



# 2018 International Tax Competitiveness Index: Individual Country Profiles

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## Australia

Australia ranks 8th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Australian tax system:

- Property taxes in Australia are assessed on the value of the land rather than real estate or other improvements to land.
- The average compliance time associated with the personal income tax is relatively low at just 18 hours. The OECD average is 67 hours.
- Australia's corporate and individual taxes have an integrated treatment of dividends, alleviating the burden of double taxation on distributed earnings.
- Australia ranks well on consumption taxes due to its low VAT rate but applies it to a relatively narrow base.

Some weaknesses of the Australian tax system:

- Australia's treaty network consists of just 45 countries, when the average among OECD countries is 77.
- The corporate tax rate in Australia is 30 percent, above the OECD average (23.9 percent).
- Corporations are limited in their ability to write off investments.

## Austria

Austria ranks 10th overall on the 2018 *International Tax Competitiveness Index*, down one spot from 2017.

Some strengths of the Austrian tax system:

- Austria's international tax system is very good with a broad treaty network of 91 countries, no Controlled Foreign Corporation rules, and thin-capitalization rules that are less complex than in most countries.
- The VAT in Austria applies to a broad base and has minimal complexity for compliance and reporting.
- There are no estate or wealth taxes.

Some weaknesses of the Austrian tax system:

- Headline corporate rate of 25 percent is above the OECD average (23.9 percent).
- Corporations are limited in their ability to write off investments.
- The tax wedge on labor is the 5th highest among OECD countries.

## Belgium

Belgium ranks 19th overall on the 2018 *International Tax Competitiveness Index*, six spots better than in 2017 and the biggest jump in the Index.

Some strengths of the Belgium tax system:

- Belgium has a broad treaty network, with 95 countries, and has a territorial tax system with no Controlled Foreign Corporations rules.
- Capital gains resulting from normal management of private wealth are exempt from tax.
- Belgium allows for Last-In-First-Out treatment of the cost of inventory.

Some weaknesses of the Belgium tax system:

- The corporate rate of 29.6 percent is above average among OECD countries (23.9 percent).
- Belgium levies estate and financial transaction taxes.
- The Belgian tax wedge on labor is the highest in the OECD countries with the average single worker facing a tax burden of 53.7 percent.

## Canada

Canada ranks 18th overall on the 2018 *International Tax Competitiveness Index*, one spot better than in 2017.

Some strengths of the Canadian tax system:

- Consumption taxes are low, and the associated compliance burden is near the average for OECD countries.
- Canada has a partial territorial system with a full exemption for foreign dividend income and a broad treaty network, with 96 countries.
- Canada does not levy wealth or inheritance taxes.

Some weaknesses of the Canadian tax system:

- The personal tax on dividends is 39.3 percent, well above the OECD average of 24 percent.
- Canada has poor treatment of corporate losses and write-offs for investments buildings and intangibles

## Chile

Chile ranks 31st overall on the 2018 *International Tax Competitiveness Index*, two spots better than in 2017.

Some strengths of the Chilean tax system:

- The VAT is at the average for OECD countries, and applies to a broad base.
- Chile provides for net operating losses to be carried forward indefinitely, allowing for corporations to be taxed on their average profitability.
- Chile has the lowest tax wedge on labor among OECD countries.

Some weaknesses of the Chilean tax system:

- Labor and consumption taxes are complex creating a serious compliance burden.
- Chile has poor treatment of corporate investments in machinery and buildings and does not allow companies to write off investment in intangibles.
- VAT compliance time is 124 hours, the most in the OECD.
- Chile has a worldwide tax system, while most countries have territorial provisions.

## Czech Republic

The Czech Republic ranks 9th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Czech tax system:

- A below-average corporate rate of 19 percent (OECD average is 23.9 percent) with above-average cost recovery provisions.
- Taxes on labor are minimally distortive.
- The Czech Republic has a territorial tax system, exempting both foreign dividend and capital gains income for its treaty partners and other European countries.

Some weaknesses of the Czech tax system:

- Consumption taxes have a high compliance burden and apply to a relatively narrow base.
- Net operating losses cannot be carried back and can only be carried forward for five years.
- The Czech Republic levies an estate tax and transfer taxes on real estate.

## Denmark

Denmark ranks 21st overall on the 2018 *International Tax Competitiveness Index*, down three spots from 2017, tied for the biggest drop in the Index.

