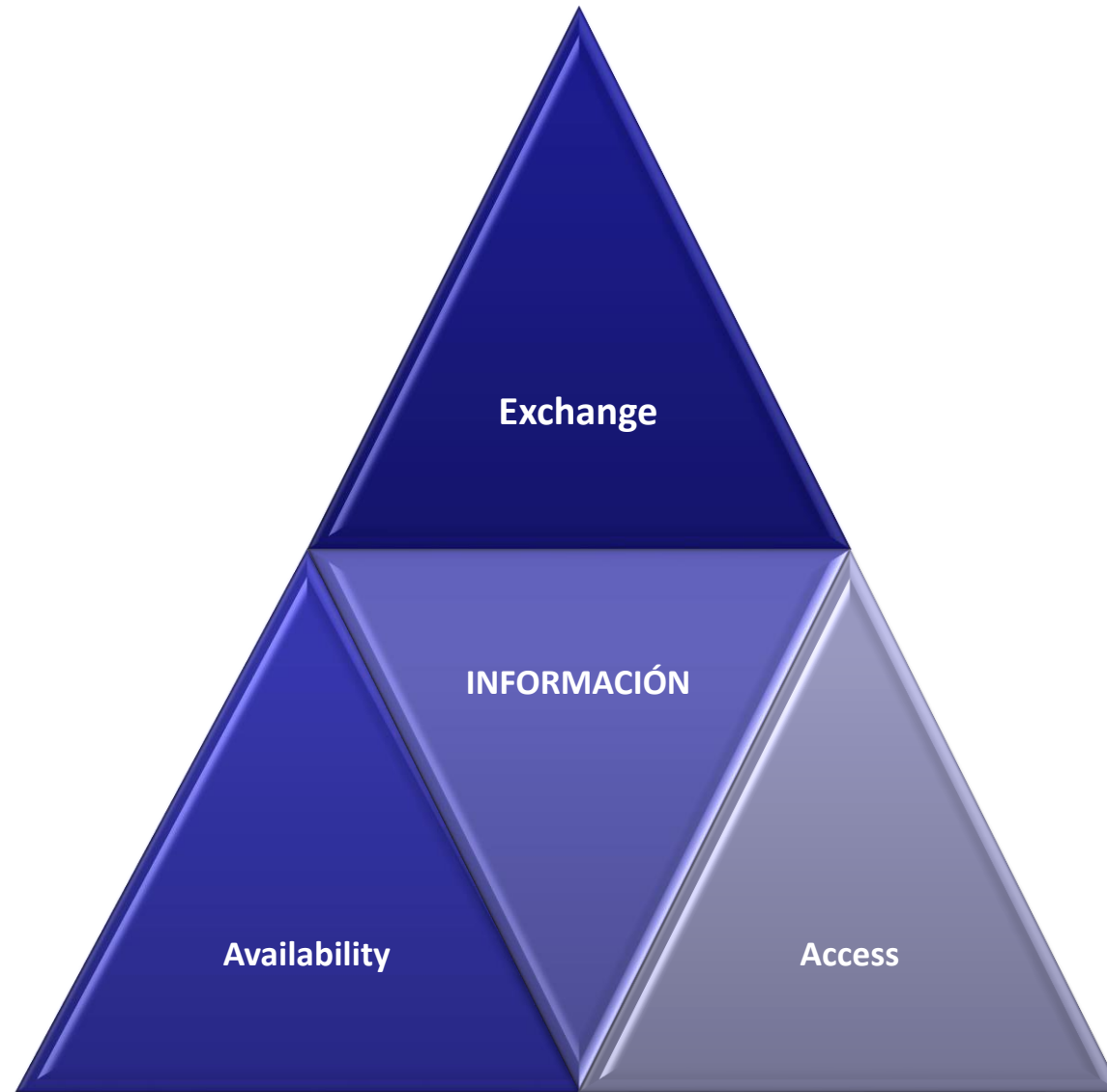
Exchange of Information on Request

HANDBOOK FOR PEER REVIEWS 2016-2020

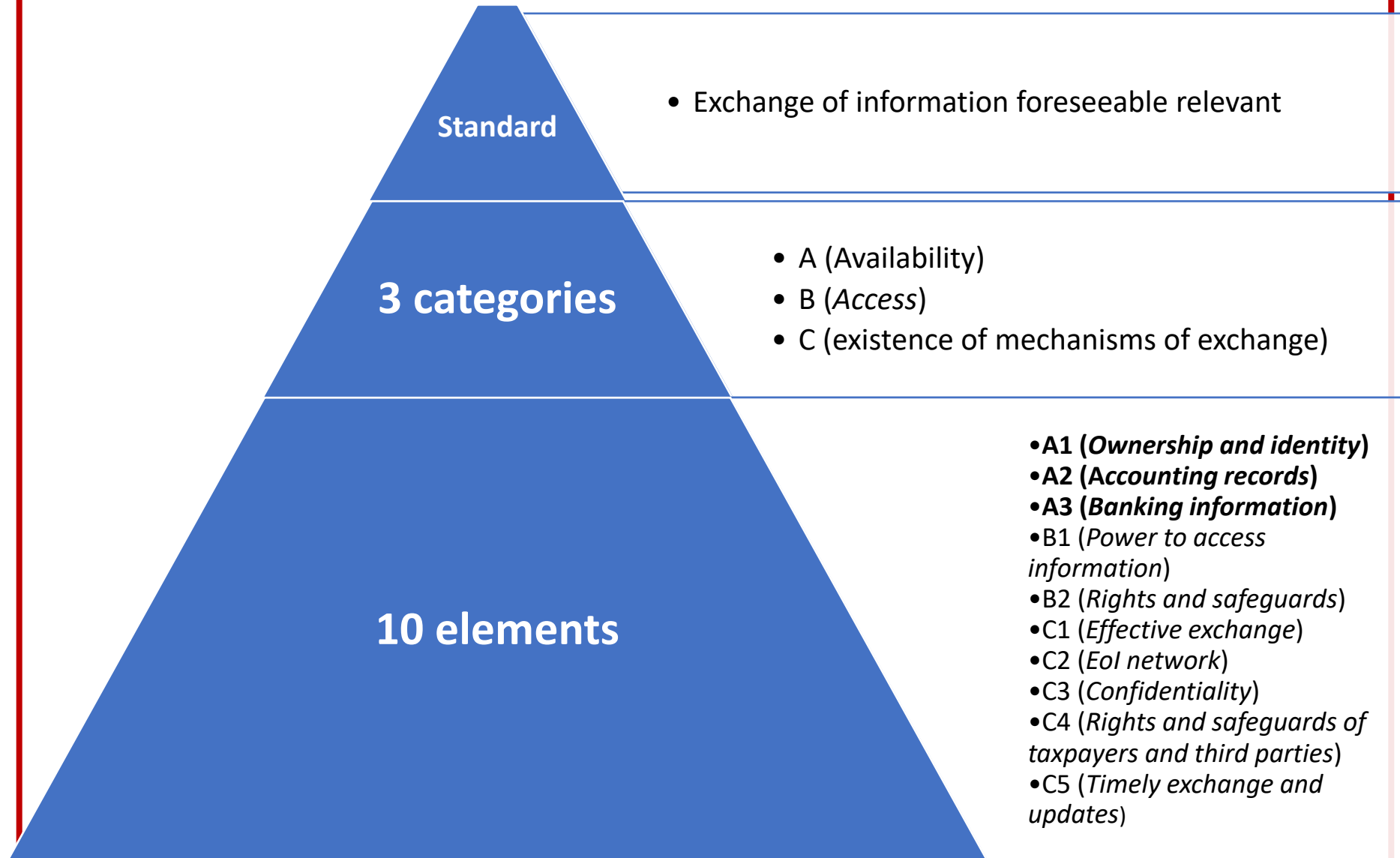
GLOBAL FORUM ON TRANSPARENCY
AND EXCHANGE OF INFORMATION FOR TAX PURPOSES



Basis of International Standards



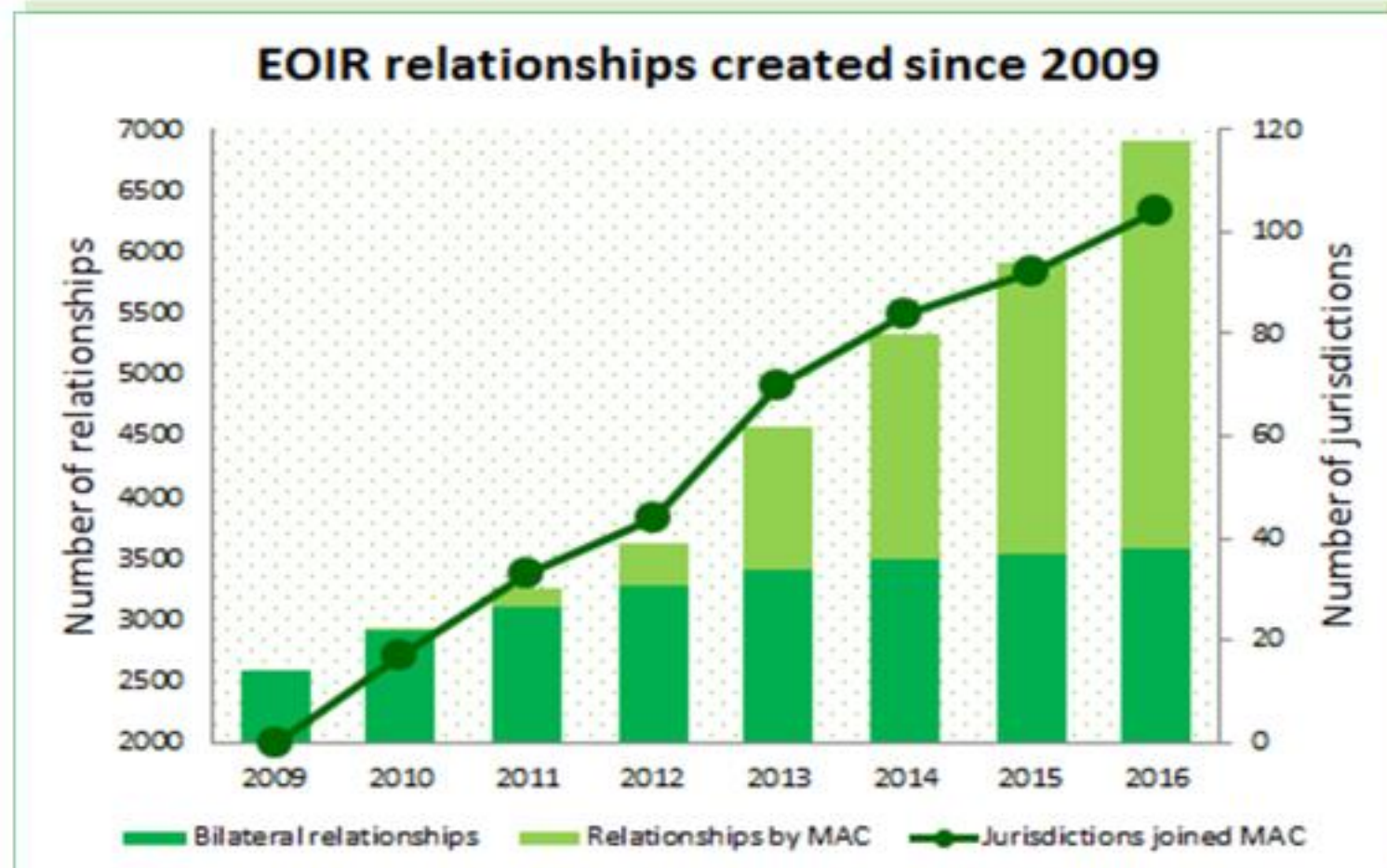
TERMS OF REFERENCE EOIR



What information would be foreseeably relevant?

