



Recent Developments in Applying for Refund of Finnish Withholding Tax on Dividends, Interest, and Royalties

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Programme

1. Changes in application form 6163e: the beneficial owner of the dividend, interest or royalty payment
2. Updated instructions for filling in application form 6163e and enclosure 6167e
3. Review of the effects of 2017 legislative changes on applying for refund of Finnish withholding tax
4. How to apply for a tax-at-source card for dividend, interest, and royalty income

Changes in application form 6163e: the beneficial owner of the dividend, interest or royalty payment

What has changed on the form?

The undersigned assures that		
<input type="checkbox"/> the applicant is the beneficial owner of the income (see instructions)		
<input type="checkbox"/> the applicant has not received or requested any refund from the Finnish payer or the Finnish Tax Administration.		
Date	Signature	Name in printed letters
Details of the right to sign for the applicant		Position or job title
<input type="checkbox"/> By letter of authorisation <input type="checkbox"/> By proper right to sign for the applicant (see instructions)		

Note: Removal of point on "permanent establishment in Finland" from the application form. Instructions however state that application form 6163e and enclosure 6167e **should not be used** by any applicant that has a permanent establishment in Finland.

Instructions: dividends

If the income concerns dividends

Tick the box, if the applicant is the beneficial owner of the dividends in question, and the related shares were not part of some sort of legal or contractual obligation. The applicant is requested to provide an explanation as to how and why they see themselves to be the beneficial owner of the dividends specified in the application. This request concerns cases when all or some of the shares related to the payment specified on the application form were part of a total return swap, a futures contract or some other derivative contract; or if the shares were lent to another party or were part of some other legal or contractual obligation. Such an explanation is required regardless of what the grounds for the refund application are (see point 1.20).

Taken directly from our updated instructions, available online in Finnish, Swedish and English!

Instructions: interest and royalty payments

If the income concerns interest payments

Tick the box, if the applicant is the beneficial owner of the interest payments specified on the application. If necessary, attach a description as to how and why the applicant sees themselves to be the beneficial owner of the interest payments in question.

If the income concerns royalty payments


Tick the box, if the applicant is the beneficial owner of the royalty payments specified on the application. If necessary, attach a description as to how and why the applicant sees themselves to be the beneficial owner of the royalty payments in question.

What do I need to do?

- Follow the instructions: if you need to provide a clarification on the beneficial ownership of the income, leave the box empty
 - Also if you are unsure, leave the box empty
 - Just make sure to provide an explanation on the beneficial ownership
 - **Note:** Even if the box is left empty, this does not automatically lead to us rejecting your claim for refund
- The explanation should contain: the circumstances and details of the arrangement, and the reasons why the applicant believes it is the beneficial owner of the income
- The need to provide an explanation **is not dependent** on the basis of the claim

What do I need to do? (in summary)

- Tick the box:
 - If the applicant is the beneficial owner of the income in question, and the related shares were not part of some sort of legal or contractual obligation
- Leave it empty:
 - In cases when all or some of the shares related to the payment specified on the application form were part of a total return swap, a futures contract or some other derivative contract; or if the shares were lent to another party **or were part of some other legal or contractual obligation.**
 - If you are unsure whether the applicant is the beneficial owner of the income



The undersigned assures that		
<input type="checkbox"/> the applicant is the beneficial owner of the income (see instructions)		
<input type="checkbox"/> the applicant has not received or requested any refund from the Finnish payer or the Finnish Tax Administration.		
Date	Signature	Name in printed letters
Details of the right to sign for the applicant		Position or job title
<input type="checkbox"/> By letter of authorisation <input type="checkbox"/> By proper right to sign for the applicant (see instructions)		

Has the applicant previously requested or received a refund?

