Tax in New Zealand

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December 2023

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Key points about tax in New Zealand

The New Zealand taxation system is broad-based, taxing its residents on their worldwide income and non-residents on income derived from sources in New Zealand.

New Zealand's taxation system is heavily reliant on collecting income taxes from individuals (at a maximum rate of 39%) and companies (at a flat rate of 28%). This is complemented by a comprehensive GST regime, which is imposed at a single rate of 15% on almost all goods and services consumed in New Zealand.

Unlike most other developed economies New Zealand does not tax capital gains. It also not does have any wealth taxes, inheritance taxes, gift duties or stamp duties.

New Zealand has a comprehensive suite of international tax rules, including transfer pricing rules, a thin capitalisation regime and anti-hybrid legislation, all aimed at protecting its domestic tax base. It also has a network of 40 double tax treaties that help ensure that foreign investors are not subject to double taxation when investing in New Zealand.

The detail

Overview

New Zealand imposes income tax on its residents. Non-residents are taxed on New Zealand sourced income.

There are currently no gift duties, stamp duties, land taxes or inheritance or wealth taxes in New Zealand. Capital gains are only taxed in limited circumstances. Income tax is the most prevalent form of tax in New Zealand. Goods and services tax (GST) which is levied at the rate of 15% on the consumption of most goods and services in New Zealand is the other major source of taxation revenue.

Double-taxation treaties (DTTs) with various countries may create an exemption from full tax liability within New Zealand. Such exemptions exist to eliminate situations where an entity or individual may be subject to double taxation. New Zealand has a network of 40 DTTs in force with its main trading and investment partners.

The DTTs take precedence over the provisions of the Income Tax Act 2007 and contain 'tie-breaking' provisions to determine residence and which country has the primary right to tax income. New Zealand has also entered into a number of tax information exchange agreements, with more being frequently added, and is a party to the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS (the MLI).

Taxation authorities

The tax system in New Zealand is administered by the New Zealand Inland Revenue. Inland Revenue collects most of the revenue that the government needs to fund its programs and administers a number of social support programs.

Business vehicles

Companies

Most business activity is carried out through limited liability companies. A limited liability company's legal status limits the liability its shareholders have in the business to the value of their shares in accordance with English common law principles.

Companies in New Zealand typically have limited liability (although it is possible for a company to have unlimited liability). A limited company is liable in full for all obligations that it incurs but the shareholders are only liable for any unpaid money owing on their shares.

Look through companies

Where a company elects and qualifies to be a `look through' company (LTC) it becomes fiscally transparent for income tax purposes. The income expenses, tax credits, rebates, gains and losses of an LTC are passed on to the shareholders pro rata to their shareholdings in the LTC. To become an LTC and maintain LTC status, a company must meet the following criteria for the whole of each income tax year that it is an LTC:

i. It must be a company;

ii. It must be a New Zealand tax resident company;

iii. Its shareholders must either be natural persons or trustees (including corporate trustees);

iv. It must not have more than five shareholders (who must be natural persons or trusts, with relatives counted as a single person)'look through counted owners'; and

v. The LTC must have only one class of shares.

Limited Partnerships

A limited partnership (LP) in New Zealand is an incorporated entity separate from its partners, having at least one general partner and at least one limited partner. Any person or body corporate (whether or not resident in New Zealand) can be a partner and there is no limit on the number of partners.

At least one general partner who is a natural person must be resident in either New Zealand or in Australia. If resident in Australia the general partner must also be a director of a company that

is registered in Australia. If the only general partner is a company registered in New Zealand then the resident director requirements will naturally apply to that company.

An LP is fiscally transparent for income tax purposes and not taxed at the partnership level. Generally, an LP will be structured so that only the limited partners receive income. Limited partners who are not resident in New Zealand will only be subject to tax in New Zealand on their share of the income generated by the LP that has a New Zealand source. An LP can register for other tax types in its own right, including GST and employment taxes.

In both a domestic and international context LPs have a range of applications including warehousing assets, and private placement collective investment schemes. LPs are also commonly formed for the transaction of agricultural, mining, mercantile, manufacturing or other business purposes. This can be particularly desirable where one or more of the investors is or are resident abroad because it can obviate withholding tax requirements and reliance on double tax treaties.

Ordinary Partnerships

The Partnership Law Act 2019 provides that a partnership is the relationship that subsists between persons carrying on business in common with a view to profit.