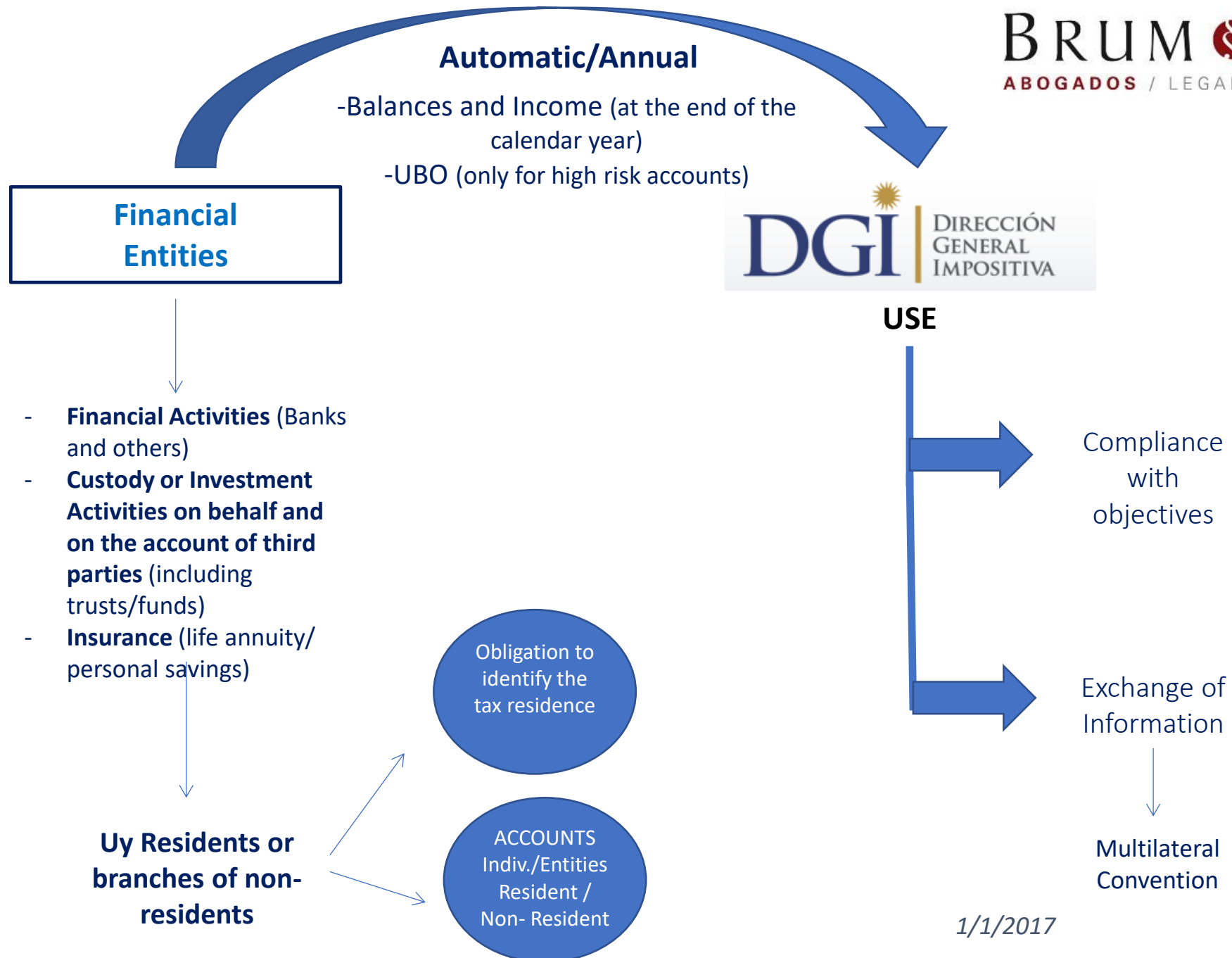
- ✓ Final or effective beneficiary (entities)
- ✓ Accounting information (financial statements, invoices, contracts)
- ✓ Banking records (account holders, transactions, balances)
 - ✓ Income tax returns
- ✓ Information on residence (confirmation of residence or information to apply tax treaties to avoid double taxation)
 - ✓ Transfer Pricing Documentation

