

Income Tax

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

2010-21

**Revoked
Subsidiary
2006/036**

Regulations made under s.47M.

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

Revoked by LN. 2015/226 as from 1.1.2016¹

(LN. 2006/036)

1.4.2006*

Amending enactments	Relevant current provisions	Commencement date
None		

EU Legislation/International Agreements involved:

Directive 85/611/EEC

Directive 2001/34/EC

Directive 2003/48/EC

¹ *The revoking Regulations do not affect any right or obligation provided for under the Income Tax (Savings Income) (United Kingdom) Regulations 2006 in so far as such right or obligation arose before the commencement of these Regulations.*

* *Subjection to sub-regulation 1(3).*

2010-21

Revoked
Subsidiary
2006/036

Income Tax

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

ARRANGEMENT OF REGULATIONS.

Regulation

PART I **PRELIMINARY AND GENERAL**

1. Title, commencement and application.
2. Interpretation.
3. Definition of beneficial owner.
4. Definition of paying agent.
5. Election by an entity to be treated as a UCITS.
6. Definition of interest payments.

PART II **EXCHANGE OF INFORMATION AND WITHHOLDING TAX**

7. Withholding of tax by paying agents.
8. Identity and residence of beneficial owners.
9. Exceptions to withholding tax procedure.
10. Exchange of information.
11. Basis of assessment for withholding tax.
12. Negotiable debt securities.
13. Withholding tax revenue sharing.
14. Transitional exclusion of certain interest payments.

SCHEDULE **GOVERNMENT OR RELATED ENTITIES** **ACTING AS PUBLIC AUTHORITIES**

In exercise of the powers conferred on me by section 47M of the Income Tax Act and in order to give effect to the Agreement on the Taxation of Savings Income between Gibraltar and the United Kingdom of Great Britain and Northern Ireland signed on 19 December 2005 and matters connected therewith I have made the following Regulations:

PART I PRELIMINARY AND GENERAL

Title, commencement and application.

1.(1) These Regulations may be cited as the Income Tax (Savings Income) (United Kingdom) Regulations 2006.

(2) Subject to sub-regulation (3), these Regulations come into operation on 1 April 2006.

(3) The operation of these Regulations shall be conditional on the adoption and implementation by all the Member States of the European Union, by the United States of America, Switzerland, Andorra, Liechtenstein, Monaco and San Marino, and by all the relevant dependent and associated territories of the Member States of the European Union, respectively, of measures which conform with or are equivalent to those contained in the Directive or in these Regulations and providing for the same or earlier dates of implementation.

Interpretation.

2.(1) In this Act, unless the context otherwise requires—

“Agreement” means the Agreement on the Taxation of Savings Income between Gibraltar and the United Kingdom of Great Britain and Northern Ireland signed on 19 December 2005;

“beneficial owner” shall be construed in accordance with regulation 3;

“contracting party” means the United Kingdom or Gibraltar as the context may require;

“competent authority” means the Chief Secretary of the Government of Gibraltar;

“country” includes territory;

“interest payment” shall be construed in accordance with regulation 6;

**INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006**

“paying agent” shall be construed in accordance with regulation 4;

“Savings Directive” and “the Directive” mean Council Directive 2003/48/EC of 3rd June 2003 on taxation of savings income in the form of interest payments;

“Securities Directive” means Directive 2001/34/EC of 28th May 2001 on the admission of securities to official stock exchange listing and on information to be published on those securities as amended;

“transitional period” has the same meaning as in the Savings Directive, in other words, it means the period ending at the end of the first full fiscal year following the later of the following dates—