An ordinary (or general) partnership is a partnership comprised of defined individuals bound together by contract between themselves to continue together for some joint object either indefinitely or for a limited time. An ordinary partnership is essentially comprised of the persons originally entering the contract with one another. In this it differs from a company or limited partnership in which the members are constantly changing. It is common in New Zealand for professionals (such as lawyers and accountants) to organise themselves as ordinary partnerships.

Like limited partnerships, ordinary partnerships are fiscally transparent for income tax purposes.

Joint ventures

The term 'joint venture' is common in the New Zealand business vernacular and describes an enterprise subject to joint control by two or more undertakings, which are economically independent of each other. Rather than being an entity or structure with defined characteristics it connotes an association of persons for the purposes of a particular trading, commercial, mining, or other financial undertaking or endeavour with a view to mutual profit, with each participant usually (but not necessarily) contributing money, property or skill. As a result, joint ventures are not separately taxed, rather each joint venture partner is responsible for the income tax obligations arising in respect of their share of the income of the venture.

Trusts in New Zealand

New Zealand does not determine the tax residency of a trust based on the tax residence of its trustees as is the case in many other jurisdictions. Instead, New Zealand has a settlor-based regime which means the New Zealand tax treatment of a trust depends on where the settlor of a trust resides.

There are three types of trusts for New Zealand tax purposes:

i. Complying trusts;

ii. Foreign trusts; and

iii. Non-complying trusts.

A complying trust is a trust that has been settled by a New Zealand resident settlor and where all New Zealand tax filing obligations have been met and all of the trust's income has been taxed in full in New Zealand.

A foreign trust is a trust that has not had a New Zealand resident settlor at any time between December 17, 1987 and the date of a distribution.

A non-complying trust is a trust that is neither a complying trust nor a foreign trust.

There are ordering rules that apply to determine the source of distributions from foreign and non-complying trusts. The ordering rules exist to

prevent the trustee from manipulating distributions and making tax-free distributions ahead of, or instead of, taxable distributions.

The New Zealand income tax implications of distributions made under a trust turns on:

The classification of the trust (i.e. is the trust complying, non-complying or foreign). A trust's classification can change from distribution to distribution therefore the classification should be confirmed each time a distribution is made;

i. The nature of the distribution;

ii. The source of the distribution; and

iii. Whether the beneficiary is a New Zealand tax resident.

The following table summarises the tax treatment of distributions from complying, foreign and non-complying trusts in New Zealand:

	Complying Trust	Foreign Trust	Non-complying Trust
Pre 1/4/88* accumulated income	Exempt income	Exempt income	Exempt income
Corpus	Exempt income	Exempt income	Exempt income
Arm's length capital gain	Exempt income	Exempt income	Taxable distribution taxed at rate of 45%
Non-arm's length capital gain	Exempt income	Taxable distribution taxed at beneficiary's marginal rate	Taxable distribution taxed at rate of 45%
Post *1/4/88 accumulated income	Exempt income	Taxable distribution taxed at beneficiary's marginal rate	Taxable distribution taxed at rate of 45%
Trustee income	Taxed at trustee rate of 33%	Income derived from New Zealand taxed at trustee rate of 33%	Taxed at trustee rate of 33%
Beneficiary income	Taxable distribution taxed at beneficiary's marginal rate	Taxable distribution taxed at beneficiary's marginal rate	Taxable distribution taxed at beneficiary's marginal rate

**April 1, 1988 is the date that the current tax regime applying to trusts came into force in New Zealand.*

Most trusts are required to file tax returns with Inland Revenue in the same way as other taxpayers.

In addition, new rules requiring the disclosure of significant additional information regarding most trusts that earn assessable income came into effect from the 2021/2022 tax year (the year April 1, 2021 to March 31, 2022 for most taxpayers).

These rules require trustees to disclose to Inland Revenue:

i. Financial statements for the trust for the relevant income year that meet certain minimum standards; and

ii. Information regarding:

- Settlements made on the trust during the relevant income year;
- The settlors of any settlements made on the trust during the relevant income year;
- Distributions made by the trust during the relevant income year;
- Beneficiaries who have received distributions from the trust during the relevant income year; and
- Any person holding a power under the trust deed to appoint or dismiss a trustee, to add or remove a beneficiary, or to amend the trust deed.

Trustees are also required to provide other information to Inland Revenue on request.