Intercambio de Información Tributaria (a requerimiento de otra jurisdicción)

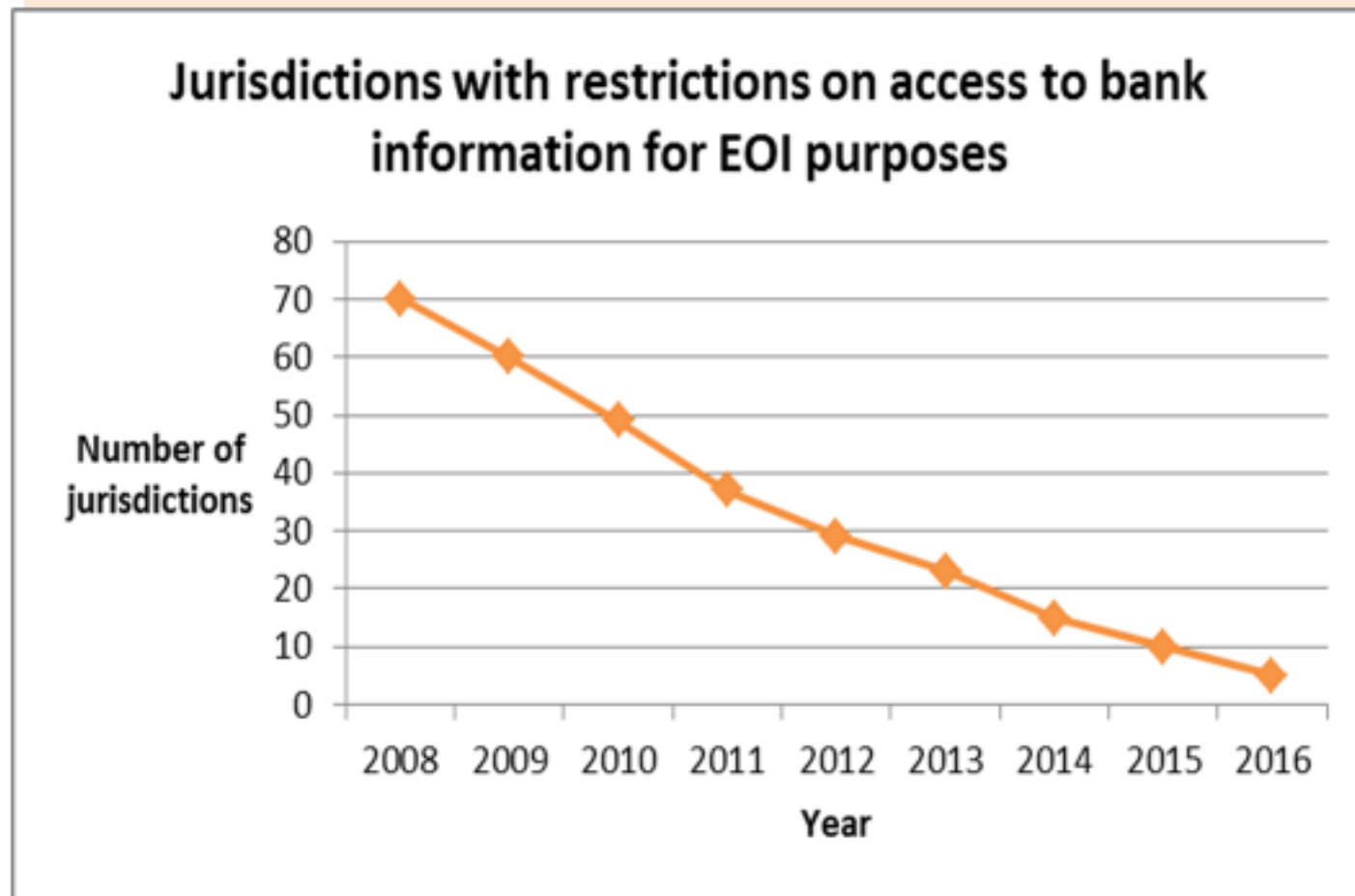


Chapters of the new Law

- Chapter I - Banks and other Financial Institutions are obliged to share information of balances and income of financial source to the Tax Administration (DGI). End of bank secrecy in Uruguay ?
- Chapter II. Identifying the Ultimate Beneficial Owner (UBO) & Nominee Holders.
- Chapter III. CFC rules for Countries or Jurisdictions of Low or Null Taxation (BONT) or benefiting from a special BONT regime.
- Chapter IV. Adjustments to the regime of Transfer Pricing related to Uruguay Income Tax of Economic activities



