International Tax
Ghana Highlights 2025

Updated April 2025

Recent developments

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

Investment basics

Currency: Ghanaian Cedi (GHS)

Foreign exchange control: Ghana does not operate strict exchange controls on outbound transfers of capital, profits, royalties, interest, fees, and income of expatriate employees. Under the Ghana Investment Promotion Centre Act, 2013, investors are guaranteed the right to transfer profits, interest, fees, charges, loan repayments, and liquidation proceeds, while expatriate employees are allowed to transfer their annual earnings abroad, provided the applicable taxes have been paid. In principle, nonresident companies are free to transfer their net after-tax profits offshore, provided the transfer is carried out through banks approved by the Bank of Ghana and supported with relevant documents evidencing the foreign payment obligation, including the obligation to pay local withholding taxes, where applicable.

Accounting principles/financial statements: IFRS generally applies. Companies must prepare financial statements annually in accordance with the local generally accepted accounting principles (GAAP). IFRS is accepted as the local GAAP.

Principal business entities: Entities can be organized as a company limited by shares, a company limited by guarantee (nonprofit), an unlimited liability company, or an external company (branch). Companies are classified into three categories; companies with total revenue or assets exceeding GHS 10 million are classified as large, those with total revenue or assets between GHS 400,000 and GHS 10 million are classified as medium-sized, and those with revenue or assets not exceeding GHS 400,000 are classified as small.

A branch of a foreign company is required to register as an external company. The commonly adopted forms of doing business by foreign investors are private companies limited by shares and branches.

Corporate taxation

Rates	
Corporate income tax rate	25% (in general)
Branch tax rate	25%

Capital gains tax rate	25% (capital gains are taxed under the general corporate income tax regime)

Residence: A company is resident in Ghana if it is incorporated under the laws of Ghana or if its management and control are exercised in Ghana at any time during a year of assessment.

Basis: Resident companies are taxed on their worldwide income. Nonresident companies are taxed only on Ghana-source income.

Taxable income: Chargeable income is determined separately for domestic-source income and foreign-source income. Chargeable income is based on the operating profit stated in the company's annual financial statements prepared in accordance with IFRS, as adjusted for any differences between accounting requirements and the tax law. Such differences normally include nondeductible expenses, exempt income, and special reliefs allowed under the tax law. Expenses must be supported with a valid tax invoice to be eligible for deduction.

Rate

General

The standard corporate income tax rate is 25%. Various concessionary rates/tax holidays are available to companies operating in specific sectors or engaged in activities such as agro-processing, waste processing, and the export of non-traditional products. A 22% rate applies to income from hotel activities and a 35% rate applies to income from mining or petroleum activities. Branches of foreign companies are subject to the same tax rate as domestic companies. In addition, an 8% tax is imposed on profits earned by the branch and treated as profits repatriated to the foreign head office.

Businesses engaged in the operation of lotteries are subject to a corporate income tax rate of 20% on their gross gaming revenue (i.e., the total amount of bets placed less any winnings paid or payable). Lottery operations include betting, gaming, and any game of chance**.**

Surtax

There is no surtax.

Alternative minimum tax

Businesses with losses in the previous five assessment years are required to assess and pay tax on a minimum chargeable income at the rate of 5% of turnover. Exemptions from the minimum chargeable income regime apply to all businesses within the first five years from the commencement of business operations, and to farming businesses.

Global minimum tax (Pillar Two)

Ghana 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 ("inclusive framework") that are designed to ensure a global minimum level of taxation of 15% for certain multinational enterprise groups. This commitment is captured in the country's Medium-Term Revenue Strategy framework for the period 2024–2027. Ghana is not a member of the inclusive framework.

Taxation of dividends: Dividend payments to resident and nonresident persons generally attract withholding tax at the rate of 8%. In the case of nonresidents, a lower withholding tax rate may apply under an applicable tax treaty**.** Dividends paid to a resident company that holds at least a 25% controlling interest in the payer company are exempt from tax.

