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# Intertrust

## Denmark



At the crossroads of finance, tax and accounting, our clients count on us to look out for their best interests. To develop and deliver the most relevant solutions to suit your particular goals, we work together with the finest lawyers and financial experts. With our roots in banking and a large international network, we have the global reach and local knowledge to help you succeed.

Denmark has a favourable tax regime, low administrative regulation and online tax registration and a good judicial system. This in combination with its good infrastructure makes it an attractive place to conduct business.

In 2008, Denmark received the top position in the business environment rankings for the 4th consecutive time, making it one of the most attractive places in the world to invest, locate and operate. Denmark also has one of the best holding company regimes.

#### The main benefits of the Danish solution are:

- > Quick and cost effective incorporation of companies (no notary required).
- > No tax on capital contribution or loans to a Danish Holding Company.
- > In most cases tax-free dividends from subsidiaries.
- > A large number of double taxation treaties.
- > Thoroughly tested holding structure and tax system.
- > Flexible workforce.

#### Tax regime in Denmark is attractive due to:

- > Free distribution of dividends from Denmark to a parent company in the EU and a country where Denmark has a double taxation treaty without Danish withholding tax:
- > Share owned by a Danish company can be disposed of without capital gains tax regardless of ownership period (from 2010)
- > Large number of double taxation treaties presenting possibilities to avoid withholding tax in foreign transactions:
- > No taxation on dividends received from a foreign or Danish subsidiary regardless of ownership period if the Danish Company owns at least 10% (from 2010).

Dividends paid to a Foreign Company from a Danish Holding Company are exempt from tax:

- > If the parent company owns at least 10% of the Danish Company regardless of ownership period (from 2010).
- > The parent company is covered by the EU parent subsidiary directive, or
- > The dividends are covered by one of Denmark tax treaties

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Our clients come from every corner of the globe. Different countries, different cultures. Just like us. We have more than 1,000 professionals in more than 20 countries worldwide. So we have the local knowledge and sensitivity to see things from your point of view.

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