Jurisdicciones con Secreto Bancario

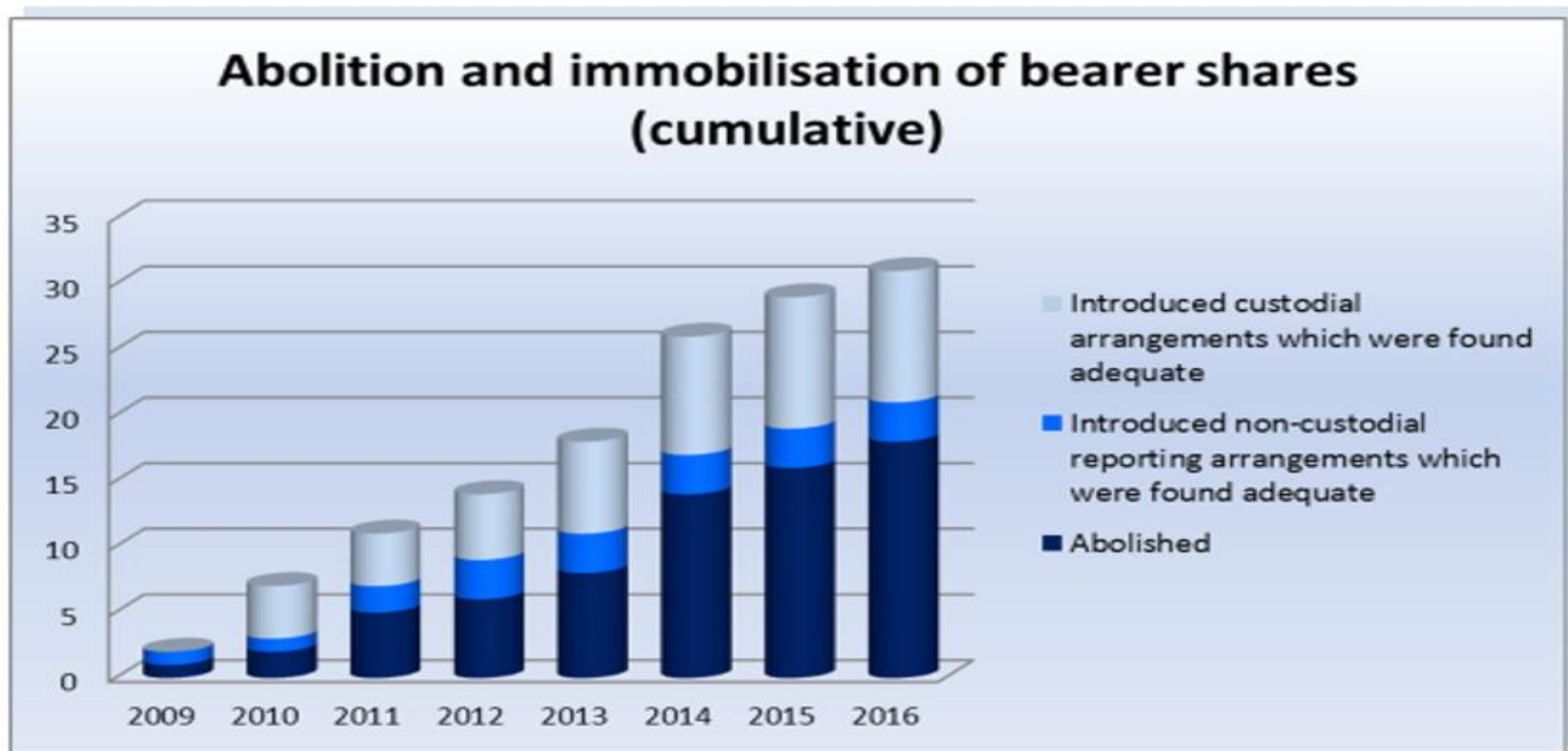


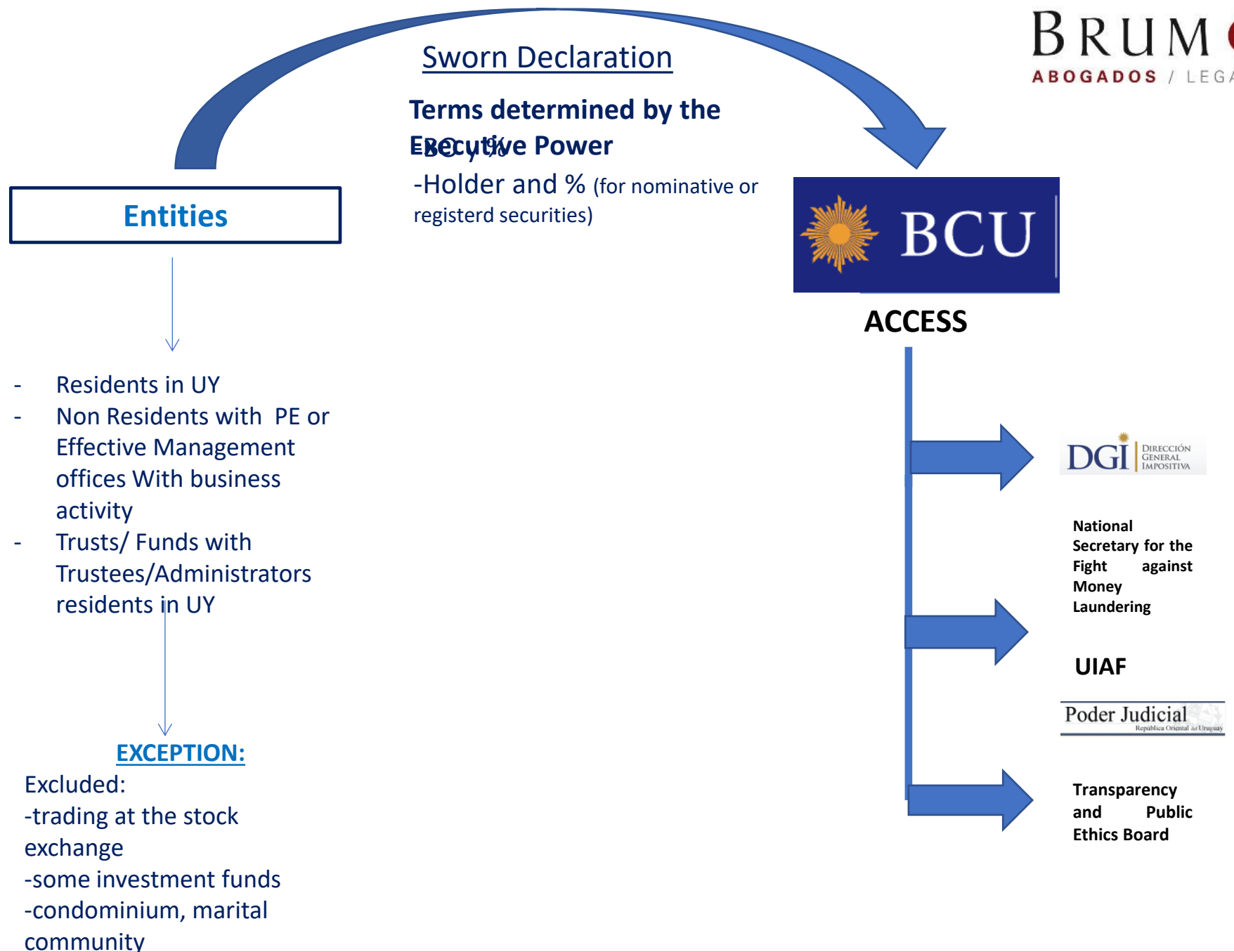
Fuente: OECD

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Source: OECD

