

An aerial photograph of a modern architectural complex. The central feature is a large, curved building with a glass facade that reflects the surrounding landscape. The building has multiple levels and a unique, flowing design. To the right of this central building is a more traditional, rectangular building with a flat roof. The complex is surrounded by green lawns, trees, and parking areas with several cars. In the background, there are more industrial or commercial buildings and a distant horizon under a blue sky with light clouds.

Investor's Guide

# Promotional schemes for investment

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## INTRODUCTION

Although in the past year, because of the global health crisis caused by COVID-19, the Uruguayan economy has suffered unfavorable impacts on the investment and employment levels, these have been maintained, adapting and in some cases creating new incentives to promote investment.

Based on the above, Uruguay continues to be positioned as a reliable and attractive destination for foreign investors.

Individuals and corporations can set up companies in Uruguay without having to comply with prior requirements or obtain special permits from the State, nor is it required to have a local counterpart. The foreign exchange market is free, with total freedom to buy and sell foreign currency.

In Uruguay there is no discrimination in the treatment of domestic and foreign capital, and investment promotion incentives are available to both. There are also no limits to the allocation of foreign capital in companies. The financial market is totally free, no prior authorization is required for the inflow or outflow of foreign currency. There are no restrictions on the entry or exit of capital, transfer of profits, dividends, interest, etc., without prejudice to the rules against money laundering and financing of terrorism.

The tax system is unique throughout the territory and is based on the source principle, so as a rule foreign sourced income and assets located abroad are not taxed.

Uruguay has several incentives and benefit schemes for investors, which can be adjusted to different types of activities, whether industrial, commercial or service activities intended to be performed in the country. Among the main incentive schemes available are those established by the Investment Law, free trade zones, the free port and airport regime, industrial parks, and temporary admission. This document is a summary of the main benefits offered by the country, both for domestic and foreign investors, and there is no discrimination between the two from the point of view of taxation or with respect to the qualification for the benefit schemes.

The first four chapters describe the tax benefits created by the Investment Promotion Law and its complementary regulations. This law includes: general benefits for all investments that comply with the conditions established therein; benefits specific to certain types of activities, including external financial intermediation, construction, forestry, graphic industry, maritime or air navigation, software, vehicles or auto parts, biofuels, communication industry and housing, among others, together with benefits that may be requested for specific investment projects.

The remaining chapters describe the treatment of holding companies, the operation of industrial parks, free trade zones, free ports and airports in Uruguay and the benefits that the relevant regulations offer both for potential users and potential operators. Next, it describes the operation and benefits of public-private partnership agreements, which is a tool widely used by Uruguay in infrastructure matters.

Finally, the last chapter describes the different foreign trade-related schemes: tax refunds, temporary admission, export tax refunds, draw-back and customs warehousing.

# 1

## INVESTMENT PROMOTION LAW

Since 1998, the Investment Promotion and Protection Law No. 16,906 establishes the legal framework for the promotion and protection of investments made in the national territory by domestic and foreign investors. Since its enactment, different regulations have been issued in order to adapt to the current economic situation.

The law divides the tax incentives into those of a general nature and those of a specific nature with respect to investments, which are detailed as follows:

### 1.1 GENERAL INVESTMENT INCENTIVES

General incentives are regulated by Decree No. 59/998.

**Beneficiaries:** taxpayers of the Corporate Income Tax - CIT (*in Spanish IRAE*) who carry out industrial (including manufacturing and extractive) or agricultural activities and of the Tax on the Sale of Agricultural Goods (IMEBA) who carry out agricultural activities aimed at obtaining primary vegetable or animal products.

The benefits granted will operate automatically for all beneficiaries.

**Investments included:** The acquisition of the following property:

1. Movable property intended to be part of the production cycle: industrial machinery and premises, agricultural machinery and utility vehicles (chassis for trucks, trucks, tow tractors, trailers, and skidders).
2. Equipment for electronic data processing and movable goods necessary for its operation. Software is excluded.
3. Fixed improvements used for industrial and agricultural and livestock activities.
4. Intangible assets: trademarks, patents, industrial models, privileges, copyrights, goodwill, trade names and concessions granted for exploration activities, crops and extraction or exploitation of natural resources.
5. Other goods, procedures, inventions or creations that incorporate technological innovation and involve technology transfer, at the discretion of the Executive Power.

## Benefits

- » Wealth Tax (*in Spanish IP*) exemption for the assets referred to in items 1) and 2) above. The same shall be considered taxable assets for the purpose of computing liabilities for tax calculation.
- » Value Added Tax (VAT) and Excise Tax (*in Spanish IMESI*) exemption to the import of the goods in items 1) and 2) above.
- » VAT refund on the local acquisition of the goods in items 1) and 2) above.

The Executive Branch is empowered (and has not yet done so) to grant the following tax benefits to the taxpayers making the investments:

- » Wealth Tax exemption to assets in items 3) to 5), which will be considered as taxable assets for the purpose of computing liabilities for tax calculation.
- » Accelerated depreciation regime for Corporate Income Tax (IRAE) and Wealth Tax (IP) exemption purposes for all items.

## 1.2 SPECIFIC INVESTMENT INCENTIVES

General incentives are regulated by various Decrees: No. 092/998, No. 455/007, No. 002/012, No. 143/018, and No. 268/020.

The last regulatory Decree will be detailed since it is the one that applies to the projects being currently presented.

**Beneficiaries:** Corporate Income Tax taxpayers who have income taxed by such tax and cooperatives whose investment projects are declared promoted by the Executive Power.

Autonomous entities and decentralized services of the State industrial and commercial domains will not be considered beneficiaries.

**Investments included:** The acquisition of the following property intended to make up the fixed or intangible assets:

1. Movable tangible property, intended directly for the activity of the company, provided that it has an individual minimum value of UI 500 (five hundred Indexed Units<sup>1</sup>).

Movable property intended for the home, vehicles acquired for lease whose activity consists of the lease of vehicles without a driver and non-utilitarian vehicles are excluded<sup>2</sup>.

2. Construction of real estate or fixed improvements in self-owned properties (excluding those destined for the home) and fixed improvements in properties owned by third parties, provided that there is a contract with a minimum term of 3 years.

<sup>1</sup> The value of the UI will be that of the last day of the month prior to the filing of the promotional declaration application (as of December 8, 2021 it is equivalent to US\$ 57. UI=\$5,1512; Exchange Rate= \$45,4).

<sup>2</sup> For further information see [Decree No. 268/020](#) page 3.



3. Seedlings and the costs of planting multi-annual fruit trees and shrubs, as well as the costs of acquisition and/or production of seedlings and the costs of planting and management in year 0 (the costs of forest maintenance and care in the following years are not considered).
4. Passenger vehicles with electric motor only, as long as they refer to investment projects presented between October 7, 2020 and August 31, 2023 and comply with certain requirements established in the operation criteria of the Application Commission (COMAP)<sup>3</sup>.

Eligible investments for obtaining the benefits will be those made as from the beginning of the fiscal year in which the promotional declaration application is filed, or in the 6 months prior to the first day of the month in which the above-mentioned application is filed, and for up to 10 fiscal years.

Investments that receive subsidies from public funds will be computed only for the non-subsidized part.

**Benefits:** Companies with promoted investment projects will have the following tax benefits:

**Corporate Income Tax (IRAE):**

- » Exemption of a percentage fixed according to the score obtained in the matrix of indicators, which shall not be less than 1 point.
- » The exemption percentage granted, taking into account the application of the general matrix of indicators, **will be at least 30%, being able to exonerate 100%** of the amount effectively invested, given that in each fiscal year the lesser amount that arises from comparing the percentage of exoneration granted, the amount effectively invested and 90% of the CIT to be paid, may be exempted.
- » **The exemption term established shall not be less than 4 years, being the maximum 25 years** depending on the amount of the eligible investment and the score obtained.
- » Users of industrial parks and scientific-technological parks, if they develop certain activities established in the COMAP operating criteria, will obtain, depending on the type of user, an increase of 15% or 5% on the CIT benefit and on the term to use the exemption. Likewise, they will obtain a tax credit for the employer's pension contributions associated with the employment committed in the employment generation indicator and exclusively for the workers that work a full working day in the park.
- » Companies categorized as micro or small companies (maximum 19 employees and non-VAT annual sales of less than UI 10,000,000), which submit investment projects for a total of UI 3,500,000, will have an additional 10% CIT benefit and an additional fiscal year to the exemption term obtained.
- » The CIT exemption may reach up to 90% of the tax payable each fiscal year included in the promotional declaration, so the minimum effective CIT rate is 2.5%.

<sup>3</sup> For further information see Art. 23 of [Decreto N° 268/020](#) page 14.

- » The exemption period may be suspended for up to two consecutive fiscal years or not.

**Wealth Tax:** Exemption on the personal property of the eligible investment, provided that it does not enjoy exemption for other benefits:

- » Personal property: Throughout the fiscal useful life.
- » Real estate: 8 years if located in Montevideo and 10 years if located in the rest of the country.

**Import Duties and Taxes:** Total exemption of import taxes and duties (including VAT) for personal property included in fixed assets and materials for civil works, provided that they are not exempted by other benefits and declared non-competitive with the national industry by the National Directorate of Industries of the Ministry of Industry, Energy and Mining.

