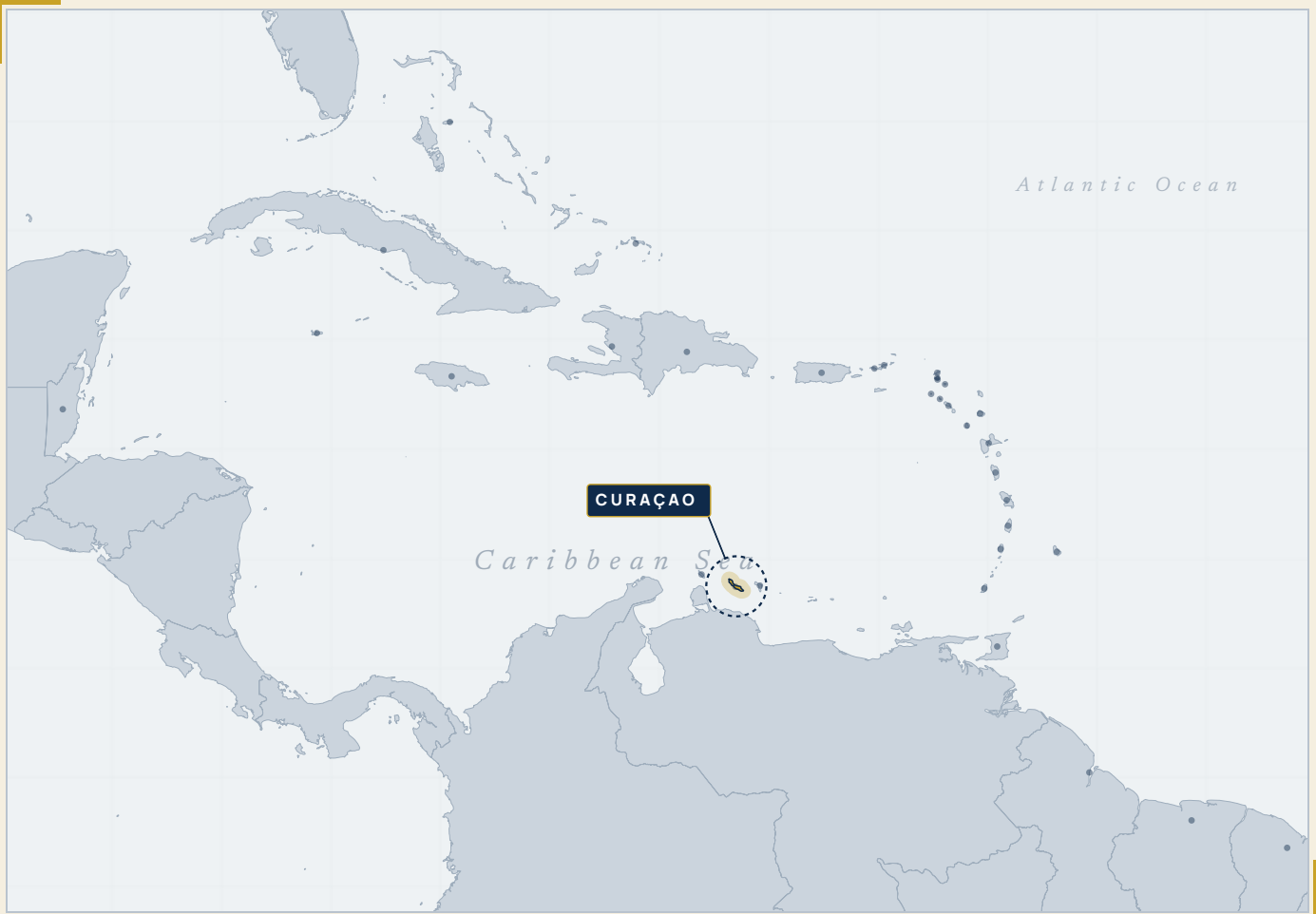




CARIBBEAN TAX SERVICE DESK · SOUTHERN CARIBBEAN

# Curaçao *Tax Guide*

*A guide to corporate, personal and indirect taxes in Curaçao*

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## FOREWORD

Curaçao taxes companies on a territorial basis, levies no withholding tax on dividends, interest or royalties, and offers reduced rates for selected activities. Its rules still demand careful handling.

