International Tax

Philippines Highlights 2025

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Recent developments

For the latest tax developments relating to the Philippines, see Deloitte tax@hand.

Investment basics

Currency: Philippine Peso (PHP)

Foreign exchange control: Foreign currency may be bought and sold freely by residents (including foreign corporations operating in the Philippines) and may be brought into or sent out of the country with minimal restrictions. Nonresidents also may hold foreign currency.

Accounting principles/financial statements: IAS/IFRS apply. Financial statements must be prepared annually and audited by an independent certified public accountant.

Principal business entities: These include corporations (stock/nonstock), partnerships, sole proprietorships, regional headquarters, regional operating headquarters, representative offices, and branches of a foreign corporation.

Corporate taxation

Rates	
Corporate income tax rate	20%/25%
Branch tax rate	25%, plus 15% tax on after-tax profits remitted to foreign head office
Capital gains tax rate	Generally, corporate income tax rate

Residence: A corporation is resident if it is incorporated in the Philippines or, if a foreign corporation (i.e., incorporated outside the Philippines), it has a branch in the Philippines.

Basis: Domestic corporations are taxed on worldwide income; nonresident corporations are taxed only on Philippine-source income. A resident foreign corporation is taxed on Philippine-source income. The taxable income of branches is calculated in the same way as that of subsidiaries.

Taxable income: Corporate income tax is imposed on a corporation's profits, which generally consist of business/trading income. Normal business expenses may be deducted in computing taxable income. In lieu of itemized deductions, corporations may elect to use the optional standard deduction (OSD), which may not exceed 40% of total gross income, in computing taxable income for the taxable quarter/year. Once a decision is made to use the OSD, it is irrevocable for the taxable year for which the return is filed.

Rate

General

Corporations generally are taxed at a rate of 25%. A 20% rate applies to corporations with net taxable income not exceeding PHP 5 million and total assets not exceeding PHP 100 million. Regional operating headquarters are taxed at the regular corporate income tax rates.

Surtax

There is no surtax.

Alternative minimum tax

A minimum corporate income tax (MCIT) equal to 2% of gross income is imposed beginning in the fourth taxable year of operations. The MCIT is imposed in each quarter of the taxable year when a corporation has no or negative taxable income, or when the amount of the MCIT is greater than the corporation's regular income tax liability. Any MCIT that exceeds the regular income tax may be carried forward and credited against the regular income tax for the following three taxable years.

Global minimum tax (Pillar Two)

The Philippines has committed to implementing rules that generally are in line with the global anti-base erosion (GloBE) or "Pillar Two" model rules published by the OECD/G20 Inclusive Framework on BEPS that are designed to ensure a global minimum level of taxation of 15% for multinational enterprise groups with annual consolidated revenue of at least EUR 750 million. No legislation has yet been drafted or enacted to implement the Pillar Two rules.

Taxation of dividends: Dividends received by domestic or resident foreign corporations from a domestic corporation are not subject to tax. Foreign-source dividends are exempt where the funds from the dividends received are reinvested in the recipient's business operations by the end of the next taxable year following the year of receipt and are used only to fund working capital requirements, capital expenditure, dividend payments, investments in domestic subsidiaries, and infrastructure projects. The recipient also must hold directly at least 20% of the outstanding shares of the foreign corporation for a minimum of two years as at the date of distribution of the dividend.

Capital gains: Capital gains generally are taxed as income subject to the regular corporate income tax rates. However, gains realized by a domestic corporation or a resident foreign corporation on the sale of shares in a domestic corporation that is not traded on the stock exchange are subject to a 15% capital gains tax. Gains on the sale of shares listed and traded on the stock exchange are taxed at 0.6% of the gross selling price. Gains derived from the sale of real property not used in a business are subject to a 6% final withholding tax based on the higher of the sales price or the fair market value.

Losses: Losses may be carried forward for three years unless the taxpayer benefits from a tax incentive or an exemption. Losses may not be carried forward where the business undergoes a substantial change in ownership. The carryback of losses is not permitted. As a temporary relief measure, losses incurred in taxable years 2020 and 2021 may be carried forward for five years.

Foreign tax relief: Foreign tax paid may be credited proportionately against Philippine tax on the same profits, but the credit is limited to the amount of Philippine tax payable on the foreign income.

