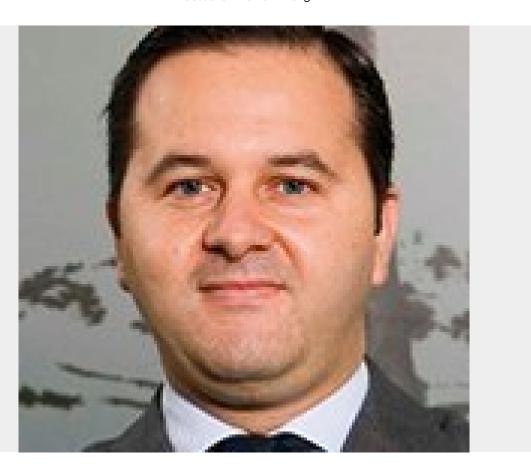
THE ATTRACTION OF TAX - VIEIRA DE ALMEIDA

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Portugal is attempting to re-establish itself as a centre of foreign nationals. It has brought in new regimes for 'golden visas' and expatriates taxes to enhance its attraction as an investment centre, says Tiago Marreiros Moreira, Head of Tax at Vieira de Almeida & Associados.

Portugal está intentando reubicarse como un centro de extranjeros nacionalizados, con "visas doradas" y beneficios fiscales a expatriados para atraer la inversión foránea, dice Tiago Marreiros de Vieira de Almeida.

Golden visas make it easier for foreign nationals to secure a Portuguese residence permit. Individuals from non-EU countries must fulfil certain obligations in order to qualify, he explains, notably, a capital transfer of more than €1,000,000, to create at least 30 jobs or to purchase a property worth over €500,000.

"Golden visas are for those willing to undertake investment activity for at least five years. Applicants only need to spend seven days in the first year in the country and 14 in the following two years, which is more attractive than other EU jurisdictions."

After five years, individuals can apply for full Portuguese citizenship and EU rights. Moreira says his

firm has seen particular interest from China, Brazil, Russia and Angola, especially as foreign nationals can also benefit from the expatriates tax regime.

If you are not a Portuguese resident, have been a tax payer abroad for more than five years and relocate to the country, you can enjoy a flat tax rate of 20 percent (increased temporarily to 23.5 percent) on Portuguese source employment, business and professional services income – other Portuguese source income is subject to local tax rates. Foreign source income, such as pensions, employment, business, professional services or passive, is fully exempt if it is taxed or subject to tax at source.

"Golden visas and the expatriate tax regime are attractive to several types of people and investors," says Moreira. "Pensioners, high net worth individuals or high value-added employees looking for a friendly tax environment should definitely consider moving to Portugal."