Curaçao combines a Dutch civil-law framework with a tax system built around profit tax, a progressive income and wage tax, social insurance premiums collected by the Social Insurance Bank, turnover tax and taxes on real estate. Recent years have brought a territorial profit tax, a two-tier rate, the Caribbean guilder, a beneficial ownership register and, in 2026, a minimum tax for large multinational groups.

This guide explains the main taxes on companies and individuals in plain language, current to October 2026. It is written for investors, finance teams and individuals with interests in Curaçao.

Tax matters are handled by Dawgen Global's Caribbean Tax Service Desk, managed from Kingston. We would be glad to help you plan, comply and resolve issues with confidence.

**Dr. Dawkins Brown, Ph.D., MCMI, ACFE**

Executive Chairman, Dawgen Global

**How to use this guide**

This guide summarises the main taxes that apply to companies and individuals in Curaçao. It is general information, current to October 2026, and is not a substitute for advice on your circumstances.

Rates and rules change; speak to us before you act. Our companion Doing Business guide covers set-up, employment and regulation.

## FOUNDATIONS

# 01 Investment basics

Curaçao uses the Caribbean guilder (Cg), pegged to the US dollar. Taxes are administered by the Tax Department; social insurance premiums are collected by the Social Insurance Bank (SVB).

**PROFIT TAX****15% / 22%**

15% on the first Cg 500,000; 3% and 0% for qualifying activities

**TURNOVER TAX (OB)****6%**

7% and 9% in certain cases; no registration threshold

**INCOME AND WAGE TAX****9.75% to 46.5%**

Six bands; top rate above Cg 162,894 in 2026

**WITHHOLDING TAX****None**

No tax on dividends, interest or royalties paid abroad

**SOCIAL PREMIUMS****AOV 15%**

9% employer, 6% employee; plus AWW, BVZ, AVBZ, sickness and accident

**TRANSFER TAX****4%**

On transfers of real estate, paid by the buyer

## Currency and foreign exchange

The Caribbean guilder (XCG) replaced the Netherlands Antillean guilder one for one in 2025 and is pegged at Cg 1.79 to US\$1. Central Bank foreign exchange regulations apply to payments between residents and non-residents, and a 1% licence fee applies to certain outflows.

## Accounting and audit

Companies keep accounts and prepare annual financial statements under the Civil Code; IFRS is widely used. Larger and regulated companies need an audit, and large companies file accounts with the Chamber of Commerce. Financial statements accompany the final profit tax return.

## Principal business entities

Private limited company (BV)

Public limited company (NV)

Branch of a foreign company

Private foundation (SPF)

Partnership (VOF or CV)

Curaçao trust

Companies, foundations and partnerships carrying on business are subject to profit tax. Sole proprietors are taxed personally.

## The tax system

Profit tax, income and wage tax, OB, transfer tax, property tax and inheritance tax are administered by the Tax Department. Curaçao Customs collects import duties and excise.

## BUSINESS TAX

## 02 Corporate taxation

Since 1 January 2020 profit tax has applied on a territorial basis: only profit from Curaçao sources is taxed.

### Residence and basis

A company is resident if incorporated in Curaçao or managed and controlled there. Foreign income is excluded by apportioning profit by the ratio of local to total direct expenses, and passive income such as dividends, interest and royalties is treated as Curaçao-source. Non-resident companies pay tax on profits of a Curaçao permanent establishment and on Curaçao real estate.

