

Corporate Income Tax

| BUSINESS TURNOVER AND PLACE OF TRANSACTIONS | | | | COMPETENT ADMINISTRATION | |
|--|---|-------------------------------------|---|----------------------------|--|
| | | | | LEGISLATION AND INSPECTION | LEVYING |
| Entities whose total turnover in the preceding year did not exceed 10 million euros | | | | Fiscal domicile | Fiscal domicile |
| Entities whose total turnover in the preceding year exceeded 10 million euros | Transactions only in one territory: common or foral | | | Place of transactions | |
| | | Fiscal domicile in the BC | <75% Transactions in common territory | Basque Country | |
| | | | >75% Transactions in common territory | Common territory | |
| | Transactions both in common territory and in the BC | Fiscal domicile in common territory | < 75% Transactions in the Basque Country | Common territory | |
| | | | > 75% Transactions in the Basque Country or =100% in the Basque Country for entities integrated in tax groups | Basque Country | |
| SPECIAL RULES FOR ECONOMIC INTEREST GROUPINGS, JOINT VENTURES AND CORPORATE TAX GROUPS | | | All the entities involved subject to foral legislation | Foral legislation | Entities shall attribute to their partners their share of turnover from the operations performed in each territory, which they shall take into account in determining the proportion of operations |
| | | | All the entities involved subject to common legislation | Common legislation | |
| | | | Entities involved subject both to common and foral legislation | Common legislation | |
| Corporate tax groups | | | All the entities involved subject to foral legislation | Foral legislation | Tax groups pay taxes, in any event, on turnover (determined prior to intragroup adjustments) |
| | | | All the entities involved subject to common legislation | Common legislation | |