

Features of Final Income Taxation (FITT) in the Philippines:

- **Final Tax:** The tax paid is complete and no more tax is needed on that income. It's settled at the point of payment.
- **Tax Withholding at Source:** The tax is deducted from the payment (like interest or dividends) before you get it. The payer sends this tax directly to the government.
- **Territorial Imposition:** The tax applies to income earned in the Philippines or by residents, based on where the income is sourced.
- **For Passive Income and Non-Business Individuals:** FITT mainly applies to investment income (like interest or dividends) and people who aren't running a business in the Philippines.

In short, FITT simplifies tax by settling it upfront on specific income types and for certain individuals.

Final Withholding System (FWT)

- Imposes upon the person making income payments the responsibility to withhold tax
- Tax will be deducted immediately to the income
- Taxpayer receives the income of net tax
- There would be no need for him to file an income tax to report the same

Note:

- Inherently territorial
- Applies only to certain passive income earned from sources within the Philippine

Taxation is territorial

- We can't impose tax obligation against non-resident subjects of foreign sovereign
- All items of income earned from sources abroad (passive/active) are subject to tax under Regular Income Tax

Rationale of Final Income Taxation:

Simplified Process for Taxpayers

- Relieves taxpayers from the obligation to file an income tax return.
- Provides convenience for those limited by distance or time.

Efficiency for the Government

- Effective in collecting taxes from income sources prone to non-compliance.
- Final withholding system is particularly useful where there is a high risk of tax evasion.

Safeguards in Place

- Strict measures are implemented to ensure withholding agents properly remit the withheld taxes.

Application Under NIRC:

- Final income tax is imposed on certain passive income.
- Applied to non-resident individuals not engaged in business.

Passive Income

- Items that are earned with very minimal involvement from the taxpayer and are generally irregular in timing and amount
- Not usually specifically monitored by taxpayers
- FW at source is the most favored scheme in taxing items of passive income

Non-resident persons not engaged in business in the Philippines:

- NRP-NETBs, NRA-NETBs, NFRCs have high risk of non-compliance
- These taxpayers do not have offices or fixed places of business in the Philippines making compliance very unlikely due to their absence and distance in the Philippines
- The law subjects them to final income tax wherein Philippine residents paying them income (passive/active) are obligated to withhold the following final tax

Non-resident person not engaged in trade or business	General final tax rate
NRA-NETBs	20%
NFRC	30%

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George Edwin Holmes



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