Participation exemption: See “Taxation of dividends,” above.

Holding company regime: There is no holding company regime.

Incentives: Incentives are provided under the Corporate Recovery and Tax Incentives for Enterprises to Maximize Opportunities for Reinvigorating the Economy (CREATE MORE) Act administered by applicable investment promotion agencies, such as the Board of Investment and the Philippine Economic Zone Authority. Benefits usually include fiscal incentives (e.g., income tax holidays) and nonfiscal incentives (e.g., simplified customs procedures for imports and exports). Enterprises engaged in specified business activities may be entitled to other incentives.

Compliance for corporations

Tax year: The tax year may be a calendar year or a fiscal year (an accounting period of 12 months ending on the last day of any month other than December).

Consolidated returns: A domestic corporation and its domestic branches may file a single corporate income tax return; otherwise, consolidated returns are not permitted, and each corporation must file a separate return.

Filing and payment: The annual corporate income tax return must be filed, with or without payment, on or before the 15th day of the fourth month following the close of the taxpayer’s taxable year.

Penalties: Late payments are subject to a surcharge equal to 25% of the amount due plus interest of 12% per annum on the unpaid amount of tax until fully paid. A compromise penalty (in lieu of imprisonment) is imposed based on the tax due (exclusive of the 25% surcharge and applicable interest).

Rulings: The tax authorities will issue a ruling on the tax consequences of a transaction at the taxpayer’s request.

Individual taxation

Rates		
Individual income tax rate	**Taxable income**	**Rate**
	Up to PHP 250,000	0%
	PHP 250,001–PHP 400,000	15% of excess over PHP 250,000
	PHP 400,001–PHP 800,000	PHP 22,500 + 20% of excess over PHP 400,000
	PHP 800,001–PHP 2,000,000	PHP 102,500 + 25% of excess over PHP 800,000
	PHP 2,000,001–PHP 8,000,000	PHP 402,500 + 30% of excess over PHP 2,000,000
	Over PHP 8,000,000	PHP 2,202,500 + 35% of excess over PHP 8,000,000
Capital gains tax rate	Generally, individual income tax rate	

Residence: A citizen of the Philippines normally is considered a resident unless they meet the requirements to be deemed a nonresident. A nonresident citizen is defined in the tax legislation as a citizen of the Philippines who:

- Establishes to the satisfaction of the Commissioner of Internal Revenue that they are physically present abroad with a definite intention to reside abroad;

- Leaves the Philippines during the taxable year to reside abroad, either as an immigrant or for employment on a permanent basis; or
- Works and derives income from abroad and whose employment requires them to be physically present abroad for the majority of the taxable year.

A citizen who has previously been considered a nonresident citizen and who arrives in the Philippines at any time during the taxable year to reside permanently in the Philippines is treated as a nonresident citizen for the taxable year of arrival with respect to foreign-source income until the date of their arrival in the Philippines.

The residence status of a foreign individual generally is established when the aggregate length of stay in the country in any calendar year exceeds 180 days. A foreign individual who stays in the Philippines for more than 180 days is considered a nonresident alien engaged in a trade or business (NRA-ETB); otherwise, the individual is considered a nonresident alien not engaged in a trade or business (NRA-NETB).

Basis: Resident citizens are taxed on worldwide income; resident aliens and nonresidents pay tax only on Philippine-source income. Foreign individuals may benefit from preferential tax treatment or may be exempt from income tax under an applicable tax treaty, subject to a confirmatory ruling from the Bureau of Internal Revenue (BIR).

Taxable income: Taxable income is all income, less allowable deductions. It includes earnings from employment (referred to as “compensation income”), business income, capital gains (arising from the sale of real property and share transactions), dividends, interest, rents, royalties, annuities, pensions, and a partner’s distributive share of the net income of general professional partnerships.

Minimum wage earners are exempt from the payment of income tax on their compensation income, including holiday pay, overtime pay, night shift differential pay, and hazard pay.

In lieu of itemized deductions, an individual engaged in business or the practice of a profession may elect to use the OSD, which may not exceed 40% of total gross sales/receipts, in computing taxable income for the taxable quarter/year. Once an election is made to use the OSD, it is irrevocable for the taxable year for which the return is made.