- (a) the date of entry into force of an agreement between the European Community, following a unanimous decision of the Council, and the last of the Swiss Confederation, the Principality of Liechtenstein, the Republic of San Marino, the Principality of Monaco and the Principality of Andorra, providing for the exchange of information upon request as defined in the OECD Model Agreement on Exchange of Information on Tax Matters released on 18 April 2002 (hereinafter the "OECD Model Agreement") with respect to interest payments, as defined in the Directive, made by paying agents established within their respective territories to beneficial owners resident in the territory to which the Directive applies, in addition to the simultaneous application by those same countries of a withholding tax on such payments at the rate defined for the corresponding periods referred to in Article 11(1) of the Directive;
- (b) the date on which the Council of the European Communities agrees by unanimity that the United States of America is committed to exchange of information upon request as defined in the OECD Model Agreement with respect to interest payments, as defined in this directive, made by paying agents established within its territory to beneficial owners resident in the territory to which the Directive applies;

“third country” means a country other than a contracting party;

“UCITS Directive” means Council Directive 85/611/EEC of 20th December 1985 on the co-ordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (“UCITS”) as amended;

(2) In these Regulations, a reference to an Article is a reference to the corresponding Article of the Agreement.

(3) A term used but not defined in these Regulations shall be construed in accordance with the Agreement.

Definition of beneficial owner.

3.(1) A "beneficial owner" means any individual who receives an interest payment or any individual for whom an interest payment is secured, unless he provides evidence that such payment was not received or secured for his own benefit, that is to say that—

- (a) he acts as a paying agent within the meaning of regulation 4; or
- (b) he acts on behalf of—
 - (i) a legal person;
 - (ii) an entity which is taxed on its profits under the general arrangements for business taxation;
 - (iii) a UCITS authorised in accordance with the UCITS Directive; or
 - (iv) an entity referred to in regulation 4(3) where it discloses the name and address of that entity to the economic operator making the interest payment and the latter communicates such information to the competent authority of the country of its establishment; or
- (c) he acts on behalf of another individual who is the beneficial owner and discloses to the paying agent the identity of that beneficial owner.

(2) Where the paying agent has information which suggests that the individual who receives an interest payment or for whom an interest payment is secured may not be the beneficial owner and where neither sub-regulation (1)(a) nor (b) applies to that individual, then sub-regulation (3) applies.

(3) Where this sub-regulation applies, the paying agent must—

- (a) take reasonable steps to establish who is the beneficial owner in accordance with regulation 8(2); and

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006

- (b) where the paying agent is unable to identify the beneficial owner, it shall treat the individual who receives an interest payment or for whom an interest payment is secured as the beneficial owner.

Definition of paying agent.

4.(1) The term "paying agent" shall be construed in accordance with sub-regulations (2) and (3).

(2) A paying agent is any economic operator who pays interest to or secures the payment of interest for the immediate benefit of a beneficial owner, whether the economic operator is the debtor of the debt claim which produces the interest or the economic operator charged by the debtor or the beneficial owner with paying interest or securing the payment of interest.

(3) Subject to sub-regulations (4) and (6), any entity established in a Contracting Party to which interest is paid or for which interest is secured for the benefit of a beneficial owner shall also be considered a paying agent upon such payment or securing of such payment.

(4) Sub-regulation (3) shall not apply where the economic operator has reason to believe, on the basis of official evidence produced by the entity referred to in sub-regulation (3), that—

- (a) it is a legal person, with the exception of the following persons—
 - (i) in Finland: avoin yhtiö (Ay) and kommandiittiyhtiö (Ky)/öppet bolag and kommanditbolag;
 - (ii) in Sweden: handelsbolag (HB) and kommanditbolag (KB);
- (b) its profits are taxed under the general arrangements for business taxation; or
- (c) it is a UCITS recognised in accordance with the UCITS Directive.

(5) Where an economic operator in Gibraltar pays interest to, or secures interest for, an entity referred to in sub-regulation (3) which is established in the United Kingdom and which is considered a paying agent under this regulation, the economic operator shall communicate the name and address of that entity and the total amount of interest paid to, or secured for, that

**INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006**

entity to the competent authority, which shall pass this information on to the competent authority of the United Kingdom.