- Tick “the applicant has not received or requested any refund from the Finnish payer or the Finnish Tax Administration” only if the applicant **has not received or requested a refund** of Finnish withholding tax on the income from: **the Finnish payer, the payer’s custodian bank, or the Finnish Tax Administration.**
- Clarification to how it was stated on the previous version of the form: also refers to previous requests and refunds from the Finnish Tax Administration

The undersigned assures that		
<input type="checkbox"/> the applicant is the beneficial owner of the income (see instructions)		
<input type="checkbox"/> the applicant has not received or requested any refund from the Finnish payer or the Finnish Tax Administration.		
Date	Signature	Name in printed letters
Details of the right to sign for the applicant		Position or job title
<input type="checkbox"/> By letter of authorisation <input type="checkbox"/> By proper right to sign for the applicant (see instructions)		

Any questions?

Updated instructions for filling in application form 6163e and enclosure 6167e

Common mistakes in filling the form

- No tax identification number (TIN) or other registration number
- The address is filled in incorrectly
 - Each field should only contain information asked in that field
 - Separate: postal address, postal code, post office (city)
- Banking details
 - Clearing code put in the BIC/SWIFT code field
 - The clearing code has its own field (3.10)
- Dividend information: writing that does not belong there
 - e.g. "See attachment"; only write information regarding the payment
- No information on the acting agent on the application form (section 2)
 - Instead often find this information on a cover letter
 - Do not use cover letters; if there are no contact details on the application form, decisions letters and information requests will be sent to the client directly
 - Same goes for banking details: do not put these on the cover letter
- Accounting periods and payment dates should be in the format **DD.MM.YYYY**

Main updates to the instructions

- Information on choosing the right form
 - 6163e and 6167e: only for foreign corporations and organisations
 - Separate form for individuals (6164e)
 - Should not be used by an applicant with a permanent establishment in Finland
- Issues arising from the fact that the form is optically read, i.e. converted into electronic format
 - QR code: do not place any writing, stamps or other markings in its vicinity
 - One-sided or double-sided: you choose
 - Can be filled in by hand
 - Any text should not exceed the limits of that field (e.g. address)
 - You can also use a sticker, given that it does not exceed the limits
 - Exception: official name of the applicant
- More generally
 - More examples
 - Improved readability
 - More detailed instructions

Our new postal address

- Please also remember to send all applications to:

