



At a glance

The Honorable Minister for Economy, Attorney General, Minister for Civil Services and Communications Mr. Aiyaz Sayed-Khaiyum delivered tonight (17 July 2020) the 2020/2021 ('F21') National Budget address. The F21 budget follows on from the COVID-19 response budget of March 2020 in response to the devasting effects of the virus on the Fiji economy.

The key focus of the F21 budget is to provide taxation relief in particular to businesses and at the same time continue the significant Government spending impact on the economy despite drastically reduced taxation revenues.

Taxation reform

Significant taxation reform includes:

- Support for tourism dependent businesses in the form of the abolishment of Service Turnover Tax of 6% on all prescribed services and a reduction in the Environmental and Climate Adaption levy ("ECAL") from 10% to 5%. Similarly, the threshold for businesses that are required to charge ECAL has increased to those with revenue over F\$3m pa (from \$1.25m);
- Departure tax is also reduced to \$100 per passenger (from \$200) with cash incentives for the first 150,000 visitors to return to Fiji for holiday. Excise tax on alcohol has also been reduced by 50%, improving the tourism product offering in this regard;
- There are major structural taxation changes such as the abolishment of stamp duty altogether, which will reduce transaction costs and insurance costs for business;
- Custom duties and import exercise have also been restructured with major reductions in duties affecting some 1,600 plus import categories; and
- There are other major taxation reforms such as new investment packages for medical investment, subdivision of lots, private sector investment in buildings and residential housing development.

Government of Fiji Fiscal position

The costs to the Government of Fiji by the pandemic have been dramatic with Government revenue forecast to decline to \$1.7 billion in F21 from \$2.76 billion in F20 and \$3.1 billion in F19.

Government expenditures have and will remain constant between \$3.6 billion in F19 to \$3.7 billion in F21

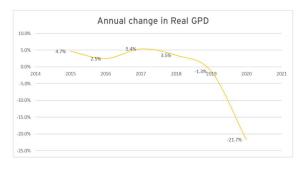
The fiscal deficit for F21 is set at 20.2% of GDP or \$2 billion. There is also an obligation for principal payments of \$750 million taking the gross deficit to \$2.75 billion. The fiscal deficit in F20 was \$0.8 billion.

Debt levels are expected to increase as a result to \$8.3 billion or 83.4% of GDP by the end of July 2021.

The Fiji Economy

The COVID-19 pandemic has severely disrupted the global economy with devastating impacts on financial markets, jobs and businesses. The International Monetary Fund (IMF) has projected a global contraction of 4.9 percent for 2020, making this the worst economic crisis since the Great Depression in the 1930s.

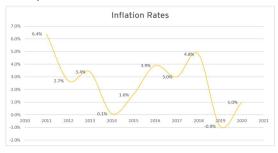
The Fijian economy is estimated to have contracted by 1.3 percent in 2019 amid the global slowdown, weak domestic demand and ending business confidence, consecutive years of economic growth since 2010.



In 2020, the Fijian economy is projected to contract by 21.7 percent given the devastating impact of the COVID-19 pandemic on the tourism sector and its rippling effects on all other sectors of the economy. This is the largest economic contraction in Fiji's history.

Tourism related activities contribute around 35 percent to GDP and visitor arrivals are forecast to decline by 75 percent in F20. As a result, accommodation & food service activities, wholesale & retail trade, transport & storage, administration & support services and arts & entertainment are expected to contract severely.

Year-end annual inflation in 2019 was -0.9 percent, mainly due to lower prices in alcoholic beverages, tobacco & narcotics, communications, housing, water, electricity, gas & other fuels and transport.



Year-end inflation for 2020 is expected at 1 percent, reflecting the impact of the pandemic on domestic and external demand, as well as global commodity prices such as crude oil.

Total exports grew by 2.7 percent in 2019 to \$2,167.8 million, led by higher re-exports which more than offset the decline in domestic exports. The contraction in domestic exports was driven by declines in pine woodchips, cement, gold, cartons and garments, which negated growth in exports of mineral water, sugar, fish, mahogany, molasses, taro and chemicals.

