



**DOING
BUSINESS**
IN MEXICO

2020

VTZ

VAZQUEZ TERCERO & ZEPEDA
ABOGADOS



TAXATION INTRODUCTION

As a result of Mexico's Trade and Investment Promotion Agency -PROMEXICO– extinguishment, **Vázquez Tercero & Zepeda (VTZ)** seeks to fill that void and promote Mexico as a business destination.

This is why **VTZ** has developed the guide **Doing Business in Mexico 2020**, which is divided into the following seven chapters:

1. *Why Invest in Mexico?*
2. *Foreign Investment.*
3. *International Trade Policy.*
4. *Trade Policy for the Manufacturing Industry.*
5. *Creating a Company in Mexico.*
6. *Taxation.*
7. *Labor & Migration.*

In line with our values, our chapters seek to provide relevant business and legal information in a practical and concise manner. This chapter, *Taxation*, our member **Jorge Montes** will provide a general overview of the main Mexican taxes focused on foreign individuals and/or legal entities, including rules on permanent establishment, tax withholding, among other tax obligations.

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6. Taxation in Mexico

As noted in [Chapter 1 – Why Invest in Mexico?](#) Mexico is a Federation made up of 32 States, and each State, in turn, is made up of municipalities. The Mexican constitution establishes the jurisdiction for each level of government and, thus, different taxes apply. Federal taxes are the primary level of taxation in Mexico, while States and municipal (local) taxes are more limited. Needless to say, States and municipalities, to a great extent, receive budget allocations from federal taxes that are collected within their borders.

The Tax Administration Service (SAT, acronym in Spanish) is the relevant government body or agency in charge of collecting federal taxes as well as surveilling compliance. At a local level, States and Municipalities have their own treasuries that enforce their local Tax Law. However, the Federal government and a State government may enter into tax coordination agreements, whereby the State is entitled to audit and collect federal taxes.

6.1 Overview: Main Taxes

The main federal and local taxes in Mexico are the following:

Federal taxes

1. **Income Tax** (ISR, acronym in Spanish): The corporate tax is 30%, individuals are subject to rates ranging from 1.92% to 35%.
2. **Value Added Tax** (IVA, acronym in Spanish): The standard rate is 16%, and 0% rate is applicable in certain activities.
3. **Tariffs or Import duties** (See Chapter 3 – [International Trade Policy](#))
4. **Special Tax on Production and Services** (IEPS, acronym in Spanish): The tax may be expressed as a percentage, ranging from 3% to 160%, specific, or a compound tax.
5. **Social Security**: An employer is subject to social security taxes that can represent between 25% and 30% of the employee's salary.

Local taxes

1. **Taxes on Real-Estate or Land**: The States have in place a **Property Acquisition Tax**. The buyer of a house, land, building, apartment, or any type of real-estate property is responsible for paying said tax. The applicable tax may vary from State to State, but the average is a 2% rate. However, the Property Acquisition Tax may reach 6.5% on the sale price in some states.
2. **Payroll Tax**: States have in place the Payroll Tax on wages and other expenditures that derives from an employment relationship. The tax rate may vary from State to State, but such tax normally amounts to 2% and 3% on the wage paid.

6.2 Residents and non-residents in Mexico for tax purposes.

Foreigners are individuals or entities that are normally subject to the tax law legislation of another country for reasons such as nationality, address, place of residence, or business, among other criteria. Mexican Tax Law, however, establishes a set of rules whereby a foreign individual or entity is considered as a resident –for tax purposes– in Mexico (hereon referred to as “tax resident”).

6.2.1. Residents in Mexico

The individuals, whether Mexicans or foreigners, that have their home in Mexico are tax residents. Furthermore, an individual without a home can still be a tax resident when, for instance, his or her “place of professional activities” is located in Mexico or more than 50% of his or her annual income comes from Mexico.

As for legal entities, a company incorporated in Mexico is a tax resident. Foreign entities are tax residents when their main place of business or corporate address is in Mexico.

