

Finance Act 2025

Law No. 48-2024 of December 9, 2024



right people
right size
right solutions

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The main provisions introduced by Law No. 48 of December 9, 2024 relating to the finance law for the management of the year 2025 are as follows:

1/- In terms of corporate tax and personal income tax

1.1. Revision of corporate tax rates and withholding taxes (Art. 37)

Revision of IS rates for profits made from January 1, 2024 to be declared in 2025 :

10%	20%	35%	40%
<ul style="list-style-type: none"> • Agriculture • Pêche • Développement régional (Au-delà de la période de grâce) • Activités de soutien et de lutte contre la pollution 	<p>Secteurs non concernés par les autres taux</p>	<ul style="list-style-type: none"> • Opérateurs téléphoniques • Sociétés d'investissement • Recouvrement de créance • Energie et grandes surfaces • Concessionnaires automobiles • Franchises avec taux d'intégration inférieur à 30% 	<ul style="list-style-type: none"> • Banques et établissements financiers • Assurances et réassurances

The advance tax rate applicable to partnerships, groups and similar entities increases from 15% to 20%.

The minimum tax applicable to legal entities benefiting from a total or partial exemption under the legislation on tax benefits is set at 25% (instead of 20%). This rate is reduced to 10% for companies subject to IS at the rate of 20%.

The 1% withholding tax for payments equal to or greater than D1,000 (VAT included) now applies to amounts subject to a corporate tax rate of 20% (instead of 15%). However, this measure excludes listed companies benefiting from a reduction in the corporate tax rate.

The rate of withholding tax on remuneration and income paid to non-residents and not established and not earned within the framework of an establishment located in Tunisia is increased from 15% to 20%.

The IS rate of 20% (instead of 15%) applies to the capital gain from the transfer of real estate made by legal entities not established or domiciled in Tunisia. However, interested parties may

opt to pay corporate tax on said capital gain at the rate of 15% (instead of 10%) of the transfer price.

The rate of withholding tax on capital gains made from the transfer or retrocession of securities or related rights, made by legal entities not established or domiciled in Tunisia, is increased from 15% to 20% (without the amount payable exceeding a limit determined on the basis of the rate of 5% of the transfer price).

Introduction of a new cyclical contribution applicable to companies that have achieved in 2023 a turnover excluding VAT of more than 20 MDT and which are subject to IS at the rate of 15%. This contribution amounts to 2% of taxable profit with a minimum of 1,000 dinars. (Art.38)

1.2 Change in the IRPP scale for income earned from January 2025 (Art.36)

Revised the income tax table as follows:

New scale (2025)	
Slices	Rate
0 to 5,000 Dinars	0%
5,000.001 to 10,000 Dinars	15%
10,000.001 to 20,000 Dinars	25%
20,000.001 to 30,000 Dinars	30%
30,000.001 to 40,000 Dinars	33%
40,000.001 to 50,000 Dinars	36%
50,000.001 to 70,000 Dinars	38%
Beyond 70,000 Dinars	40%

1.3 Tax relief for disability pension recipients (Art.20)

Like the compensation and annuities paid to victims of work accidents, compensation paid to orphans and victims of accidents not related to work is now exempt from income tax and withholding tax. This exemption applies to pensions paid by the CNSS or the CNRPS in accordance with the legislation and regulations in force in terms of social security from January 1, 2025.

1.4 Deduction of income and profits reinvested through crowdfunding platforms (Art.57)

Deduction of income and profits reinvested through crowdfunding platforms including participation in capital and issue premium. The minimum tax is applicable except for cases of investment in regional and agricultural development.

2/- In matters of VAT, Customs duties and TCL

2.1 Reduction of the financial difficulties of the Central Pharmacy (Art.34)

In order to improve the financial situation of the central pharmacy, customs duties are reduced to 0% from January 1, 2025 to December 31, 2026 and VAT is suspended on the import of medicines with a locally manufactured similar. Also, the importation by drug factories of products and materials now benefit from the suspension of VAT instead of an exemption from VAT.

2.2 Suspension of VAT on the import and sale of coffee and tea (Art. 35)

Suspension of VAT on the importation of tea and coffee, which concerns the trade office, is now generalised to all authorised importers.

2.3 Revision of VAT on sales of residential premises by real estate developers (Art. 64)

Sales of residential premises by real estate developers are subject to VAT at 19% for all premises whose value is greater than 400,000 dinars and 7% for those whose amount is lower.

2.4 Revision of VAT on electricity for domestic use (Art. 31)

Household electricity for domestic use not exceeding a monthly consumption of 300 kW is subject to VAT at a rate of only 7% instead of 13%.