**VAT:** VAT refund for the purchase of personal property for the investment project and materials and services for the civil works.

**Procedure for Obtaining Benefits:** Companies planning to make investments and obtain the exemptions established in the regulations must submit to COMAP's One-Stop Shop<sup>4</sup> certain documentation established by such agency, in order to apply for the benefits provided for in the decree. The steps to obtain the investment project Resolution once the application has been filed are as follows:

1. The One-Stop Shop will have to forward the taxpayer's request to COMAP within 5 working days from the date of receipt of the documentation.
2. Once the documentation has been received, COMAP will determine, according to the nature of the project and the corresponding activity, which Ministry will be in charge of its assessment: Ministry of Economy and Finance (commerce and services sector), Ministry of Industry, Energy and Mining (industrial sector), Ministry of Livestock, Agriculture and Fisheries (agricultural sector), Ministry of Tourism and Sports (tourism sector).
3. Once the project has been assessed by the corresponding Ministry, COMAP will make the relevant recommendations. To do so, it has 90 working days from the date on which the One-Stop Shop sends the project, which may be extended to request additional information, but shall not exceed 90 working days.

If COMAP has not issued a decision within the aforementioned term, it shall be understood that the project has been recommended to the Executive Power. Likewise, if additional information has been requested and it is not received within the established term, the project will be considered abandoned.

4. When the Executive Power receives the recommendation of the project from COMAP, in case there are no observations, it will approve it, issuing a Resolution where the declaration of promoted project will be established including the project's specific information with the applicable exemptions.

<sup>4</sup>For more information visit the following link: <https://www.gub.uy/ministerio-economia-finanzas/politicas-y-gestion/presentacion-proyectos-ampliaciones-del-regimen-decreto-268020>

Once the investment project has been submitted (even without the resolution in place), the beneficiary companies must submit annually, within 4 months of the closing of each fiscal year, follow-up information on the project's compliance. This includes the following: Tax Affidavit and Accounting Statements with the corresponding reports, Affidavit, provided by COMAP containing information on the execution of the investment, tax benefits used and compliance with committed indicators.

**Matrix of Indicators:** At the time of submitting the investment project, companies must commit to the fulfillment of certain indicators: employment generation, decentralization, increase in exports, clean technologies, research, development and innovation, and sectoral indicators.

#### General Matrix:

- » Each investment project will be assigned an overall score based on the weighted sum of the scores obtained for each indicator. The minimum score is 1 point and the maximum is 10 points.
- » In order to qualify for the scheme, companies must score at least 1 point for any of the indicators mentioned above, except for decentralization, in which case an additional indicator must be included (regardless of whether the required minimum is reached).
- » Obtaining 1 point in the matrix ensures 30% CIT exemption and a 4-year term to use it.

The following is the general matrix of indicators with their weightings:

Objective	Score	Weighting
Employment generation	0 to 10	0.5
Increase in exports		0.2
Decentralization		0.15
Clean technologies		0.2
Research, development and innovation		0.2
Sectoral indicator		0.25
<b>TOTAL</b>		<b>1.5</b>

### Simplified matrix:

- » A simplified scheme is contemplated, whereby companies may use only one indicator for the purpose of calculating the score. The indicator to be used is the “employment generation” indicator, which will be measured in terms of jobs created.
- » Based on the amount of eligible investment, a score will be assigned to determine the number of jobs that will need to be created in order to obtain 1 point and then determine how many additional people will be required in order to obtain more points. The maximum score is 10 points and in the event that the increase in the number of people causes the above-mentioned score to be exceeded, the maximum value will be maintained.
- » The score of 1 point assures an CIT exemption of 42% with a 5-year exemption term, while the maximum score (10 points) assures an CIT exemption of 69% in a 7-year term of use.

The simplified matrix is as follows:

Investment amount in UI	Number of persons to obtain 1 point	Number of persons to obtain additional points
Less than/equal to 3,500,000	3	1
From 3,500,001 to 14,000,000	5	2
From 14,000,001 to 70,000,000	8	3
From 71,000,001 to 140,000,000	11	
From 140,000,001 to 250,000,000	14	
From 250,000,001 to 500,000,000	17	
More than 500,000,000	20	

In both matrices, indicators must be met according to a schedule, which will imply a commitment of 3 fiscal years. In the event that for reasons of force majeure it is not possible to meet the deadline at the time of submitting the project, authorization may be requested for the project to be rescheduled, provided that there are justified reasons.

Likewise, a tolerance margin of 20% of the total score obtained is established, which will be applied at the end of the schedule for the fulfillment of indicators.



# 2

## **AUTOMATIC INVESTMENT PROMOTION SCHEME**

In addition to the Investment Promotion and Protection Law, there are automatic exemptions for investments, established in the 1996 Consolidated Text No. 4 and Regulatory Decree No. 150/007.

**Beneficiaries:** Corporate Income Tax - CIT taxpayers whose income in the fiscal year immediately prior to that in which the investment is made does not exceed UI 10,000,000.

**Investments included:** Acquisition in the exercise of:

1. Machinery and premises for industrial, commercial and service activities (excluding financial activities and the leasing of real estate).
2. Agricultural machinery.
3. Fixed improvements in the agricultural sector.
4. Utility vehicles.
5. Movable goods destined to equipping and re-equipping hotels, motels and inns.
6. Capital goods destined for entertainment, recreation, information, and transportation to provide better service to tourists.
7. Equipment necessary for electronic data processing and communications.
8. Machinery, premises and equipment for innovation and productive specialization of the goods included in the previous items.
9. Phosphate fertilizers intended for the installation and fertilization of permanent pastures.
10. Construction and expansion of hotels, motels and inns.
11. Construction or enlargement of buildings intended for industrial or agricultural activities.

### Benefits:

» **Taxpayers whose income does not exceed UI 10,000,000:** CIT exemption of up to 40% of the investment made in the year for the investments of items 1) to 9) mentioned above and up to 20% for the investments of items 10) and 11) above.

The income exempted shall not exceed 40% of the net income for the year after deducting the exemptions by other provisions. Las rentas que se exoneren no podrán superar el 40% de las rentas netas del ejercicio una vez deducidas las exoneraciones por otras disposiciones.

» **Taxpayers whose income does not exceed UI 5,000,000:** CIT exemption of up to 60% of the investment made in the year for the investments of items 1) to 9) above and up to 30% for the investments of items 10) to 11) above.

The income exempted shall not exceed 60% of the net income for the year after deducting the exemptions by other provisions.

The income exempted cannot be distributed, and a reserve called "Investment Exemption Reserve" must be created for the sole purpose of capitalization.

# 3

## SECTOR-SPECIFIC SCHEMES

The Investment Promotion and Protection Law establishes that the promotional declaration may apply to a specific sectorial activity. In this sense, several sectors have been promoted for which there are regulatory decrees. The sectors are: call centers, shipbuilding and electronic industry, manufacturing of agricultural machinery, energy generation, tourism projects, treatment and final disposal of industrial solid waste, vehicle manufacturing and cargo transportation equipment, hydrocarbons, construction activities for the sale and lease of real estate for housing and office projects of large economic dimension.

Companies belonging to the aforementioned sectors are required to file with the COMAP<sup>5</sup> certain documents in order to access the tax benefits, except for projects in the hydrocarbons and agricultural machinery sectors, which must start the process at the offices of the National Directorate of Industries of the Ministry of Industry, Energy and Mining, and those in the energy sector, which must start the process at the offices of the National Directorate of Energy of said Ministry.

The documents to be submitted vary depending on the sector and usually include an affidavit with a description of the activity to be developed and supporting documents proving that the company presenting the project is up to date with its obligations.

On the other hand, there are other tax benefits granted to different sectors of activity, not covered by the Investment Promotion and Protection Law, so they will not have to start the process at the COMAP. These sectors are: biotechnology, forestry, scientific and technological innovation, external financial intermediation, graphic industry, software, vehicles or auto parts, biofuels, communication industry, housing.

<sup>5</sup> Address: Colonia 1089, Telephone: 0800 86 12.

### 3.1 BIOFUELS

Companies producing biodiesel and fuel alcohol that have been authorized by the Ministry of Industry, Energy and Mining may be exempted from IP on fixed assets, except land, directly affected to the production of fuel alcohol and biodiesel, as well as CIT exemption for 100% of the income generated exclusively in the production of fuel alcohol and biodiesel for a period of 10 years.

On the other hand, a new law is in force, although pending regulation by the Executive Power, which broadens the activities to be covered by the aforementioned exemption, applying to the production, domestic marketing and export of renewable liquid fuels with domestic or imported raw materials for fuel alcohol and biodiesel products, all renewable liquid fuels obtained either from raw materials of agricultural origin or from the processing of industrial, agro-industrial or solid urban waste.

**Regulations:** Law No. 17,567, Law No. 18,195, Decree No. 523/008, Law No. 19,924.

### 3.2 BIOTECHNOLOGY

Research and development activities in the areas of biotechnology and bioinformatics are exempt from CIT, provided that the following requirements are met:

1. The assets resulting from research and development activities in these areas are covered by the regulations for the protection and registration of intellectual property.
2. The services are performed at least partially in the country.