6.2.2. Non-residents in Mexico

Individuals or legal entities that are non-residents may, under certain circumstances, be subject to Mexican taxes. For instance, a foreign individual or entity is subject to Mexican taxes when he or she has a “permanent establishment” in Mexico or obtains income from any source of wealth located in Mexico. A permanent establishment, in general terms, is any business place where activities are partially or totally developed or where independent personal services are offered. The law lists examples of permanent establishments in Mexico, including the following:

1. Branches;
2. Agencies;
3. Offices;
4. Factories;
5. Installations;
6. Mines; and
7. Any place where exploration, extraction or exploitation of natural resources activities are carried out;

We highlight that the previous list is non-exhaustive. A foreign resident may, nevertheless, establish a permanent establishment when it has a representative or non-independent agent in Mexico.

6.3 Income Tax

Depending on the “tax-residency” status, the income tax may apply to all the income or the income attributable to the permanent establishment or source of wealth as follows:

1. Residents in Mexico’s income is subject to the income tax in its entirety, regardless of its origin or source.
2. If a non-resident has a permanent establishment in Mexico, the income attributable to the permanent establishment is subject to the income tax.
3. If a non-resident has a source of wealth in Mexico, the income attributable to the source of wealth is subject to the income tax. In Section 6.3.3, we will discuss this aspect in greater detail.

6.3.1 Individuals and the Income Tax

As noted above, individuals that are tax residents are subject to the income tax, which varies between 1.92% and 35% on the annual income. The income gained from wages, business and professional activities, real estate leasing, property sales, interests, dividends, lottery prizes, among others, are subject to the income tax rate.

6.3.2 Companies and the Income Tax

Companies that are residents in Mexico or foreign entities that have a permanent establishment determine their income tax considering the 30% rate on the profit obtained in the tax year.

We highlight that dividends are subject to a withholding tax in Mexico and, therefore, the effective tax rate for the shareholder may be more than 40%.

6.3.2.1 Tax Incentives

The Income Tax Law provides the existence of tax incentives. In general terms, the incentives allow companies that meet the requirements to pay less income tax or defer the payment date. For example, a company may receive a tax credit of 30% due to the total spending on research and development activities. A company that performs any of the following acts or activities may benefit from tax incentives:

1. Hiring individuals with different or special abilities;
2. National Film production investment;
3. Theater production investment;
4. Edition and publication of literary work;
5. Visual Arts
6. Research and development of technology;
7. High-performance sports;
8. Real estate developments;
9. Installation of power equipment for electric vehicles.

6.3.2.1.1 IMMEX

A special tax regime is available to “pure” IMMEX or maquiladora companies, i.e. foreign-owned maquiladoras. As noted in Chapters [Trade Policy in Mexico](#) and [Policy for the Manufacturing Industry](#), a foreign investor that seeks to establish a maquiladora (or IMMEX company) may avoid creating a permanent establishment in Mexico and, thus, benefit from a special tax “regime”. If the conditions are met, the Income Tax law provides two alternatives to calculate the income tax of a “pure” maquiladora that are the “safe harbor” rules or an advance pricing agreement (APA). IMMEX companies normally opt for the safe harbor rule.

1. Safe Harbor for an IMMEX/Maquiladora Companies

The “safe harbor” rule entails that an IMMEX/maquiladora company must calculate its taxable income per the following two methodologies and pay the highest result:

1. The IMMEX company will apply a 6.9% rate on the value of its assets. The assets include all fixed assets and raw materials employed in the maquila operations, as well as the inventory, including foreign-owned assets or goods.
2. The IMMEX company will apply a 6.5% rate on its costs and expenses, which includes operating costs and expenses as calculated under the Mexican GAAP.

2. Advance Price Agreement for an IMMEX/Maquiladora Company

One option that IMMEX or maquiladoras companies can take, instead of applying the Safe Harbor rule, is requesting the tax authorities to authorize a profit margin on their specific operation, determined through a transfer pricing study.

The IMMEX company will have to submit information, data, and the necessary documentation regarding the methodology used for determining transaction prices with related parties to the tax authorities. If the submission is complete, the tax authorities will issue its ruling. These rulings may stem from an agreement with the competent tax authorities of a country that has a Bilateral Tax Treaty with Mexico.