International Context & the new reality







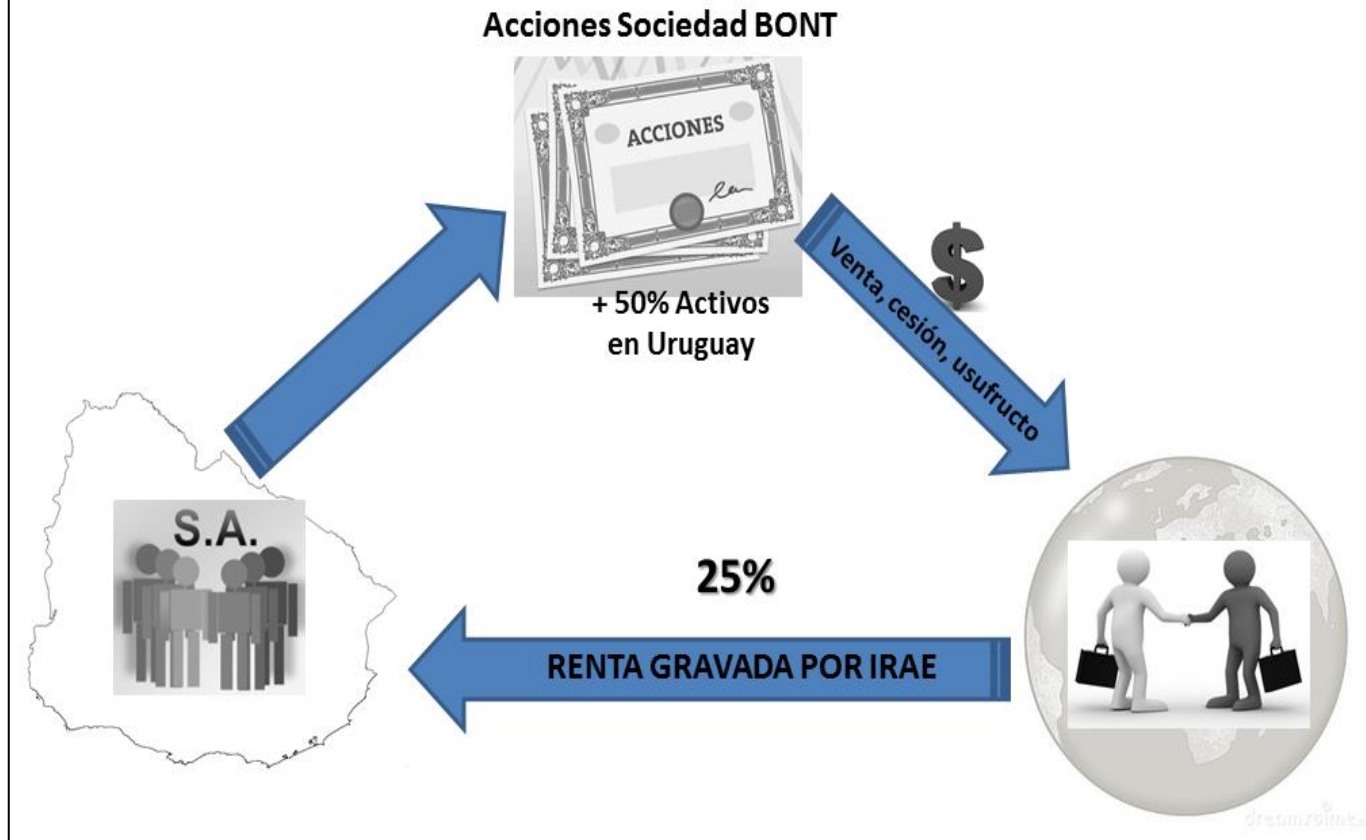
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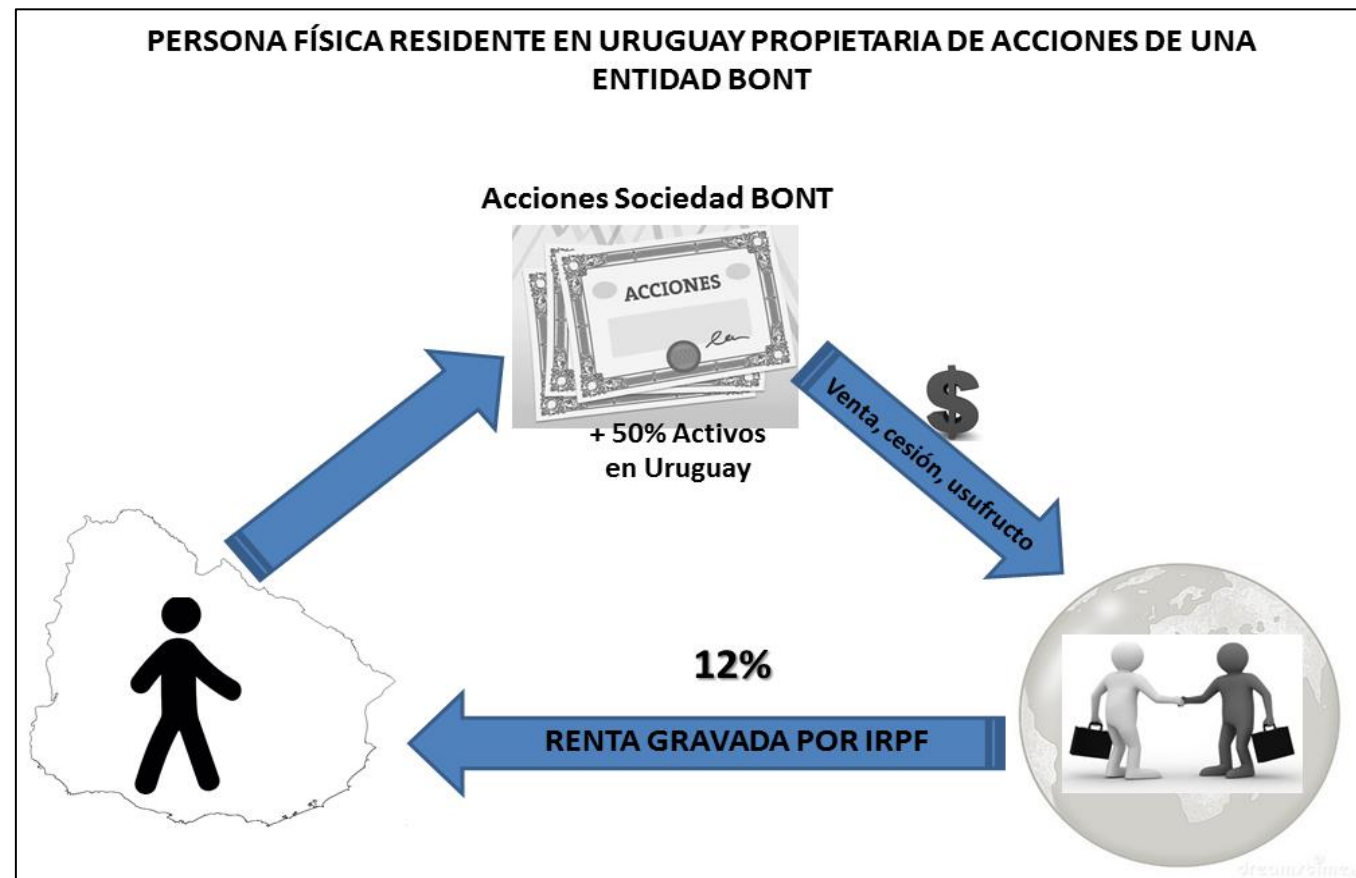
AMENDMENTS TO INCOME TAX