Some strengths of the Danish tax system:

- Compliance times associated with corporate, consumption, and individual taxes are all below average among OECD countries.
- Denmark has a territorial tax system, exempting both foreign dividend and capital gains income for its treaty partners and other European countries.
- Property taxes are modest and allow costs associated with improvements to be deducted.

Some weaknesses of the Danish tax system:

- In addition to a top marginal tax rate of 55.8 percent, the personal income tax on dividends is 42 percent, well above the OECD average of 24 percent.
- Net operating losses can be carried forward indefinitely but are limited to 60 percent of taxable income.
- Denmark uses First-In-First-Out for assessing the cost of inventory for tax purposes.
- Controlled Foreign Corporation rules are among the most stringent in the OECD.

## Estonia

Estonia ranks 1st overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Estonian tax system:

- Estonia's corporate income tax system only taxes distributed earnings, allowing companies to reinvest their profits tax-free.
- The VAT applies to a broad base and has a low compliance burden.
- Property taxes only apply to the value of land.

Some weaknesses of the Estonian tax system:

- Estonia has tax treaties with just 57 countries, below the OECD average (77 countries).
- Estonia's Controlled Foreign Corporation rules are more stringent than the average OECD country.

## Finland

Finland ranks 14th overall on the 2018 *International Tax Competitiveness Index*, down one spot from 2017.

Some strengths of the Finnish tax system:

- Finland has a corporate tax rate of 20 percent and a low corporate tax compliance burden.
- Corporations can deduct their property taxes.
- Finland has a territorial tax system and a broad treaty network with 86 countries.

Some weaknesses of the Finnish tax system:

- Finland levies both an estate and a financial transactions tax.
- Companies are limited in their ability to carry forward net operating losses.
- Controlled Foreign Corporation rules are among the most stringent in the OECD.
- Finland has a progressive tax system with a combined top rate on personal income of 58.3 percent.

## France

France ranks 35th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the French tax system:

- France has above-average cost recovery provisions for investments in machinery and intangibles.
- France has a broad tax treaty network with 107 countries.

Some weaknesses of the French tax system:

- France has multiple distortionary property taxes with separate levies on real estate, net wealth, estates, assets, and financial transactions.
- The tax burden on labor of 47.6 percent is among the highest for OECD countries.
- At 34.4 percent, France has the highest corporate income tax rate among OECD countries.

## Germany

Germany ranks 16th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the German tax system:

- Inventory can receive Last-In-First-Out treatment, the most neutral treatment of inventory costs.
- Germany has a broad tax treaty network with 96 countries.
- The VAT rate of 19 percent is near the OECD average (19.1 percent) and the VAT compliance burden is relatively low.

Some weaknesses of the German tax system:

- Germany has the second-highest corporate income tax rate among OECD countries at 29.8 percent.
- The personal income tax is complex with an associated compliance burden of 134 hours—the highest among OECD countries.
- Companies are limited in the amount of net operating losses they can use to offset income on future or previous tax returns.

## Greece

Greece ranks 29th overall on the 2018 *International Tax Competitiveness Index*, one spot better than in 2017.

Some strengths of the Greek tax system:

- The personal tax rate of 15 percent on dividends is below the OECD average of 24 percent.
- Greece has a partial territorial system, exempting 95 percent of foreign dividends and capital gains.
- Controlled Foreign Corporation rules in Greece are modest and only apply to passive income.

Some weaknesses of the Greek tax system:

- Greece has an above-average corporate tax rate of 29 percent (OECD average is 23.9 percent).
- Companies are severely limited in the amount of net operating losses they can use to offset future profits, and companies cannot use losses to reduce past taxable income.
- Greece has a relatively narrow tax treaty network, with just 57 countries.
- At 24 percent, Greece has one of the highest VAT rates in the OECD on one of the narrowest bases.

## Hungary

Hungary ranks 13th overall on the 2018 *International Tax Competitiveness Index*, one spot better than in 2017.

Some strengths of the Hungarian tax system:

- Hungary has the lowest corporate tax rate in the OECD at 9 percent.
- Hungary has a flat personal income tax system.
- Better-than-average Controlled Foreign Corporation rules.

Some weaknesses of the Hungarian tax system:

- Companies are severely limited in the amount of net operating losses they can use to offset future profits, and companies cannot use losses to reduce past taxable income.
- Hungary has the highest VAT rate among OECD countries at 27 percent.
- Hungary levies estate, asset, and financial transaction taxes.