Capital gains: Any taxable gains derived by a company from the realization of assets or liabilities is added to other business or investment income and taxed at the entity's applicable corporate income tax rate.

Losses: Businesses are permitted to carry forward tax losses for up to five years. Carryforward losses are deductible on a first-in-first-out basis.

Foreign tax relief: Companies may claim a foreign tax credit for taxes paid on their foreign-source income. A deduction for foreign taxes paid also may be available under an applicable tax treaty. Claims for relief from foreign taxes under a treaty are subject to written approval by the Ghanian tax authorities.

Participation exemption: There is no participation exemption for income from foreign subsidiaries. However, dividend income received from a resident entity may be exempt from tax subject to qualifying conditions.

Holding company regime: There is no holding company regime.

Incentives: A reduced corporate income tax rate of 8% is available for companies engaged in "nontraditional exports," and a 20% rate applies for financial institutions on income from loans granted to farming enterprises and leasing companies.

Free zone companies are exempt from corporate income tax for the first 10 years of operations, after which they pay corporate income tax at a 15% rate on export sales and a 25% rate on domestic sales.

A tax rebate is granted to manufacturing companies located outside Accra and Tema. In regional capitals (other than Accra and Tema), the rebate is 25% of the standard corporate income tax rate of 25% (i.e., an effective tax rate of 18.75%), and in all other places, it is 50% of the standard tax rate (i.e., an effective tax rate of 12.5%).

Industry-specific tax incentives are granted from the commencement of operations for companies in certain sectors, as follows:

- Agricultural enterprises, agro-processing and waste processing companies, rural banks, and venture capital financing companies pay a 5% corporate income tax rate for a period ranging from five to 10 years; and
- Real estate companies pay a 5% corporate income tax rate for five years on income from certified low-cost housing, subject to certain restrictions.

Entrepreneurs aged 35 years and under are granted a five-year corporate income tax holiday if they are engaged in specific businesses. Businesses that qualify for the exemption include manufacturing, information and communications technology, agro-processing, energy production, waste processing, tourism, creative arts, horticulture, and medicinal plants. Such entrepreneurs also enjoy a rebate on corporate income tax rates ranging from 5% to 15% for five years after the tax holiday.

Privately owned universities are exempt from corporate income tax if they reinvest 100% of their profits in the operation of the university.

Employers receive an additional tax deduction for employing new graduates as part of their workforce, which ranges from 10% to 50% of the salaries or wages of such employees.

Manufacturers and assemblers of vehicles in Ghana are entitled to a three-year exemption from corporate income tax in respect of the manufacturing or assembling of semi-knocked down vehicles, or five years in respect of the manufacturing or assembling of completely knocked-down vehicles.

Compliance for corporations

Tax year: Companies are assessed and pay tax based on their financial accounting year.

Consolidated returns: Consolidated returns are not permitted; each company must file a separate corporate income tax return.

Filing and payment: Taxpayers must submit an annual return within four months after the end of their accounting year. Corporate income taxes are paid on a provisional basis at the end of each quarter of the company's accounting year.

Penalties: Offenses that can result in penalties/interest include underestimation of income tax payable, failure to comply with the tax laws, failure to pay tax, making false or misleading statements, failure to withhold tax, failure to file a return, and impeding tax administration. The penalties range from monetary penalties and interest to imprisonment, or both.

Rulings: A taxpayer may apply to the tax authorities for a private ruling regarding a specific transaction or arrangement. The ruling is binding on the tax authorities, but not on the taxpayer, for the period specified in the ruling if the transaction is carried out in all material aspects as described in the application.