Verohallinto

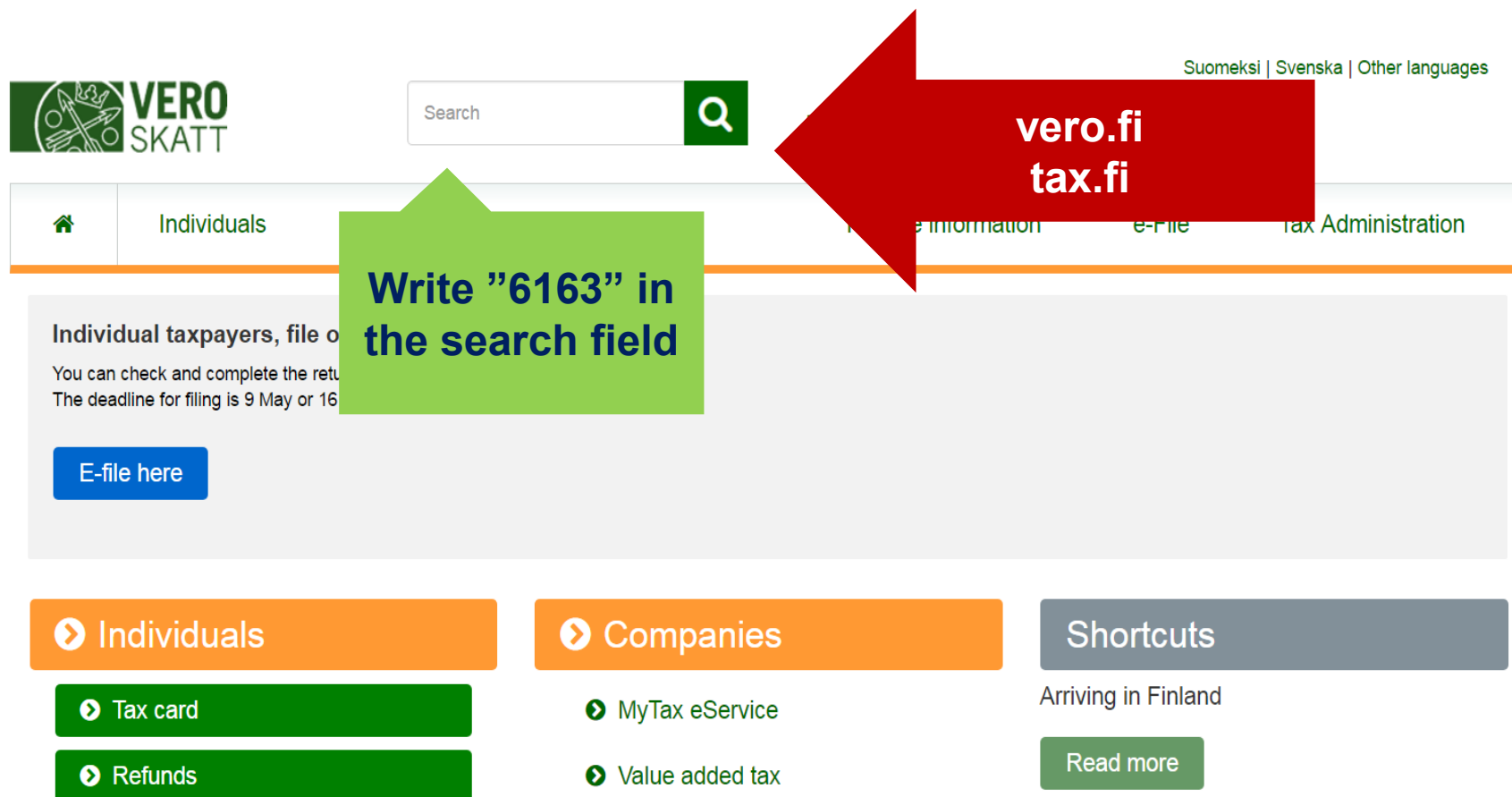
P.O. Box 560

FI-00052 VERO

Finland

- If you need a street address for courier service, please use **Vääksyntie 4 (Helsinki-Vallila)** – and the address above

Where can I find the instructions?



vero.fi tax.fi

Write "6163" in the search field

Individual taxpayers, file o
You can check and complete the retu
The deadline for filing is 9 May or 16

[E-file here](#)

Individuals

- Tax card
- Refunds

Companies

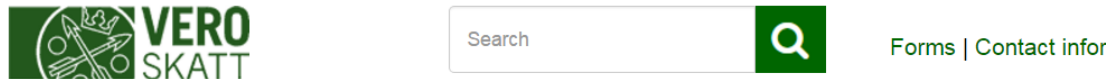
- MyTax eService
- Value added tax

Shortcuts

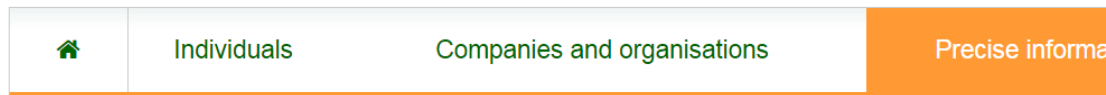
Arriving in Finland

[Read more](#)

Where can I find the instructions?



The options given should take you here...



Home > Precise information > Forms > Forms for companies and corporate entities > Instructions for Filling in Forms 6163e and Enclosure 6167e: Application for Refund of Finnish Withholding Tax on Dividends, Interest, and Royalties (Non-individual applicants, e.g. a corporate entity)

Instructions for Filling in Forms 6163e and Enclosure 6167e: Application for Refund of Finnish Withholding Tax on Dividends, Interest, and Royalties (Non-individual applicants, e.g. a corporate entity)

General Instructions

Choosing the right form

...or to the page with the application forms, where a link to the instructions is provided

- ❖ Forms for individual taxpayers
- ❖ Information return forms

NEWS

- ❖ Refund applications for source taxes have shorter deadlines in 2017

Instructions Step-by-Step: Section 1 (Applicant)