(6) The entity referred to in sub-regulation (3) may be treated for the purposes of this Act as a UCITS as referred to in sub-regulation (4)(c), if it fulfils the condition in sub-regulation (7).

(7) The exercise of the option referred to in sub-regulation (6) shall require the entity to present to the paying agent or economic operator a certificate issued by the Contracting Party in which that entity is established that it is to be treated as if it were a UCITS recognised in accordance with the UCITS Directive.

(8) Where the economic operator and the entity referred to in this regulation are established in the same contracting party, that contracting party shall take the necessary measures to ensure that the entity complies with these Regulations when it acts as a paying agent.

Election by an entity to be treated as a UCITS.

5.(1) An entity established in Gibraltar may obtain a certificate to the effect that it is to be treated as a UCITS recognised in accordance with the UCITS Directive for the purposes of the Agreement in accordance with this regulation.

(2) A notice requesting the issue of a certificate shall be given to the competent authority by or on behalf of the entity.

(3) The notice shall include the following information—

- (a) the name and address of the entity;
- (b) where the notice is given on behalf of the entity, the name, address and position of the person giving notice;
- (c) a statement that the entity—
 - (i) is established in Gibraltar;
 - (ii) the entity is not a legal person;
 - (iii) the entity's profits are not taxed under general arrangements for business taxation;
 - (iv) the entity is not a UCITS recognised in accordance with the UCITS Directive; and

**INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006**

(v) the entity elects to be treated as if it were a UCITS recognised in accordance with the UCITS Directive for the purposes of the Savings Directive, and

(d) a signed and dated declaration by the person giving notice to the effect that it is to the best of his knowledge correct and complete.

(4) The competent authority will issue a certificate to that entity confirming that it is to be treated as if it were a UCITS recognised in accordance with the UCITS Directive for the purposes of the Agreement and that certificate shall have effect from the date specified in that certificate.

Definition of interest payments.

6.(1) In these Regulations "interest payment" means—

- (a) interest paid or credited to an account, relating to debt claims of every kind, whether or not secured by mortgage and whether or not carrying a right to participate in the debtor's profits, and, in particular, income from government securities and income from bonds or debentures, including premiums and prizes attaching to such securities, bonds or debentures; penalty charges for late payments shall not be regarded as an interest payment;
- (b) interest accrued or capitalised at the sale, refund or redemption of the debt claims referred to in paragraph (a);
- (c) income deriving from interest payments either directly or through an entity referred to in regulation 4(3) distributed by—
 - (i) a UCITS authorised in accordance with the UCITS Directive;
 - (ii) entities which qualify for the option under regulation 4(6);
 - (iii) undertakings for collective investments established outside the territory of the European Community;
- (d) income realised upon the sale, refund or redemption of units or shares in undertakings and entities set out in paragraph (c)(i) to (iii) investing directly or indirectly through like undertakings and entities more than 40 % of their assets in debt claims as referred to in paragraph (a).

(2) Income mentioned under sub-regulation (1)(d) is included in the definition of interest only to the extent that such income corresponds to gains directly or indirectly deriving from interest payments within the meaning of sub-regulation (1)(a) and (b).

(3) The following shall not constitute an interest payment—

- (a) any income falling within sub-regulation 1(c) and (d), where the investment whether direct or indirect in debt claims referred to in sub-regulation 1(a) of entities referred to in sub-regulation 1(c)(i) to (iii) established within Gibraltar which has also provided for this derogation has not exceeded 15 % of their assets;
- (b) one falling within sub-regulation (6), where interest has been paid or credited to an account of an entity referred to in regulation 4(3) which has not qualified for the option under regulation 4(6) and is established within Gibraltar, where the investment whether direct or indirect of such an entity in debt claims referred to in sub-regulation 1(a) has not exceeded 15 % of its assets.

(4) Where a paying agent has no information concerning the proportion of income falling under sub-regulation (1)(c) and (d) which derives from interest payments, the total amount of the income shall be considered an interest payment.

