



Tax Agenda Cyprus

March 2025



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No.	Fact	Action
1	Cyprus Tax Authority publishes 10-year government bond yield rates for Notional Interest Deduction purposes On 14 February 2025, the Cypriot Tax Department issued an announcement that lists the 10-year government bond yield rates as of 31 December 2024 for a number of countries with respect to the Notional Interest Deduction (NID) on equity. These yield rates should be used to determine the reference interest rate for claiming NID for the 2025 tax year. Read more: Cyprus Tax Authority publishes 10-year government bond yield rates for Notional Interest Deduction purposes	Taxpayers should be aware of the updated reference rates as these impact the determination of the taxable income for 2025. ● ● ●
2	Cyprus introduces Global Minimum Tax for MNE groups and large-scale domestic groups On 12 December 2024, the Cyprus House of Representative voted to transpose into law Council Directive (EU) 2022/2523 of 14 December 2022 (Pillar Two Directive) to ensure a global minimum level of taxation for multinational enterprise groups and large domestic groups in the Union (the Law). The Law introduces an Income Inclusion Rule (IIR) for the financial years starting from 31 December 2023 in line with the Pillar Two Directive. A Domestic Minimum Top-Up Tax (DMTT) and an Undertaxed Profits Rule (UTPR) are also introduced for financial years starting from 31 December 2024. Cyprus has also consented to all safe harbors, including the Transitional CbCR Safe Harbor as well as a Transitional UTPR Safe Harbor. New compliance and filing requirements are introduced for reporting and collecting the Top-up Tax under the DMTT, IIR and UTPR. Read more: Cyprus introduces Global Minimum Tax for MNE groups and large-scale domestic groups	Taxpayers affected by the new legislation should ensure compliance with the new legislation and ensure they make all relevant filing within the appropriate timeframes. ● ● ●
3	Extension of the deadline for the submission of the 2022 & 2023 Income Tax Returns for taxpayers with a Summary Information Table reporting obligation The extension of the deadline for the submission of the 2022 Income Tax Return (Form TD4) until the 28 February 2025, and for the 2023 TD4 until 30 November 2025. The extension is available only for persons who have an obligation to submit a Summary Information Table. The summary information table should reflect high-level information about the taxpayer's annual intercompany transactions, including details of the counterparties, of intercompany transactions entered into, and amount per transaction category. Read more: TaxLegi 31.10.2024 EY - Cyprus	Submission of the 2022 and 2023 Income Tax Returns (Form TD4) by 28 February 2025 and 30 November 2025 respectively for taxpayers with an obligation to submit a Summary Information Table. ● ● ●

Use text boxes above the timeline to plan your actions for coming months

● Compliance ● Risk management ● Cash-flow and ETR impact

No.	Fact	Action
4	Cyprus increases Capital Allowances for Green Expenditures Cyprus has extended capital allowances for capital expenditures incurred in the following areas for tax years 2023 to 2026: - Expenditure incurred for enhancing energy efficiency of buildings is eligible for a 7% allowance (previously, 3%) - Expenditure incurred for technical systems aimed at improving energy efficiency of buildings, renewable energy systems and electric energy storage systems (such as batteries) is eligible for a 20% allowance (previously, 10%) - Expenditure incurred for the purchase of electric vehicles is eligible for a 33.3% allowance (previously, 20%)	Taxpayers should be aware of these increased capital allowances. 
5	Transfer pricing (TP) Cyprus introduced transfer pricing rules and documentation requirements effective as of 1 January 2022. The legislation is broadly in line with The Organisation for Economic Co-operation and Development (OECD) TP Guidelines and requires domestic and cross-border intra-group transactions to be documented for Cypriot TP purposes. The TP documentation files include a Local and Master file as well as the Summary Information Table. On 1 February 2024, the Tax Department issued revised thresholds relating to taxpayers' obligation to prepare a Cyprus Local File for transactions falling within the ambit of Section 33 of the Income Tax Law (ITL) (i.e., intercompany transactions). The revised thresholds are applicable for the tax year 2022. On 24 September 2024, the tax authorities have published additional frequently asked questions (FAQs) on their website, regarding transfer pricing. These FAQs provide further guidance to taxpayers on complying with TP requirements and procedures for the completion of the summary information table, the use of safe harbours and simplified TP documentation. With respect to the Summary Information Table, an e-mail account (tpqueries@icpac.org.cy) has been created by the Institute of Certified Public Accountants of Cyprus to which taxpayers can send written comments, questions and queries in relation to the completion and submission of the Summary Information Table. These questions/answers will be grouped together and posted in the form of FAQs on the tax department's website. Read more: Cyprus tax authorities issue revised thresholds for transfer pricing documentation (ey.com)	Develop a thorough understanding of the new TP documentation rules and assessment of the impact of the new transfer pricing requirement for your group. Taxpayers considering to apply any of the simplification measures should ensure the eligibility and application of such measures, while adequate documentation should be maintained to ensure their compliance. Taxpayers should be aware of the new submission deadlines for years 2022 and 2023 and work closely with their tax advisors in ensuring compliance with the relevant transfer pricing documentation and reporting obligations. 