In 2019, total imports fell by 8.6 percent to \$5,075.8 million, due to declines in the import of machinery and transport equipment, manufactured goods, chemicals, mineral fuel, miscellaneous goods, food & live animals, crude materials and animal & vegetable oil & fats. This reflects lower aggregate demand, the slowdown in economic activity and tightening financial conditions earlier in the year.

Fiji recorded a current account deficit of \$572.5 million in 2019, equivalent to 4.9 percent of GDP, an improvement from a 7.3 percent deficit in 2018.

Tourism earnings grew by 2.7 percent to \$2,065.5 million in 2019. With significantly lower expected visitor arrivals in 2020, earnings are projected to fall by about 70 percent. However, for 2021 and 2022, tourism earnings are expected to rebound by 66.6 percent and 6 percent, respectively.

Personal remittances stood at \$587.5 million in 2019 and are forecast to decrease by 15 percent to \$499.5 million in 2020. In 2021 and 2022, remittances are projected to grow by 14.1 percent and 10 percent, respectively, in line with the anticipated global growth.

Monetary policy

The Reserve Bank of Fiji (RBF) will continue to focus on ensuring adequate level of foreign reserves and low and stable inflation. Foreign reserves (RBF holdings) levels in early July 2020 were around \$2.15 billion, equivalent to almost 7 months of retained imports.

Government of Fiji Fiscal position

At a glance

Table 1 below is the cashflow statement that provides the fiscal position of Government for 3 comparable years. It provides the actual fiscal position of the Government for the FY2018 - 2019, projections for FY2019 - 2020, the revised budget as a result of the COVID-19 pandemic and the budget estimates for FY2020 - 2021.

Table 1: Government of Fiji Statement of Cash Flows

In F\$M	2018 – 19 Actual	2019 - 20 Initial Budget	2019 - 20 Revised Budget	2019 - 20f	2020 - 21f
Receipts	3,181	3,492	2,508	2,699	1,674
Tax receipts	2,820	3,080	2,022	2,189	1,466
Non-Tax revenue	361	412	486	510	208
Payments	3,600	3,841	3,536	3,536	3,674
Operating payments	2,464	2,535	2,393	2,438	2,466
Capex	1,136	1,306	1,143	1,098	1,208
Net Deficit	-419	-349	-1,028	-837	-2,000
- % of GDP	-3.6	-2.7	-9.0	-8.2	-20.2
Debt	5,735	5,979	6,989	6,705	8,256
- % of GDP	49.3	47.1	60.9	65.6	83.4
GDP	11,636	12,704	11,480	10,214	9,905

Sources: Revised Budget estimates are from COVID-19 Response Supplementary Budget delivered in March 20 Economic and fiscal update supplement to the 2020-2021 budget address

Key highlights of the Government fiscal position are:

- Government receipts in F21 will be down 38% compared to the prior year (F20) and down 47% from F19;
- ▶ Government expenditure in F21 will increase by 4% compared to the prior year (F20) and stands at \$3.7 billion;
- The deficit increases by \$1,164 million to \$2,000 million as a result;
- ▶ GDP is expected to contract by -3% in F21 with largest decline being in F20 of -21.7%;
- Government debt to GDP will be 83.4% as the deficit will be funded by borrowing;
- The Increase in debt levels will be primarily sourced internationally from the World Bank, ADB and other international borrowers with the FNPF funding 32%.

Government Revenue

Government revenue, of which tax revenue comprises 90%, have nearly halved due to the pandemic. Tax revenues are expected to further decline in F21 due to the reduction in a number of taxes to stimulate economic activity support tourism and increase domestic demand.

Government revenue as a percentage of GDP will as a result drop dramatically from 27% in F19 to 16% in F21. Significant concessions have been made on future tourism tax revenue as well on customs duties to encourage economic activity.

Expenditure

The largest component of Government's operating expenditure is personnel costs. In FY2018-2019, personnel costs amounted to \$1,017 million or around 41.9% of total operating expenditure, and around 28.2% of total expenditure.