These ruling are valid in the tax year when the request was submitted or the immediately preceding year, and for up to the following three tax years. Needless to say, COVID-19 poses serious challenges to obtain an advance price agreement.

6.3.2.1.2 Tax Incentives for the Northern Border Region

Since the new Mexican government took office in 2018, a program with tax incentives for certain taxpayers that have their tax address in the Northern Border Region of Mexico, adjacent to the United States of America. The program concludes on December 31, 2020, unless its validity is extended. Needless to say, the “pure” IMMEX/maquiladora companies, i.e. foreign-owned entities, cannot benefit from this program because they already benefit from tax incentives in the calculation of their income tax (see above).

In general terms, the tax incentive provides the following benefits:

- a) Income Tax for companies is determined by applying the 20% rate on profit, instead of the 30% rate.
- b) The Value Added Tax is determined by applying an 8% rate instead of the 16% rate on the value of operations.

A company must meet several requirements to apply these incentives, including the following:

- a) Having their tax address in the northern border region of Mexico.
- b) Obtaining at least 90% of their income from operations carried out in the border region.
- c) Having evidence that it timely fulfills its tax obligations.
- d) The company that applies for this incentive may not apply for another tax incentive.

6.3.3. Foreign Resident Earning Income from Mexican Sources of Wealth

A foreign resident who earns income in cash, kind, services, or credit shall pay income tax when said income arises from sources of wealth located in Mexico, even if he or she does not have a permanent establishment in Mexico or when the income is not attributable to their permanent establishment.

In this case, the income tax payment is considered as “definitive”, and it shall be paid by filing a tax return at the authorized offices.

When foreign residents earn income as beneficiaries of a Trust, created in accordance with Mexican law, the trustee shall calculate the taxable income for each foreign resident and withhold the tax that would have been applicable as if they had earned said income directly.

Below are some assumptions in which a foreigner must pay an income tax in Mexico, even if he or she does not have a permanent establishment in Mexico.

6.3.3.1 Salary Income of Foreign Residents

When the service is rendered in the country, the law considers that the source of wealth of the salary is from Mexico.

Tax Rate

The tax shall be calculated by applying the following rates to the income:

- I. The first \$125,900.00 Mexican pesos earned in the calendar year are exempted.
- II. A 15% rate shall apply to income received in the calendar year when more than \$125,900.00 Mexican pesos are earned and up to \$1,000,000.00 Mexican pesos.
- III. A 30% rate shall apply to income received in the calendar year when more than \$1,000,000.00 Mexican pesos are earned.

The person (or employer) who pays the salary shall withhold the tax if he or she is a Mexican resident. Otherwise, the foreign taxpayer (i.e. employee) shall pay the income tax directly by filing a tax return within fifteen days following after earning the income.

Salary Income Exemption

Salary income is exempted from the income tax if the employee remains in Mexico less than 183 calendar days, whether consecutive or otherwise, in a twelve-month period.

A taxpayer shall continue paying the income tax until proving that he or she has remained outside of Mexico for more than 183 consecutive days.

6.3.3.2. Professional or Service Fees as income of Foreign Residents

When the service is rendered in Mexico, the law considers that the source of wealth of the fees is from Mexico. When a portion of the service is performed in Mexican territory, the service is presumed to be rendered totally in Mexico unless the taxpayer proves otherwise. If a portion of the services was rendered abroad, the taxpayer shall calculate the tax considering the corresponding portion of the services performed in Mexico.

Payments to Related Parties

When a resident or a foreign resident with a permanent establishment in Mexico pays service fees to a related-party, the law presumes that the services were rendered totally in Mexican territory and, thus, are subject to the income tax.

Income Tax Withholding

The beneficiary of the services must calculate the income tax applying a 25% rate to the total income earned, without any deductions. In fact, the beneficiary of the services, who is a Mexican resident, shall withhold the resulting tax when making the fee payment. Otherwise, the “foreign” service provider shall pay the corresponding tax when filing their tax return within fifteen days following the day when income is earned. The “foreign” service provider who receives income of these types shall be required to issue tax invoices.