- 1.1: Applicant's official name
 - This should be in the same form as on the certificate of residence
- 1.2-1.3: Accounting period or financial year
 - Typically the calendar year, but also varies
 - Write in the form DD.MM.YYYY
- 1.4-1.5: Stock-exchange listed or non-listed
 - " A company is stock-exchange listed if at least one series of the company shares are stock-exchange listed, and those shares are bought and sold on a regulated marketplace."
 - ISIN code refers to the applicant's ISIN code, not that of the Finnish payer
- 1.6-1.8: Address
 - If the applicant does not have an agent, all correspondence will be sent to the address stated here
 - Again: Fill in the address field by field so that you separate the postal address, postal code and post office
- 1.11-1.12: Country of residence
 - Please use the ISO 3166 standard country code!

Instructions Step-by-Step: Section 1 (Applicant)

- 1.13-1.15: Tax identification number (TIN)
 - Mandatory
 - **However**, if the applicant does not have a TIN, provide an explanation and some other registration number
- 1.16-1.17: Applicant's legal entity
 - If you feel like none of the options in 1.16 apply, choose "other" and give a description of the applicant's legal entity in point 1.17
- 1.18-1.19: Previous refund decisions
 - Has the applicant previously applied for a refund?
 - If you have previous decision, please write down the registration or decision number from the decision letter
- 1.20: Grounds for refund
 - Tax Convention claim
 - EU claim
 - Other

Instructions Step-by-Step: Section 2 (Information on the agent)

- When the applicant is represented by an agent, such as a bank or consultant, the decision and information requests will be sent to the address stated here.
- If the applicant is represented by several different agents, only write down the contact information of the agent that the decision and information requests should be sent to, regardless of whether the application form has been signed by another agent.
- Power of Attorney (POA)
 - Attach
- Right of signature
 - Enclose some sort of document showing that the person(s) signing the application form or the power of attorney has the right to sign on behalf of the company or organisation.
 - Examples of such a document include an extract from the local trade register, or the company's articles of incorporation.

Instructions Step-by-Step: Section 3 (Bank account number for the refund)

- Banking details: bank account in the Single Euro Payments Area (SEPA)
 - Name of account holder, the bank account number in IBAN format, and the bank's BIC code
 - Recommended: your own reference (though not mandatory)
- Banking details: bank account outside SEPA
 - Name of account holder, the bank account number, the clearing code, as well as the name and address of the bank
 - Recommended: your own reference (though not mandatory)

**Your reference can
contain both letters and
numbers**

Instructions Step-by-Step: Section 4 (Information on the income - dividends)

- This section concerns **dividend payments**
 - **Note:** if your application concerns **a return of capital**, tick “dividend” and attach a detailed description of the nature of the payment
- 5.1: Direct shareholding, through a fund or through a partnership
 - Mistakes often made in this section
 - **Example:** The applicant is a partner in an American LP-form partnership. If the dividend was paid to the applicant through the partnership, tick the box for “through a partnership” in point 5.1 and fill in the remaining details in boxes 5.3–5.6. If the applicant is the partnership itself, rather than one of its partners, attach a list of all partners.
- 5.7: Investment assets
 - Tick “yes” or “no” **only if the applicant is a financial institution, an insurance company, or a pension institution, and the dividends are a part of its investment assets**. If the applicant is none of the above, just leave the boxes blank.

Instructions Step-by-Step: Section 4 (Information on the income - dividends)

- 5.9-5.15: Information on the payer
 - Fill in the name of the Finnish dividend payer as it appears on the list of Finnish dividend paying companies (see instructions [online](#))
 - Remember to note whether the dividend paying company is stock-exchange listed or non-listed
 - The date of payment refers to the date that the payer has specified in its Annual General Meeting
 - For the payment details write: gross dividend amount, the amount of tax originally withheld, and the amount of refund requested.
 - Even when the applicant has already received a partial refund, write down in point 5.14 **the original amount of tax withheld**

Instructions Step-by-Step: Section 4 (Information on the income - dividends)