### Taxable income

- ◆ Profit determined on sound business practice; most business expenses deductible
- ◆ Depreciation follows sound business practice, not fixed statutory rates
- ◆ Investment allowance: an extra 10% deduction where qualifying investment exceeds Cg 5,000 in a year
- ◆ A disinvestment addition recaptures the allowance on early disposal
- ◆ Gifts to charities deductible up to 3% of profit, within conditions

| Taxpayer or activity                                                                                                                  | Rate |
|---------------------------------------------------------------------------------------------------------------------------------------|------|
| Taxable profit up to Cg 500,000                                                                                                       | 15%  |
| Taxable profit above Cg 500,000                                                                                                       | 22%  |
| Building and repair of aircraft and vessels of 10 metres or more                                                                      | 3%   |
| Call, service and data centres for groups with turnover of Cg 50 million or more; warehousing; services to unrelated investment funds | 3%   |
| Curaçao investment companies                                                                                                          | 0%   |
| IP income meeting the OECD nexus approach                                                                                             | 0%   |
| Private foundation without business activity                                                                                          | 0%   |

Shipping companies may elect a tonnage-based profit.

### Minimum tax and surtax

There is no surtax and no alternative minimum tax. Large multinational groups are subject to the Pillar Two income inclusion rule from 2025 (section 05), but there is no domestic top-up tax on low-taxed profit in Curaçao.

## BUSINESS TAX

# 03 Corporate taxation (continued)

## Dividends and the participation exemption

Dividends and capital gains on a qualifying participation are exempt. A holding qualifies at 5% or more of the shares, or an acquisition cost of at least Cg 890,000. The exemption is full where the subsidiary is taxed at 10% or more or is an active business; otherwise a partial exemption leaves an effective rate of 10%. Dividends from real estate companies are fully exempt.

## Capital gains

Gains are taxed as ordinary profit at 15% or 22% unless the participation exemption applies. Mergers, demergers and conversions can be tax-deferred.

## Losses

Losses are carried forward for 10 years, oldest first. There is no carry-back, foreign losses cannot be used, and restrictions apply in certain cases.

## Foreign tax relief

Under the territorial system foreign profit is largely excluded. A 2022 national decree gives unilateral relief from double taxation where no treaty applies.

## Holding companies and groups

A fiscal unity may be formed where a Curaçao parent holds at least 99% of Curaçao subsidiaries. The group files one return and intra-group transactions are eliminated. A request can apply up to three months retroactively.

## Tax incentives in brief

| Incentive                   | Main benefit                                                                   |
|-----------------------------|--------------------------------------------------------------------------------|
| <b>3% and 0% regimes</b>    | Reduced rates for the activities in section 02, with substance conditions      |
| <b>Investment allowance</b> | Extra 10% deduction on qualifying investment                                   |
| <b>Tax holidays</b>         | On request for most sectors, for investment of at least Cg 5 million           |
| <b>Historic city centre</b> | Incentives for restoring monuments and historic real estate                    |
| <b>Economic zones</b>       | Customs and OB relief on goods; the 2% profit tax rate was abolished from 2020 |
| <b>Employment</b>           | Expatriate regime; youth employment exemption                                  |

## CROSS-BORDER PAYMENTS

## 04 Withholding taxes and tax treaties

Curaçao levies no withholding tax on payments to non-residents. A planned dividend withholding tax was revoked in 2025 without taking effect.

| Payment                       | Resident company | Resident individual               | Non-resident      | Treaty position           |
|-------------------------------|------------------|-----------------------------------|-------------------|---------------------------|
| Dividends                     | None             | None                              | None              | No domestic tax to reduce |
| Interest                      | None             | 8.5% on interest from local banks | None              | No domestic tax to reduce |
| Royalties                     | None             | None                              | None              | No domestic tax to reduce |
| Management and technical fees | None             | None                              | None              | —                         |
| Branch profits                | —                | —                                 | No remittance tax | —                         |

Some payments to related parties may be non-deductible for the payer (section 05). Treaties mainly matter for relief abroad and for residence.

**Treaties and arrangements in force**

- ◆ **Netherlands:** Tax Arrangement Netherlands–Curaçao, amended for OECD anti-abuse rules
- ◆ **Aruba and Sint Maarten:** Tax Arrangement for the Kingdom
- ◆ **Malta:** in force from 1 September 2024

**Signed or in negotiation**

- ◆ **Suriname:** signed July 2024, awaiting ratification
- ◆ **Cyprus:** signed April 2025, awaiting ratification
- ◆ **Barbados:** initialled August 2025
- ◆ **Norway:** former treaty terminated

**Information exchange and the CARICOM agreement**

The Multilateral Instrument has applied to Curaçao since 1 July 2019, and information is exchanged under the Kingdom's agreements, including with the United States. Curaçao is not party to the CARICOM double taxation agreement.