(5) In respect of interest payments described in sub-regulation (1)(d)—

- (a) where a paying agent has no information concerning the percentage of the assets invested in debt claims or in shares or units as defined in sub-regulation (1)(d), that percentage shall be considered to be above 40 %;
- (b) where a paying agent cannot determine the amount of income realised by the beneficial owner, the income shall be deemed to correspond to the proceeds of the sale, refund or redemption of the shares or units.

(6) When interest as defined in sub-regulation (1) is paid to or credited to an account held by an entity to which regulation 4(3) applies, such entity not having qualified for the option under regulation 4(6), it shall be considered an interest payment by such entity.

2010-21

**Revoked
Subsidiary
2006/036**

Income Tax

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

(7) From 1 January 2011 sub-regulations (1)(d) and (5) shall have effect with the substitution of “25”% for “40”%.

(8) The percentages referred to in sub-regulation (1)(d) and (3) shall be determined by reference to the investment policy as laid down in the fund rules or instruments of incorporation of the undertakings or entities concerned and, failing which, by reference to the actual composition of the assets of the undertakings or entities concerned.

PART II EXCHANGE OF INFORMATION AND WITHHOLDING TAX

Withholding of tax by paying agents.

7. Subject to regulation 9, during the transitional period interest payments made by a paying agent established in Gibraltar to beneficial owners resident in the United Kingdom shall be subject to withholding tax from the amount of interest payment at the following rates—

- (a) 15% until 30 June 2008;
- (b) 20% for the subsequent three years;
- (c) 35% thereafter.

Identity and residence of beneficial owners.

8.(1) Where a paying agent makes an interest payment to an individual whom he believes to be a beneficial owner, the paying agent shall establish the identity and residence of the beneficial owner in the manner provided in this regulation.

(2) The paying agent shall establish the identity of the beneficial owner as follows—

- (a) for contractual relations entered into before 1 January 2004, the paying agent shall establish the identity of the beneficial owner, consisting of his name and address, by using the information at its disposal, in particular pursuant to the Drug Trafficking (Money Laundering) Regulations 1995 and the Criminal Justice Act 1995 as amended from time to time;
- (b) for contractual relations entered into, or transactions carried out in the absence of contractual relations, on or after 1 January 2004, the paying agent shall establish the identity of the

**INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006**

beneficial owner, consisting of the name, address and, if there is one, the tax identification number allocated by the contracting party of residence for tax purposes.

(3) The details required pursuant to sub-regulation (2)(b), shall be established as follows—

- (a) on the basis of the passport or of the official identity card presented by the beneficial owner;
- (b) if the address does not appear on the documents set out in paragraph (a), it shall be established on the basis of any other documentary proof of identity presented by the beneficial owner;
- (c) if the tax identification number is not mentioned on the passport, on the official identity card or any other documentary proof of identity, including, possibly, the certificate of residence for tax purposes, presented by the beneficial owner the identity shall be supplemented by a reference to the latter's date and place of birth established on the basis of his passport or official identification card.

(4) Subject to sub-regulations (5) and (6), residence shall be considered to be situated in the country where the beneficial owner has his permanent address.

(5) The paying agent shall establish the residence of the beneficial owner as follows—

- (a) for contractual relations entered into before 1 January 2004, the paying agent shall establish the residence of the beneficial owner by using the information at its disposal, in particular pursuant to the Drug Trafficking (Money Laundering) Regulations 1995 and the Criminal Justice Act 1995 as amended from time to time;
- (b) for contractual relations entered into, or transactions carried out in the absence of contractual relations, on or after 1 January 2004, the paying agent shall establish the residence of the beneficial owner on the basis of the address mentioned on the passport, on the official identity card or, if necessary, on the basis of any documentary proof of identity presented by the beneficial owner.