- 5.16: Intermediary banks
 - List **all** intermediary banks, agents or other intermediaries
 - If there are several different audit trails, these can be clarified in a separate attachment
 - Mandatory question for **all** applications
 - **Note:** please be specific with the location of the intermediary, e.g. which branch (London, Luxembourg, etc.)
- 5.17: Enclosure form 6167e
 - Payment details **must be provided on forms 6163e and 6167e**
 - Exception: pension insurance institutions and life insurance companies

Example: Intermediary Banks and Agents



5.16 Give the name of the foreign intermediary bank(s) handling the dividend payment

Finnish custodian bank, Foreign custodian bank, Applicant's bank

Instructions Step-by-Step: Section 6 (Interest payments or royalties)

- If your application concerns interest or royalty payments, fill in the details in section 6
 - In such cases leave the fields in section 5 blank
- Follow the same instructions filling in for these payments as you would for a dividend payment (see points 5.9–5.15)

Instructions Step-by-Step: The undersigned section and other considerations

- Has the applicant previously received or requested a refund from the Finland?
- Is the applicant the beneficial owner of the income?
- Right to sign
 - The person(s) signing the application form or the power of attorney has to have the right to sign on behalf of the company or organisation
 - Provide documentation showing the right to sign, e.g. an extract from the local trade register, or the company's articles of incorporation
- Certificate of Residence
 - Mandatory attachment
 - If for some reason the applicant cannot get a certificate of residence from local tax authorities, leave the box blank and attach some sort of other registration document, along with an explanation as to why the applicant cannot receive a certificate of residence

Instructions Step-by-Step: Further instructions for umbrella funds, pension insurance institutions, and life insurance companies

- Umbrella funds
 - The application forms should be filled in per sub-fund, allowing the Tax Administration to better process the application as well as identify the funds in question
 - Decisions will be made in the name of the umbrella fund or “main fund”
 - Nevertheless, always fill in applications at the sub fund level
- Pension insurance institutions and life insurance companies
 - Follow the Tax Administration’s instructions for making a separate calculation of the amount of refund requested
 - Do not use enclosure 6167e, leave points 5.9–5.14 blank on form 6163e
- Remember to fill in point 5.16 on intermediary banks

Any questions?

Review of the effects of 2017 legislative changes on applying for refund of Finnish withholding tax

The use of application form 6163e and enclosure 6167e

- Starting on 1.1.2017, the applicant **must** use the form stated by the Finnish Tax Administration
 - i.e. **form 6163e**, and when applicable **form 6167e**
- Older versions or any other forms **will not be accepted**
 - In such cases that the Finnish Tax Administration receives any other forms, a letter asking the applicant to use the new form in the future will be sent
- The applicant must also use a specific form when appealing a decision made by the Finnish Tax Administration, namely **form 6168e**
- Benefits of the new form
 - Swifter processing
 - Allows the Tax Administration to easier locate your application and confirm its arrival

Shorter deadlines for refund applications

- In the case that excess tax has been withheld at source, the taxpayer may ask for a refund during the three calendar years **that follow the year of withholding**. This new three year deadline is first applied on dividends paid in 2017.
- Example: A Finnish listed company decides to pay a dividend of x amount to its shareholders in 2017 for the financial year 2016, i.e. the beneficiary of the dividend distribution **receives them in 2017**. 30% of tax-at-source is withheld. However, the tax treaty between the beneficiary's country of residence and Finland would entitle the beneficiary to a 15% tax-at-source. The beneficiary may ask the Tax Administration for a refund in 2018, 2019 or 2020. The application must arrive to the Tax Administration **by 31 December 2020**.

Shorter deadlines for appeals

- The applicant may also appeal any decision made on an application for refund of Finnish withholding tax.
- From 2017 onwards, **the appeal period is shortened to 60 days**, counted from the date when the beneficiary is expected to have received the decision letter.
- The new appeal period applies to refund decisions made by the Tax Administration after the 1st of January 2017.
- Example: A decision rejecting the applicant's claim for a refund of tax-at-source on dividends has been received by the applicant. It is dated 23 January 2017, and posted 24 January 2017 according to its "mail date". The taxpayer is deemed as having received information on the decision **after seven days** have elapsed after the day when the letter was sent, i.e. on 31 January 2017. The end date for the appeal period would fall on Saturday 1 April 2017. This means that the following business day, Monday 3 April 2017, will be the final day when the taxpayer is allowed to lodge an appeal.