Exempt Fees Income

Income resulting from fees are exempted from the income tax when the service provider (as an individual) remains in Mexico less than 183 calendar days, whether consecutive or otherwise, in a twelve-month period.

6.3.3.3. Payments to Members of the Board of Directors, Statutory Audit Committees, among others, who are Foreign Residents

When a Mexican company or a foreign company with a permanent establishment in Mexico pays a member of the board of directors, statutory audit committee, or any other board or committee, the Law considers that the source of wealth of such fees is from Mexico.¹

In the case of remuneration of any kind received by members of boards of directors, statutory audit committees, advisory boards, and members of boards or committees of any other kind, as well as fees paid to administrators, statutory auditors, and general managers, the source of wealth shall be considered to be in Mexican territory when said income is paid in Mexico or abroad by Mexican resident enterprises.

Income Tax Withholding

The company shall calculate the tax applying the 25% rate on the total income earned, without any deductions; and, the company must withhold the tax.

¹ This includes fees paid to administrators, statutory auditors, and general managers. The source of wealth is considered to be from Mexico when said income is paid in Mexico or abroad by an enterprise that is a Mexican resident.

6.3.3.4. Leasing Real Estate of Foreign Residents

When income is obtained from granting the right to use or enjoy temporary real estate located in Mexico, the law considers that the source of wealth is, of course, from Mexican territory.

Income Tax Withholding

The person paying, for instance, a fee shall calculate the income tax applying the 25% rate on total income earned, without any deductions. Furthermore, the person making the payment shall withhold the corresponding tax.

If the person making the payments is a foreign resident, the foreign resident shall pay the tax within fifteen days after receiving the income.

Taxpayers earning income as a result of granting the right to temporarily use or enjoy real estate located in Mexico are required to issue tax invoices to the lessee. When said income is received through trusts, the trustee is required to issue the respective tax invoice and withhold the income tax applicable to the beneficiary.

6.3.3.5. Leasing Movable Goods of Foreign Residents

Regarding income from granting the temporary use and enjoyment of movable goods, the source of wealth shall be considered to be in Mexican territory when the personal property is used for commercial, industrial, agricultural, livestock, or fishing activities in Mexico.

Unless demonstrated otherwise, the personal property shall be presumed to be used in Mexico in the aforementioned activities when the party who uses or enjoys the property is a Mexican resident or a foreign resident with a permanent establishment in Mexican territory.

Withholding of Income Tax

For purposes of the preceding paragraph, the tax shall be calculated by applying the 25% rate on total income earned, without any deductions, and the person that makes the payment shall withhold the tax. In the case of containers, trailers and semi-trailers that are temporarily imported for up to a month pursuant to the Customs Law, as well as airplanes and ships that have a Federal Government concessions or permit for commercial operation, the tax shall be calculated by applying the 5% rate, provided that said goods are used directly by the lessee to transport passengers or goods.

6.3.3.6. Sale of Real Estate and Foreign Residents

When income is obtained from a sale of real estate located in Mexico, the law considers that the source of wealth is, of course, from Mexican territory.

Withholding of Income Tax

If the purchaser is a Mexican resident or a foreign resident with a permanent establishment in Mexico, he or she must calculate the tax applying a 25% rate to all the income earned, without any deductions; furthermore, the purchaser has to withhold the income tax.

The tax shall be calculated by applying the 25% rate to all income earned, without any deductions, and if the acquirer is a Mexican resident or a foreign resident with a permanent establishment in Mexico, he shall withhold income tax; otherwise, the seller shall pay the tax by filing a tax return within fifteen days after income is earned.

Available Options when the Taxpayer has a Representative in Mexico

In cases where sales are recorded in a notarial deed, a seller that has a representative in Mexico may opt to apply a 35% rate to the profit obtained.

Difference between Appraisal and Price

When the tax authority performs an appraisal and the appraised value exceeds more than 10% of the sales value, the excess is considered as an income for the foreign resident purchaser. Hence, the involved foreign resident purchaser has to calculate a tax applying a 25% rate on the entire excess, without any deductions.