## Iceland

Iceland ranks 25th overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the Icelandic tax system:

- Iceland's corporate tax rate of 20 percent is below the OECD average of 23.9 percent.
- Iceland has a territorial tax system that fully exempts foreign dividends and capital gains with no country limitations.

Some weaknesses of the Icelandic tax system:

- Companies are severely limited in the amount of net operating losses they can use to offset future profits, and companies cannot use losses to reduce past taxable income.
- The VAT of 24 percent applies to a relatively narrow tax base.
- Iceland's Controlled Foreign Corporation rules apply to both passive and active income.

## Ireland

Ireland ranks 20th overall on the 2018 *International Tax Competitiveness Index*, two spots better than in 2017.

Some strengths of the Irish tax system:

- Ireland has a low corporate tax rate of 12.5 percent.
- Net operating losses can be carried back one year and carried forward indefinitely allowing companies to be taxed on their average profitability.
- Ireland has no Controlled Foreign Corporation rules.

Some weaknesses of the Irish tax system:

- Ireland's personal tax rate on dividend income of 51 percent is the highest among OECD countries.
- The VAT rate of 23 percent is one of the highest in the OECD and applies to a relatively narrow tax base.
- Corporations are limited in their ability to write off investments.



## Israel

Israel ranks 30th overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the Israeli tax system:

- Israel has a below-average corporate tax rate of 23 percent (OECD average is 23.9 percent) and allows net operating losses to be carried forward indefinitely.
- Israel does not levy net wealth or estate taxes.

Some weaknesses of the Israeli tax system:

- On average, compliance with the corporate code takes 110 hours.
- The progressivity of Israel's taxes on labor means that it costs the economy \$1.77 for every extra dollar of revenue that Israel raises from labor taxes.
- Israel has a worldwide tax system and a relatively narrow tax treaty network with 55 countries.

## Italy

Italy ranks 34th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Italian tax system:

- Italy has above-average cost recovery provisions for investments in intangibles.
- Italy has a broad treaty network, with 102 countries.

Some weaknesses of the Italian tax system:

- Italy has multiple distortionary property taxes with separate levies on real estate, net wealth, estates, and financial transactions.
- The VAT rate of 22 percent applies to one of the narrowest tax bases in the OECD.
- Compliance with the personal income tax system takes 169 hours on average, highest by far in the OECD.

## Japan

Japan ranks 26th overall on the 2018 *International Tax Competitiveness Index*, three spots down from 2017, tied for the biggest drop in the Index.

Some strengths of the Japanese tax system:

- Japan has a low VAT rate of 8 percent applied to a broad base.
- Japan's personal income tax rate on dividends is 20.3 percent, below the OECD average of 23.9 percent.

Some weaknesses of the Japanese tax system:

- Japan has poor cost recovery provisions for business investments.
- Japan has a hybrid international tax system with a 95 percent exemption for foreign dividends and no exemption for foreign capital gains.
- Companies are severely limited in the amount of net operating losses they can use to offset future profits, and companies cannot use losses to reduce past taxable income.

## Korea

Korea ranks 17th overall on the 2018 *International Tax Competitiveness Index*, two spots down from 2017.

Some strengths of the Korean tax system:

- Korea has a low VAT of 10 percent that is applied to a relatively broad base.
- Korea has a broad treaty network, with 93 countries.
- Business investments in machinery receive better-than-average treatment for corporate write-offs.

Some weaknesses of the Korean tax system:

- Korea has multiple distortionary property taxes with separate levies on real estate, estates, and financial transactions.
- The personal income tax rate on dividends is 40.3 percent.
- Companies are severely limited in the amount of net operating losses they can use to offset future profits or reduce past taxable income.

## Latvia

Latvia ranks 2nd overall on the 2018 *International Tax Competitiveness Index*, one spot better than in 2017.

Some strengths of the Latvian tax system:

- Latvia's corporate income tax system only taxes distributed earnings, allowing companies to reinvest their profits tax-free.
- Corporations can deduct property taxes when calculating taxable income.
- Latvia's taxes on labor are generally flat allowing the government to raise revenue from taxes on workers with very few distortions.

Some weaknesses of the Latvian tax system:

- Latvia's network of tax treaties includes 61 countries, a relatively low number.
- The VAT of 21 percent applies to approximately half of the potential tax base.

## Luxembourg

Luxembourg ranks 4th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Luxembourg tax system:

- Business investments in machinery, buildings, and intangibles receive better-than-average tax treatment.
- Luxembourg has a territorial tax system exempting both foreign dividends and capital gains with no country limitations.