If the service is rendered partially in the country, the exemption shall be determined by the application of a quotient based on the direct expenses and costs incurred in the country or abroad for the provision of these services. The numerator will consider the direct expenses and costs incurred by the developer and the services with non-related parties (residents or non-residents), or with resident related parties increased by 30%, while the denominator will consider the total direct expenses and costs to develop each asset and the expenses and costs for the concession of use or acquisition of intellectual property rights as well as the services contracted with non-resident related parties.

Income from activities carried out in the national territory shall be fully exempted.

For such purposes, it will be considered that the taxpayer carries out its activities in the national territory when the amount of the direct expenses and costs incurred in the country for the provision of such services exceeds 50% of the amount of total direct expenses and costs incurred in the fiscal year for the rendering of such services and that human resources are employed on a full-time basis, according to the services rendered (adequately qualified and remunerated).

On the other hand, Decree No. 011/013 declares the promotion of the generation of biotechnological products, services and processes with application in strategic productive sectors, giving priority to the agricultural, environmental, energy, human and animal health sectors.

The Executive Power, in consultation with the Biotechnology Sectorial Council, will review this prioritization every two years and may include new biotechnological development sectors to be promoted.

For granting the benefits, the decree establishes that one of the following alternatives should be met as a requirement: implementation of a program for the development of suppliers of biotechnological products and services, that the company should be a micro, small or medium-sized company producing biotechnological services and/or products, or that it should be a new company that is going to produce biotechnological products and/or services.

The regulation establishes the CIT exemption for the income originated in the promoted activities, in accordance with the following percentages and terms:

- » Fiscal years beginning between January 1, 2018 and December 31, 2019: 75%.
- » Fiscal years beginning between January 1, 2020 and December 31, 2021: 50%.

**Regulations:** Title 4 of 1996 Consolidated Text, Decree No. 150/007, Decree No. 011/013

### **3.3 CALL CENTERS**

The activity developed by Call Centers was promoted under Law No. 16,906.

Call Centers are considered to be services performed by tele-operators that receive or make telephone calls and receive or send messages via Internet or any other type of channel, with the support of a software that allows for the monitoring of telecommunications for a specific purpose. Advice and consultancy activities are not included (except when the activities result from queries made by users abroad and the response is of a general nature, pre-established by the software).

The activities that simultaneously comply with the following conditions will be covered by the promoted declaration: 1) they generate at least 100 positions of direct qualified work, and 2) the services are fully used abroad by non-resident individuals. It will be understood that the service is fully used abroad when it is exclusively related to activities developed, property located or rights economically used outside the country.

Income originated from such activities is CIT exempt for a period of 10 years as of the year in which the promotional declaration is applied for (inclusive). Said exemption shall apply as follows:



- » 100% when it exceeds 150 positions of direct qualified work.
- » 70% when it exceeds 100 positions of direct qualified work.

**Regulations:** Decree No. 207/008, Decree No. 379/011.

### 3.4 SHARED SERVICES CENTER

En diciembre de 2017, el gobierno uruguayo aprobó el Decreto N° 361/017 (modificativo). In December 2017, the Uruguayan government approved Decree No. 361/017 (amending Decree No. 251/014), which aligned Uruguay's shared services schemes with OECD international standards.

Decree No. 251/014 defines a Shared Services Center as an entity belonging to a multinational group, whose exclusive activity is the effective provision of any of the following services to its related parties, resident or located in at least twelve countries: consulting; data processing; management or administration; logistics and storage; financial administration; and research and development operations support.

Pursuant to Article 2 of Decree No. 251/014, Shared Services Centers will have access to a series of **tax benefits**:

- » Exemption from the Corporate Income Tax (*IRAE*) for five fiscal years to 90% of the income generated by the Shared Services Center (SSC) activities. To this effect, at least 150 new positions of direct qualified work must be created, with Uruguayans holding 75% of such jobs. The company must also implement a training plan with a minimum expenditure of US\$ 1,300,000.
- » CIT exemption for five fiscal years to 70% of the income from SSC activities. To access this benefit, companies must create at least 100 positions of direct qualified work and the expenditure in human capital training must exceed US\$ 650,000.
- » Exemption from Wealth Tax (IP) to the assets affected in SSC activities, from the year in which the request is made until the end of the CIT exemption period. Said assets will be considered taxed for the purposes of calculating the liabilities for the liquidation of the Wealth Tax (effective exoneration).

In order to promote global service rendering activities in the interior of the country, Decree No. 281/019 of September 23, 2019 grants the following tax benefits:

- » CIT exemption: to the income originated in the promoted activities, provided that the result of the following quotient of each fiscal year exceeds 60% of the following: remuneration for personal services under an employment contract / remuneration for personal services under an employment contract and outside of it. In such case, the exemption shall amount to 90% of the referred income for the following terms: I) 5 years when at least 15 new positions of direct qualified work are created at the end of the first two fiscal years; II) 8 years when at least 30 new positions of direct qualified work are created at the end of the first 3 fiscal years; and III) 10 years when

at least 60 new positions of direct qualified work are created at the end of the first 4 fiscal years.

- » Wealth Tax exemption (100%) applicable to the assets involved in the promoted activities, as of the fiscal year in which the application is filed to be included in the promoted scheme and until the end of the exemption period provided for the CIT.

Service exporting companies can access the above-mentioned benefits if:

- » They carry out their activities outside an 80 km radius from the center of Montevideo.
- » They generate at least 15 new positions of direct qualified work that develop the activity under employment contracts and in the established place referred to above; at least 50% of these jobs correspond to Uruguayan personnel (provisional reductions may be authorized).
- » They provide the above-mentioned services to at least 5 entities.

**Regulations:** Decree No. 251/014, Decree No. 361/017, Decree No. 281/019.

### **3.5 CONSTRUCTION: PROJECTS OF LARGE ECONOMIC DIMENSION**

The construction activity for the sale or lease of real estate for office or residential use, as well as private initiative urbanizations corresponding to projects of large economic dimension, is declared as promoted by the Investment Promotion Law.

#### **Definition of Large Economic Dimension:**

- » New constructions: Constructions with a value in civil works and movable assets destined to common use areas exceeding UI 20,000,000<sup>6</sup>, being a necessary condition that they are undertakings with construction works registered with the Social Security Authority.
- » Reactivations: Registered with the Social Security Authority (with or without activity) and investments remaining to be executed for a value in civil works and movable goods destined to the areas of common use exceeding UI 20,000,000.

#### **Investments included:**

- » New constructions: Up to 60 months from the date on which the Departmental Government grants the construction permit.
- » Reactivations: Up to 48 months from the entering into force of Decree 138/020 (May 2020).

Investments cannot be executed beyond April 30, 2025 and projects must be submitted by December 31, 2022.

<sup>6</sup> The value of the UI will be that of the last day of the month prior to the filing of the promotional declaration application and the exchange rate of the last business day of the month prior to such filing. (As of December 8, 2021, it is equivalent to US\$ 2.269.251. UI=\$5,1512; Exchange Rate= \$45,4).

## Tax benefits:

**Corporate Income Tax:** CIT exemption will depend on the amount of the promoted eligible investment:

Promoted eligible investment in UI	Exemption percentage
20,000,000 to 40,000,000	5%
40,000,001 to 60,000,000	10%
60,000,001 to 90,000,000	15%
90,000,001 to 205,000,000	20%
205,000,001 to 287,000,000	25%
287,000,001 to 574,000,000	30%
More than 574,000,000	40%

The maximum exemption period will be 10 years from the fiscal year in which taxable income is obtained and the amount to be exempted shall not exceed 90% of the tax payable.

**Wealth Tax:** Real estate is exempted for a term of 8 years if the project is located in Montevideo and 10 years if it is located in the rest of the country.

Likewise, movable property destined to the common use area is exempted for the term of its useful life.

The exempted property will be considered taxed for the purposes of calculating liabilities.

**VAT:** A VAT credit is granted for the acquisition of equipment, machinery, materials and services destined to civil works and movable property destined to common use areas.

**Import Taxes:** Exemption from all surcharges and taxes (including VAT) on the import of equipment, machinery and materials for civil works and movable property for common use areas, provided that they have been declared non-competitive with the national industry.

**Regulations:** Decree No. 138/020, Decree No. 225/021.

## 3.6 FORESTRY

Natural and artificial forests existing or to be planted in the future in forestry priority areas declared as “protective” and forests declared as “yielding” in forestry priority areas will enjoy the following tax benefits:

- » Income resulting from their exploitation will not be computed for CIT purposes.
- » Their respective values or extensions are not computed for the determination of the Wealth Tax taxable amount.

- » Rural real estate tax exemption only for forests included in the quality timber projects defined by the Ministry of Livestock, Agriculture and Fisheries and for natural forests declared as “protective”.

In order to access the aforementioned tax benefits, the General Forestry Directorate of the Ministry of Livestock, Agriculture and Fisheries must approve the management plan for the exploitation and regeneration of forests. Any modification to said management plan must be previously approved by the General Forestry Directorate. With respect to the forests included in the quality timber projects, it should be noted that short rotation plantations (less than fifteen years) with no pruning and thinning are not entitled to tax exemptions.

In addition, Decree No. 268/020 considers the purchase of seedlings and the cost of planting multiannual fruit trees and shrubs as part of the investment in the promoted activities.