Certain trusts are excluded from the disclosure rules, including foreign trusts (which are already subject to a similar disclosure regime), charitable trusts (which are, in general, exempt from paying tax in New Zealand), and trusts that are eligible to be Māori Authorities (i.e. trusts that are established to administer Māori owned property).

Financing a corporate subsidiary

Equity financing

Companies in New Zealand are financed by either debt or equity. A company financed by equity typically issues shares to the financier in exchange for capital contributed. Capital may be returned to a shareholder by dividend on profits or on a solvent winding up. In both cases the directors must be satisfied that the company is able to fulfil balance sheet and cash flow solvency tests.

Debt financing — financial arrangement rules

New Zealand has financial arrangement rules, which are a set of rules that require all returns on 'financial arrangements' to be taxed on a progressive nature over the term of the financial arrangement using a spreading method.

A financial arrangement is broadly defined and includes virtually any arrangement where there is a delay in giving or receiving consideration, including any debt instruments and securities such as bank accounts, loans and most derivatives. There are some exceptions that may be applicable in certain circumstances.

A person who is subject to the financial arrangement rules must account for all income and expenditure under the rules using an applicable spreading method regardless of whether the financial arrangement is of a revenue or capital nature. For example, in the context of a foreign currency bank account this would include any foreign exchange movement.

Without tax implications

Resident withholding tax (RWT) is imposed on interest at 28% for companies. Certain exemptions may apply.

Where a dividend is paid to a resident shareholder, RWT must generally be deducted such that the total of the attached imputation credits and RWT is 33% of the gross dividend (for example RWT of 5% must be deducted if a dividend is fully imputed except where the dividend recipient is another resident company and elects for no RWT to be withheld).

Non-resident withholding tax (NRWT) is imposed on interest paid to offshore lenders. The domestic rate of NRWT on interest is 15%. This is reduced to 10% under most of New Zealand's DTTs.

NRWT is imposed on dividends paid to non-resident shareholders. The rate of NRWT can be reduced to 0% under New Zealand domestic law where the dividend is fully imputed and a voting interest of 10% or more is held in the New Zealand company. Otherwise NRWT will generally apply at a rate of 30%. Once again though New Zealand's DTTs will generally reduce the amount of NRWT down to 15%, with some particularly favourable DTTs reducing the rate down to 5% or even 0% in some circumstances.

Approved Issuer Levy (AIL)

NRWT does not need to be deducted from the interest paid on offshore borrowings when:

i. The New Zealand borrower and overseas lender are not associated;

ii. The borrower is registered as an 'approved issuer';

iii. The debt instrument is registered;

iv. The borrower pays a tax-deductible AIL equal to 2% of the interest paid and which cost may be passed on contractually to the holder; and

v. The rate of AIL reduces to 0% on bonds that meet certain requirements e.g. offered to the public issued in NZD and listed on a recognised stock exchange or are widely held, and other requirements.

AIL is deductible for income tax purposes, meaning the tax-effected cost for a tax-paying corporate borrower is reduced to 1.44%. AIL is technically a stamp duty and is imposed on the borrower, meaning that unlike NRWT it is usually not a creditable tax for the foreign lender.

Thin capitalisation

'Inbound' thin capitalisation rules apply to New Zealand taxpayers controlled by non-residents, including branches of non-residents. The aim of the rules is to ensure that New Zealand entities or branches do not deduct a disproportionately high amount of the worldwide group's interest expense. This is achieved by deeming income in New Zealand when, and to the extent that, the New Zealand entities in the group are thinly capitalised (i.e. excessively debt funded).

The inbound rules include situations where non-residents are 'acting together' and include trusts where the majority of settlements have come from non-residents or from entities subject to the thin capitalisation rules.

The 'outbound' thin capitalisation rules are intended to operate as a base protection measure to prevent New Zealand residents with Controlled Foreign Company (CFC) investments and certain Foreign Investment Fund (FIF) investments from allocating an excessive portion of their interest cost against the New Zealand tax base.

An apportionment of deductible interest is required under the thin capitalisation rules when the debt percentage (calculated as the total group interest bearing debt/total group assets net of non-debt liabilities of a New Zealand entity or group) exceeds both:

i. 60% (for 'inbound' thin capitalisation) or 75% (for 'outbound' thin capitalisation) and

ii. 110% of the worldwide group's debt percentage.

