

With its entrance into the European Union and the implementation of new corporate legislation in 2003, Cyprus has become one of the most attractive holding jurisdictions in the world.

Cyprus has linked its Global network of over 40 double income taxation treaties (2006), with an outstanding holding regime. This very powerful combination provides the following major advantages:

- Full participation exception for resident companies for dividend income received from subsidiary companies.
- Application for EU Parent /Subsidiary Directive (providing a qualified tax exemption for the inter- EU cross border distribution).
- Freedom to distribute dividends, interest and royalties tax free from Cyprus to any country.
  
- No minimum holding period for shares prior to liquidation.
- No controlled foreign corporation (CFC) legislation.
- No substance requirements for Cyprus Holding Company or underlying subsidiaries.
- Minimum Holding of 1% of the stock of the underlying subsidiary company.
- Full tax exemption on the receipt of capital gains from the disposal of shares into a subsidiary.
- Freedom to distribute capital gains tax from the disposal (or liquidation) of the shares of the Cyprus holding Company tax free to any country.
- No capital taxation to capitalize Cyprus Companies.
- Net worth taxes during the life of a Cyprus Company.

Cyprus has concluded double taxation treaties covering the following countries:

Armenia  
Austria  
Belarus  
Belgium  
Bulgaria  
Canada  
China  
Czech Republic  
Denmark  
Egypt  
France  
Germany  
Greece

Hungary  
India  
Italy  
Kuwait  
Kyrgyzstan  
Lebanon  
Malta  
Mauritius  
Moldova  
Montenegro  
Norway  
Poland  
Qatar  
Romania  
Russia  
San Marino  
Seychelles  
Singapore  
Slovakia  
Slovenia  
South Africa  
Sweden  
Syria  
Tajikistan  
Thailand  
Ukraine  
United Kingdom  
United States of America  
Uzbekistan

Ireland

Serbia