No.	Fact	Action
	Cyprus Tax Department provides clarifications and guidance regarding the reorganisation of companies On 5 November 2024, the Cypriot Tax Department issued a Circular (05/2024), which provides important clarifications and guidance regarding the reorganisation of companies (Part VI of the Income Tax Law).	We encourage all clients involved in or considering a company reorganization to review these provisions carefully and ensure timely submission of the necessary applications required by the Tax Authorities, to benefit from the available tax exemptions for approved reorganisations.
6	Companies that have undergone reorganization without obtaining approval from the Tax Authorities (via the submission of form TD88 for approved reorganization and tax exemption) should consider submitting such application before the transitional deadline of 30 June 2025. This will ensure that the reorganization is not viewed as “non-approved” and that any taxes arising from the reorganization are eligible for tax exemptions. Read more: TaxLegi 30.11.2024 EY - Global	
7	Green Taxes updates As part of the Cyprus green taxation reform, a number of environmental taxes will be implemented: ▶ Tourism tax ▶ Carbon tax on transport ▶ Carbon tax on production ▶ Water tax ▶ Landfill tax The above measures announced are subject to consultation and are expected to be implemented by the end of the 1st quarter.	Businesses (and citizens) should monitor the legislative proposals of such new green taxes and understand their impact as well as any compliance obligations. 
8	VAT in the digital age package (ViDA) adopted On 05 November 2024, at the Economic and Financial Affairs Council (ECOFIN) meeting, the EU Member States finally managed to reach an agreement regarding the “VAT in the Digital Age” (ViDA) package. ViDA introduces new measures on three pillars, namely (1) digital real-time reporting based on e-invoicing, (2) platform economy (including deemed supplier rules for short-term accommodation rentals and passenger transportation) and (3) single EU registration (including expansion of One Stop Shop (OSS)). Read more: TaxLegi 30.11.2024 EY - Global	Businesses should be aware of these changes. 
9	FUEL EU Pooling Mechanism: The FuelEU Maritime, which aims to reduce the greenhouse gases (GHG) emissions from the shipping sector covering vessels over 5000 gross tonnage (GT) calling the European Economic Area (EEA) ports, will be applicable from January 2025. Read more: TaxLegi 30.11.2024 EY - Global	Businesses should prepare for these changes. 