**Regulations:** Law No. 15,939, Law No. 18,245, Title 4 of 1996 Consolidated Text, Decree No. 150/007.

### 3.7 ENERGY GENERATION

The following activities are declared promoted under the Investment Promotion and Protection Law:

- » Electricity generation from non-traditional renewable sources.
- » Electricity generation through co-generation.
- » Energy resources production from renewable sources.
- » Transformation of solar energy into thermal energy.
- » Conversion of equipment and/or incorporation of processes intended for the efficient use of energy.
- » Mineral prospecting and exploration according to Law No. 15,242.
- » Services provided by Energy Service Companies (ESCOs) registered with the National Directorate of Energy and qualified as category A.
- » Domestic manufacturing of machinery and equipment intended for use in the aforementioned activities.

An CIT exemption is established for electricity generation from non-traditional renewable sources when sold in the forward contract market, for 40% of income generated between January 1, 2021 and December 31, 2023.

On the other hand, Decree No. 268/020 establishes as a sector indicator the investments in energy generation from renewable sources, granting the maximum score (10 points) except in the case that other investments are obtained, in which case they will be prorated.

**Regulations:** Decree No. 354/009, Decree No. 268/020.

### 3.8 HYDROCARBONS

Income obtained by contractor companies, owners of hydrocarbon exploration and exploitation projects, are exempt from all national or municipal taxes and duties created or to be created, except for CIT.

It should be noted that in the Uruguay Round II project, exploratory activities within the framework of the round were declared promoted as eligible investments for the tax benefits established in Decree No. 68/013. Additional benefits were also established, including VAT credit and exemption, exemption from Non-Resident Income Tax (IRNR) and customs duties exemption on goods related the development of the eligible activities. Subcontractors received benefits for the calculation of CIT, IRNR, VAT and Wealth Tax.

A new Uruguay Round is currently underway, so it is possible that the above-mentioned benefits could be made available again.

**Regulations:** Chapter 5, Title 3 of 1996 Consolidated Text, Decree No. 354/009, Decree No. 68/013.

### 3.9 GREEN HYDROGEN

The aim of the Decree No. 268/020 is to encourage the development of productive processes with high added value. The entities that submit investment projects to be evaluated by the Ministry of Industry, Energy and Mining (in Spanish, Ministerio de Industria, Energía y Minería - MIEM), will be entitled to score in the general investment matrix for the sectorial indicator of "Technological Level of the Elaborated Product".

The highest possible score for this indicator will be obtained by investments related to the production of industrialized goods made with high technology manufacturing, according to the Standard International Trade Classification.

As of February 3, 2022, this can be achieved by using green hydrogen in such production, which results in a higher Corporate Income Tax (IRAE) exemption, as mentioned in Chapter II of this guide.

The score will depend on whether the investment project is directly linked to the product being scored. In the first case, the score can be of a maximum of 10 points. If the project includes other investments that are not linked to said product, the score must be prorated.



### 3.10 RESEARCH AND DEVELOPMENT (R&D)

Companies governed by private law that have expenditures in Research and Development activities may obtain a tax credit.

**Beneficiaries:** CIT or IMEBA taxpayers who carry out R&D activities with income taxed by said taxes.

The Autonomous Entities and Decentralized Services of the State's industrial and commercial domain, as well as state-owned companies governed by private law, are not eligible for this benefit.

**Definition of Research:** The original work undertaken to obtain new knowledge.

**Definition of Development:** The systematic work that uses knowledge obtained from research and/or experience to develop new products, production processes or to improve existing ones.

**Tax benefit:** Tax credit of 35% of the eligible expenses and 45% of the eligible expenses if the project is developed jointly with technology centers or universities accredited by the National Agency for Research and Innovation (ANII).

The tax credit will be granted through credit certificates issued by the Tax Authority (DGI) which shall not exceed UI 9,000,000 per year per company.

The eligible expenses to which the tax credit refers are as follows:

- » Fees for training and qualification services for the company's personnel.
- » Expenses associated with short courses abroad, for a maximum of 2 months (including airfare, lodging, tuition and other necessary expenses).
- » Fees for technical personnel hired for the implementation of the project.
- » Salaries of company personnel.
- » Expenses for contracting consultancy services.
- » Purchase of materials and supplies.
- » Purchase of essential equipment.
- » Expenditures for test equipment, tests and laboratories.
- » Expenditures on installations and/or work and environmental protection measures.
- » Purchase of bibliographic material.

- » Intellectual property protection expenses.
- » License costs.
- » Building adequacy with a maximum of 25% of the acknowledged amount.

**Regulations:** Law No. 19,739, Decree No. 407/019.

### **3.11 COMMUNICATION INDUSTRY**

Journalism, broadcasting and television, theater and film exhibition and distribution companies are exempted from taxes on imports, capital, sales, tickets, acts and business, excluding income tax in respect of said line of business.

Likewise, journalism and broadcasting companies will be exempted from all taxes, provided that their income for the fiscal year does not exceed UI 2,000,000. If they exceed said amount during the fiscal year, the corresponding taxes must be paid as of the following month and until the end of the fiscal year. Then, in the following fiscal year, they will enjoy the exoneration again.

**Regulations:** Chapter 15, Title 3 of 1996 Consolidated Text.

### **3.12 GRAPHIC INDUSTRY**

1. Printing studios, publishing houses and bookstores, as regards printing and sale of books, brochures and magazines of literary, scientific, artistic, teaching and educational material, are exempted from taxes levied on their capital, sales, tickets, acts, services and businesses, excluding income tax in respect of their line of business.

The exemption extends to contracts and other documents generated on the sale of books.

In addition, the following tax exemptions are established aimed at benefiting book distribution:

- » Payments related to copyright: exempt from all taxes.
- » Export of books, brochures and magazines of literary, scientific, artistic and teaching nature, as well as educational material: exempt from proceeds, port charges and all duties.
- » Import of works of literary, artistic, scientific and teaching nature, as well as educational material, and the catalogs for the dissemination or promotion of such goods: exempt from all national taxes, proceeds, port prices, and other customs duties and consular fees.
- » Import of machinery, equipment, components, tools, accessories and spare parts for book manufacturing is exempt from any other tax applicable to said import, except for surcharges.

2. Logistical support services for film and television productions rendered to national or foreign companies involved in international co-productions in which Uruguay participates shall be considered exports of services for Value Added Tax (VAT) purposes (which implies a 0% rate for such tax). To such effect, the National Audiovisual Institute shall certify the aforementioned. Likewise, the aforementioned services that involve foreign companies not operating in the country through a Permanent Office, and as long as the services are used exclusively abroad, will also be considered as exports of services for VAT purposes.
3. Temporary admission: Imported goods intended to promote artistic and cultural projects (including cinematographic, audiovisual, plastic arts exhibitions, literary or musical productions; and scientific projects) promoting innovation, science and technology, by individuals or legal entities with usual residence abroad, will be exempt from taxes and duties and it will not be necessary to provide a guarantee. For such purpose, the activity to be developed must be declared of national interest by the Ministry of Education and Culture. The maximum period the goods may remain is 90 days.
4. Finally, the operation of a Free Trade Zone with specialized infrastructure for audiovisual industry production in the department of Maldonado has been approved, which will imply for this industry the possibility of benefiting from tax exemptions.

**Regulations:** Chapter 10, Title 3 of 1996 Consolidated Text (Law No. 15,913), Decree No. 086/007.

### **3.13 SHIPBUILDING INDUSTRY**

Activities derived from the construction, maintenance and repair of ships and water transportation vehicles, production of sets and subsets for ships and water transportation vehicles are promoted under the Investment Promotion and Protection Law.

An exemption from all taxes, including VAT, is established for the import of materials, raw materials, capital goods and, in general, all other items needed to build shipyards, dry docks and dams, as well as for building, recovering, transforming or modifying ships.

**Regulations:** Decree No. 532/009.

### **3.14 TOURISM INDUSTRY**

For the purpose of granting tax benefits, tourism activities are classified into two groups, applying different incentives to each one of them:

1. Tourism Projects: Accommodation, cultural, business, sport conventions, recreational, leisure or health service activities that make up a complex unit designed to attract tourism demand, approved in accordance with Law No. 16,906 and Decree No. 175/003.
2. Hotels, Apart-hotels, Inns, Motels and Tourist Ranches built or to be built.

### **Exemption for Tourism Projects:**

Civil works:

- » VAT exemption on imports of goods for civil works.
- » VAT credit balance on local purchases of goods and services for civil works.
- » Computation as an exempt asset for Wealth Tax purposes at the end of the fiscal year in which the works were started and for the following 10 fiscal years.
- » 50% tax exemption on imports of goods for civil works.
- » For CIT purposes, the investment can be amortized over a 15-year period.

Equipment:

- » VAT exemption on imports of these goods.
- » VAT credit balance on local purchases.
- » Computation as an exempt asset for Wealth Tax purposes at the end of the fiscal year in which the works were started and for the following 4 fiscal years.
- » 50% tax exemption on imports of goods for equipment.
- » For CIT purposes, the equipment can be amortized over a 5-year period.