Free Acquisitions

In the case of a free acquisition, the acquirer shall calculate a tax applying a 25% rate to the total appraised value of the real property, without any deductions.

Income Tax for Sales in Installments

When a sale is recorded in notarial deed and installment payments for over 18 months are agreed, the seller may opt to pay the income tax when an installment is payable provided that the tax liability is secured; certain conditions apply.

6.3.3.7. Sales of Shares and Securities and Foreign Residents.

When income is obtained from a sale of shares or securities, either issued by a Mexican resident or when 50% of their accounting value derives directly or indirectly from a real estate located in Mexico, the law considers that the source of wealth is from Mexican territory.

Tax Rate

The foreign resident's income resulting from the total amount of shares or securities transaction is subject to a 25% tax rate, without any deductions.

Income Tax Withholding

If the purchaser is a Mexican resident or foreign resident with a permanent establishment in Mexico, he or she must calculate and withhold the applicable income tax. In all other cases where the seller is a Mexican tax resident, the taxpayer shall pay the corresponding tax by filing a tax return within fifteen days after income is earned.

Options Available when the Foreign Resident has a Representative in Mexico

Taxpayers, who have a representative in Mexico, may opt to apply a 35% tax rate to the profit (rather than income) obtained as a result of the sale of the shares or securities.

Accountant's Report

The taxpayer that opts to apply the 35% tax rate mentioned above, he or she must file a report prepared by a certified public accountant.

Sales of Shares Through Stock Exchanges

In the case of the sale of shares issued by a public Mexican company in a Stock Exchange Institution, the financial broker will apply a 10% withholding tax based on the gain (i.e. profit) of the sale.

Income Tax Withholding

For purposes of the tax described in the preceding paragraph, the financial intermediary in the securities market shall withhold the applicable tax. When the seller of the shares is a tax resident of a country that has a tax treaty with Mexico, the tax withholding from the profit of sale is not required.

Difference between Appraisal and Price

When the tax authority performs an appraisal and the appraised value exceeds more than 10% of the sales value, the excess is considered as an income for the foreign resident purchaser of shares.

Free Acquisitions

In the case of a free acquisition of shares or securities, the acquirer shall calculate a tax applying a 25% rate to the total appraised value of the shares or ownership interest, without any deductions.

Corporate Reorganization

In the case of corporate reorganization within a group, the tax authorities may authorize the deferral of the tax payment for the gain on shares within said group.

For tax purposes, there is a group when a single legal entity owns, directly or indirectly, at least 51% of the voting shares, that represent the capital stock, of a group of companies.

6.3.3.8. Dividends and Profits

When a legal person with Mexican residency distributes dividends or profits, the law considers that the source of wealth is from Mexican territory.

Tax Rate

Legal entities that distribute dividends or profits shall withhold the tax at the 10% rate. The tax paid is considered as "definitive".

6.3.3.9. Interests

In the case of income from interest, the law considers that the source of wealth is from Mexican territory when the capital is placed or invested in Mexico; or, when a Mexican resident or a foreign resident with a permanent establishment in Mexico pays the interest.

Income Tax Withholding

The person paying the interests is responsible of withholding the applicable income tax to the person gaining the interests and, thus, shall apply the rates, without any deductions, that range from 4% to 35% depending on the payor, beneficiary, and/or activity, such as financing entities, foreign banks, reinsurers, etc.

6.3.3.10. Royalties, Technical Assistance, and Publicity

In the case of income from royalties, technical assistance, or advertising, the law considers that the source of income is from Mexican territory when the goods or rights subject to the royalty payments or technical assistance are used in Mexico; or, when such payment is made by a Mexican resident or foreign resident with a permanent establishment in Mexico.

Withholding Tax Obligations

Accordingly, the person paying the royalties to a foreign resident shall calculate and withhold the income tax, without any deductions, as follows:

- I. Royalties for the temporary use or enjoyment of railroad cars are subject to 5%.
- II. Other Royalties as well as royalties for technical assistance are subject to 25%

In the case of royalties for the temporary use of rights or enjoyment of patents, invention or improvement certificates, trademarks, trade names, as well as for advertising, the applicable rate is 35%.

