

# Egypt

# Tax overview

Personal Income Tax	2.5%-25%
Corporate Income Tax	22.5%
Gift Tax (direct line)	None
Inheritance Tax (direct line)	None
Wealth Tax	None

# **Legal System**

The Arab Republic of Egypt is a democratic State, which applies a mixture of Napoleonic Civil Law and Sharia.

# **Foreign Exchange Controls**

The currency is the Egyptian Pound (EGP). Egypt has no foreign exchange controls.

# **Personal Income Taxation**

Individuals resident in Egypt are taxed on worldwide income at progressive rates from 10% to 22.5%.

## **Corporate Income Taxation**

Egyptian corporations are subject to tax on worldwide income at standard rates of 22.5%.

# Value Added Tax (VAT)

Egypt levies a 14% sales tax on most goods and services, with some exemptions.

# **Anti-Avoidance Rules**

Egypt has General Anti-Avoidance Rules (GAAR). Egypt has Transfer Pricing rules based on OECD guidelines. Egypt has Thin Capitalization rules, and Controlled Foreign Corporation (CFC) rules.

# **Controlled Foreign Corporations (CFCs)**

Egypt has CFC rules which result in income imputation of the undistributed profits of the CFC to the Egyptian shareholder corporation. CFC rules apply where: the Egyptian corporation owns more than 10% of the CFC; more than 70% of the income of the CFC is passive income; and, the profits of the CFC are subject to tax at less than 75% of the Egyptian corporate tax rate.

# **Double Tax Treaties (DTTs)**

Egypt has DTTs with a number of jurisdictions, including Cyprus, Ireland, Malta, Mauritius, Netherlands, Singapore, Switzerland, UAE, UK, and the US.

#### **OECD Multilateral Convention**

Egypt has not ratified the Multilateral Convention on Mutual Administrative Assistance in Tax Matters. The Convention is the underlying instrument to the MCAA, and requires parties to exchange information "on request," and allows parties to agree spontaneous and automatic exchange.

## **Common Reporting Standard (CRS)**

Egypt has not executed the Multilateral Competent Authority Agreement (MCAA) to implement automatic exchange under CRS, and has not committed to joining CRS

#### **FATCA**

Egypt has not executed a FATCA IGA with the US, and is not treated as having an "agreement in substance" for FATCA.

## **Notice**

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