### **Exemption for Hotels, Apart-hotels, Inns, Motels and Tourist Ranches built or to be built:**

Equipment:

- » VAT exemption on imports of goods for equipment.
- » VAT credit balance on local purchases.
- » Computation as an exempt asset for Wealth Tax purposes at the end of the fiscal year in which the works were started and for the following 4 fiscal years.
- » 50% tax exemption on imports of these goods.

On the other hand, the activity developed by Condominium Hotels, destined to offer accommodation services for the purpose of attracting tourism demand, has been declared promoted.

The undertakings will be developed by a developer company, which will build and sell the condominium units. Once the purchasers receive the units, they will transfer the use and/or usufruct to the operator for a period of not less than 10 years, in order to develop the hotel activity.

The tax benefits are as follows:

**Developer company:**

- » VAT credit included in local purchases of goods and services for construction purposes.
- » VAT exemption on imports of goods for construction purposes.
- » Exemption on imports of materials and goods necessary for construction, having to choose between one of the following regimes: i) 100% of the taxes levied on the aforementioned goods declared non-competitive with national industry, having to pay the total taxes levied on goods competitive with the national industry; or ii) 50% of the taxes levied on all aforementioned goods.
- » Computation as an exempt asset for Wealth Tax purposes of the goods incorporated to the civil works for a maximum term of 11 years as of their incorporation.

**Operating company:**

- » VAT credit included in local purchases of goods and services destined for equipping the tourism project.
- » VAT exemption on imports of fixed assets destined for equipping the tourism project.
- » Exemption on imports of fixed asset destined for equipment, having to choose between one of the following regimes: i) 100% of the taxes levied on the aforementioned goods declared non-competitive with the national industry; or ii) 50% of the taxes levied on all aforementioned goods.
- » Computation as an exempt asset for Wealth Tax purposes of the fixed assets used for equipment for the term of their useful life.
- » Exemption of CIT generated by the promoted activity for an amount and term resulting from applying the matrix of indicators of the general scheme.

**Regulations:** Decree No. 175/003, Decree No. 404/010, Decree No. 59/012.

### **3.15 EXTERNAL FINANCIAL INTERMEDIATION**

Financial intermediation companies whose exclusive purpose is to carry out intermediation operations between supply and demand of securities, money or precious metals located abroad, will be exempted from any kind of tax obligation that falls on their activity, the operations in their line of business, their assets or their income.

The exemption does not include obligations for payments to social security bodies. Taxes levied on the incorporation and capital increases of such financial entities are considered included within the exemption of reference.

**Regulations:** Chapter 18, Title 3 of 1996 Consolidated Text.

### **3.16 AGRICULTURAL MACHINERY**

Income originated in machinery and equipment manufacturing activities, as well as parts and accessories thereof, were declared promoted by the Investment Promotion and Protection Law.

Fifty per cent (50%) of CIT is exempted from the net taxable income originated in the promoted activity between the fiscal years beginning on January 1, 2018 and December 31, 2022.

On the other hand, the VAT Regulatory Decree No. 220/998 establishes that the manufacturers of these goods will be entitled to a credit for VAT included in the acquisition of goods and services related to the cost thereof.

The Executive Branch is empowered to grant the import tax exemption to goods intended to make up the cost of agricultural machinery, accessories, raw materials, parts, pieces, spare parts and kits of such machinery provided that three requirements are met: 1) the machinery and accessories must have been declared non-competitive with the national industry; 2) the import must be carried out by those companies that develop activities included in the promotional declaration of manufacture of agricultural machinery and equipment; and 3) that more than 60% of the annual invoicing is represented by the sale of the goods that made up said declaration. For this purpose, the goods to be imported must be those included in Annex I of Decree No. 124/019 or obtain the declaration of non-competitive by resolution of the Ministry of Industry, Energy and Mining, as well as request their inclusion in the Register of National Companies Producing Agricultural Machinery and its Accessories.

**Regulations:** Decree No. 346/009, Decree No. 06/010, Decree No. 220/998, Decree No. 124/019.

### 3.17 MARITIME OR AIR NAVIGATION

Maritime or air navigation companies are exempt from CIT. For foreign companies, the exemption shall apply provided that in their countries of origin Uruguayan companies with the same purpose enjoy the same exemption.

**Regulations:** Title 4 of 1996 Consolidated Text.

### 3.18 INDUSTRIAL SOLID WASTE

The treatment and final disposal of industrial solid waste was promoted under the Investment Promotion and Protection Law.

The tax benefits are as follows:

- » Wealth Tax exemption for the real estate and personal property incorporated to develop the activity.
- » CIT exemption for income derived from the aforementioned activity.
- » VAT credit for the acquisition of goods and services destined to integrate investments in fixed assets.
- » Exemption from all import surcharges (including Consular Fees and VAT) of the goods destined to integrate the cost of the investment in fixed assets, provided that they have been declared non-competitive with the national industry.

It should be noted that waste management is currently under study by the government, through a National Waste Management Plan, which aims to be a tool for planning waste transformation and achieving sustainable development. Therefore, it is to be expected that the above-mentioned exemption will be modified.

**Regulations:** Decree No. 411/011.

### 3.19 SOFTWARE

Income derived from software production activities and related services are CIT exempt, provided the following requirements are met:

1. The assets resulting from research and development activities in these areas are covered by the regulations on the protection and registration of intellectual property.
2. The services are performed at least partially in the country.

<sup>7</sup> CKD: Completely Knocked Down, a kit of entirely unassembled parts.

<sup>8</sup> SDK: Semi-Completely Knocked Down, a kit of partially assembled parts.



If the service is rendered partially in the country, the exemption shall be determined by the application of a quotient based on the direct expenses and costs incurred in the country or abroad for the provision of these services. The numerator will consider the direct expenses and costs incurred by the developer and the services with non-related parties (residents or non-residents), or with resident related parties increased by 30%, while the denominator will consider the total direct expenses and costs to develop each asset and the expenses and costs for the concession of use or acquisition of intellectual property rights as well as the services contracted with non-resident related parties.

Income from activities carried out in the national territory shall be fully exempted.

For such purposes, it will be considered that the taxpayer carries out its activities in the national territory when the amount of the direct expenses and costs incurred in the country for the provision of such services exceeds 50% of the amount of total direct expenses and costs incurred in the fiscal year for the rendering of such services and that human resources are employed on a full-time basis, according to the services rendered (adequately qualified and remunerated).

**Regulations:** Title 4, 1996 Consolidated Text, Decree No. 150/007.

### **3.20 VEHICLES OR AUTO PARTS**

Companies that export finished or semi-finished vehicles, or auto parts of national origin are entitled to a 10% refund on the FOB value of exports through credit certificates. Such certificates may be used for paying other taxes or to import motor vehicles for the domestic market with a preferential Global Tariff Rate (GTR) of up to 13 points.

Exporting companies can assign their benefits to vehicle importing companies for the domestic market.

On the other hand, assembly companies can import CKD<sup>97</sup> kits for assembling vehicles intended for the domestic market with a 2% tariff, provided that they comply with a complete assembly process in the country. SKD<sup>108</sup> kits intended for the production in the country of a new model, not previously manufactured, are subject to an 85% exemption of the tariff for the first year, 70% during the second year and 55% during the third and subsequent years.

**Regulations:** Decree No. 316/992, Decree No. 340/996, Decree No. 126/012, Decree No. 255/019.

### 3.21 ELECTRIC VEHICLES

Investment projects submitted under Decree No. 268/020 may include the purchase of the following as eligible investment until August 31, 2023:

- » Passenger vehicles with electric motor only whose gravimetric energy density battery is greater than or equal to 100 Wh/kg, which are directly destined to the activity of the company. In the case of automobiles, the CIF import value shall not exceed US\$ 60,000.

The vehicles must be part of an investment project in which they represent at most 25% of the total project, except for projects destined to the investment of an exclusively electric fleet, this being understood as the purchase of 5 or more vehicles.

- » Passenger and utility vehicles with electric motor only whose gravimetric energy density battery is greater than or equal to 100 Wh/kg, acquired to be leased by companies whose activity consists of leasing vehicles without a driver (without being assigned through use credit contracts). In the case of automobiles, the CIF import value shall not exceed US\$ 60,000.

The goods must be held in fixed assets for 4 years as from their incorporation. If they are removed from the fixed assets, they may not be included in another investment project.

**Regulations:** Decree No. 268/020.

### 3.22 VEHICLES AND CARGO TRANSPORTATION EQUIPMENT

The manufacturing activity intended for professional land transportation of cargo for third parties, trucks, truck tractors, semi-trailers, trailers, structures added to these goods destined to contain or load cargo with passive role and dump boxes is promoted under the Investment Promotion Law.

The benefit granted consists of VAT exemption for sales in the domestic market made by the manufacturers of motor transportation equipment, thus establishing a VAT refund system for purchases in the domestic market and imports of goods and services.

**Regulations:** Decree No. 210/010.

### 3.23 SOCIAL HOUSING

Improvements in the conditions of access to social housing are declared of national interest.

Those projects and activities aimed at the construction, refurbishment, remodeling or expansion of at least two houses per plot, which may be sold or rented, will have access to the following tax benefits:

### **Housing Intended for Sale:**

**CIT:** Exemption on income from the first sale up to 9 fiscal years after the fiscal year in which the works are completed.