Individual taxation

Rates

Individual income tax rate	Annual taxable income (GHS)	Rate
	Up to 5,880	0%
	Next 1,320	5%
	Next 1,560	10%
	Next 38,000	17.5%
	Next 192,000	25%
	Next 366,240	30%
	Above 600,000	35%
Capital gains tax rate		As above or 25%, at the election of the individual

Residence: An individual is resident in Ghana for tax purposes if they are (i) a citizen of Ghana, other than a citizen who has a permanent home outside Ghana during the calendar year; (ii) present in Ghana for 183 days in a 12-month period; or (iii) a citizen who is temporarily absent from Ghana for a period not exceeding 365 continuous days and has a permanent home in Ghana. All other individuals are considered nonresidents.

Basis: Resident individuals are taxed on their worldwide income, i.e., all income regardless of source and regardless of whether foreign income derived is brought into or received in Ghana. Nonresidents are taxed only on Ghana-source income.

Taxable income: Chargeable income is determined separately for domestic-source income and foreign-source income. The chargeable income of an individual from any source for a year of assessment is the total assessable income from employment, business, and investment, less the total amount of allowable deductions. Taxable employment income includes salaries and wages, bonuses, overtime payments, and other kinds of benefits and allowances (however, pension income is exempt). Foreign-source income earned by resident individuals for work performed abroad is taxable in Ghana when earned, rather than when brought into Ghana. Similarly, income attributable to employment in Ghana is taxable in Ghana, regardless of where or how it is paid.

Rates: Resident individuals are subject to individual income tax at progressive rates, with a top marginal rate of 35%. Nonresident individuals pay income tax on their Ghana-source income at a rate of 25%.

Capital gains: Capital gains earned by individuals are taxed using the graduated tax rates in the case of residents, or at the flat rate of 25% in the case of nonresidents. A resident individual may also elect for such gains to be taxed at the flat rate of 25%.

Deductions and allowances: Generally, expenses are not allowed as deductions in determining total income from employment. However, a resident individual may deduct various personal reliefs from gross income in arriving at annual taxable income. These reliefs include a basic annual allowance of GHS 1,200 for a married taxpayer supporting a spouse or an unmarried taxpayer supporting at least two children; an allowance of GHS 1,500 for an employed or self-employed taxpayer over 60 years of age; child relief of GHS 600 per child for the education of a child (for up to three children); and additional relief of GHS 1,000 per elderly dependent for taxpayers supporting an elderly relative (up to two relatives). Professional, vocational, or technical skills training relief is available at GHS 2,000 per year.

An individual also may deduct mortgage interest on one residential property during the individual's lifetime. Social security contributions and contributions to a provident fund are deductible within certain limits.

Foreign tax relief: Individuals may claim a foreign tax credit for taxes imposed on their foreign-source income. A foreign tax credit also may be available under an applicable tax treaty. Foreign tax relief claimed under a treaty is subject to approval by the tax authorities.

Compliance for individuals

Tax year: The tax year is the calendar year.

Filing status: Couples are not allowed to file a joint individual income tax return. Each individual must file a separate return.

Filing and payment: Individuals who earn income during a year of assessment are required to file an annual individual income tax return by 30 April following the end of the tax year. Self-employed persons are required to make advance payments of individual income tax at progressive rates in four equal installments.

Penalties: Offenses that can result in penalties include failure to comply with the tax laws, failure to pay tax, making false or misleading statements, failure to file a return, and impeding tax administration. The penalties range from monetary penalties and interest to imprisonment, or both.

Rulings: A taxpayer may apply to the tax authorities for a private ruling regarding a specific transaction or arrangement. The ruling is binding on the tax authorities, but not on the taxpayer, for the period specified in the ruling if the transaction is carried out in all material aspects as described in the application.

Withholding tax

Rates				
Type of payment	**Residents**		**Nonresidents**	
	Company	**Individual**	**Company**	**Individual**

Dividends	8%	8%	8%	8%
Interest	8%	0%/8%	8%	8%
Royalties	15%	15%	15%	15%

Dividends: An 8% withholding tax rate applies to dividends paid to resident and nonresident entities and individuals. The withholding tax rate on dividends paid to nonresidents may be reduced under an applicable tax treaty.

