**Corporate Tax Haven Index 2019**

**San Marino**

**Rank:** #59

**Corporate Tax Haven Indicators**

1. **Lowest Available Corporate Income Tax** 51
2. **Loopholes and gaps** 40
3. **Foreign Investment Income Treatment** 75
4. **Loss Utilisation** 0
5. **Capital Gains Taxation** 51
6. **Sectoral Exemptions** 38
7. **Tax Holidays and Economic Zones** 25
8. **Patent Boxes** 90
9. **Fictional Interest Deduction** 0

**Transparency**

9. **Public Company Accounts** 100
10. **Country by Country Reporting** 100
11. **Local Filing of Country by Country Reporting** 100
12. **Tax Rulings and Extractive Contracts** 100
13. **Reporting of Tax Avoidance Sheet** 100
14. **Tax Court Secrecy** 100

**Anti-avoidance**

15. **Deduction Limitation for Interest** 100
16. **Deduction Limitation for Royalties** 100
17. **Deduction Limitation for Service Payments** 100
18. **Dividend Withholding Taxes** 100
19. **Controlled Foreign Company Rules** 100

**20. Double Tax Treaty Aggressiveness** 16

**Corporate tax haven score:** 62/100

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