TAXATION OF BONTS

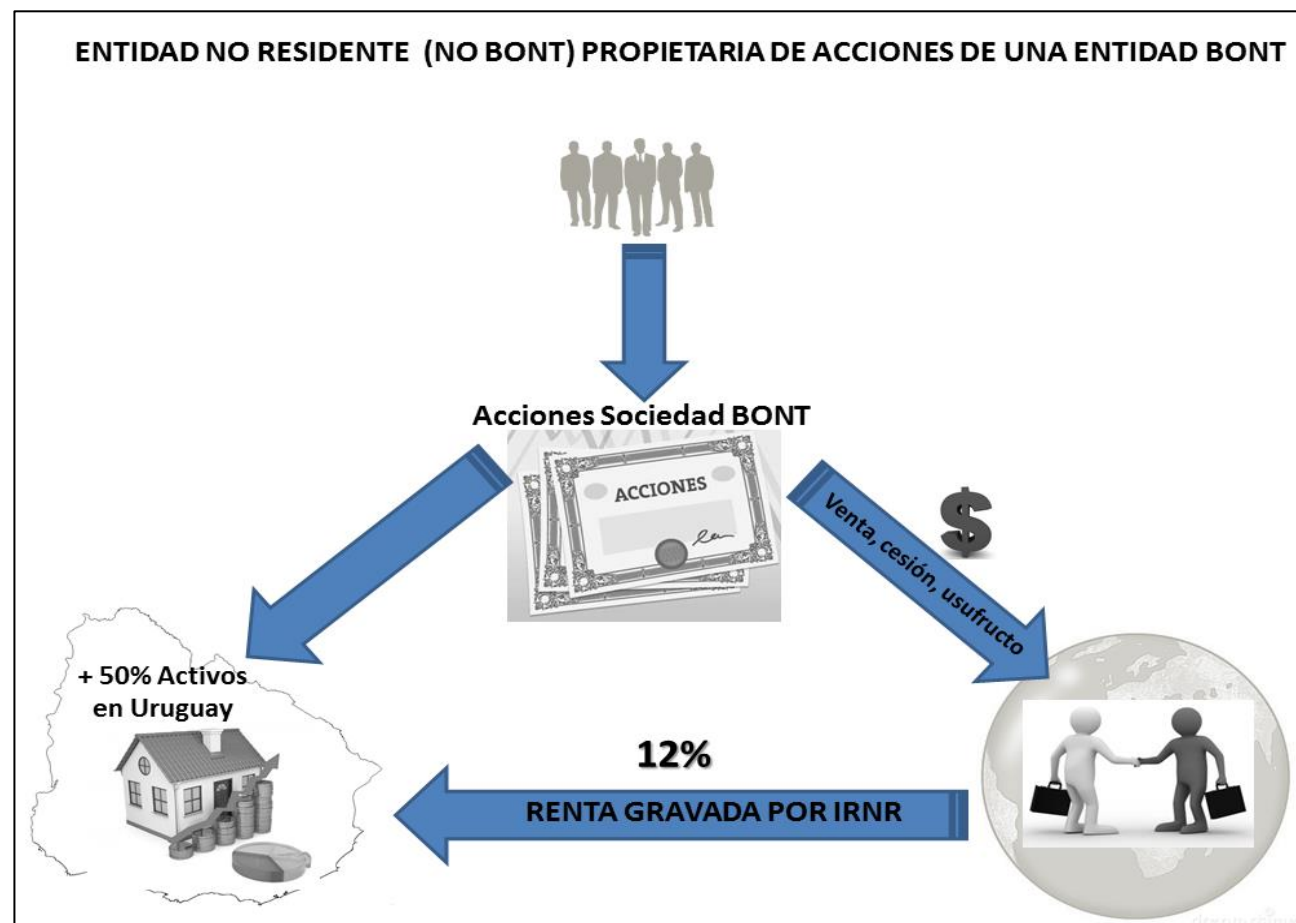
SOCIEDAD ANÓNIMA URUGUAYA PROPIETARIA DE ACCIONES DE UNA ENTIDAD BONT



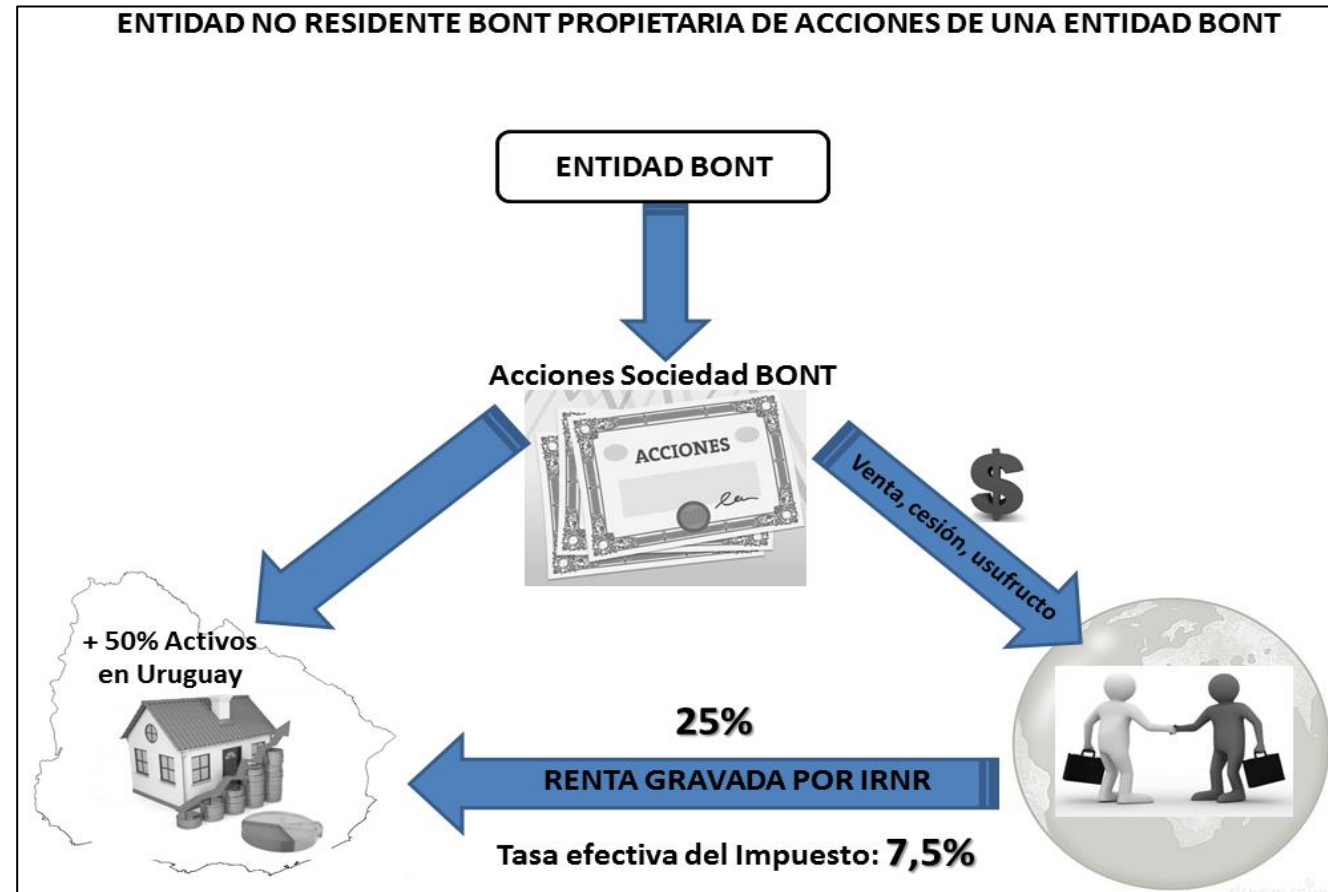
TAXATION OF BONTS



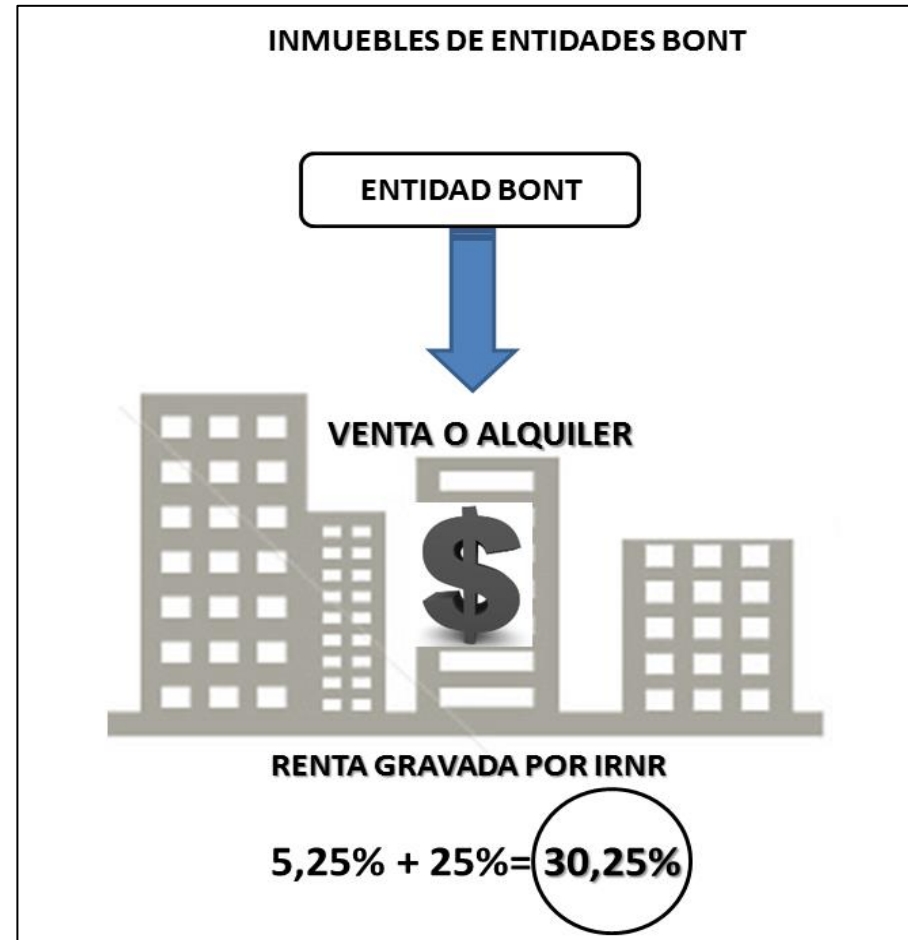
TAXATION OF BONTs



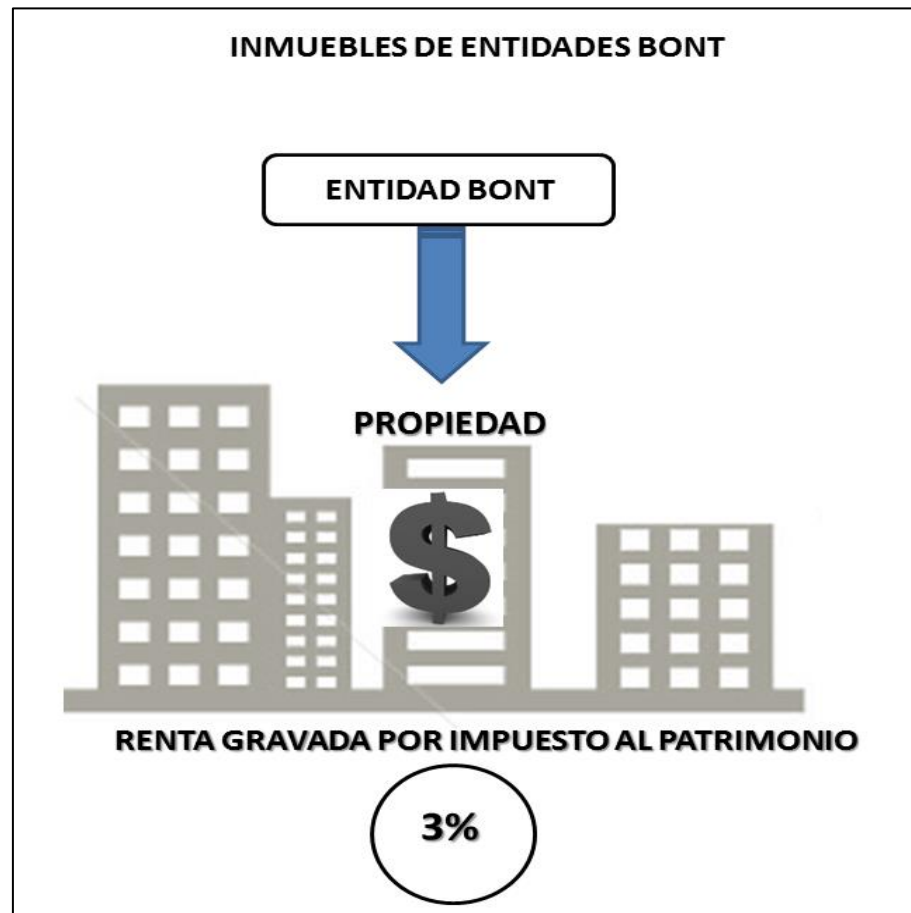