Interest: An 8% withholding tax rate applies to interest paid to resident and nonresident entities and individuals. Interest paid to a resident individual by a resident financial institution or on bonds issued by the government of Ghana is exempt from withholding tax. The withholding tax rate on interest paid to nonresidents may be reduced under an applicable tax treaty.

Royalties: A 15% withholding tax rate applies to royalties paid to resident and nonresident entities and individuals. The withholding tax rate on royalties paid to nonresidents may be reduced under an applicable tax treaty.

Fees for technical services: A 7.5% withholding tax rate applies to fees for technical services paid to resident entities and individuals. The rate of withholding tax is generally 20% for payments to nonresidents but may be reduced under an applicable tax treaty.

Branch remittance tax: An 8% tax is imposed on profits after tax earned by a branch and treated as profits repatriated to the foreign head office.

Other: An 8% withholding tax rate applies to rental payments if the rent is paid to a resident for residential accommodation. The rate is 15% if the building is used for commercial purposes or paid to a nonresident. Payments to real estate companies are subject to 7.5% withholding tax.

A 3% withholding tax rate applies to payments for goods made to residents. Payments for imported goods when made to nonresidents generally do not attract withholding tax.

A 5% withholding tax rate applies to payments for the provision of works to residents. The rate is 15% for payments to nonresidents but may be reduced under an applicable tax treaty.

A 3% withholding tax rate applies to consideration provided by persons other than individuals to a resident person in connection with the disposal of an asset or liability (which is not specifically covered under provisions imposing withholding tax on investment returns). The rate is 10% for payments to nonresident persons.

Anti-avoidance rules

Transfer pricing: Ghana's transfer pricing regulations are generally consistent with the OECD transfer pricing guidelines and require taxpayers to demonstrate that related party transactions are on arm's length terms by maintaining contemporaneous documentation of such transactions for each tax year. Entities with related party transactions in a year of assessment are required to file a transfer pricing return, local file, and master file. Companies are also required to prepare and file a country-by-country (CbC) report and notification for each financial year, where applicable.

Interest deduction limitations: A resident person, other than a financial institution, is deemed to be thinly capitalized if the ratio of interest-bearing or foreign currency-denominated debt (to a nonresident parent or associated entity) to equity exceeds 3:1. Interest deductions or exchange losses arising on debt in excess of the 3:1 ratio are disallowed.

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

Anti-hybrid rules: There are no anti-hybrid rules. Instruments that are equity in substance but disguised as debt may be subjected to the general anti-avoidance rules contained in the Income Tax Act.

Economic substance requirements: The tax authorities are authorized to disregard or recharacterize any arrangement or transaction that is determined to lack economic substance or whose form does not reflect its substance.

Disclosure requirements: CbC reporting applies to multinational enterprises with consolidated group revenue of at least GHS 2.9 billion. The CbC reports are due within 12 months after the end of the relevant financial year.

Exit tax: Exit tax applies only on the foreign assets of an individual who ceases to be a resident in Ghana.

General anti-avoidance rule: The Income Tax Act and the Revenue Administration Act contain anti-avoidance provisions that disregard fictitious transactions lacking economic substance, or arrangements that seek to avoid, defer, or reduce income tax. Generally, any transaction or arrangement that is entered into with the principal purpose of obtaining a tax benefit may be disregarded as a tax avoidance scheme. Similarly, any arrangement that involves the misuse or abuse of a tax law provision, considering the wider purpose of the provision, may be disregarded as an avoidance arrangement.

Value added tax

Rates	
Standard rate	15%
Other rates	0%/1%/2.5%/3%/5%

Taxable transactions: VAT is imposed on the supply of taxable goods or services in Ghana, and on the import of goods or services. The tax base is generally the amount paid for the goods or services. For imports, the tax base is the customs value, plus any import duties and taxes, except VAT.

E-commerce supplies (including digital services) supplied by nonresident service providers are subject to VAT.

