

Flash News

Exclusion of Luxembourg from Brazilian list of preferential tax regimes

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ADE RFB 3, dated 25 March 2011, definitively excludes Luxembourg from the list of countries with preferential tax regimes set forth by IN RFB 1.037 dated 4 June 2010.

On 28 March 2011, the Brazilian Tax Authorities issued a regulation (ADE RFB/MF 3/2011), which excludes Luxembourg from the list of countries with preferential tax regimes.

Luxembourg was included in such list, set forth by regulation IN RFB 1037/2010, because of its holding companies. After the Luxembourg government submitted a document showing that its special tax regime for holding companies - established under a law of 1929 - had been phased out, the Brazilian authorities decided to exclude Luxembourg from the said list.

Contrary to what happened to other countries, which are having their inclusion suspended while their request for exclusion is being examined by the competent Brazilian authorities, Luxembourg was definitively excluded from the aforementioned list.

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