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10	Exemption of natural persons from the obligation to submit a personal income tax return for the year 2024 On 15 November 2024, the Council of Ministers issued a decree (No.384/2024) exempting natural persons, whose total gross income is below €19.500, from the obligation to submit a personal income tax return (Form T.D.1) for the tax year 2024. Read more: TaxLegi 30.11.2024 EY - Global	Taxpayers which fall below the relevant threshold should be aware of this exemption. 
11	Default Interest Rate increases to 5.5% As of 1 January 2025, the default interest rate was set to 5,50%, (5% in 2024). The default interest rate, applies to payable or refundable tax amounts arising for taxpayers. Read more: Tax Department Default Interest	Businesses should consider the revised interest rate upon making a payment to the tax authorities. 
12	Submission of Withholding Taxes & Contributions (Employer's) Return (Form TD7) through the The Tax For All (TFA) platform The system will be updated to accept the submission of the Withholding Taxes & Contributions (Employer's) Return (Form TD7) and the remittance of the withheld taxes and contributions. Until the completion of the process, the following applies: ▪ The submission of the TD7 Form up until the year 2023 (inclusive) will be done through the TAXISnet system. ▪ The monthly payments of withheld taxes and contributions for the years 2023, 2024, and 2025 will be made through the Tax Portal. Once the process is finalised and the submission of Form TD7 can be made through the TFA system, the following will apply: ▪ Both the submission of the Form TD7 and the remittance of the withheld taxes and contributions will be made exclusively through the TFA system. ▪ As of the year 2025 onwards, Form TD7 will need to be submitted on a monthly basis. ▪ All monthly Form TD7 for 2025 (as of January 2025) must be submitted in the TFA system, including those for which taxes and contributions are paid through the Tax Portal. ▪ In order for the monthly Form TD7 to be submitted, all the employees should have a Tax Identification Number (TIN) in place. Further announcements are expected from the Tax Department. Read more: TaxLegi 30.01.2025 EY - Global	Businesses should be aware of these changes. 
13	Change in Intrastat thresholds for 2025 The Cyprus Tax Authorities have allowed for a new higher intra-acquisition of goods threshold for the year 2025, currently standing at 350,000EUR. The intra-community deliveries and Intrastat simplification thresholds have remained the same. Read more: Tax Department INTRASTAT	Businesses with intra-community acquisitions of goods should check if the increased threshold can be exploited by the business. 

Contacts:

Philippos Raptopoulos

Partner, Head of Tax
and Legal Services,
EY Cyprus Advisory Services Limited
philippos.raptopoulos@cy.ey.com

Petros Krasaris

Partner, International Tax
and Transaction Services
MDR Country Leader
EY Cyprus Advisory Services Limited
petros.p.krasaris@cy.ey.com

Petros Liassides

Partner, Direct Tax Services
EY Cyprus Advisory Services Limited
petros.liassides@cy.ey.com

George Liasis

Partner, Indirect Tax Services
EY Cyprus Advisory Services Limited
george.liasis@cy.ey.com

Christos Tooulas

Partner, Global Compliance &
Reporting
EY Cyprus Advisory Services Limited
christos.tooulas@cy.ey.com

Christoforos Socratous

Partner, Global Compliance
& Reporting
EY Cyprus Advisory Services Limited
christoforos.socratous@cy.ey.com

Charalambos Palaontas

Partner, Transfer Pricing Services
EY Cyprus Advisory Services Limited
charalambos.palaontas@cy.ey.com

Myria Saparilla

Partner, Direct Tax Services
EY Cyprus Advisory Services Limited
myria.saparilla@cy.ey.com

Panayiotis Thrasyvoulou

Partner, Head of People Advisory
Services
EY Cyprus Advisory Services Limited
panayiotis.thrasyvoulou@cy.ey.com

Anna Papamichael

Partner, Direct Tax Services
EY Cyprus Advisory Services Limited
anna.papamichael@cy.ey.com

Andria Koukounis

Partner, Head of Financial Services,
Funds and Capital Markets
Koukounis, Karaolis LLC
andria.koukounis@cylaw.ey.com

Panayiotis Tziongouros

Partner, International Tax and
Transaction Services
EY Cyprus Advisory Services Limited
panayiotis.tziongouros@cy.ey.com

Eleni Sofocleous

Partner, Direct Tax Services
EY Cyprus Advisory Services Limited
eleni.sofocleous@cy.ey.com

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