Stamp tax

There is no stamp duty in New Zealand.

Corporate income tax

Income tax rate

Corporate taxation for New Zealand resident companies is at the rate of 28% on their worldwide income. An overseas company is taxed at the same rate, but only in respect of income that has a New Zealand source.

Capital gains

There is no comprehensive capital gains tax in New Zealand.

However, in certain circumstances capital gains are taxable. A significant example, which applies in the context of residential land, is the 'bright- line test'. This applies to tax capital gains derived in relation to the disposal of residential land that is owned for less than certain periods of time. The `bright line test' will apply if residential land is acquired:

i. On or after March 27, 2021, and disposed of within ten years;

ii. Between March 29, 2018 and March 26, 2021, and disposed of within five years;

iii. Between October 1, 2015 and March 28, 2018, and disposed of within two years (as two years have now passed since March 28, 2018 this is no longer relevant).

There are certain exemptions from the 'bright line test'. A significant exemption applies where the property is the 'main home' of the owner or a 'principal settlor' of a trust that owns the property. How the 'main home' exemption applies depends on when the property was acquired.

Note that at the time of writing the new National-led Government elected in October 2023 is proposing to reduce the bright-line period back to two years.

New Zealand also subjects commercial property transactions to taxation in a wide variety of circumstances. While not technically a capital gains tax, New Zealand's property tax rules will generally deem gains made by property dealers, developers and building to tax, as well as gains made by any person where the property was acquired with a purpose of resale.

Dividends

New Zealand operates an imputation system under which the payment of company tax is imputed to shareholders. Imputation credits can be attached pursuant to a ratio of 28/72 to cash dividends paid (or taxable bonus shares issued). Imputation credits reduce tax payable on a dividend (or taxable bonus shares) received by a shareholder. There are rules in relation to limits on carrying forward and the use of imputation credits in future years, which attempts to prevent streaming of imputation credits. There is a requirement for a continuity of shareholding of at least 66% to carry imputation credits forward.

Branch tax

Overseas companies that are carrying on business in New Zealand must register as an overseas company with the Companies Office.

If operated by a non-resident, the branch will be treated as a non-resident company for New Zealand tax purposes. Branch profits are subject to ordinary corporate rates of taxation, and there is no withholding tax on repatriated profits. A branch may also use utilise branch losses to offset foreign income.

Computation of taxable income

Taxable base

New Zealand resident companies are taxed on their worldwide income. Non-resident companies (including branches) are taxed only on their New Zealand-sourced income.

Deductions

Taxable income is calculated by subtracting allowable deductions from assessable income. Example of corporate deductions include:

i. Depreciation and amortisation;

ii. Salaries and wages;

iii. Property leasing costs;

iv. Start-up expenses;

v. Research and development costs;

vi. Interest expenses;

vii. Bad debts;

viii. Charitable deductions;

ix. Entertainment expenditure;

x. Legal expenditure;

xi. Net operating losses; and Payments to foreign affiliates.

New Zealand also operates a research and development (R&D) tax incentive, that offers a tax credit equal to 15% of eligible R&D expenditure up to NZD120 million. The credit offsets a company's income tax liability and in some circumstances is refundable. At least NZD50,000 of R&D expenditure must be incurred in an income year to be eligible for an R&D incentive claim

Income tax reporting

New Zealand has a self-assessment tax regime meaning taxpayers are required to file an income tax return reflecting their assessable income and deduct expenses for a tax or income year. Financial statements are required to be submitted to the Inland Revenue by the income tax return date.

The standard tax year is April 1st to March 31st however a company can apply to Inland Revenue to have a non-standard balance date in certain circumstances.

Cross-border payments

Transfer pricing

New Zealand has a comprehensive transfer pricing regime based on the Organisation for Economic Cooperation and Development Transfer Pricing Guidelines. The purpose of New Zealand's transfer pricing regime is to seek to protect the New Zealand tax base by ensuring that cross-border transactions (at least for tax purposes) are in accordance with the 'arm's length' principle.

The transfer pricing rules apply to arrangements for the acquisition or supply of goods, services, money, intangible property, and anything else where the supplier and acquirer are associated persons. Various methods are available for determining the 'arm's-length consideration'. The taxpayer is required to use the method that produces the most reliable measure of the amount that independent parties would have paid or received in respect of the same or similar transactions. Inland Revenue has published guidelines that make it clear that documentation is required to support a taxpayer's transfer prices.