### **Wealth Tax:**

- » Exemption for construction works (land and improvements) from the time the application is filed until the works are completed.
- » Exemption for finished houses, from the fiscal year when the works are completed and for the following 3 fiscal years.

In both cases, the property will be considered as a taxable asset for the purpose of computing liabilities for tax calculation.

### **VAT:**

- » Exemption on the first sale of the property.
- » VAT refund on local purchases of goods and services destined to make up the cost of the houses.
- » Exemption on the import of goods to be incorporated to the civil works.

### **Property Transfer Tax (ITP):**

- » Exemption for the seller and purchaser on the first sale for a maximum of 9 years after the year in which the works are completed.

### **Housing Intended for Rental:**

**CIT:** Exemption of 100% on the income generated by the lease of units (located in the areas established by the Ministry of Housing, Land Management and Environment) or 60% on the income generated by the remaining leases, in the fiscal year when the works are completed and for the following 9 fiscal years.

### **Wealth Tax:**

- » Exemption in the fiscal year when the works are completed and for the following 9 fiscal years. Only applicable to leases intended for permanent housing, with contracts for a term greater than or equal to 6 months.

**Regulations:** Law No. 18,795, Decree No. 355/011, Decree No. 299/015, Decree No. 340/020, Decree No. 283/021.

# 4

## HOLDING

**Definition:** Holding companies are those whose assets consist mainly of shares in other companies.

They are created for the purpose of investing in other companies and exercising control over them, since they generally own the majority of shares or equity interest.

They mainly carry out capital activities: granting loans, receiving payments for dividends, royalties, interest, among others.

**Tax Regime:** Since Uruguay's regime is based on the source principle (Uruguayan sourced income and assets located in Uruguay are taxed), Uruguayan Holding companies investing in foreign companies will benefit from our tax system.

### CIT:

- » **Shares in Uruguayan and foreign companies:** Income derived from the holding and distribution of dividends is not taxed by CIT.
- » **Transfer of shares/equity interest:** The treatment for CIT purposes will depend on the place of incorporation of the company issuing the equity securities.
- 1. Uruguayan company: income derived from the sale taxed by CIT at the rate of 25%, except for shares listed on a stock exchange, which shall be CIT exempt.
- 2. Foreign company located in a country that is not considered a Low-Tax or No-Tax (BONT<sup>9</sup>) country: income derived from the sale not taxed by CIT.
- 3. Foreign company located in a BONT country: income derived from the sale will be taxed by CIT at the rate of 25% when more than 50% of the foreign company's assets are made up, directly or indirectly, of goods located in Uruguay.

<sup>9</sup> The BONT entities according to DGI Resolution No. 2,440/020 in force as of January 1, 2021 are the following: Angola, Antigua and Barbuda, Ascension, Brunei, Commonwealth of Dominica, Guam, Guyana, Honduras, Cocos Island, Christmas Island, Saint Helena Island, Norfolk Island, Pacific Islands, Fiji Islands, Maldives, Falkland Islands, Palau Islands, Solomon Islands, United States Virgin Islands, Jamaica, Jordan, Kiribati, Labuan, Liberia, Niue, French Polynesia, Puerto Rico, Kingdom of Tonga, Republic of Yemen, St. Martin, St. Pierre and Miquelon, Sultanate of Oman, Svalbard, Swaziland, Tokelau, Tristan da Cunha, Tuvalu, Djibouti.

**Wealth Tax:** Shareholding in local and foreign companies is not taxed.

**IRPF/IRNR on the distribution of dividends:**

- » **Dividends distributed by the Holding Company derived from income taxed by CIT to resident or non-resident individuals:** The Holding Company must withhold the Personal Income Tax (IRPF) or IRNR at the rate of 7% taking into account the lower amount resulting from comparing the tax net income taxed by CIT and the accounting result to be distributed. Likewise, withholding for fictitious dividends at the rate of 7% will be applicable in case the CIT taxpayer has accumulated results for more than three fiscal years.

These withholdings may be lower if there is an applicable Double Taxation Avoidance Agreement.

- » **Dividends distributed by the Holding Company derived from income taxed by CIT to another CIT taxpayer company:** No withholding is applicable.
- » **Dividends distributed by the Holding Company derived from income not taxed by CIT:** No withholding is applicable.

**Regulations:** Title 4 of 1996 Consolidated Text, Title 7 of 1996 Consolidated Text, Title 8 of 1996 Consolidated Text, Title 14 of 1996 Consolidated Text.

<sup>15</sup> <https://www.impo.com.uy/bases/leyes/10449-1943>

<sup>16</sup> Tipo de cambio de fecha 1/12/21 asciende a \$44 pesos uruguayos, 1 dólar equivale a \$44 pesos uruguayos.

# 5

## TRADING

### Definition:

It refers to intermediation activities carried out in the national territory corresponding to: 1) the purchase and sale of goods located abroad that have neither origin nor destination in the national territory; and 2) intermediation in the rendering of services, provided that such services are rendered and used economically abroad.

### Tax Regime:

**CIT:** A specific optional regime is established for the purposes of calculating the net taxable income for CIT.

To the difference between the sale price of the goods (or services) and the purchase price of the same, 3% will be applied in order to determine the fictitious income on which the tax rate of 25% will be applied, which implies an effective rate of 0.75%.

In the event that the company carries out another activity independent from trading, the general scheme will be applied for such income and associated expenses; therefore, at the time of liquidation of CIT, the activities must be separated in order to apply the 3% fictitious rate to the trading operation.

**Regulations:** Resolution No. 51/997.

<sup>17</sup> En el presente apartado referimos al régimen general. Tener presente que pueden existir regímenes especiales y/o excepciones dependiendo del sector de actividad.

<sup>18</sup> <http://www.impocom.uy/bases/decretos/611-1980/1>

# 6

## INDUSTRIAL PARKS AND SCIENTIFIC-TECHNOLOGICAL PARKS

### Definitions:

Law No. 19,784 declares Industrial Parks (IPs) and Scientific-Technological Parks (PCT) to be of national interest, defined as those public or private areas authorized by the Executive Power, equipped with the infrastructure to carry out industrial, services and training, and research and innovation activities.

The IPs are intended for the installation and operation of manufacturing and service industries, while the PCTs are intended for the installation of knowledge and innovation centers, as well as innovative companies.

### Developers:

The developer is the legal entity, public or private, duly authorized by the Executive Power, in charge of providing the necessary infrastructure to develop the activities in the IP or PCT.

It shall especially encourage the setting up of micro, small and medium-sized enterprises, cooperatives and self-managed enterprises in such premises.

### Users:

Users shall be those subjects that have been duly authorized by the Ministry of Industry, Energy and Mining, and that belong to one of the following categories:

- » Companies engaged in industrial activities, including information and communication technology services; biotechnology and nanotechnology products and services; creative industries products and services; industrial waste recovery and by-product utilization activities.
- » Companies that provide services, including logistics services.
- » Companies that provide services in activities that the Executive Power determines that contribute to the objectives of Law No. 19,784 due to their potential.



- » Entrepreneurs and business incubators.
- » Education and training institutions.
- » Research or innovation institutions.
- » Other institutions linked to the generation of applied knowledge.

### **Tax benefits:**

#### **1. For developers**

Developers may also be eligible for benefits under the Investment Promotion Law, and said benefits may include the following:

- » CIT exemption: In the case of IPs, an CIT exemption equivalent to 50% of the computable investment will be granted, with a period of 6 years for its use, while in the case of PCTs, the exemption will amount to 75% of the computable investment, with a period of 10 years for its use.

This benefit may be increased depending on the geographic location of the park in question:

- » Northern zone: additional exemption of 10% of the computable investment and extension of the period of use of the benefit for an additional 2 years.
- » Southern zone: additional exemption of 5% of the computable investment, and extension of the period of use of the benefit for 1 additional year.

In addition to the above, the CIT exemption will be increased by an additional 20% of the computable investment, and the period of use will be extended to 3 additional years, when the following conditions are simultaneously met in an IP:

- » That at least 3 users falling into some of the following categories are installed: entrepreneurs and business incubators, education and training institutions, research or innovation institutions, or other institutions linked to the generation of applied knowledge.
- » And that not all of them are included in the same category.

On the other hand, the possibility of an additional increase of 15% of the computable investment for specialized parks established by the Executive Power, and two additional years for using the benefit is contemplated.

In any case, the total CIT exemption shall not exceed 100% of the computable investment, and the exemption per fiscal year will be limited to 80% of the CIT payable.

- » Exemption from Wealth Tax on fixed improvements, intangible goods and other goods, procedures or creations that incorporate technological innovation and involve technology transfer, at the discretion of the Executive Power.

- » Exemption from taxes and duties on the import of fixed assets destined to the developer's operations, as well as goods and materials destined to civil works.
- » VAT credit included in acquisitions for civil works.

In addition to these benefits, it is contemplated that public entities may establish tariffs or promotional prices for the services they provide to IPs and PCTs.

## 2. For users

Users will enjoy additional benefits under an investment project according to Law No. 16,906, compared to those that would be available to an identical project set up outside a park.