Rates: The standard VAT rate is 15%, which is applied on the total amount of taxable supplies, inclusive of the National Health Insurance Levy (NHIL) (2.5%), the Ghana Education Trust Fund (GETFund) levy (2.5%), the COVID-19 Health Recovery and Communication Service Tax (if applicable) (1%), and any other industry-specific levies or taxes, such as the communication service tax or the tourism levy (see "Other taxes on corporations and individuals," below). Exports are zero-rated.

The VAT Flat Rate Scheme (VFRS) generally covers the wholesale and retail sale of goods where the taxable revenue earned by the retailer is between GHS 200,000 and GHS 500,000 per year. Under the VFRS, VAT-registered retailers and wholesalers of goods account for VAT, the NHIL, and the GETFund levy at a flat rate of 3%, alongside the COVID-19 Health Recovery Levy at 1%. Such suppliers do not qualify for input VAT claims, so they must remit the output tax collected in full.

A flat rate of 5% applies on the supply of commercial premises for sale or rental.

Registration: A business making, or expecting to make, taxable supplies exceeding GHS 200,000 over a 12-month or shorter period must register and charge VAT.

Nonresident suppliers of electronically supplied services for use or enjoyment in Ghana are required to register and account for VAT in Ghana unless the services are supplied through a VAT-registered agent in Ghana. No registration threshold applies.

Filing and payment: A VAT return must be submitted by the last business day of the month immediately following the accounting period (one month) to which the return relates.

VAT withholding may be applicable at a rate of 7% by designated VAT-registered entities and certain government agencies on payments for taxable supplies.

All VAT-registered taxpayers are required to issue electronic invoices through a mechanism certified by the tax authorities.

Other taxes on corporations and individuals

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

Social security contributions: Employers must contribute 13% of an employee's basic salary as a pension contribution, with the employee contributing 5.5% of their basic salary. Expatriates working in Ghana are required to contribute to pensions in Ghana, unless they expect to be present in the country for no more than 36 months and can show proof that they are participating in a pension scheme outside Ghana.

Payroll tax: Pay-As-You-Earn (PAYE) taxes are withheld from the salaries of employees to satisfy their income tax responsibilities. PAYE is computed at the applicable individual income tax rates.

Capital duty: Capital duty of 1% applies on amounts registered as equity capital or any additional increment in equity.

Real property tax: Local government authorities levy "rates" on the occupation of real property. The property rate payable for the year is based on the applicable ratable value of the property and the rate per GHS determined by the relevant local authority. The rates are published annually in the local government bulletin.

Transfer tax: There is no transfer tax.

Stamp duty: Stamp duty is charged on the conveyance or sale of immovable property at rates ranging from 0.25% to 1%. The stamp duty rates on leases range from 0.5% to 1% of the consideration, but also depend on the duration of the lease period.

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

Inheritance/estate tax: There is no inheritance tax or estate tax.

Other

Growth and sustainability levy (GSL)

GSL is charged at 5% of the profit before tax of specified companies and institutions. All other entities pay GSL at 2.5%, other than companies in the extractive industry, which pay GSL at a rate of 3% of gross production. The levy is payable in quarterly installments for the years of assessment 2025 through 2028, and is not deductible against corporate income tax.

Environmental tax

An environmental tax of 5% is charged on the import and local supply of plastic packaging materials and products.

Vehicle income tax

Vehicle income tax is collected quarterly from commercial vehicle operators. A flat amount ranging from GHS 10 to GHS 200 per quarter is charged based on the type of vehicle.

Communication service tax (CST)

CST is payable at a rate of 5% on charges for electronic communication services other than private electronic communication services.

Financial sector recovery levy (FSRL)

The FSRL is levied on banks at the rate of 5% of the accounting profit before tax. The FSRL applies to all banks other than rural and community banks and is not deductible in determining taxable income. The levy is payable quarterly on a self-assessment basis.

Tax treaties: Ghana has concluded over 20 tax treaties.

Tax authorities: Ghana Revenue Authority (GRA)

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