6.4 Value Added Tax in Mexico

A company or individual, either tax residents or non-residents, must normally pay VAT when performing the following activities in Mexico:

1. Purchasing goods.
2. Enjoying the provision of services.
3. Using or enjoying temporarily assets of another individual or entity, such as in a lease.
4. Importing goods or services.

The Value Added Tax (VAT) rate is normally 16% throughout the Mexican territory, which is payable by the buyer, beneficiary, or consumer. However, the seller or service provider normally is responsible to calculate as well as to withhold the VAT per the invoice and make monthly VAT payments. Needless to say, some goods or services are subject to a 0% VAT rate, for instance, non-processed foods, medicines, etc.

Additionally, as noted in [section 6.3.2.1.2](#), taxpayers who have their tax address in the northern border region of Mexico may apply the 8% rate, instead of the 16% rate, when sell and deliver the goods or provide their services in that region, provided that they meet certain requirements.

6.4.1. Value Added Tax (VAT) and Exported Goods and Services

Exports are subject to a 0% tax rate on the sales value of the exported goods or services. The maquila (or tolling) services, for instance, are also taxed at a 0% rate provided that the goods are exported by the IMMEX/maquiladora company. Mexican entities with export-oriented activities normally can request VAT refunds because they pay more VAT than what they collect.

6.4.2. Value Added Tax (VAT) and Imported Goods and Services

As noted in the Trade Policy and Trade Policy for the Manufacturing Industry Chapters, VAT is applicable to all imported goods and services, including goods subject to the temporary importation regime. A company may, however, not pay VAT applicable to temporary imports, to goods subject to the manufacturing and assembly of vehicles in an in-bond facility, and to goods subject to the strategic in-bond facility, provided that the VAT certification is granted.

6.4.3. Vat Refunds

If a company's VAT balance is favorable, the taxpayer may request a VAT refund. As noted above, this occurs when a company has paid more VAT than what it has collected or withheld from its clients.

Per the Tax Code, the SAT must refund within forty working days after the date the refund request is filed. However, the SAT may request the company to submit any additional data, reports, or documents to verify the merits of the refund request. In such an event, the taxpayer shall have twenty working days term to respond to SAT's information request. VAT refunds are normally obtained in approximately sixty business days, provided that the request and response are clear and well supported.

6.5 Obligation of Foreign Shareholders in Mexican Companies to Register in the Federal Taxpayer Registry

The shareholders of Mexican companies are required to:

- a) Request registration in the Federal Taxpayer Registry, (or RFC).
- b) Provide the information related to identity, address, tax situation, as well as to indicate an email and telephone number.
- c) Request an electronic signature certificate (e-signature).

The RFC for each shareholder must be identified in the following documents:

- a) In all documents and procedures, printed or electronic, related to the SAT.

- b) In the public deed that contains the incorporation of the Mexican company in which the shareholders participate.
- c) In the partners and shareholders' corporate book of the company.
- d) In each corporate minute or deed regarding partners or shareholders.

As of 2020, the company must file a notice to the SAT, informing the name and shareholder's RFC, when a new or old shareholder has either entered or exited, respectively, from the company.

When the shareholder or partner of a Mexican company is a foreign resident, he or she may nevertheless avoid having an RFC provided that such company carries out the following:

- a) Within the first three months following the end of each tax year, provide a list of shareholders that are foreign residents.
- b) Indicate the address, tax residence, and foreign tax identification number of the shareholders that are foreign residents.

In the event that the Mexican company does not comply with the aforementioned requirements, the foreign shareholder has the legal obligation to have his or her RFC.

6.6 Tax Treaty

Mexico has an active international tax policy. In fact, Mexico has about 75 tax treaties in force to avoid double taxation (or Double Taxation Treaties), and Mexico is currently negotiating other tax treaties. The following map shows the countries with which Mexico has celebrated Bilateral Tax Agreements, as well as those currently under negotiation:



For a list of countries, see our **Appendix 1** and **Appendix 2**.