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006

(6) Where sub-regulation (5)(b) applies and the individual presents a passport or official identity card issued by a Contracting Party but declares his country of residence to be in a third country—

- (a) the paying agent shall establish the country of residence by means of a certificate of residence for tax purposes issued by the competent authority of the third country in which the individual claims to be his country of residence;
- (b) if the individual fails to present such a certificate, the contracting party that issued the passport or other official identity document shall be considered to be the country of residence.

(7) The beneficial owner may present a certified copy of any of the documents referred to in this regulation.

Exceptions to withholding tax procedure.

9.(1) A beneficial owner resident in the United Kingdom may request that no tax be withheld in accordance with regulation 7 where the following conditions are met, namely—

- (a) he expressly authorizes his paying agent to report all interest payments made by a particular paying agent to the competent authority; or
- (b) he presents to his paying agent a certificate drawn up in his name by the competent authority of the United Kingdom in accordance with article 2(2) of the Agreement.

(2) Where sub-regulation (1)(a) applies, the competent authority shall communicate to the competent authority of the United Kingdom the following information—

- (a) the identity and residence of the beneficial owner established in accordance with these Regulations;
- (b) the name and address of the paying agent;
- (c) the account number of the beneficial owner or, where there is none, identification of the debt claim giving rise to the interest;
- (d) the total amount of interest or income, or the total amount of the proceeds from sale, redemption or refund.

Exchange of information.

10.(1) The competent authority shall transmit the information referred to in regulation 9(2) to the competent authority of the United Kingdom of residence of the beneficial owner.

(2) Transmissions of information under sub-regulation (1) shall take place within six months following the end of the tax year in which the payment was made.

(3) The provisions of section 4B (1), (3), (6), (6A) and (7) of the principal Act shall apply to the exchange of information under these Regulations.

Basis of assessment for withholding tax.

11.(1) This regulation applies where tax is withheld by a paying agent in accordance with regulation 7.

(2) Where this regulation applies, tax shall be withheld as follows—

- (a) in the case of an interest payment within the meaning of regulation 6(1)(a), tax shall be withheld on the gross amount of interest paid or credited;
- (b) in the case of an interest payment within the meaning of regulation 6(1)(b) or (d) tax shall be withheld on the amount of interest or income referred to in regulation 6(1)(b) or (d) or by a levy of equivalent effect to be borne by the recipient on the full amount of the proceeds of the sale, redemption or refund;
- (c) in the case of an interest payment within the meaning of regulation 6(1)(c) tax shall be withheld on the amount of interest referred to in that paragraph;
- (d) in the case of an interest payment within the meaning of regulation 6(6), tax shall be withheld on the amount of interest attributable to each of the members of the entity referred to in regulation 4(3) who meet the conditions of regulation 3(1).

(3) For the purposes of sub-regulation (1)(a) and (b)—

- (a) the withholding tax shall be deducted on a pro rata basis to the period during which the beneficial owner held the claim; and
- (b) where the paying agent is unable to determine the period of holding on the basis of the information made available to him,

**INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006**

the paying agent shall treat the beneficial owner as having been in possession of the debt claim for the entire period of its existence, unless the latter provides evidence of the date of the acquisition.

(4) During the transitional period, an economic operator paying interest to, or securing interest for, an entity referred in regulation 4(3) established in the United Kingdom shall be considered the paying agent in place of the entity and shall levy the withholding tax on that interest, unless the entity has formally agreed to its name, address and the total amount of the interest paid to it or secured for it being communicated in accordance with regulation 4(5).

Negotiable debt securities.

12.(1) During the transitional period but up until and including 31 December 2010 at the latest, domestic and international bonds and other negotiable debt securities to which sub-regulation (2) applies shall not be considered to be debt claims within the meaning of these Regulations.

(2) This sub-regulation applies to domestic and international bonds and other negotiable debt securities—

- (a) which were first issued before 1 March 2001; or
- (b) for which the original prospectus was approved before that date by—
 - (i) the competent authorities established by the Member States and Gibraltar for the purposes of the Securities Directive; or
 - (ii) the responsible authorities in third countries:

Provided that no further issue of such domestic and international bonds and other negotiable debt securities are made on or after 1 March 2002.