With respect to CIT, the exempted tax and the period to use the benefit will be increased by 15% compared to what would be applicable for such project for those who carry out any of the following activities: (a) industrial activities; (b) rendering of services related to the activities developed in the park (storage, classification, fractioning, assembling, disassembling, handling or mixing raw materials or goods); (c) thermal and/or photovoltaic solar energy generation activities framed within the Executive Power's promotional measures in force at the time of presentation of the project; (d) waste recovery and utilization activities; (e) service activities in the areas of information and communication technologies, biotechnology, creative industries.

In case the users are not qualified in any of the aforementioned activities, the amount and term of CIT exempted will be increased by 5%.

On the other hand, with respect to the Social Security Contributions (CESS), the authorized users who carry out industrial activities and operations of storage, packaging, selection, classification, fractioning, assembly, disassembly, handling or mixing of goods or raw materials, provided that they are exclusively associated to the industrial activities set up in the parks, will have a tax credit for the employer contributions associated with the employment committed in the employment generation indicator of the investment project for which the tax benefits were obtained.

The benefit referred to in the previous paragraph will be applied during the period specified in the employment schedule (5 fiscal years, unless the investment execution schedule is longer than such period, in which case the compliance with the indicators will be extended accordingly) and exclusively for the workers that are employed in the park during their entire working day.

### **Control:**

The control body is the National Directorate of Industries (DNI), which may carry out the inspections it deems necessary to ensure compliance with the current regime.

**Regulations:** Law No. 19,784 (in force for parks authorized since August 2019), Decree No. 79/020.

# 7

## FREE TRADE ZONES

Uruguay has declared the promotion and development of Free Trade Zones (FTZs) of national interest in order to achieve a series of economic and social objectives such as creating jobs, encouraging high-tech activities, promoting decentralization and developing international trade, which materializes through a preferential tax regime with broad exemptions.

FTZs are areas of the national territory designated by the Executive Power, where all kinds of industrial, commercial and services activities can be carried out, being the National Directorate of Free Trade Zones the controlling body.

At present there are twelve FTZs in the country distributed in the cities of Canelones, Colonia, Colonia Suiza, Florida, Fray Bentos, Libertad, Montevideo, Nueva Helvecia, Nueva Palmira, Punta Pereira and Rivera.

As regards customs tariffs, it should be noted that goods produced in Mercosur countries, or countries with which the bloc has signed agreements, may keep their origin and benefits when they transit through a commercial or industrial free trade zone. It should be clarified that in order not to lose their origin, only operations aimed at ensuring the commercialization, preservation, fractioning or other operations with similar purposes may be carried out. Within this regime, the following actors can be found:

### 7.1 FREE TRADE ZONE USERS

The bodies, individuals or legal entities that are entitled to carry out activities in the FTZ, being direct users those that contract directly with the developer, and indirect users those that contract with a direct user.

#### Requirements to Become a User:

- » The Free Trade Zone Area must approve the user contract, as well as an investment project through which the contribution to the objectives of the FTZ regime is demonstrated.
- » Direct user contracts will have a maximum term of 15 years for industrial activities and 10 years for commercial or service activities, while for indirect users the maximum term will be 5 years in all cases. Extensions may be requested and must be approved by the Free Trade Zone Area.

- » Contracts may have a longer term than the aforementioned maximum term in the case of companies that comply with the following:
  - For FTZs located outside the metropolitan area<sup>[1]</sup>: hiring of more than fifty employees and an investment of more than UI 20,000,000 (approx. US\$ 2,326,000) within the first three years.
  - For FTZs located in the metropolitan area: hiring of more than one hundred employees and an investment of more than UI 40,000,000 (approx. US\$ 4,652,000) within the first two years.
- » Legal entities must establish in their bylaws or articles of incorporation the development of activities in the FTZ as their sole purpose.
- » At least 75% of the personnel hired must be Uruguayan citizens. In the case of service activities, said percentage may be reduced to 50%, with prior authorization from the Free Trade Zone Area.
- » The activities in question must be permitted within the framework of the provisions in force.

#### **Permitted Activities:**

As a general principle and in order to qualify for the broad tax exemptions, the main activities must be carried out within the FTZ.

The permitted activities are:

- » Commercialization of goods, warehousing, storage, selection, classification, fractioning, assembling, disassembling, handling or mixing of goods or raw materials of foreign or domestic origin.
- » International sale and purchase activities in relation to goods or merchandise located abroad or in transit in national territory.
- » Installation and operation of manufacturing facilities.
- » Provision of all kinds of services, both within the FTZ and from it to third countries.

Exceptions are provided for, which must be evaluated on a case-by-case basis, such as the development of activities outside the national territory to the extent that they are not substantial in nature or the rendering of services to taxpayers taxed by CIT to the extent that identical services are rendered to third countries.

### **Exemptions:**

In general terms, FTZ users are entitled to total exemption from national taxes, with the exception of Special Social Security Contributions.

Therefore, they will be exempted, for example, from CIT, Wealth Tax, Tax on the Control of Public Limited Companies (ICOSA), VAT, Excise Tax and even the distributions paid to their partners or shareholders will be exempted from IRPF or IRNR, respectively (as long as all their activities are exempted from CIT).

In particular, it is contemplated that the exemption on income from the exploitation of intellectual property rights and other intangible goods of similar nature will be applicable provided that said assets are protected and registered under Uruguayan law (Laws No. 9,739 and No. 17,164). Such exemption may be total, partial or null, depending on the relation between direct expenses or costs, except for those contracted with related entities abroad, increased by 30% over the total direct expenses and costs incurred to develop them.

### **Taxation of Foreign Personnel in FTZ**

Foreign FTZ personnel may choose to pay IRNR instead of IRPF if the following conditions are met:

- » They are foreign nationals.
- » They exercise the option not to be covered by the Uruguayan social security system.
- » For income from work as FTZ personnel.

This can mean savings for the individual insofar as the IRNR taxes income at a proportional rate of 12% while the IRPF taxes income at progressive rates ranging from 0% to 36%.

## **7.2 FREE TRADE ZONE OPERATORS**

A FTZ may be developed by the State or by private entities duly authorized by the Executive Power and controlled by the Free Trade Zone Area. The developer shall be the subject in charge of providing users with the necessary structure to carry out their activity in the FTZ.

These subjects will not enjoy the exemptions granted to users by the Free Trade Zone Law, but they may benefit from other promotional schemes such as the Investment Promotion Law No. 16,906.

As a particular case, it is provided that FTZ developers located outside the metropolitan area as determined by the Executive Power will be exempted from all national taxes created or to be created, except for the CIT, the special contributions to social security and the legal services of a pecuniary nature established in favor of non-State social security entities subject to public law.

The developer may hire non-user third parties for the purpose of providing the necessary services to users, who will not benefit from the tax exemptions of this regime.

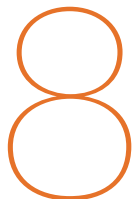
### **7.3 FREE TRADE ZONE CUSTOMERS**

FTZ customers shall be foreign entities, and a minimum percentage may be allocated to local customers, taking into account that the substantial part of the business must be related to the company's activity abroad.

There is an express prohibition on retail trade within the FTZs by FTZ users, except for transactions between users and between users and developers.

On the other hand, developers or non-user third parties may sell the goods and services necessary to perform the tasks of FTZ personnel, and these operations will be taxed with VAT and Excise Tax, if applicable.

**Regulations:** Law No. 15,921 as amended, and Decree No. 309/018.



## **FREE PORT AND AIRPORT**

The flexibilities granted by this regime can be seen as an attraction for the installation of distribution centers for the region.

The free port regime refers to port customs areas in which special tax and customs provisions are applicable, and is implemented, for example, in the commercial ports of Colonia, Fray Bentos, Juan Lacaze, La Paloma, Nueva Palmira, Paysandú and Puerto Sauce, as well as in the Carrasco International Airport.

### **Permitted Activities:**

The activities carried out in said port will not imply any modification of the nature of the product or goods and shall be limited to storage, repacking, remarking, sorting, grouping and ungrouping, consolidating and deconsolidating, handling and fractioning operations.

In this way, we will have:

- » Goods-related activities: those that may add value, change the presentation or implement the free disposition or destination of goods, without changing their nature.
- » Activities related or associated with the services rendered to goods: loading, unloading, stowage, unstowage and mobilization of packages, transportation, transshipment, re-shipment, transit, removal, warehousing, storage, disposition, ship supply, ship repairs and other related services.

### **Circulation of Goods:**

Goods shall circulate freely in the ports and airports without permits or formal procedures being required.

Goods may remain in the free port for a maximum term of five years, and this term may be extended.



**Tax Regime:**

During their stay at the port customs area, goods shall be exempt from all import or import-related taxes and surcharges.

As regards VAT, the circulation of goods in such areas is tax exempt, while they shall be considered exempt assets in terms of the Wealth Tax.

As regards income taxation, both the CIT and the IRNR include rules that exempt income from activities carried out in port customs areas with goods of foreign origin declared in transit or deposited in such areas, when such goods do not originate in the national customs territory, nor are they destined to such territory.

When sales are made to the national customs territory, the exemption will also be applicable to the extent that such operations do not exceed in the fiscal year 5% of the total amount of sales of goods deposited in the premises during said period.

When the goods enter the national customs territory, they shall be considered as imports and taxes and tariffs shall be applicable to them.