Some weaknesses of the Luxembourg tax system:

- Companies are limited in the amount of net operating losses they can use to offset future profits and are unable to use losses to offset past taxable income.
- Luxembourg has several distortionary property taxes with separate levies on real estate, estates, and assets.

## Mexico

Mexico ranks 28th overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the Mexican tax system:

- The personal income tax rate on dividends is 17.1 percent, below the OECD average of 24 percent.
- Corporations can deduct property taxes when calculating taxable income.

Some weaknesses of the Mexican tax system:

- Compliance time associated with corporate and consumption taxes is greater than 100 hours.
- Companies are limited in the amount of net operating losses they can use to offset future profits and are unable to use losses to offset past taxable income.
- Mexico has a higher-than-average corporate tax rate of 30 percent (the OECD average is 23.9 percent).
- Mexico has a worldwide tax system and a narrow tax treaty network, with 58 countries.

## Netherlands

The Netherlands ranks 5th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Dutch tax system:

- The Netherlands has above-average provisions for corporations to write off investments in machinery.
- The Netherlands has a territorial tax system exempting both foreign dividends and capital gains and a broad tax treaty network, with 97 countries.
- Corporations can deduct property taxes when calculating taxable income.

Some weaknesses of the Dutch tax system:

- The Netherlands has a progressive tax system with a combined top rate on personal income of 52.3 percent.
- The VAT of 21 percent applies to less than half of the potential tax base.
- Companies are limited in the amount of net operating losses they can use to offset future profits or reduce past taxable income.

## New Zealand

New Zealand ranks 3rd overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the New Zealand tax system:

- New Zealand allows corporate losses to be carried forward indefinitely, allowing businesses to be taxed on their average profitability.
- The VAT of 15 percent applies to nearly the entire potential tax base.
- New Zealand property taxes apply just to the value of land rather than real estate or other improvements to the land.

Some weaknesses of the New Zealand tax system:

- New Zealand has an above-average corporate tax rate of 28 percent (the OECD average is 23.9 percent) and poor cost recovery provisions for business investments.
- New Zealand has a narrow tax treaty network, with 40 countries.

## Norway

Norway ranks 15th overall on the 2018 *International Tax Competitiveness Index*, two spots better than in 2017.

Some strengths of the Norwegian tax system:

- Norway allows corporate losses to be carried forward indefinitely and to offset taxable income in the past two years, allowing businesses to be taxed on their average profitability.
- Compliance time associated with corporate, consumption, and individual taxes is below average in Norway.

Some weaknesses of the Norwegian tax system:

- Corporations are limited in their ability to write off investments.
- Norway has a progressive tax system with a combined top rate on personal income of 46.7 percent.
- Norway applies its Controlled Foreign Corporation rules to both passive and active income.

## Poland

Poland ranks 33rd overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the Polish tax system:

- Poland has a below-average corporate tax rate of 19 percent (OECD average is 23.9 percent).
- Poland's taxes on labor are generally flat allowing the government to raise revenue from taxes on workers with very few distortions.

Some weaknesses of the Polish tax system:

- Poland has multiple distortionary property taxes with separate levies on real estate, estates, assets, and financial transactions.
- Companies are severely limited in the amount of net operating losses they can use to offset future profits and are unable to use losses to reduce past taxable income.
- Companies can only write off 33.8 percent of the cost of industrial buildings.

## Portugal

Portugal ranks 32nd overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the Portuguese tax system:

- Corporations can deduct their property taxes from their taxable income.
- Portugal has a territorial tax system, exempting foreign dividend and capital gains income for most countries.

Some weaknesses of the Portuguese tax system:

- Portugal has a high corporate tax rate of 31.5 percent.
- Companies are limited in the amount of net operating losses they can use to offset future profits and are unable to use losses to reduce past taxable income.
- The VAT of 23 percent applies to less than half of the potential tax base.

## Slovak Republic

The Slovak Republic ranks 11th overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the Slovakian tax system:

- The personal income rate on dividends is very low at 7 percent.
- Slovakia has better-than-average tax treatment of business investment in machinery, buildings, and intangibles.

Some weaknesses of the Slovakian tax system:

- Companies are limited in the amount of net operating losses they can use to offset future profits and are unable to use losses to reduce past taxable income.
- The VAT of 20 percent applies to less than half of the potential tax base.
- The Slovak Republic has a relatively narrow tax treaty network, with 67 countries, and only a partial territorial tax system.