2.5 Other measures

2.5.1 Public institutions working in the field of childhood, the elderly and the disabled now benefit from the suspension of taxes and import duties on equipment, materials and products that have no equivalent in Tunisia. (Art.30)

2.5.2 Suspension of customs duties on imports of beef and lamb by the company "Ellouhoum", until the end of 2027.(Art. 33)

2.5.3 Reduction of VAT to 7% and exemption from customs duties on purchases by industrial companies of buses, less than 10 years old, intended for the transport of employees.(Art.54)

2.5.4 Suspension of VAT and duties on equipment, materials, products, services and real estate acquired by Community companies for a period of 10 years from the date of their incorporation. (Art. 56)

2.5.5 Reduction from 19% to 7% of VAT on preserved olives not intended for the production of olive oil.(Art.59)

2.5.6 The transfer of reformed equipment and materials to the company El Fouledh is now exempt from duties and taxes, subject to authorization issued by the customs services.(Art.61)

2.5.7 ONAS will benefit from exemption from customs duties on the import of equipment and materials that have no equivalent in Tunisia, after consulting the Ministry of Industry.(Art.62)

3/- Control procedures and penalties

3.1 Facilitate the regularization of the situation of individuals with regard to tax and customs debts and the waiver of financial penalties and fines (art 74 to 81)

The 2025 finance law provides for :

1. Waiver of late payment, recovery and pursuit penalties for tax debts recorded before January 1, 2025, or having been the subject of a transaction before June 20, 2025, provided that a repayment schedule is subscribed to and the first installment is settled no later than June 30, 2025.
2. Waiver of 50% of administrative fines and penalties entered by tax collectors before June 20, 2025, under the same conditions cited below in 1 and of financial penalties and fines imposed by the courts before January 1, 2025.
3. Waiver of penalties following omission in declarations due before October 31, 2024, including registration fees, subject to regularization before June 20, 2025, and payment of taxes and fees and filing of corrective declarations even following a tax audit.
4. Waiver of rental tax for the years 2021 and earlier and late payment and prosecution penalties subject to payment of taxes for the years 2025, and establishment of a payment schedule for 2024, 2023 and 2022 before January 1, 2026.
5. Exemption from customs penalties subject to PV or judgments before December 1, 2024, provided that the principal of duties and taxes is paid before January 1, 2026 or a payment schedule is concluded before July 1, 2025 or a fine of 10% to 20% of the value of the seized goods is paid

3.2 Other measures

3.2.1 Unification of the procedures for opposition to ex officio taxation decisions which is now carried out before the court of first instance to which the regional centre of the control office concerned belongs.(Art.41)

3.2.2 Authorization of the tax authorities to carry out on-site inspections to establish the value of real estate and businesses as part of a preliminary tax audit.(Art.42)

3.2.3 Delivery companies must now apply a withholding tax (or rather a withholding tax in passing) of 3% on amounts collected on behalf of non-licensed persons who sell their goods on the internet.(Art.68)

3.2.4 A right of information is granted to the tax administration in respect of services provided by health professionals. In this respect, clinics must communicate to the tax administration every six months a statement of the medical interventions carried out by each practitioner, the nature of the

intervention and the amounts received. Insurance companies and mutual insurance companies must do the same in respect of health service providers subject to coverage and reimbursements of care.(Art.70)

3.2.5 Failure to comply with electronic invoicing as provided for in Article 18 of the VAT Code results in fines of 100 to 500 dinars for each invoice established manually with a ceiling of 50,000 dinars.. (Art.71)

3.2.6 Penalties for smuggling crimes are increased to 6 months to 2 years in prison, and 2 to 3 years if the number of persons involved exceeds 2 people. (Art.72)

4/- Other provisions

4.1 Rationalization of the taxation of property income (Art.39)

The flat-rate deduction increases from 20% to 25% when determining rental income from built properties according to the flat-rate assessment system, and removal of the possibility of deducting justified repair and maintenance costs, for income earned from January 1, 2024.

4.2 Creation of an insurance fund against loss of employment for economic reasons and increase in the CNSS contribution by 1% (Art.17)

Creation of an insurance fund to finance a system of insurance against collective job losses for economic reasons. The Fund is financed mainly by a State budgetary contribution, set at 5 million dinars and a participation fee at the rate of 0.5%, divided equally between the employer and the employee, applicable to salaries declared to the CNSS.

The operating conditions and management methods of the fund will be determined by decree.

4.3 Extension of the retirement measure for civil servants from the age of 57 (Art.14)

The provisions of Article 14 of the Finance Act for the year 2022 will continue to be applied under the same conditions, procedures and terms provided for by the regulations in force, during the period from January 1, 2025 to December 31, 2028.

4.4 Other measures

4.4.1 Replacement of the guarantee fund for victims of road accidents by a special treasury account, and simplification of the procedures for its intervention.(Art.18)

4.4.2 Exemption from the single road transport compensation tax for vehicles other than those intended for the transport of people and goods.(Art.27)

4.4.3 ONFP exemption from customs duty and FODEC tax on the importation of contraceptive products.(Art.29)

4.4.4 Suspension of duties and taxes applied to the importation of powdered milk and butter and updating of customs duties on certain food products(Art.40)

4.4.5 The traffic fines to be set by decree are now classified into 3 categories, amounting to 20, 40 and 60 dinars. (Art.49)

4.4.6 In addition to individual activities in the fields of industry, crafts, trades, commerce, and services other than non-commercial professions, the self-employed worker regime is extended to journalists and services in the field of creative digital technology.(Art.67)

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