

## Updated Italian White List: Opportunities For Issuers and Investors



On Monday, 22 August 2016, the Italian tax authorities (Agenzia delle Entrate), published the long awaited **updated Italian White List**. The Italian White List establishes the countries of tax residence where investors may benefit from exemption from “Italian Substitute Tax” under Italian **Legislative Decree 239 of 1996** (“LD239/1996”). The decree stipulates that interest paid on eligible securities, including bonds, commercial paper and hybrid securities, issued domestically or abroad, is not subject to Italian substitute tax of 26% if the “White List” beneficial owner and its custodian comply with the relevant Italian tax compliance and relief procedures. **Acupay** in partnership with **Monte Titoli** have implemented such procedures on a total of **US\$19,3bn of Italian debt securities**.

The Italian tax authorities only include in their White List countries for which they consider that information exchange through bilateral agreements with Italy is sufficient. This most recent change to the Italian White List has increased the number of countries on the list from 72 to 123, adding **51 new countries**<sup>1</sup> including Switzerland, Hong Kong, Bermuda, the Cayman Islands, Jersey (Channel Islands), British Virgin Islands, and Taiwan.

This is not only good news for offshore investors who now qualify as eligible to receive interest free from Italian substitute tax under LD239/1996. It also opens up a host of new markets where Italian issuers can offer foreign investors more competitive yields hence widening their investor base.

Especially noteworthy is the inclusion of **Hong Kong** and **Taiwan** in the White List. This is paving the way for Italian *direct* issuances into the Far Eastern domestic markets, using our tax compliance systems to bridge Monte Titoli’s infrastructure and that of the foreign domestic clearing system.

**For more information on the Acupay solution for Italian debt issued in foreign domestic markets, please contact:**

### Product Team

Tel: +44 20 7382 0340

Email: [product@acupay.com](mailto:product@acupay.com)

**acupay**

[www.acupay.com](http://www.acupay.com)

<sup>1</sup> Alderney, Anguilla, Armenia, Aruba, Azerbaijan, Belize, Bermuda Islands, Bosnia and Herzegovina, Cameroon, Cayman Islands, Colombia, Congo, Cook Islands, Costa Rica, Curacao (Netherlands Antilles), Ethiopia, Faroe Islands, Georgia, Ghana, Gibraltar, Greenland, Guernsey, Herm Island, Hong Kong, Isle of Man, Jersey, Jordan, Kyrgyzstan, Lebanon, Liechtenstein, Malaysia, Moldova, Montenegro, Montserrat, Mozambique, Nigeria, Oman, Saudi Arabia, Senegal, Serbia, Seychelles, Saint Martin, Switzerland, Syria, Taiwan, Tajikistan, Turkmenistan, Turks and Caicos, Uganda, Uzbekistan, British Virgin Islands.