TAXATION OF BONTS



TAXATION OF BONTS



TAXATION OF BONTS



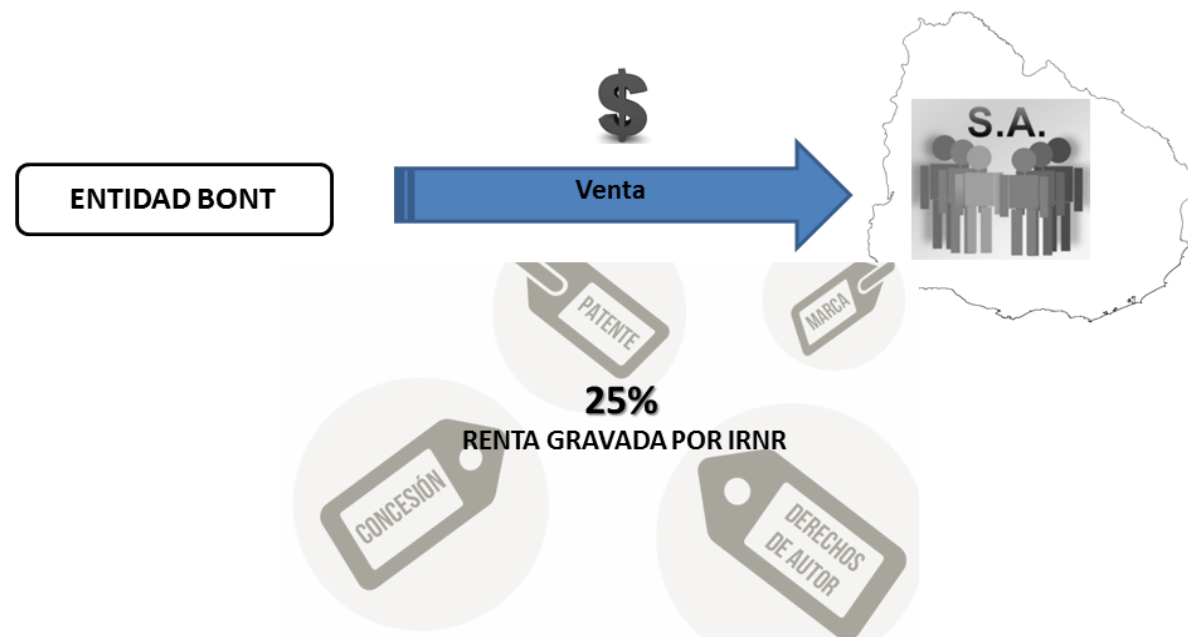


TAXATION OF BONTS

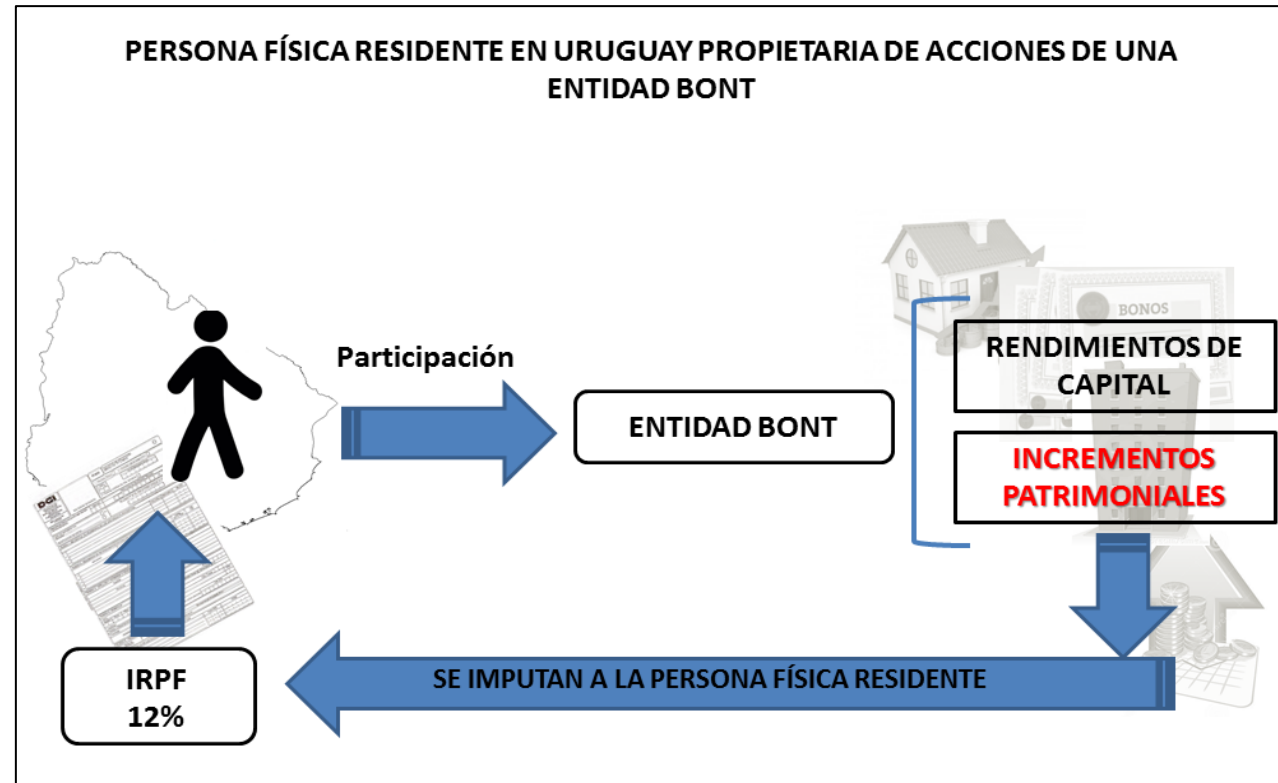
	PF Residente	PF o PJ No Residente	Contribuyente IRAE	Entidad BONT
Arrendamiento o Enajenación del inmueble	12%	12%	25%	30,25%

