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# Global Tax Alert

News from EY Americas Tax

## Peruvian tax authorities address merger of nonresident entities with one entity having a PE in Peru

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On 6 October 2020, the Peruvian tax authorities published Public Ruling 061-2020-SUNAT/7T0000, addressing the merger of two nonresident entities when the absorbed entity has a permanent establishment (PE) in Peru.

The Peruvian tax authorities ruled the merger will have the following tax consequences in Peru:

- ▶ The PE of the absorbed entity will not have to obtain a new Tax ID.
- ▶ The merger of the two nonresident entities will not have tax effects for the PE in Peru.
- ▶ The absorbed entity will be taxed in Peru on the income from the transfer of the PE because the income qualifies as Peruvian-sourced income.

For additional information with respect to this Alert, please contact the following:

**Ernst & Young Asesores S.C.R.L, Lima**

- ▶ Roberto Cores [roberto.cores@pe.ey.com](mailto:roberto.cores@pe.ey.com)
- ▶ Ramón Bueno-Tizón [ramon.bueno-tizon@pe.ey.com](mailto:ramon.bueno-tizon@pe.ey.com)

**Ernst & Young LLP (United States), Latin American Business Center, New York**

- ▶ Ana Mingramm [ana.mingramm@ey.com](mailto:ana.mingramm@ey.com)
- ▶ Enrique Perez Grovas [enrique.perezgrovas@ey.com](mailto:enrique.perezgrovas@ey.com)
- ▶ Pablo Wejcman [pablo.wejcman@ey.com](mailto:pablo.wejcman@ey.com)

**Ernst & Young Abogados, Latin America Business Center, Madrid**

- ▶ Jaime Vargas [jaimе.vargas.c@es.ey.com](mailto:jaimе.vargas.c@es.ey.com)

**Ernst & Young LLP (United Kingdom), Latin American Business Center, London**

- ▶ Lourdes Libreros [lourdes.libreros@uk.ey.com](mailto:lourdes.libreros@uk.ey.com)

**Ernst & Young Tax Co., Latin American Business Center, Tokyo**

- ▶ Raul Moreno [raul.moreno@jp.ey.com](mailto:raul.moreno@jp.ey.com)

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