## INTERNATIONAL RULES

# 05 Anti-avoidance and international rules

Curaçao follows OECD standards on transfer pricing and information exchange, and links its preferential regimes to real substance.

## Transfer pricing

Related-party transactions must be at arm's length, in line with OECD guidelines. A master file and local file form part of the records, and groups with revenue of Cg 1.5 billion or more file country-by-country reports. Without documentation, the burden of proof shifts to the taxpayer.

## Interest limits

Interest on intra-group loans tied to certain tainted transactions is not deductible. Interest on loans from low-taxed group entities is deductible only up to a 3:1 debt-to-equity ratio.

## CFC rules and GAAR

There are no CFC or anti-hybrid rules and no statutory general anti-avoidance rule. The courts and the Tax Department apply abuse of law (fraus legis) and substance over form.

## Economic substance

Companies using the territorial basis or a reduced rate must meet substance standards for staff and costs. Fines for intentional or grossly negligent breaches range from Cg 50,000 to Cg 500,000. A confirmation can be requested.

## Pillar Two

Parliament passed the Minimum Tax Ordinance on 1 September 2026. It introduces only the 15% income inclusion rule for groups with revenue of €750 million or more, retroactive to years beginning on or after 1 January 2025. No domestic top-up tax or UTPR has been introduced.

## Information exchange

- ◆ **FATCA:** Model 1 agreement with the United States
- ◆ **CRS:** automatic exchange under local law since 2017
- ◆ **Beneficial ownership:** UBO register at the Chamber of Commerce
- ◆ **Exit:** assets revalued when an entity ceases to earn Curaçao income

## CORPORATE COMPLIANCE

# 06 Compliance for corporations

Companies self-assess and file electronically through the Tax Department's portal, in two stages: a provisional return and a final return.

## Tax year and returns

The tax year is the financial year, normally the calendar year; a different year may be requested. A fiscal unity files one return for the group; otherwise each company files its own.

**1**

### Provisional return and payment

**31 MAR**

Within three months of year-end. No extension is available.

**2**

### Final return and balance

**30 JUN**

With financial statements and UBO details. Extensions may be granted for compliant taxpayers.

**3**

### Assessment

**AFTER FILING**

The Tax Department issues the final assessment; any balance is payable within the stated term.

## Penalties and interest

Late filing or payment can attract fines of up to Cg 10,000, and intent or gross negligence up to 100% of the tax due. Since 2024 failure to file profit tax returns may be prosecuted. Interest is charged at rates set by law.

## Audits, records and rulings

The Tax Department may audit and issue additional assessments within statutory time limits. Keep books and records for the period the law requires. Advance rulings are available under a published policy, and anonymised rulings are published.

## Objections and appeals

Object in writing to the Tax Inspector within the period stated on the assessment. Appeals go to the Court of First Instance, then the Joint Court of Justice, with cassation to the Supreme Court of the Netherlands.

## Practical points

Base the provisional return on a realistic estimate, since it cannot be extended. Document substance and the expense apportionment behind the territorial basis each year. Reconcile wage tax, premium and OB filings to the accounts before the final return.