(3) Should the transition period continue beyond the date referred to in sub-regulation (1), sub-regulations (1) and (2) shall continue to apply but only in respect of such negotiable debt securities—

- (a) which contain gross-up and early redemption clauses; and
- (b) where the paying agent is established in Gibraltar and that paying agent pays interest to, or secures the payment of interest

Income Tax

2010-21

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

**Revoked
Subsidiary
2006/036**

for the immediate benefit of, a beneficial owner resident in the United Kingdom.

- (4) Where a further issue is made on or after 1 March 2002 of an aforementioned negotiable debt security issued by—
- (a) a government or a related entity acting as a public authority or whose role is recognised by an international treaty, as defined in the Schedule, the entire issue of such security, consisting of the original issue and any further issue, shall be considered a debt claim within the meaning of these Regulations;
 - (b) a corporate issuer, such further issue shall be considered a debt claim within the meaning of these Regulations.

Withholding tax revenue sharing.

13.(1) 25% of the tax withheld under regulation 7 and 11(3) shall be paid into the Consolidated Fund with the remaining 75% transferred to the Government of the United Kingdom.

(2) Transfers under sub-regulation (1) shall take place for each year in one installment at the latest within a period of 6 months following the end of the year of assessment established in accordance with section 2 of the Income Tax Act.

Transitional exclusion of certain interest payments.

14. Without prejudice to the provisions of regulation 12, regulations 7, 9, 10 and 11 shall not apply in the case of savings income paid or credited to an account before 1 April 2007 provided—

- (a) the savings income relates to an instrument issued, or an account opened, or the current terms of which were agreed on or before 19 December 2005 with an effective date no later than 21 December 2005; and
- (b) the instrument or account is for a fixed term and its terms have not been varied since 19 December 2005.

2010-21

**Revoked
Subsidiary
2006/036**

Income Tax

**INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM)
REGULATIONS 2006
SCHEDULE**

Regulation 12

GOVERNMENT OR RELATED ENTITIES ACTING AS PUBLIC AUTHORITIES

For the purposes of regulation 12(4)(a), an entity is “a related entity acting as a public authority or whose role is recognised by an international treaty” if it is listed in Part 1 or Part 2 below or it is situated in a third country and meets the following criteria—

- (a) the entity is clearly considered to be a public entity according to the national criteria;
- (b) such public entity is a non-market producer which administers and finances a group of activities, principally providing non-market goods and services, intended for the benefit of the community and which are effectively controlled by general government;
- (c) such public entity is a large and regular issuer of debt; and
- (d) the State concerned is able to guarantee that such public entity will not exercise early redemption in the event of gross-up clauses.

PART 1

ENTITIES WITHIN THE EUROPEAN UNION

Member State

Belgium

Entity

Vlaams Gewest (Flemish Region)

Région wallonne (Walloon Region)

Région bruxelloise/Brussels Gewest (Brussels Region)

Communauté française (French Community)

Vlaamse Gemeenschap (Flemish Community)

Deutschsprachige Gemeinschaft (German-speaking Community)

Member State

France

Income Tax

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

2010-21

**Revoked
Subsidiary
2006/036**

Entity

La Caisse d'amortissement de la dette sociale (CADES) (Social Debt Redemption Fund)

L'Agence française de développement (AFD) (French Development Agency)

Réseau Ferré de France (RFF) (French Rail Network)

Caisse Nationale des Autoroutes (CNA) (National Motorways Fund)

Assistance publique Hôpitaux de Paris (APHP) (Paris Hospitals Public Assistance)

Charbonnages de France (CDF) (French Coal Board)

Entreprise minière et chimique (EMC) (Mining and Chemicals Company)

Member State

Greece

Entity

Οργανισμος Τηλεπικοινωνιων Ελλαδος □ (National Telecommunications Organisation)