There will be no reduction in pay for all other civil servants. Government, as the largest employer in the economy (around 38,000 civil servants), is mindful that any significant reduction in public sector wages and salaries will place considerable strain on domestic activity and the welfare of thousands of families.

Interest in F21 is forecast at \$403m (F20 \$350m) which equates to 11% of total expenditure or forecast at 4% of GDP.

Government debt

Government debt as at July 2020 is forecast to reach \$6.7 billion or 65.6% of GDP due to an increased borrowing limit in the 2019-2020 COVID-19 Response Budget to accommodate a higher deficit of 8.2%. The significant increase in debt to GDP is also attributed to the downward revision of nominal GDP given the massive economic contraction projected for this financial year.

Particulars	July 16	July 17	July 18	July 19	July 20 (f)
Domestic Debt	3,245.0	3,300.8	3,763.0	4,278.5	4,955.1
External Debt	1,262.6	1,370.9	1,457.5	1,456.8	1,750.3
Total Debt	4,507.7	4,671.7	5,220.5	5,735.2	6,705.4
Debt (as a % of GDP)	44.7	43.5	46.0	49.3	65.6
Domestic Debt to Total Debt (%)	72%	71%	72%	75%	74%
External Debt to Total Debt (%)	28%	29%	28%	25%	26%

Medium term fiscal framework

The table below outlines the medium-term fiscal framework for FY 2019-2021 to FY 2022-2023.

	2020-2021 Budget	2021-2022 Target	2022-2023 Target
Revenue	1,673.6	1,805.7	1,886.2
As a % GDP	16.9	16.4	16.3
Tax Revenue	1,465.7	1,626.9	1,708.3
Non-Tax Revenue	207.9	178.8	177.9
Expenditure:	3,674.6	2,357.1	2,233.6
As a % of GDP	37.1	21.4	19.3
Net Deficit	(2,001.0)	(551.4)	(347.4)
As a % of GDP	(20.2)	(5,0)	(3.0)
Debt:	8,256.4	8,807.8	9,155.1
As a % of GDP	83.4	79.9	79.1
GDP at Market Prices:	9,905.3	11,027.5	11,578.9

Revenue Policies

Government has brought in a draft of direct taxation measures and indirect taxation measurement as per below:

Part 1 – Direct Tax Measures

i. Income Tax Act

Polic	cy	Description		
Social Responsibility Tax (SRT) and Environment & Climate	The ECAL component new SRT and ECAL stru		ed from 10% to 5%. The vs:	
	Adaptation Levy (ECAL)	Chargeable Income	Social Responsibility Tax Payable	Environment & Climate Adaptation Levy
		270,001 - 300,000	13% of excess over \$270,000	5% of excess over \$270,000
		300,001 - 350,000	5,400 + 14% of excess over \$300,000	5% of excess over \$300,000
		350,001 - 400,000	14,900 + 15% of excess over \$350,000	5% of excess over \$350,000
		400,001 - 450,000	24,900 + 16% of excess over \$400,000	5% of excess over \$400,000
		450,001 - 500,000	35,400 + 17% of excess over \$450,000	5% of excess over \$450,000
		500,001 - 1,000,000	46,400 + 18% of excess over \$500,000	5% of excess over \$500,000
		1,000,000 +	161,400 + 19% of excess over \$1,000,000	5% of excess over \$1,000,000
2.	Advance Payments of Tax		nce payment as ame vill be made permaner	ended in the COVID-19
		Companies will be installments at the	-	vance tax payments in 9
		COVID-19 Respons		es was removed in the alid until 31 December the next 3 years.
3.	Debt Forgiveness	forgiveness is not s		esponse Budget, debt for all debt outstanding ember 2020.
		The existing policy extended until 31 [eriod for the new debt is