## BEYOND PROFIT TAX

## 07 Other taxes on corporations

| Tax                                     | Rate and base (2026)                                                             | Who pays                       |
|-----------------------------------------|----------------------------------------------------------------------------------|--------------------------------|
| <b>Old age and survivors (AOV, AWW)</b> | Employer 9% and 0.5% of wages up to Cg 100,000 a year                            | Employer, plus employee shares |
| <b>Basic health (BVZ)</b>               | Employer 9.3% of wages up to Cg 150,000 a year                                   | Employer, plus employee share  |
| <b>Special medical (AVBZ)</b>           | Employer 0.5%, up to Cg 606,247.08 a year                                        | Employer, plus employee share  |
| <b>Sickness and accident (ZV, OV)</b>   | 1.9% and 0.5% to 5% by risk, on wages up to Cg 85,753.20 a year                  | Employer                       |
| <b>Severance fund (cessantia)</b>       | Fixed annual premium per employee                                                | Employer                       |
| <b>Wage tax</b>                         | Withheld from pay at income tax rates (section 08)                               | Employer withholds             |
| <b>Property tax</b>                     | 0.4% of value to Cg 350,000; 0.5% to Cg 750,000; 0.6% above                      | Owner of real estate           |
| <b>Transfer tax</b>                     | 4% of the value of real estate transferred                                       | Buyer                          |
| <b>Stamp duty and capital duty</b>      | None                                                                             | —                              |
| <b>Insurance premiums</b>               | OB at 7%                                                                         | Insurers                       |
| <b>Foreign exchange licence fee</b>     | 1% on certain outflows, with exemptions                                          | Residents paying abroad        |
| <b>Excise and room tax</b>              | Excise on fuel, tobacco, beer, wine and spirits; room tax on guest accommodation | Importers, producers, hotels   |

Premiums and taxes incurred in the business are generally deductible for profit tax. Premiums are paid to the SVB monthly.

## INDIVIDUALS

## 08 Personal taxation

Residents pay income tax on worldwide income at progressive rates; non-residents pay on income from Curaçao sources.

**Basis of taxation**

- ◆ **Resident:** worldwide income
- ◆ **Non-resident:** Curaçao-source income, such as employment in Curaçao, a business carried on there, Curaçao real estate and a substantial interest in a Curaçao company

**Residence**

Residence depends on where the individual's centre of life is, judged on all the facts, such as home, family and work. Treaties can resolve dual residence.

**Filing status**

Spouses file one joint return. Separate filing may be requested only where the marriage is outside community of property.

**Taxable income**

Employment income and benefits, business profits, pensions, rents and other investment income. Interest from local banks is taxed at 8.5%; income and gains from a substantial interest (5% or more) at 19.5%.

| Taxable income, 2026     | Rate  |
|--------------------------|-------|
| Up to Cg 39,094          | 9.75% |
| Cg 39,094 to Cg 52,127   | 15%   |
| Cg 52,127 to Cg 78,190   | 23%   |
| Cg 78,190 to Cg 110,769  | 30%   |
| Cg 110,769 to Cg 162,894 | 37.5% |
| Above Cg 162,894         | 46.5% |

Brackets and credits are set each year by ministerial regulation; the 2026 amounts apply from 1 January 2026.

**Tax credits, 2026**

| Credit                    | Amount          |
|---------------------------|-----------------|
| Basic credit              | Cg 2,915        |
| Sole earner supplement    | Cg 1,779        |
| Elderly supplement        | Cg 1,342        |
| Child credit, by category | Cg 96 to Cg 948 |

## INDIVIDUALS

## 09 Personal taxation (continued)

**Capital gains**

Private gains are generally exempt. Gains on a substantial interest of 5% or more are taxed at 19.5%, and gains of a business are part of its profit.

**Deductions and reliefs**

- ◆ Home financing costs, up to Cg 27,500 a year
- ◆ Personal loan interest, up to Cg 2,500 a year
- ◆ Medical expenses and insurance, within conditions
- ◆ Education loan interest and repayment, up to Cg 10,000 a year for 10 years
- ◆ Donations, up to 3% of income

**Pensions**

Contributions to qualifying pension schemes and annuities are deductible within limits; pensions are taxed when paid. Qualifying pensioners settling in Curaçao may opt for a 10% flat rate on foreign income.