## Slovenia

Slovenia ranks 22nd overall on the 2018 *International Tax Competitiveness Index*, two spots down from 2017.

Some strengths of the Slovenian tax system:

- Slovenia has a 19 percent corporate tax rate, below the OECD average (23.9 percent).
- Slovenia's 22 percent VAT applies to a relatively broad base.

Some weaknesses of the Slovenian tax system:

- Slovenia's progressive personal income tax system has a combined top rate of 61 percent.
- Slovenia has a relatively narrow tax treaty network, with 58 countries, and only a partial territorial tax system.

## Spain

Spain ranks 27th overall on the 2018 *International Tax Competitiveness Index*, one spot down from 2017.

Some strengths of the Spanish tax system:

- Spain provides for net operating losses to be carried forward indefinitely, allowing for corporations to be taxed on their average profitability.
- Spain has a territorial tax system that exempts both foreign dividends and capital gains income from taxation.

Some weaknesses of the Spanish tax system:

- The VAT of 21 percent applies to less than half of the potential tax base.
- Spain has multiple distortionary property taxes with separate levies on real estate, net wealth, and estates.
- Corporations are limited in their ability to write off investments.

## Sweden

Sweden ranks 7th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Swedish tax system:

- Sweden provides for net operating losses to be carried forward indefinitely, allowing for corporations to be taxed on their average profitability.
- Sweden has a territorial tax system that exempts both foreign dividends and capital gains income from taxation.
- Sweden has a broad tax treaty network, with 81 countries.

Some weaknesses of the Swedish tax system:

- Sweden's personal dividend tax rate is 30 percent, above the OECD average (23.9 percent).
- Sweden has a progressive personal income tax and a combined top rate of 60 percent.



## Switzerland

Switzerland ranks 6th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Swiss tax system:

- Switzerland has above-average cost recovery provisions for investments in machinery, buildings, and intangibles.
- Switzerland has a broad treaty network, with 93 countries.
- The Swiss VAT of 7.7 percent applies to a broad base and has very low compliance costs.

Some weaknesses of the Swiss tax system:

- Switzerland has multiple distortionary property taxes with separate levies on real estate, net wealth, estates, assets, and financial transactions.
- Companies are limited in the amount of net operating losses they can use to offset future profits and are unable to use losses to reduce past taxable income.

## Turkey

Turkey ranks 12th overall on the 2018 *International Tax Competitiveness Index*, the same as in 2017.

Some strengths of the Turkish tax system:

- Turkey has a territorial tax system exempting foreign dividends and capital gains income.
- The personal income tax on dividends is 17.5 percent, below the OECD average (24 percent).

Some weaknesses of the Turkish tax system:

- Companies are limited in the amount of net operating losses they can use to offset future profits and are unable to use losses to reduce past taxable income.
- Turkey's VAT rate of 18 percent applies to just 42 percent of the potential tax base.

## United Kingdom

The United Kingdom ranks 23rd overall on the 2018 *International Tax Competitiveness Index*, down two spots from 2017.

Some strengths of the U.K. tax system:

- The corporate income tax rate is 19 percent, below the OECD average (23.9 percent).
- The U.K. has a territorial tax system exempting both foreign dividend and capital gains income.
- The U.K. tax treaty network with 131 countries is the broadest in the OECD.

Some weaknesses of the U.K. tax system:

- The personal income tax rate on dividends is 38 percent, well above the OECD average (24 percent).
- Corporations are prohibited from writing off any costs of buildings or industrial structures.
- The VAT of 20 percent applies to less than half of the potential consumption tax base.
- The U.K. has multiple distortionary property taxes with separate levies on real estate, estates, assets, and financial transactions.

## United States

The United States ranks 24th overall on the 2018 *International Tax Competitiveness Index*, four spots better than in 2017.

Some strengths of the U.S. tax system:

- The U.S. provides full expensing for business investments in machinery.
- Consumption taxes are very low in the U.S. with states levying an average sales tax rate of 7 percent.

Some weaknesses of the U.S. tax system:

- The U.S. has a progressive income tax with a top rate of 46 percent, including payroll and personal income taxes.
- The U.S. has a partial territorial system and does not exempt foreign capital gains income—it ranks as one of the most onerous international tax systems of any OECD nation.
- The real property tax burden is among the highest in the OECD.