Poli	су	Descri	ption	
		20	addition, debts created between 1 Apri 21 will also be eligible for income tax giveness provisions.	
4.	Thin Capitalisation	► Th	e debt-to-equity ratio will be increased I .	from the current 2:1 to
			erefore, a higher amount of tax d erest will be allowed for foreign contro	
5.	Depreciation write-off incentive	use	100% write-off on purchase of fixed a ed for business purposes was annou sponse Budget.	
			ight of the current economic situation, rmanent.	this policy will be made
6.	Accelerated Depreciation	inc 31 Re	100% write-off for the construction of lustrial building, provided that approva December 2020, was made available sponse Budget.	als are obtained prior to
			is incentive will be made permanent.	
7.	Tax deduction for reduction of commercial rent	tax coi coi	part of the government assistance part deduction was accorded to landlemmercial rent. The deduction appliphracts whereby landlords need to prome received for the past 6 months.	ords for reduction of ied to existing rental
			e reduction refers to the rent payable December 2020.	after 01 April 2020 to
			is tax deduction will be further extended. 21.	ded until 31 December
8.	New Medical Investment Incentive		e existing package will be repealed lowing:	and replaced with the
		Pri	vate Hospital	
		•	Income tax exemption for the es hospital based on the following capi	
			Capital Investment (\$)	Tax Holiday
			\$2,500,000 - 5,000,000	7 years
			\$5,000,001-\$10,000,000	13 years
			More than \$10,000,000	20 years

Policy	Description	
	 An investment allowance will be refurbishment, renovation and externovation and externovation and externovation are the based on the following capital investment. 	ension of a hospital
	Capital Investment (\$)	Tax Deduction
	\$500,000 - \$1,000,000	30%
	More than \$1,000,000	60%
	Ancillary Medical Services	
	 Income tax exemption for the esta ancillary medical service centre bas capital investment levels: 	
	Capital Investment (\$)	Tax Holiday
	\$500,000 - \$3,000,000	7 years
	\$3,000,001 - 10,000,000	13 years
	More than \$10,000,000	20 years
	refurbishment, renovation and exter medical service centre based on t investment levels:	he following capital
	Capital Investment (\$)	Tax Deduction
	\$500,000 - \$1,000,000	30%
	More than \$1,000,000	60%
New Incentive Package for Subdivision of lots	 A new incentive package will be introduced business of sub-division of lots for reside purpose. The following benefits will be avai 	ential or commercial
	Capital Investment (\$)	Tax Deduction
	Less than \$1,000,000	20%
	\$1,000,001 - \$3,000,000	30%
	\$3,000,001 - \$7,000,000	40%
	More than \$7,000,000	60%
	 Duty concession will be available or materials, equipment and machinery to of the project. 	
	 Income tax exemption will be available for proceeds of sale. 	e on developer profits
	 The new Incentive Package for Sub-dapplicable from 1 August 2020 to 31. 	

Policy	/	Description
1	New Incentive Package for Private sector investment in buildings	 A new incentive package will be introduced for private companies investing in buildings to be used by government or entities approved by government. The following benefits will be available: Duty concession will be available on importation of raw materials, plant, machinery and equipment for the
		establishment of the project. Tax exemption will be available on rental income.
<u> </u>	Residential Housing Development Incentive – Development of Housing for Public Rental	Regulation 12, Part 3 of the Income Tax (Residential Housing Development Package) Regulations 2016 will be extended to include duty concessions for the importation of raw materials, machinery and equipment for the establishment of the housing project.
	Tax incentives for Corporate Bonds	➤ To support post COVID-19 recovery through provision of additional avenues for corporate financing, the issuance of corporate bonds will be incentivized as follows:
		 A 150% tax deduction will be allowed to companies for listing of corporate bonds with the South Pacific Stock Exchange (SPSE). This deduction will be applied on the cost of listing.
		 A 150% tax deduction will be allowed on interest paid on corporate bonds.
		 Interest income earned on corporate bonds will be exempt from tax.
13.	FNPF Contribution	To provide immediate financial support to employers during this time of financial hardship, the mandatory FNPF contribution was reduced to 5 percent in the COVID-19 Response Budget. This policy is further extended until 31 December 2021.
		Employer contribution exceeding the 5% mandatory FNPF contribution and up until 10%, will be allowed a tax deduction of 150% of the excess.
		The deduction will be applied retrospectively from 1 April 2020.
14. (Capital Gains Tax (CGT)	CGT exemption threshold for capital gains made by a resident individual or Fijian citizen will be increased from \$16,000 to \$30,000.
	Income Tax Act - Section 2: Definition of Capital Asset	 Depreciable Assets will now be taxed under Capital Gains Tax rules and not income tax rules. Therefore, the definition of Capital Asset in Section 2 of the Income Tax Act 2015 will be extended to include depreciable assets and section 34 will be amended to clarify rules on disposal of depreciable assets.