A tax treaty benefits only the taxpayers of the States, say US-Mexico or Netherlands-Mexico. An individual or company seeking to apply a tax treaty in Mexico must, therefore, demonstrate that he or she is a tax-resident in a State that has a Tax Treaty with Mexico. Furthermore, said individual or company must also comply with the provisions of the relevant Tax Treaty as well as the procedural provisions set forth in the Mexican Income Tax Law.

The SAT may request a foreign taxpayer, who intends to apply a tax Treaty, to prove the existence of double taxation when having a transaction with a related party that is a Mexican Taxpayer. In such cases, the foreign taxpayer has to provide a statement that describes that the income (e.g. interests, royalties), which is taxable in Mexico, is also subject to tax in his or her country of residence. Moreover, the SAT may further request to prove the existence of a “legal” double taxation in cases of transactions entered into with related parties.

Appendix 1 - List of Tax Treaties²

Tax Treaties in Force					
Country	Signature Date	Country	Signature Date	Country	Signature Date
GERMANY	23/02/93	USA	09/11/89	LUXEMBOURG	07/02/01
NETHERLANDS ANTILLES	01/09/09	PHILIPPINES	17/11/15	MALTA	17/12/12
SAUDI ARABIA	17/01/16	FINLAND	12/02/97	NORWAY	23/03/95
ARGENTINA	26/11/97	FRANCE	07/11/91	NEW ZEALAND	16/11/06
ARUBA	18/07/13	GIBRALTAR	09/11/12	NETHERLANDS	27/09/93
AUSTRALIA	09/09/02	GUATEMALA	13/03/15	PANAMA	23/02/10
AUSTRIA	13/04/04	GREECE	13/04/04	PERU	27/04/11
BAHAMAS	23/02/10	HONG KONG	18/06/12	POLAND	30/11/98
BAHRAIN	10/10/10	HUNGARY	24/06/11	PORTUGAL	11/11/99
BARBADOS	07/04/08	INDIA	10/09/07	QATAR	14/05/12
BELGIUM	24/11/92	INDONESIA	06/09/02	UNITED KINGDOM	02/06/94
BELIZE	17/11/11	ISLE OF MAN	18/03/11	REP. CZECH REP.	04/04/02
BERMUDA	15/10/09	CAYMAN ISLANDS	17/08/10	REP. SLOVAK REP.	13/05/06
BRAZIL	25/09/03	COOK ISLANDS	08/11/10	ROMANIA	20/07/00
CANADA	16/03/90	GUERNSEY ISLANDS	10/06/11	RUSSIA	07/06/04
COLOMBIA	13/08/09	JERSEY ISLANDS	08/11/10	SAMOA	17/11/11
KOREA	06/10/94	ICELAND	11/03/08	SAINT LUCIA	05/07/13
COSTA RICA	25/04/11	ISRAEL	20/07/99	SINGAPORE	09/11/94
CHILE	17/04/98	ITALY	08/07/91	SOUTH AFRICA	19/02/09
CHINA	12/09/05	JAMAICA	18/05/16	SWEDEN	21/09/92
DENMARK	11/06/97	JAPAN	09/04/96	SWITZERLAND	03/08/93
ECUADOR	30/07/92	KUWAIT	27/10/09	TURKEY	17/12/13
ARAB EMIRATES U.	20/11/12	LATVIA	20/04/12	UKRAINE	23/01/12
ESTONIA	19/10/12	LIECHTENSTEIN	20/04/13	URUGUAY	14/08/09
SPAIN	24/07/92	LITHUANIA	23/02/12	VENEZUELA	06/02/97

²Information obtained from SAT see <https://www.sat.gob.mx/normatividad/98105/tratados-en-materia-fiscal-y-cuestiones-relacionadastratados-en-materia-fiscal-y-cuestiones-relacionadas> (available in Spanish).

Appendix 2 - List of Bilateral Tax Treaties in Negotiation

Tax Treaties in Negotiation	
Country	
EGYPT	
SLOVENIA	
IRAN	
IRELAND	
MARSHALL ISLANDS	
LEBANON	
MALAYSIA	
MOROCCO	
MONACO	
NICARAGUA	
OMAN	
PAKISTAN	
THAILAND	
VANUATU	
VIETNAM	

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