Rates: Individual income tax is charged at progressive rates ranging from 0% to 35%. However, self-employed individuals with gross sales not exceeding PHP 3 million and that are not required to be registered for VAT, have the option to pay 8% income tax based on gross income in excess of PHP 250,000 (in lieu of graduated tax rates of 0% to 35% and a 3% “percentage tax,” see “Other taxes on corporations and individuals,” below).

Capital gains: Capital gains generally are subject to the ordinary individual income tax rates, although gains from the sale of certain shares and real property are subject to specific rates. An individual is subject to capital gains tax on the sale of real property at a rate of 6% of the higher of the gross sales price or the fair market value. An individual also is subject to tax on the capital gains derived from the sale of shares not traded on the stock exchange at a rate of 15%. Gains derived from the sale of shares listed and traded on the stock exchange are taxed at 0.6% of the gross sales price.

Deductions and allowances: Statutory contributions, as required by domestic law, and nontaxable income (e.g., a nontaxable bonus amount of up to PHP 90,000, de minimis benefits) are allowed as deductions and exclusions against an individual’s gross income.

Foreign tax relief: Foreign tax paid may be credited proportionately against Philippine tax on the same income, but the credit is limited to the amount of Philippine tax payable on the foreign income.

Compliance for individuals

Tax year: The tax year is the calendar year.

Filing status: Married couples in the Philippines with income other than compensation income must file a joint income tax return.

Filing and payment: Tax returns are due on or before 15 April after the close of the tax year. Tax on compensation income is withheld monthly by the employer.

Single or married individuals who receive compensation income from only one employer during the taxable year may qualify for "substituted" filing, provided the amount of tax due equals the amount of tax withheld by the employer at the end of the taxable calendar year.

Penalties: Late payments are subject to a surcharge equal to 25% of the amount due and interest of 12% per annum based on the unpaid amount of tax until fully paid. A compromise penalty (in lieu of imprisonment) is imposed based on the tax due (exclusive of the 25% surcharge and applicable interest).

Rulings: The tax authorities will issue a ruling on the tax consequences of a transaction at the taxpayer's request.

Withholding tax

Rates

Type of payment	Residents		Nonresidents	
	Company	Individual	Company	Individual
Dividends	0%	10%	15%/25%	20%/25%
Interest	15%/20%	15%/20%	0%/20%	0%/20%/25%
Royalties	20%	10%/20%	25%	10%/20%/25%

Dividends: Dividends paid to a resident corporation are exempt from tax. Dividends paid to a resident individual are subject to a 10% withholding tax.

Dividends paid to a nonresident corporation are subject to withholding tax at 15% where the jurisdiction of residence of the nonresident corporation allows a tax credit of at least 10%; otherwise, the rate is 25%. Dividends paid to an NRA-ETB or an NRA-NETB are subject to withholding tax at 20% or 25%, respectively. The withholding tax may be reduced under an applicable tax treaty.

Interest: Interest from Philippine currency deposits paid to a resident corporation is subject to a 20% withholding tax. Interest paid to a nonresident corporation is subject to a 20% withholding tax.

Interest paid to a resident individual or an NRA-ETB is subject to a 20% withholding tax, and for an NRA-NETB, the rate is 25%.

Withholding tax at 15% applies to interest received by resident corporations and resident individuals from transactions with depository banks under the expanded foreign currency deposit system; nonresident corporations and nonresident individuals are exempt.

The withholding tax on interest paid to nonresidents may be reduced under an applicable tax treaty.

Royalties: Royalties paid to resident corporations are subject to a 20% withholding tax; the rate is 25% for payments to nonresident corporations.

A 20% final withholding tax is levied on royalty payments made to an individual, except for royalty payments from books, literary works, and musical compositions, which are taxed at 10%. However, a 25% withholding tax applies for any royalty payments made to an NRA-NETB.

The withholding tax on royalties paid to nonresidents may be reduced under an applicable tax treaty.

Fees for technical services: Technical service fees generally are treated as business profits (rather than royalties) and are subject to the applicable income tax rates. Where technical services fees are treated as royalties, they are subject to the withholding tax rules applicable to royalties. Technical service fees treated as royalties also are subject to final withholding VAT of 12%, unless specifically exempt under the law.