New Zealand also has a unique restricted transfer pricing (RTP) regime that applies to the pricing of cross-border related party loans. The rules are complex and can require loans to New Zealand subsidiaries that are highly geared to be priced at interest rates that assume the New Zealand subsidiary has a credit rating only one or two notches lower than that of its global parent. The rules also require any so-called 'exotic features' of a loan (such as subordination or a term of more than five years) to be disregarded when undertaking the pricing exercise.

Withholding tax on passive income

Dividends, interest and royalties paid by a New Zealand resident company to non-residents are subject to NRWT which is generally payable at 15% on interest and royalties, and 30% on dividends (as explained above). These rates are subject to modification by DTTs between New Zealand and the recipient's country of residence.

Withholding tax on service fees

There is currently no specific withholding tax on service or management fees. However, the definition of royalty is very wide and can include what might be considered service fees in some other jurisdictions.

Multilateral Instrument

New Zealand signed the MLI on June 8, 2017 and deposited its instrument of ratification on June 26, 2018. The MLI entered into force in New Zealand from October 1, 2018 and came into effect from the latest of the dates on which the MLI enters into force for New Zealand and the other jurisdiction:

i. For withholding taxes: from January 1 of the following calendar year; and

ii. For all other taxes: for taxable periods commencing on or after the expiry of six calendar months.

New Zealand has listed 37 double tax agreements to be covered by the MLI. New Zealand has adopted the minimum provisions of the MLI as well as Article 3 (Fiscally Transparent Entities), Article 4 (Dual Resident Entities), Article 8 (Dividend Transfer

Transactions), Article 9 (Capital Gains), Article 10 (Anti-Abuse Rule for Permanent Establishments), Article 11 (Right to Tax Own Residents), and Articles 12 to 15 (Avoidance of Permanent Establishment Status).

International tax reform

On October 8, 2021, New Zealand, along with over 135 other countries and territories, committed to a two-pillar plan for international corporate tax reform that supports the OECD Inclusive Framework's 'Tax Challenges Arising from Digitalization' project.

On May 5, 2022 Inland Revenue released a paper for public consultation on the implementation of the Pillar Two rules for New Zealand. As New Zealand is part of the Inclusive Framework the consultation paper did not seek feedback on technical details, but rather on broader questions including whether New Zealand should adopt the Pillar Two rules, when the rules should be effective from and how best to translate the rules into New Zealand law. This was followed on May 18, 2023 by the introduction of the Taxation (Annual Rates for 2023-24, Multinational Tax, and Remedial Matters) Bill (the Bill) which proposes to implement the Pillar Two rules.

The draft legislation contained in the Bill has been introduced through incorporating the OECD rules, as opposed to drafting New Zealand specific legislation. The Bill does not contain a specific application date. This will be set by the New Zealand Government once it determines that a critical mass of countries have adopted the Pillar Two rules. The application date will not be earlier than January 1, 2004 for the Income Inclusion Rule and January 1, 2025 for the Undertaxed Profits Rule.

New Zealand's Inland Revenue estimates that out of approximately 1,500 multinational groups that will be within the scope of the proposed rules, only 20-25 are headquartered in New Zealand. As a result Inland Revenue is not expecting the Pillar One or Pillar Two rules to generate much additional tax revenue.

Payroll taxes

New Zealand has a pay as you earn (PAYE) regime. Any person who makes a PAYE income payment must withhold tax from the payment under the PAYE rules. The PAYE rules specify how much tax must be deducted and when it must be paid to Inland Revenue.

Individual taxpayers are taxed at progressive or 'marginal' tax rates. For the year ending March 31, 2024 the individual tax rates are:

- Income up to NZD14,000: 10.5%
- Income over NZD14,000 and up to NZD48,000: 17.5%
- Income over NZD48,000 and up to NZD70,000: 30%
- Income over NZD70,000 and up to NZD180,000: 33%
- Income over NZD180,000: 39%

Note that the National-led Government elected in October 2023 is proposing to adjust these income tax rates to the following, with effect from 1 July 2004:

- Income up to NZD15,600: 10.5%
- Income over NZD15,600 and up to NZD53,500: 17.5%
- Income over NZD53,500 and up to NZD78,100: 30%
- Income over NZD78,100 and up to NZD180,000: 33%
- Income over NZD180,000: 39%

Employer superannuation contribution tax (ESCT)

Employers' contributions to an approved superannuation fund (excluding foreign schemes) are subject to ESCT. This includes employer contributions to KiwiSaver (which is a type of registered superannuation scheme).