Poli	су	De	escription
16.	Fringe Benefit Tax	•	A tax deduction will be allowed to the employer for Fringe Benefits Tax. Consequently, Section 22 of the Income Tax Act will be amended.
17.	Non-Resident Withholding Tax	•	Section 10 will be amended to exclude accommodation provided or reimbursed, airfare, transport and allowances from the application of Non-Resident Withholding Tax.
18.	Permanent Establishment	•	The Permanent Establishment Rules will be amended to allow consistent application with international taxation rules.
19.	Tax deduction on loans taken for medical purposes	•	A tax deduction will be allowed on loan (inclusive of both principal amount and interest accrued) taken from a licensed financial institution for medical treatment.
		•	The applicant will be required to provide medical certificate, details of the loan facility and receipts to confirm expenses.
		•	The following expenses are eligible:
			 hospital expenses;
			 food and accommodation if part of the package with the hospital;
			 international air fares; and
			 interest expenses incurred with the loan (in case of consolidated
			loan), interest deduction will be allowed proportionately.
20.	Corporate Reorganization	•	Deferral rules for company incorporation will be introduced.
		•	Transfer of assets by an individual shareholder to a company at the point of incorporation will not be subject to tax.
		•	Subsequently, disposal of assets will be subject to normal tax.
21.	Donation to the Sports Fund	-	The threshold to qualify for the 150% tax deduction available for donations to the Sports Fund will be removed.
		•	The recipient of the donation must be registered with the Fiji National Sports Commission.
22.	Tax deduction to hire local artists	•	A 150% tax deduction will be allowed to hotels and resorts that hire local artists such as craftsmen, dancers and musicians.

Tax Administration Act

Policy	Description
1. Audit Penalty	▶ 300% VAT evasion penalty and 75% income tax audit penalty will be replaced with a low, harmonized and progressive audit penalty regime.
	Audit penalty rates for tax shortfall for Income Tax, VAT and Other Taxes will be 15% per annum and will be computed using the simple interest formula. The same rate and methodology will be applied for tax benefits obtained through overestimation of tax losses.
	Consequently, section 46 and Section 46A will be amended and section 46B will be removed.

Stamp Duty Act

Policy	Description
1. Stamp Duty	▶ Stamp Duty Act will be repealed.

Airport Departure Tax Act

Policy	Description		
1. Review of Airport Departure Tax	► The Airport Departure Tax will be reduced from \$200 to \$100.		

Part 2 – Indirect Tax Measures

Service Turnover Tax Act

Policy	Description		
1. Service Turnover Tax (STT)	The 6% STT on all prescribed services will be removed.		

Value Added Tax Act

Policy	Description		
VAT Monitoring System (VMS)	The implementation of the VAT Monitoring System (VMS) as captured in the Electronic Fiscal Device (EFD) Regulations will be further deferred to 01 January 2022.		
2. VAT Reverse Charge	The provisions of VAT Reverse Charge applicable on supplies received from abroad will be repealed.		
3. VAT on Residential Rents	A person engaged in the supply of residential accommodation, irrespective of the annual gross turnover will be exempted from VAT.		

