CAYMAN ISLANDS



International Tax Co-operation (Economic Substance) Act

(2021 Revision)

## INTERNATIONAL TAX CO-OPERATION (ECONOMIC SUBSTANCE) (PRESCRIBED DATES) (AMENDMENT) REGULATIONS, 2021

(SL 49 of 2021)

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### **PUBLISHING DETAILS**



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## INTERNATIONAL TAX CO-OPERATION (ECONOMIC SUBSTANCE) (PRESCRIBED DATES) (AMENDMENT) REGULATIONS, 2021

(SL 49 of 2021)

In exercise of the powers conferred by section 15 of the International Tax Co-operation (Economic Substance) Act (2021 Revision), the Cabinet makes the following Regulations—

#### Citation

1. These Regulations may be cited as the International Tax Co-operation (Economic Substance) (Prescribed Dates) (Amendment) Regulations, 2021.

Insertion of regulations 4 and 5 in the International Tax Co-operation (Economic Substance) (Prescribed Dates) Regulations, 2018 - date from which the economic substance test shall be satisfied by partnerships, exempted limited partnerships and foreign limited partnerships, etc.

**2.** The International Tax Co-operation (Economic Substance) (Prescribed Dates) Regulations, 2018 are amended by inserting after regulation 3 the following regulations —



"Date from which the economic substance test shall be satisfied by partnerships, exempted limited partnerships and foreign limited partnerships

- **4**. Notwithstanding regulation 2, the date from which a partnership, an exempted limited partnership, or a foreign limited partnership, which is a relevant entity, shall satisfy the economic substance test in relation to a relevant activity shall be
  - (a) in the case of a partnership, an exempted limited partnership or a foreign limited partnership that was not in existence prior to the commencement of the *International Tax Co-operation* (*Economic Substance*) (*Amendment of Schedule*) Regulations, 2021, the date on which the partnership, the exempted limited partnership or the foreign limited partnership, as the case may be, commences the relevant activity; or
  - (b) in the case of a relevant entity that was in existence prior to the commencement of the *International Tax Co-operation* (*Economic Substance*) (*Amendment of Schedule*) Regulations, 2021, 1st January, 2022.

# Prescribed date for the purposes of section 7(3) of the Act for partnerships, exempted limited partnerships and foreign limited partnerships

**5.** Notwithstanding regulation 3, the date for the purposes of section 7(3) of the Act shall be 1st July, 2021 in the case of a partnership, an exempted limited partnership or a foreign limited partnership.".

Made in Cabinet the 29th day of June, 2021.

Kim Bullings Clerk of the Cabinet