**Employment benefits**

Benefits in cash or kind are taxable. Under the expatriate regime, benefits in kind are capped at Cg 15,000 a year and school fees and housing may be paid tax-free.

| Tax                             | Position for individuals             |
|---------------------------------|--------------------------------------|
| <b>AOV (employee)</b>           | 6% of income up to Cg 100,000 a year |
| <b>AWW (employee)</b>           | 0.5%, same ceiling                   |
| <b>BVZ (employee)</b>           | 4.3% up to Cg 150,000 a year         |
| <b>AVBZ (employee)</b>          | 1.5% up to Cg 606,247.08 a year      |
| <b>Transfer tax</b>             | 4% on buying real estate             |
| <b>Property tax</b>             | 0.4% to 0.6% of value by band        |
| <b>Inheritance and gift tax</b> | Rates up to 24%; exemptions apply    |
| <b>Stamp duty</b>               | None                                 |
| <b>Net wealth tax</b>           | None                                 |

Self-employed individuals and pensioners pay BVZ at the full 13.6%. Premium ceilings are set each year by the SVB.

## INDIVIDUAL COMPLIANCE

# 10 Compliance for individuals

Employees meet most obligations through wage tax withheld by their employer. Others with business, rental or foreign income file an annual return.

## Employees and wage tax

The tax year is the calendar year. Employers withhold wage tax and employee premiums using daily, weekly or monthly tables, and pay them with monthly returns by the 15th of the next month. Wage tax is credited against income tax on assessment.

## Annual returns

| When                          | What                                                             |
|-------------------------------|------------------------------------------------------------------|
| Within six months of year-end | Income tax return, or by the date in the Tax Department's notice |
| After filing                  | Assessment issued; balance or refund settled                     |

Late filing and payment attract fines and interest. Binding rulings are available on uncertain points.

## Non-residents and expatriates

- ◆ Each taxpayer needs a tax identification (CRIB) number
- ◆ Pay for work done in Curaçao is taxable from the first day
- ◆ The expatriate regime needs pay of at least Cg 150,000, scarce expertise and no Curaçao residence in the previous five years; it lasts up to five years
- ◆ The employer must arrange a local successor trainee within a year
- ◆ Employees aged 18 to 29 may qualify for a wage tax and premium exemption from July 2025
- ◆ A departing holder of a substantial interest may receive a protective assessment
- ◆ Foreign staff also need work and residence permits

## Treaty relief

Residents of the Netherlands, Aruba, Sint Maarten and Malta can rely on the treaty rules for employment income and pensions.

## INDIRECT TAXES

# 11 Turnover tax and customs

Turnover tax (omzetbelasting, OB) is charged on goods and services supplied in Curaçao by entrepreneurs, and on imports.

| Rate              | Applies to                                                     |
|-------------------|----------------------------------------------------------------|
| <b>6% general</b> | Most goods and services                                        |
| <b>7%</b>         | Insurance and short-term rentals to tourists                   |
| <b>9%</b>         | Imports and certain listed goods and services                  |
| <b>0%</b>         | Specified supplies                                             |
| <b>Exempt</b>     | Certain supplies, such as residential leases of a year or more |

## Registration and returns

Every entrepreneur making taxable supplies must register; there is no threshold. Returns are monthly by the 15th; quarterly for turnover of Cg 30,000 to Cg 75,000 and annual below Cg 30,000. Nil returns are required.

## Penalties

Late OB returns can attract fines of up to Cg 10,000, and penalties for missed returns accumulate quickly. Short-term rental of homes to tourists is taxable at 7%, and owners should register and file.

## Input tax

OB is a turnover tax, not a full value added tax: there is no general credit for OB on business purchases. Confirm the treatment of OB paid on imports with the Tax Department.

## Imported and digital services

Foreign businesses supplying consumers in Curaçao must register. Local businesses using foreign providers may owe OB on those services.

## Customs and excise

Import duty is charged on the customs value under the Curaçao tariff, plus OB and, for fuel, tobacco and alcohol, excise. Goods in the free zones bear duty and OB only when released locally.

## ADMINISTRATION

# 12 Tax calendar and administration

## Main tax laws

Profit Tax Ordinance; Income Tax Ordinance 1943; Wage Tax Ordinance; Turnover Tax Ordinance; Real Estate Transfer Tax Ordinance; Real Estate Tax Ordinance; Inheritance Tax Ordinance; General Ordinance on National Taxes; Ordinance on International Assistance in Tax Matters; Minimum Tax Ordinance 2024; and the social insurance ordinances administered by the SVB.