Environmental & Climate Adaptation Levy Act

Pol	icy	Des	scription			
1.	Environment & Climate Adaptation Levy (ECAL)	 The Environment & Climate Adaptation Levy (ECAL) will be reduced from 10% to 5%. The threshold for application of ECAL will be increased from \$1.25m to \$3m for all prescribed services. 				
2.	ECAL on Superyacht Charter.	► ECAL on Superyacht charter will be reduced from 10% to 5%.				
3. Environment & Climate Adaptation Levy (ECAL) on Motor Vehicles			ECAL on motor vehicles will be reduced from the current 10% to 5%. ECAL Structure on Hybrid Vehicles			
			Cylinder Capacity	Description	Current ECAL	New ECAL
			Less than 1,500 cc	New	10%	5%
				Used	10%	5%
			1,500 cc to 2,500 cc	New	10%	5%
				Used	10%	5%
		2,500 cc to 3,000 cc	New	10%	5%	
			Used	10%	5%	
			Exceeding 3,000 cc	New	10%	5%
				Used	10%	5%

			Cylinder Capacity	Description	Current	
					ECAL	New ECAL
			Less than 1,000 cc	New	10%	5%
				Used	10%	5%
			1,000 cc to 1,500 cc	New	10%	5%
				Used	10%	5%
			1,500 cc to	New	10%	5%
		2,500 cc	Used	10%	5%	
		2,500 cc to 3,000 cc	New	10%	5%	
			Used	10%	5%	
		Exceeding	New	10%	5%	
		3,000 cc	Used	10%	5%	
A	Environment & Climate Adaptation Levy (ECAL) on White Goods		 ECAL on white goods will be reduced from the current 10% to 5% The goods are as follows: Smart phones; Air conditioners; Refrigerators and Freezers; Televisions; Washing Machines; Dryers; Dishwashers; Electric Stoves; Microwaves; Electric Lawn Mowers; Toasters; Electric Jugs; and Hair Dryers 			
C	Exemption of ECAL on concession codes 232, 284 and 285	•	The ECAL Act w 284, and 285 fo imported under	r exemption of E	CAL on vehicles	

Policy		Description		
6. Refund of ECAL duty drawback Customs Act		•	The ECAL Act will be amended to include provisions of refund for ECAL paid on customs declaration in instances of a re-export.	

Customs Act

Policy	Description
Age limit on passenger motor vehicles	The age limit requirement on non-hybrid passenger motor vehicles will be removed. Vehicles are still required to be Euro 4 compliant.
	The age limit requirement for hybrid passenger motor vehicles remains at 5 years.
2. Luxury Vehicle Levy	Luxury vehicle levy imposed on passenger motor vehicles will be removed.
3. Objection to Tax Decision	Customs Act will be amended to allow a tax payer or importer dissatisfied with a tax decision to lodge an objection with the CEO, FRCS.
4. Trans-shipment Levy (Fish Levy)	▶ The Fish Levy of \$450 per ton will be removed.
5. Importation of mobile plant, machinery and cranes	A restriction will be imposed on the importation of mobile plant, machinery and cranes exceeding 32 tonnes as per Section 80 Land Transport authority Regulations.

Local Excise Duty

Policy	Description
Decrease in Local Excise Duty on Alcohol	The Local Excise Rate on Alcohol will be reduced by 50%.

New Local Excise Rates for Alcohol

Description	2019-2020 Rates	2020-2021 Rates
Ale, Beer, Stout and other fermented liquors of an alcoholic strength of 3% or less	\$3.43/litre	\$1.72/litre
Ale, Beer, Stout and other fermented liquors of an alcoholic strength of 3% or more	\$3.99/litre	\$2.00/litre
Potable Spirit Not Exceeding 57.12 GL	\$75.47/litre	\$37.74/litre
Potable Spirit Exceeding 57.12 GL	\$132.17/litre	\$66.09/litre
Still Wine	\$5.32/litre	\$2.66/litre
Sparkling Wine	\$6.07/litre	\$3.04/litre
Other fermented beverages: Still	\$5.32/litre	\$2.66/litre
Sparkling	\$6.07/litre	\$3.04/litre
Ready to Drink Mixtures of any Alcohol and non-alcoholic beverages of an alcoholic strength by volume of 11.49% or less	\$2.45/litre	\$1.23/litre

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