

Coucounis

JUNE 2019

THE CYPRUS IP REGIME

ANDREAS COUCOUNIS & CO LLC



CYPRUS
FROM
SPACE

DIMITRIA COUCOUNI

www.coucounis.com



IDEAS



INVENTIONS

PRODUCTS



PROCESSES



=

VALUABLE ASSETS



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INTELLECTUAL PROPERTY (IP)



Benz Patent Motor Car:
The first automobile (1885–1886)

DIGITAL ERA



INTERNET RULES!

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PROTECTION AGAINST INFRINGEMENT



MAINTAINING CONTROL = REWARD

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CYPRUS ROBUST IP PROTECTION REGIME



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CYPRUS REGISTRAR PATENTS & TRADEMARKS



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IP REGISTRATION

PROTECTION OF ASSETS EXPLOITED FOR PROFIT

**IMPORTANT IN ACTIONS FOR INFRINGEMENT
OR PASSING OFF**

**VITAL FOR LICENSING PURPOSES &
COLLECTION OF FEES AND ROYALTIES**

CONTINUATION OF EXCLUSIVITY RIGHTS

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IP REGISTRATION IN CYPRUS



FULL PROTECTION IN ALL EU

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REGISTRATION OF NOVEL STARTUPS



FIRST REGISTERED IN CYPRUS

IP STRUCTURING = STRATEGIC DECISION

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CYPRUS

EU MEMBER STATE

ACCESS TO EU INTEREST AND ROYALTY DIRECTIVE

SIGNATORY TO ALL MAJOR IP TREATIES AND PROTOCOLS

BENEFICIAL IP TAX REGIME

WIDE DOUBLE TAX TREATY NETWORK

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NEW CYPRUS IP TAX REGIME

APPLICABLE FROM 1ST JULY 2016

IMPORTANT TAX EXEMPTIONS

LOW EFFECTIVE TAX RATE

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NEW CYPRUS IP TAX REGIME

QUALIFIED PERSONS

QUALIFYING ASSETS

QUALIFYING PROFITS

QUALIFYING EXPENDITURE

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NEXUS RATIO

$$OI \times \frac{QE + UE}{OE}$$

Qualifying Profit = Overall Income x $\frac{\text{Qualifying Expenditure} + \text{Uplift Expenditure}}{\text{Overall Expenditure incurred to develop IP Asset}}$
(Income Eligible From IP Asset Incurred to develop IP Asset to 80% tax exemption)

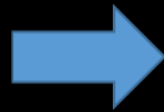
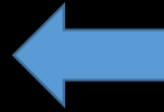
CYPRUS IP TAX REGIME

**80% OF QUALIFYING PROFITS
GENERATED FROM QUALIFYING INTANGIBLE ASSETS
= TAX DEDUCTIBLE EXPENCE**

CYPRUS CORPORATE TAX RATE = 12,5%

**IF NEXUS RATIO = 100%
⇒ EFFECTIVE TAX RATE = 2,5%**

CYPRUS AND IP ASSETS



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CYPRUS
INTO THE
FUTURE

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