

Content

Title :	Offshore Banking Act 
Date :	2025.07.16
Legislative :	9. Amendment to Article 22-16 promulgated per Presidential Order No. Hua-Zong-Yi-Jing-Zi-11400070331 dated July 16, 2025
Content :	<p>Article 22-16</p> <p>Income from offshore insurance businesses operated by offshore insurance branches shall be exempt from business income tax. However, income derived from utilization of funds within the territory of the ROC shall be subject to taxation or exemptions as specified in the Income Tax Act.</p> <p>Sales revenue from offshore insurance businesses operated by offshore insurance branches shall be exempt from business tax. However, sales revenue generated from utilization of funds within the territory of the ROC shall be subject to taxation or exemption as specified in the Value-Added and Non-Value-Added Business Tax Act.</p> <p>All types of certificates used in offshore insurance businesses operated by offshore insurance branches shall be exempt from stamp tax. However, certificates issued in connection with utilization of funds within the territory of the R.O.C shall be subject to taxation or exemption as specified in the Stamp Tax Act.</p> <p>Insurance benefits, interest generated on investment objects linked to investment-type insurance contracts or income derived from structured product transactions paid by offshore insurance branches to natural persons, juristic persons, government agencies or financial institutions outside the territory of the ROC in connection with their offshore insurance businesses shall be exempt from income tax withholding.</p> <p>The exemptions from business income tax, business tax, stamp tax, and income tax withholding under the preceding four paragraphs shall be in force from February 6, 2015 to December 31, 2035. However for insurance contracts entered during the aforementioned period, the exemption period shall not exceed 30 years from the time the contract is entered to the time the effective period of the contract expires.</p> <p>The scope of fund utilization within the territory of the ROC mentioned in the proviso of paragraphs 1 to 3 hereof shall be set by the FSC in consultation with the Ministry of Finance.</p>

Data Source : Financial Supervisory Commission Laws and Regulations Retrieving System