

# The Double Tax Treaty between Cyprus and Kazakhstan and opportunities thereof



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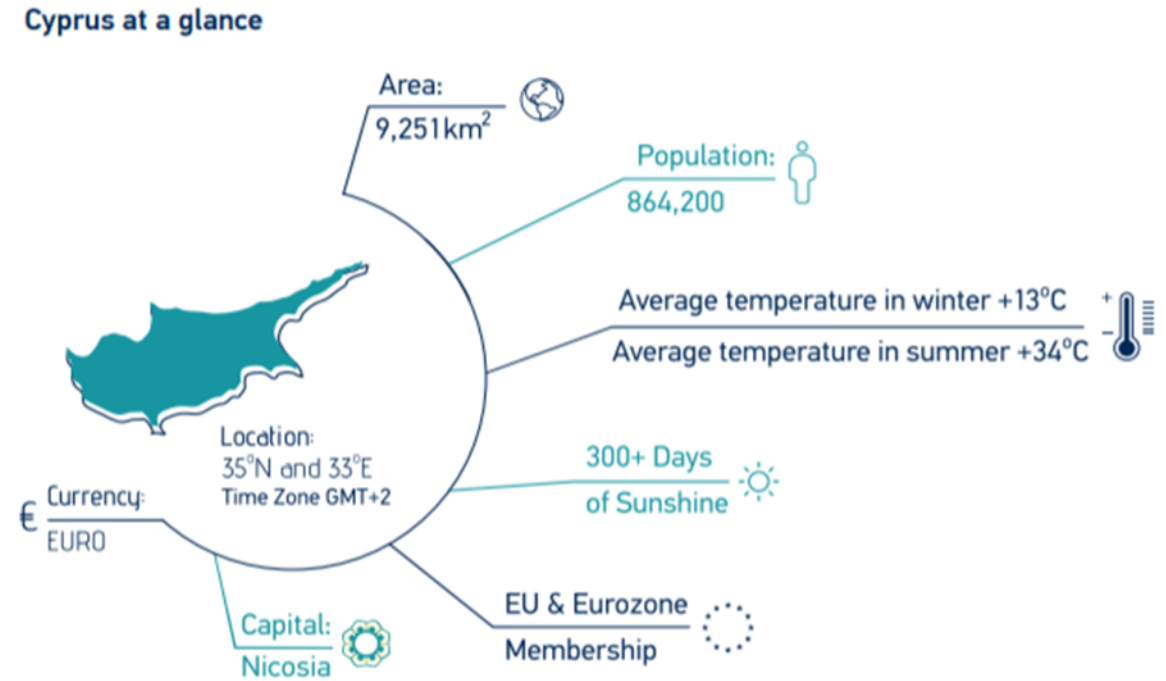


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# Cyprus at a glance

- Area: 9,251 km<sup>2</sup>
- Population: 864,200
- Currency: Euro
- Time Zone: GMT+2
- Political system: Presidential Democracy
- Legal System: Common Law (UK)
- Significant economic memberships such as WTO, World Bank, IBRD and IMF.





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# An overview of the Cyprus Economy



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# Current Situation

- Positive GDP growth rate during the first quarter of 2020, despite the slowdown due to COVID-19
- Strong recovery from COVID-19 with an estimated 6% GDP growth rate for 2021
- Cyprus is now rated as “investment grade” by all major Rating Agencies.