Any questions?

How to apply for a tax-at-source card for dividend, interest, and royalty income

What is a tax-at-source card?

- The tax-at-source card allows the payer to withhold the correct amount of tax during the payment year
 - Either already at the original time of withholding
 - or during the payment year through the payer's custodian bank
- One tax-at-source card, several income payers
 - The same tax-at-source card can be used
- After receiving tax-at-source card there is no more need for separate refund applications
- You can apply for a tax-at-source card on an annual basis, i.e. the applicant can receive a tax-at-source card for the whole calendar year

What do I need?

First time applicants

- Application form 6202e
- Certificate of Residence (COR) for the year of application
 - e.g. If applying for a tax-at-source card for 2017, a COR for the year 2017 should be attached
 - If for some reason you cannot receive a COR from your local tax authorities, provide an explanation as well as a registration document
- Describe the basis for your application and what tax percentage you are applying for
 - For example a German open contractual investment fund sees itself as comparable to a Finnish tax-exempt investment fund, and is applying for a 0% tax-at-source card:
 - Describe in the explanation attached to your application **how** the German fund is comparable to a Finnish investment fund
 - Attach any supporting documents to your explanation, as you would to a refund application: fund prospectus, fund registration document (e.g. Bescheinigung), etc.

Example: Investment funds

- The following example gives you an idea of the sort of information that is required. The questions below refer to the type of information we are looking for with regards to **investment funds**.
 1. How is the investment fund managed?
 2. Who is the fund's custodian, i.e. the one that holds the fund's assets?
 3. Who owns the fund's assets?
 4. How is the value of the fund's shares calculated?
 5. Who can invest in the fund? How does the investor buy and sell the fund shares?
 6. Is the fund supervised by government officials?
 7. How is the fund and its shareholders or unit holders taxed in the domicile country?
 8. Is the fund in question open ended with variable capital or is it a close ended fund?
 9. The legal Act under which the investment fund is established.
 10. The rules under which the investment fund is established: concerning contractual funds, trusts (unit trust), or company by-laws (investment companies). Description of the entity form used for the collective investment scheme in question (e.g. investment association).

Note: This is an example, more information may be required.

What do I need?

Those with previous decisions

- Application form 6202e
- Certificate of Residence (COR) for the year of application
 - e.g. If applying for a tax-at-source card for 2017, a COR for the year 2017 should be attached
 - If for some reason you cannot receive a COR from your local tax authorities, provide an explanation as well as registration document or comparable proof of appropriate registration with the authorities of the country
- Confirm that the circumstances resulting in a refund decision or previous tax-at-source card **have not changed**
 - If these circumstances have changed, outline these in a separate attachment and/or attach any other relevant documents
- Either attach the previous refund decision or tax-at-source card, **or** refer to the date and/or reference on the letter you have received from the Finnish Tax Administration

Application Form 6202e

Company name / Ettevõtte nimi		Country of tax domicile / Kodumaa	
Description of business in home country / Ettevõtte tegevus		<div>Details on the applicant</div>	
Business address in home country / Aadress kodumaal			
Business address in Finland / Aadress Soomes		<div>Please fill in for the applied validity for the tax-at-source card</div>	
TIN / Ühiskondlik registreerimiskood	Finnish Business ID / Y-tunnus	<div>Please choose whether you have applied for a tax-at-source card previously</div>	
Requested for Finnish tax card previously / Kas tulumaksukaarti on varem taotletud		Requesting validity for / Millise perioodi kohta tulumaksukaarti taotletakse	
<input type="checkbox"/> No/Ei <input type="checkbox"/> Yes/Jah Date / Millal / 20 / 20 - / 20			
Name of Finnish client/payer / Soomalasest maksja/tellija nimi		Business ID / Y-tunnus	