**Regulations:** Law No. 16,246, Article 43 of Law No. 17,243, Law No. 17,555, Law No. 19,276 (CAROU), Title 4, Article 52, Paragraph I and Title 8, Article 15, Paragraph L.

# 9

## **PUBLIC-PRIVATE PARTNERSHIP**

### **Definition:**

Public-Private Partnership (PPP) agreements are those in which the State entrusts a private party with the design, construction and operation of infrastructure, or any such services, in addition to financing.

### **Purpose:**

PPP agreements shall have as purpose some of the following activities:

- » Road works (including rural roads), railway, port and airport works.
- » Energy infrastructure works.
- » Waste disposal and treatment works.
- » Social infrastructure works, including prisons, health centers, education centers, social housing, sports complexes and urban improvement, supply and development works.
- » Hydraulic works for irrigation.

### **Agreement Process:**

These agreements may originate from a public or a private initiative; in the latter case, the proposal must be submitted to the National Development Corporation (CND).

The process will consist of the following stages:

1. Preliminary assessment: Before starting the contracting process, the contracting Public Administration body must have an assessment document showing the feasibility and suitability of the project in question, which will be submitted to the Planning and Budget Office and the Ministry of Economy and Finance for their consideration and report.

2. Public call for bids: With a positive report, the Public Administration body may initiate the public call for bids, using any competitive method, including invitation to tender and bids, or any other method that is not contrary to the general principles admitted by the regulations in force.
3. Submission of bids: Bids shall be submitted with all the required information and documents.
4. Provisional award: The Technical Commission will classify in decreasing order the bids submitted according to the different evaluation criteria. Once a report from the Public-Private Partnership Projects Unit has been received, the contracting Public Administration body, through a competent spending officer, will stipulate the provisional award by means of a well-founded resolution, which shall be notified to all bidders and will establish the definitive terms of the contract.
5. Final award: The process will continue with the intervention of the State Accounting Oversight Board, which will have 30 calendar days to make a decision, effective as of the receipt of the notification file. The final award shall be granted with the favorable decision of said Board, or it will be deemed approved, after 30 days have elapsed without a decision being issued.

For private initiatives, the process will be identical, the only difference being that a private proposal will be submitted to the CND, which will be technically evaluated and submitted to the corresponding Public Administration body to begin the process described above.

#### **Tax Regime:**

As regards the tax treatment of activities developed under PPP agreements, the general scheme shall be applicable.

In particular, intangible assets arising from ownership of rights under the concession contract will be amortized over the useful life of the investment committed and made, having as limit the term of the respective contract. Notwithstanding this, in the case of awards granted since July 1, 2015, such assets may be amortized over a term of 10 years, to the extent so established in the bidding document.

**Regulations:** Law No. 18,786, Decree No. 17/012, Decree No. 280/012, Decree No. 251/015, Art. 94 bis of Decree No. 150/007.

# 10

## FOREIGN TRADE-RELATED SCHEMES

### 10.1 TAX REFUNDS

Uruguay has an active policy in place to promote and support the export sector. In line with these policies, efforts are made not to make the exported product more expensive, in order to make it more competitive in the foreign market.

In terms of VAT, this is implemented by not taxing export sales and refunding the VAT included in purchases of goods and services which make up the cost of such income.

**Regulations:** Title 10 of 1996 Consolidated Text, Decree No. 220/998.

### 10.2 TEMPORARY ADMISSION

Industrial activity operators may use the Temporary Admission (TA) import mechanism, which allows them to enter into the market foreign goods from abroad for a specific purpose (other than consumption), exempt from taxes, to be re-dispatched within a period of 18 months, either on an “as is” basis or after having undergone a certain transformation, processing, repair or addition of value, with effective employment of labor.

Said term may be extended by the Executive Power to 18 additional months, by means of a well-founded request to be submitted to the Technological Laboratory of Uruguay (LATU).

**Regulations:** Law No. 18,184, Decree No. 505/009.

### 10.3 EXPORT TAX REFUNDS

A tax refund system is contemplated for industrialized, finished or semi-finished goods of national production that are exported, based on a percentage of the customs value thereof (generally between 3% and 6% of the FOB value, to the extent that 20% of value is added), in accordance with the commitments undertaken by our country within the World Trade Organization.

**Regulations:** Law No. 16,492 as amended, Decree No. 147/014.

### 10.4 DRAW-BACK

The draw-back regime is the possibility of claiming the refund of taxes and charges paid for the import under the general scheme of all those goods that, by definition, can be imported under temporary admission, which were used in the country, in the manufacturing, transformation, repair or value addition, of products intended for export, with effective employment of labor.

Said imports cannot exceed five years since they were customs cleared and will be verified by LATU, once the requests to operate under this refund regime have been authorized.

**Regulations:** Law No. 18,184, Decree No. 505/009.

### 10.5 STOCK-TAKING

It consists of the possibility of replacing goods imported under the general scheme, by the import of similar goods, free of taxes and charges, when such goods have been used as input for the transformation, manufacturing, repair or value addition in the country, of exported products, with effective employment of labor.

Similar goods are those with the same technical characteristics, quality level and tariff item.

Imports, as replacements, must be made for up to the same quantity used and in a single operation.

In addition to this, it must be noted that the request for a stock-taking operation must be made within 5 years from the date of on which the goods imported under the general scheme or nationalized were customs cleared. ATU will verify the goods both physically and in terms of documentation, prior to authorizing the request.

**Regulations:** Law No. 18,184, Decree No. 505/009.

## 10.6 CUSTOMS WAREHOUSING

Customs warehousing is the customs regime whereby imported goods enter and remain in a customs warehouse without payment of taxes, except for fees, for subsequent inclusion in another customs regime, re-shipment or re-export.

### **Types:**

- » Warehouse: Goods may only undergo operations aimed at ensuring their recognition, preservation, fractioning into batches or volumes and any other operation that does not alter their value or changes their nature or state.
- » Bonded warehouse: Goods may undergo operations aimed at facilitating their commercialization or increasing their value, without changing their nature or state.
- » Industrial warehouse: Goods may undergo operations aimed at changing their nature or state, including the industrialization of raw materials and semi-finished products, assembly, adjustment any other similar operation.
- » Repair and maintenance warehouse: Goods may undergo repair and maintenance services, without changing their nature.
- » Temporary warehouse for exhibition or any other similar activity: Foreign goods entered may be bound for exhibitions, shows, fairs or other similar activities, with prior authorization from the National Customs Authority.
- » Logistic warehouse: Goods may undergo operations which change their state or nature, provided that their origin is not altered. These operations consist of: assembly or adjustments; mixture; placement or replacement of parts, pieces or accessories; hardware setup; software installation; manufacturing of containers, packages, labels or other products, provided that they are used for the commercialization of goods that will leave the warehouse; and other similar operations established by the Executive Power.

Customs warehouses located in free ports or airports may never adopt the modality of industrial warehouses.

It should be noted that goods in customs warehouses do not lose their Mercosur origin. Goods may remain in customs warehouses for a maximum period of five years and said period may be extended.

**Regulations:** Law No. 19,276.

## 10.7 MERCOSUR ORIGIN REGIME

Mercosur grants preferences to products traded among its members. In order to benefit from preferences, products must be considered as originating in one of the signatory States, for which purpose they must comply with the provisions under the Mercosur Regime of Origin.

Rules of Origin: These are provisions that establish the cases in which goods may be considered as originating in a given country. A distinction is made between preferential and non-preferential rules.

1. Preferential rules of origin: Those necessary to determine the country of origin for the purpose of applying the corresponding tariff preference resulting from a trade agreement.
2. Non-preferential rules of origin: These are necessary to determine the country of origin of goods for reasons other than the application of a tariff preference (application of trade defense measures, origin marking requirements, among others).

Certificate of Origin: This is the document permitting verification of the origin of goods and must accompany them in all cases. The certificate must comply with the following requirements:

- » Be issued by authorized certifying bodies.
- » Identify the goods to which it refers.
- » Indicate that the goods to which it refers originate from the State Party in question under the terms and provisions of the Regime.

In Uruguay, the Trade Policy Advisory Office of the Ministry of Economy and Finance is responsible for delegating the power to issue certificates of origin to private entities and public bodies.

Certificates of Origin may be issued as of the date of issuance of the commercial invoice or during the following 60 days and must be presented to Customs at the time of import clearance.

**Regulations:** Consolidated Text of the MERCOSUR Regime of Origin.





## WHO WE ARE

We are the agency responsible for the promotion of exports, investment and country brand. We work to enhance the export capacity and competitiveness of Uruguayan companies, promote the country as an attractive destination for productive investments and promote the country brand Uruguay Natural in the world.

Together with other institutions, we are part of the National System of Productive Transformation and Competitiveness (Transforma Uruguay) that works to promote the productive and innovative economic development of the country, with sustainability, social equity and environmental and territorial balance.



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- Promotion. We promote investment opportunities in strategic events, missions and business rounds.
- Facilitation of visits to the country of foreign investors, including organization of agenda of meetings with, for example, public authorities, suppliers, potential partners and business chambers.
- Support in establishment and expansion. We facilitate your establishment in the country and support you to achieve the growth of your business in Uruguay.





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