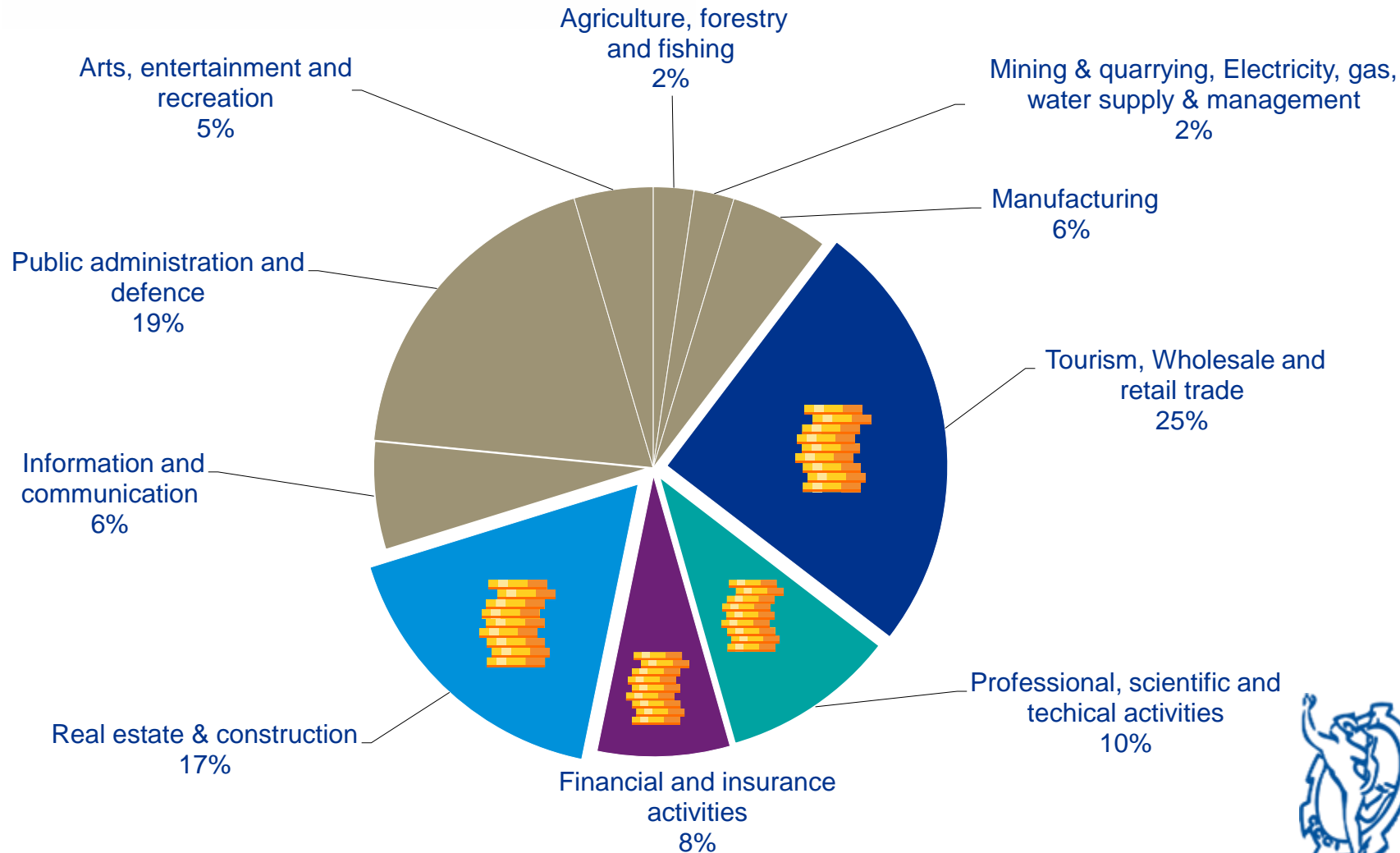
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# Cyprus Gross Value Added (GVA) by sector 2019



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# Cyprus Tax System at a glance





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## The Cyprus Tax System at a Glance (1/2)

- Taxation is based on residency status
- The corporate tax is 12.5%
- Notional Interest Deduction on new equity invested
- Fully reformed Intellectual Property Regime
- Capital gains on sale of securities: 100% exemption
- Capital gains from the sale of immovable property situated outside Cyprus are tax exempt
- No withholding tax on outgoing payments (dividends-interest-royalties)



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## The Cyprus Tax System at a Glance (2/2)

- Incoming dividends exempt from tax subject to relaxed conditions
- No Inheritance, Wealth or Gift Taxes
- Interest expense on 100% corporate acquisitions permitted
- Applicability of all EU tax directives
- Advance tax ruling practice exists
- Extensive and constantly expanding network of attractive Double Tax Treaties



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