ESCT is generally deducted at the employee's relevant marginal rate based on the employee's total salary or wages and employer superannuation cash contributions paid to the employee in the previous year.

KiwiSaver is a voluntary retirement savings scheme to which employees make contributions of at least 3% of their gross salary or wages. Employers are required to make KiwiSaver deductions from the employee's wages and forward them to Inland Revenue. Employers must also pay compulsory employer contributions of at least 3% of the employee's gross salary or wages.

Fringe Benefit Tax (FBT)

FBT applies to benefits provided by employers to employees such as motor vehicles, low interest loans and subsidised goods or services. It is levied on employers according to the taxable value of the fringe benefit provided. The tax rate varies with the tax rate of the employee receiving the benefit.

Pension plan

A pension payment is treated as an item of salary or wages and therefore tax should be deducted at the appropriate rate according to the PAYE tax deduction tables.

Provincial payroll taxes

Not applicable in New Zealand.

Indirect taxes

Goods and services tax

GST is charged on the supply of goods and services made in New Zealand by a registered person in the course or furtherance of a taxable activity, provided that the supply made is not an exempt supply (for example, the supplies of financial services and residential rental accommodation). Registration is compulsory if supplies exceed NZD60,000 in any 12-month period. The standard rate of GST is 15%.

Certain supplies can be zero-rated, which means that GST is calculated at the rate of 0%. These include the supply of exports, the sale of a business as a going concern and any transactions involving the transfer of commercial property (including leases of commercial property) between two GST registered parties.

Other supplies are treated as exempt from GST, which means no GST is charged on the supply and that no GST input tax credits are able to be claimed in respect of costs incurred in making the exempt supply. The main categories of exempt supplies are financial services and the transfer or rental of residential property.

Groups of related entities can form a GST group. If entities form a GST group, they nominate one member to be the group's representative, which then attends to all GST-related compliance on behalf of the group. Transactions within a GST group are disregarded.

Since December 1, 2019 GST has also been levied on low value (less than NZD1,000) imported goods into New Zealand. This can require non-resident suppliers of goods into New Zealand (including online marketplaces) to register for and charge New Zealand GST.

Finally, non-resident suppliers of remote services (e.g. TV and movie streaming services, suppliers of e-books, and online newspaper and magazine subscriptions) to New Zealand resident consumers must register for and charge New Zealand GST if their supplies into New Zealand exceed NZD60,000 in a 12-month period.

Land Transfer Requirements

Due to recent changes to land transfer legislation to address potential taxation issues, most buyers (including overseas buyers) are now required to provide an Inland Revenue Number (IRD Number) and any foreign equivalent of IRD Numbers at the time of purchase. In order for overseas buyers to apply for an IRD Number they must have a fully functioning New Zealand bank account.

Tax Depreciation

Depreciation can be claimed on building fit outs, but not on most buildings or land. Until April 1, 2011, buildings acquired after March 31, 1993 could be depreciated at 4% diminishing value or 3% straight-line, based on an estimated useful life of 50 years. The plant and capital equipment are depreciated at different rates, reflecting their economic life. Any depreciation claimed in the past is clawed back as income if a building is sold at a profit over the tax book value. Depreciation deductions have been re-introduced for non-residential buildings from the 2020/21 income year at 2% diminishing value or, 1.5% straight line.

Fit outs on commercial premises are depreciable at the rates listed in Determination DEP 1. Residential building fit out is not depreciable. If a fit out has been historically depreciated at the same rate as the building, 15% of the tax book value of the building is treated as equal to the fit out, and depreciation at 2% straight-line is permitted.

How we can help you

- Undertaking tax due diligence on New Zealand acquisition targets.
- Providing tax structuring and funding advice for New Zealand acquisitions and/or expansion activity (in co-ordination with other Dentons global offices and/or your existing offshore tax advisers).
- Reviewing the tax clauses of key contracts entered into in New Zealand.
- Providing advice on the implications of providing offshore goods and/or services to New Zealand customers.
- Advising on the tax implications of employing personnel in New Zealand.
- Advising on the personal tax implications of moving to New Zealand.
- Assisting with tax disputes with New Zealand Inland Revenue.

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