Οργανισμος Σιδηροδρομων Ελλαδος (National Railways Organisation)

Δημοσια Επιχειρηση Ηλεκτρισμου (Public Electricity Company)

Member State

Italy

Entity

Regions

Provinces

Municipalities

Cassa Depositi e Prestiti (Deposits and Loans Fund)

Member State

Latvia

Entity

Pašvaldības (local government)

Member State

2010-21

Revoked
Subsidiary
2006/036

Income Tax

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

Poland

Entity

gminy (communes)
powiaty (districts)
województwa (provinces)
związku gmin (associations of communes)
powiatów (association of districts)
województw (association of provinces)
miasto stołeczne Warszawa (capital city of Warsaw)
Agencja Restrukturyzacji I Modernizacji Rolnictwa (Agency for
Restructuring and Modernisation of Agriculture)
Agencja Nieruchomości Rolnych (Agricultural Property Agency)

Member State

Portugal

Entity

Região Autónoma de Madeira (Autonomous Region of Madeira)
Região Autónoma dos Açores (Autonomous Region of Azores)
Municipalities

Member State

Slovakia

Entity

mestá a obce (municipalities)
Železnice Slovenskej republiky (Slovak Railway Company)
Štátny fond cestného hospodárstva (State Road Management Fund)
Slovenské elektrárne (Slovak Power Plants)
Vodohospodárska vystavba (Water Economy Building Company)

Member State

Spain

Entity

Xunta de Galicia (Regional Executive of Galicia)
Junta de Andalucía (Regional Executive of Andalusia)
Junta de Extremadura (Regional Executive of Extremadura)

Income Tax

2010-21

**Revoked
Subsidiary
2006/036**

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

Junta de Castilla-La Mancha (Regional Executive of Castilla-La Mancha)
Junta de Castilla-León (Regional Executive of Castilla-León)
Gobierno Foral de Navarra (Regional Government of Navarra)
Govern de les Illes Balears (Government of the Balearic Islands)
Generalitat de Catalunya (Autonomous Government of Catalonia)
Generalitat de Valencia (Autonomous Government of Valencia)
Diputación General de Aragón (Regional Council of Aragon)
Gobierno de las Islas Canarias (Government of the Canary Islands)
Gobierno de Murcia (Government of Murcia)
Gobierno de Madrid (Government of Madrid)
Gobierno de la Comunidad Autónoma del País Vasco/Euzkadi (Government of the Autonomous Community of the Basque Country)
Diputación Foral de Guipúzcoa (Regional Council of Guipúzcoa)
Diputación Foral de Vizcaya/Bizkaia (Regional Council of Vizcaya)
Diputación Foral de Alava (Regional Council of Alava)
Ayuntamiento de Madrid (City Council of Madrid)
Ayuntamiento de Barcelona (City Council of Barcelona)
Cabildo Insular de Gran Canaria (Island Council of Gran Canaria)
Cabildo Insular de Tenerife (Island Council of Tenerife)
Instituto de Crédito Oficial (Public Credit Institution)
Instituto Catalán de Finanzas (Finance Institution of Catalonia)
Instituto Valenciano de Finanzas (Finance Institution of Valencia)

PART 2

INTERNATIONAL ENTITIES

European Bank for Reconstruction and Development
European Investment Bank
Asian Development Bank
African Development Bank
World Bank/IBRD/IMF
International Finance Corporation
Inter-American Development Bank
Council of Europe Social Development Fund
Euratom
European Community
Corporación Andina de Fomento (CAF) (Andean Development Corporation)
Eurofima
European Coal and Steel Community
Nordic Investment Bank
Caribbean Development Bank

2010-21

Revoked
Subsidiary
2006/036

Income Tax

INCOME TAX (SAVINGS INCOME) (UNITED KINGDOM) REGULATIONS 2006

Note: The provisions of regulation 12 are without prejudice to any international obligations that member States may have entered into with respect to the international entities listed in Part 2.