Application Form 6202e

Does your company have / Kas ettevõtte on Soomes an office or workshop / büroo või töökoda		sales office in Finland / müügikoht		place of procurement / ostukoht		a warehouse / ladu	
<input type="checkbox"/> Yes/Jah	<input type="checkbox"/> No/Ei	<input type="checkbox"/> Yes/Jah	<input type="checkbox"/> No/Ei	<input type="checkbox"/> Yes/Jah	<input type="checkbox"/> No/Ei	<input type="checkbox"/> Yes/Jah	<input type="checkbox"/> No/Ei
Do any directors live in Finland / Kas Soomes on füüsiline juhatuse liige				Where are decisions made regarding your company / Kus tehakse ettevõtte puudutavad otsused			
<input type="checkbox"/> Yes/Jah	<input type="checkbox"/> No/Ei						
Is there a physical or legal entity in Finland / Kas Soomes on füüsiline või juriidiline üksus				the company / ettevõtte nimel lepinguid või võtta vastu tellimusi			
<input type="checkbox"/> Yes/Jah	<input type="checkbox"/> No/Ei						
Your company sells products to consumers / ettevõtte müüb tooteid või teenuseid eraisikutele				companies registered for VAT in Finland / Soomes registreeritud ettevõtetele			
<input type="checkbox"/> Yes/Jah	<input type="checkbox"/> No/Ei	<input type="checkbox"/> others / muule sihtgrupile					
Person to contact for more information / Lisainfo andva isiku kontaktandmed							

Contact details for the person who should be contacted in case we require further information regarding your application

Enclose with this form: / Avaldusele tuleb lisada:

- foreign trade register extract and its translation into English, Finnish or Swedish / välismaine äriregistri väljavõte ja selle tõlge soome, rootsi või inglise keelde
- copy of building contract / copy of employee-leasing contract / töötavõttulepingu / tööjõurendilepingu koopia

Place and date / Koht ja aeg	Signature and printed name / Allkiri ja nimi loetavalt

Application Form 6202e

Description of business in Finland / Soomes toimivad tegevused			
Is the business construction, building, installation / Kas Soomes tehakse ehitus-, ja paigaldustööd			
<input type="checkbox"/> Yes/Jah	Details concerning building or installation construction / Ehitus- ja paigaldustööde kohta Soomes	Name of customer / Klienti nimi	Duration / Period
<input type="checkbox"/> No/Ei	Description of the activity / Tegevuse kirjeldus		
Number of employees in Finland / Töötajate arv Soomes			

Application Form 6202e

- What you should fill in if you apply for a tax at-source card for dividend, interest or royalty income:
- Details on the applicant
- Whether you have requested for a Finnish tax-at-source card previously
 - Does the applicant have previous tax-at-source cards?
 - Write down the date on the tax-at-source card
- Requesting validity for
 - Typical validity is one calendar year, e.g. 1.1.2017-31.12.2017
- Person to contact for more information
 - This refers to the applicant's representative who should be contacted if further information is required.
 - **Note:** If you wish for the tax-at-source card to be sent to another address than the one on the application form, e.g. **the applicant's acting agent**, please specify this either in the "person to contact for more information" field, or in a cover letter

In summary

- Fill in the application form only in so far as it is relevant to your situation
 - The same application form is also used for tax-at-source cards regarding trade income, e.g. a building contract
- Remember to attach details on any previous refund decisions or tax-at-source cards, as well as any other relevant attachments
- Make sure to specify if the tax-at-source card should be sent to your agent rather than the address you have specified for yourself on the application form
- Form 6202e is currently not optically read, i.e. converted to digital format. This means that you can easily write additional information that does not fit on the application form in other attachments if necessary.
- If more information is required, the Finnish Tax Administration will be in direct contact with the person specified on the form.
- **Note:** The tax-at-source card is provided in Finnish or Swedish. However, the applicant can request for a separate explanation of the content of the card in English.

Any questions?

Links

- [The updated application form 6163e \(available in Finnish, Swedish and English\)](#)
- [The updated instructions for filling in 6163e and 6167e \(available in Finnish, Swedish and English; link to English version\)](#)
- [Application form 6202e](#)

For You.