## Authorities

The Tax Department and the Tax Collector administer domestic taxes; Curaçao Customs collects duties; the SVB collects premiums. Tax appeals go to the Court of First Instance.

## Recent and upcoming changes

- ◆ **2025:** Caribbean guildier introduced; UBO register filings; dividend withholding tax revoked; OB filing by turnover; youth exemption; expatriate regime tightened
- ◆ **2026:** wider brackets and higher credits; new premium ceilings; Minimum Tax Ordinance passed with the income inclusion rule only
- ◆ **Ahead:** first minimum tax filings in 2027; treaties with Suriname and Cyprus awaiting ratification

| When                           | What                                                                     |
|--------------------------------|--------------------------------------------------------------------------|
| <b>15 January</b>              | Annual OB return for small businesses                                    |
| <b>15th monthly</b>            | Wage tax and premiums; monthly OB return and payment                     |
| <b>15th after each quarter</b> | Quarterly OB return                                                      |
| <b>31 March</b>                | Provisional profit tax return and payment                                |
| <b>By 31 March</b>             | Request a fiscal unity from 1 January                                    |
| <b>30 June</b>                 | Final profit tax return, unless extended; income tax returns as notified |
| <b>30 June 2027</b>            | First minimum tax notifications expected for 2025                        |
| <b>Within two weeks</b>        | Report UBO changes to the Chamber of Commerce                            |

Dates assume a calendar year. Property tax is payable on assessment by the Tax Department.

YOUR PARTNER

# 13 How Dawgen Global helps

Our Caribbean Tax Service Desk, managed from Kingston, supports companies and individuals with every Curaçao tax, from registration to dispute.

**Tax compliance**

Provisional and final profit tax returns, income tax returns and extensions.

**Corporate tax advisory**

Territorial basis, participation exemption, fiscal unity, losses and transactions.

**International tax and transfer pricing**

Treaty positions, substance, master and local files, CbC reporting and minimum tax.

**Indirect taxes (OB and customs)**

OB registration, returns, rentals, imported services and customs reviews.

**Payroll and employment taxes**

Wage tax, SVB premiums, cessantia, youth exemption and benefit reviews.

**Tax disputes and authority engagement**

Tax Department audits, objections, rulings and appeals.

**Incentives and investment planning**

3% and 0% regimes, investment allowance, tax holidays and economic zones.

**Private client and expatriate tax**

Residence, expatriate and pensioner regimes, substantial interests and estates.

**Tax technology and reporting**

Tax calendars, provisions, data and reporting processes.

**Start with a conversation**

Tell us about your plans or your tax question in Curaçao, and we will set out the steps and timeline for your situation. Some regulated services are performed by affiliated firms; we will advise you of the arrangements when you make a request. Fees are tailored to each client's circumstances and set out in an engagement letter. Email [curacao@dawgen.com](mailto:curacao@dawgen.com) or [info@dawgen.global](mailto:info@dawgen.global), or call (876) 926-5210.

# Talk to the Caribbean Tax Service Desk about Curaçao

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## Key official sources

- Government of Curaçao, Ministry of Finance ([minfin.cw](http://minfin.cw))
- Tax Department, Government of Curaçao ([gobiernu.cw](http://gobiernu.cw))
- Social Insurance Bank, SVB ([svbcur.org](http://svbcur.org))
- Curaçao Customs ([gobiernu.cw](http://gobiernu.cw))
- Centrale Bank van Curaçao en Sint Maarten ([centralbank.cw](http://centralbank.cw))
- Chamber of Commerce and Industry Curaçao ([curacao-chamber.cw](http://curacao-chamber.cw))
- Court of First Instance of Curaçao ([rechtspraak.nl](http://rechtspraak.nl))
- Treaty database of the Kingdom of the Netherlands ([treatydatabase.overheid.nl](http://treatydatabase.overheid.nl))