TAXATION OF BONTS

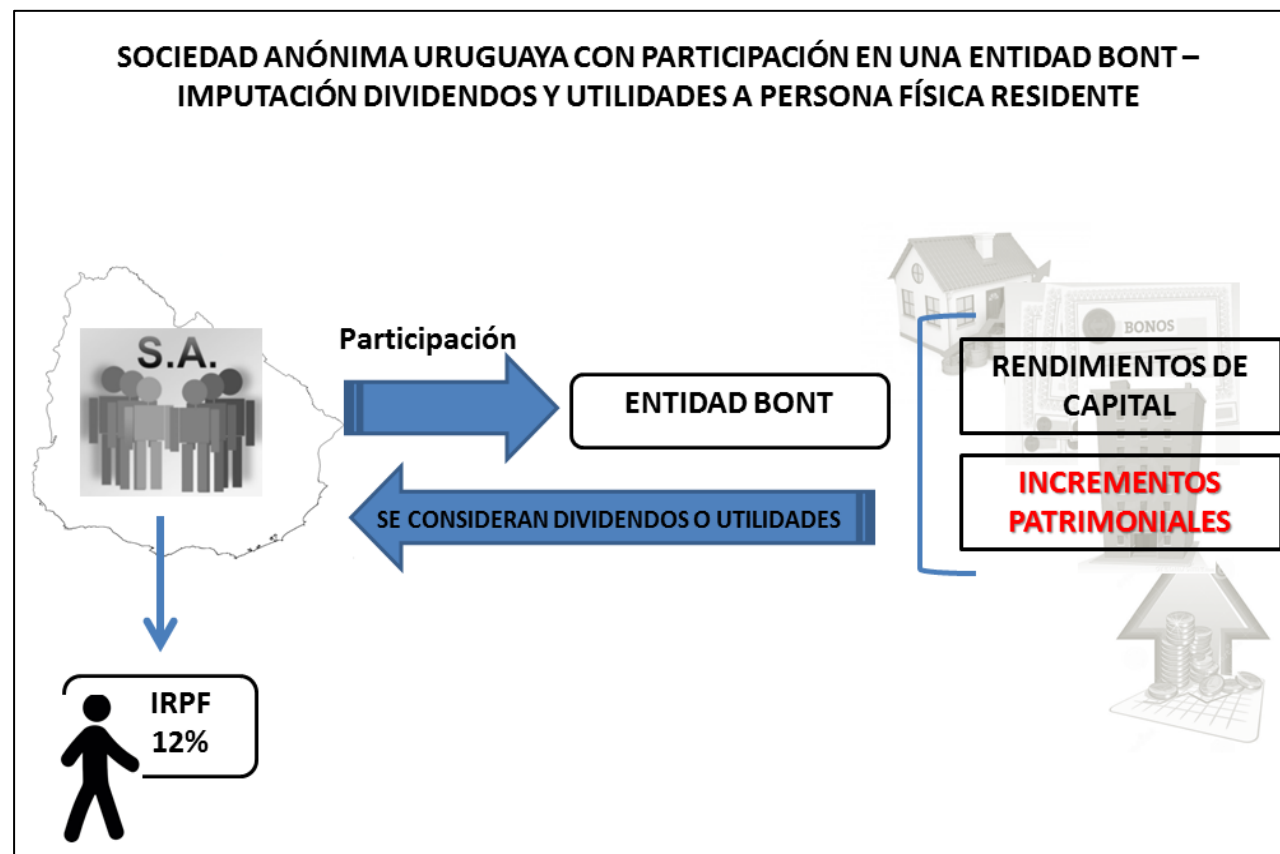
VENTA DE INTANGIBLES DE UNA ENTIDAD BONT A UN CONTRIBUYENTE DE IRAE



TAXATION OF BONTS



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Thank you

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