Branch remittance tax: A 15% branch profits tax is imposed on the after-tax profits remitted by a branch to its foreign head office, except for profits on activities registered with the Philippine Economic Zone Authority.

Other: Other payments to nonresidents may be subject to withholding tax (e.g., management fees at 25%; certain payments related to vessels at 4.5%; certain payments related to aircraft, machinery, and other equipment at 7.5%). Rates may be reduced under an applicable tax treaty, subject to a confirmatory ruling from the BIR.

Anti-avoidance rules

Transfer pricing: Transfer pricing rules, based on OECD guidelines, apply to both domestic and cross-border related party transactions. The following transfer pricing methods are permitted: comparable uncontrolled price method, resale price method, cost-plus method, profit split method, residual profit split approach, and transactional net margin method. Documentation requirements apply.

Interest deduction limitations: The allowable deduction for interest expense is reduced by an amount equal to 20% of the interest income that is subject to a final withholding tax.

Controlled foreign companies: There are no controlled foreign company rules.

Anti-hybrid rules: There are no anti-hybrid rules.

Economic substance requirements: There are no economic substance requirements.

Disclosure requirements: There are no disclosure requirements.

Exit tax: There is no exit tax.

General anti-avoidance rule: There is no general anti-avoidance rule.

Value added tax

Rates	
Standard rate	12%
Reduced rate	0%

Taxable transactions: VAT is imposed on the sale and importation of most goods and services.

Rates: The standard VAT rate is 12%. Certain sales are zero-rated or exempt.

Registration: The registration threshold for VAT purposes is PHP 3 million.

Filing and payment: The quarterly return/declaration may be filed either manually or through the Electronic Filing and Payment System (eFPS), no later than the 25th day following the close of each taxable quarter. Taxpayers are no longer required to file monthly returns, but have the option to do so. A domestic corporation and its domestic branches may file a single VAT return.

Other taxes on corporations and individuals

Unless otherwise stated, the taxes in this section apply both to corporations and individuals and are imposed at the national level.

Social security contributions: The employer must make monthly contributions to the social security system corresponding to the salaries of covered employees. The maximum monthly employer contribution for an employee in the highest salary bracket is PHP 3,530. Employees are required to make monthly contributions (ranging from PHP 250 to PHP 1,750) to the social security system based on their salary bracket.

In addition to social security contributions, the employer must make monthly contributions to the Philippine Health Insurance Corporation (PHIC) and Home Development Mutual Fund (HDMF) based on the salaries of covered employees. The maximum monthly employer contribution for an employee in the highest salary bracket is PHP 2,500 for PHIC and PHP 200 for HDMF. Employees are required to make monthly contributions (ranging from PHP 250 to PHP 2,500 for PHIC and PHP 200 (where monthly compensation is at least PHP 10,000)) for HDMF based on their salary bracket.

Payroll tax: There is no separate payroll tax, but employers are required to withhold individual income tax at progressive rates from 0% to 35% depending on the monthly/annual compensation bracket.

Capital duty: There is no capital duty.

Real property tax: A property tax is imposed on real property at a rate that depends on the location of the property. The tax should not exceed 3% of the assessed value per the tax declaration.

Transfer tax: Gratuitous transfers of property are subject to a donor’s tax at 6% of the fair market value of the property at the time of the donation.

A local transfer tax on real property is levied at a rate of 0.5% to 0.75% on the higher of the gross sales price or the fair market value of the property upon the transfer or sale of the property.

Stamp duty: Various rates of stamp duty apply, depending on the type of transaction/document.

Net wealth/worth tax: There is no net wealth tax or net worth tax.

Inheritance/estate tax: A 6% tax is imposed on the net estate of both residents and nonresidents.

Other: A “percentage tax” of 1% to 30% is imposed on certain types of businesses, such as banks, finance companies, insurance companies, and common carriers (except domestic carriers that transport passengers by air that are subject to VAT).

Tax treaties: The Philippines has concluded more than 40 tax treaties. For information on the Philippines’ tax treaty network, visit Deloitte International Tax Source.

Tax authorities: Bureau of Internal Revenue (national taxes); city/municipal treasurer’s office (local taxes); Bureau of Customs

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