



VICEPRESIDENCIA  
PRIMERA DEL GOBIERNO  
MINISTERIO  
DE HACIENDA

# SOLIDARITY CONTRIBUTION ON LARGE FORTUNES AND WEALTH TAX IN SPAIN

FISCAL ATTACHÉ. SPAIN PERMANENT REPRESENTATION

# INTRODUCTION AND BACKGROUND

## SOLIDARITY CONTRIBUTION ON LARGE FORTUNES

## WEALTH TAX

LAW  
38/2022

Temporary

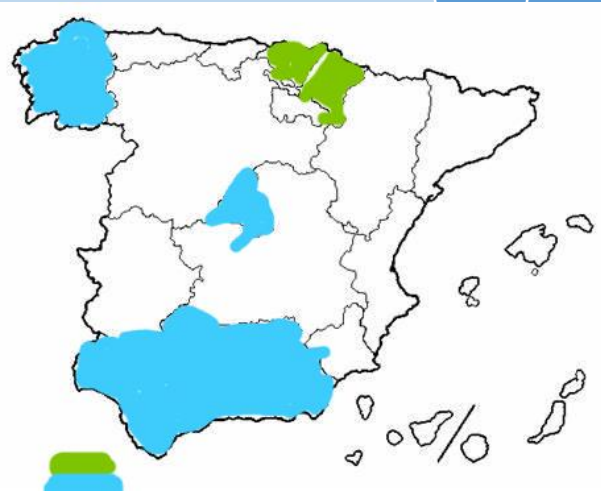
Purposes:

- Additional source of revenue
- Harmonization

LAW 19/1991

Applied since 1992 (not  
2008-10)

Transferred to Regions



# WEALTH TAX

DEFINITION: levied on the **net wealth** of individuals

- value of goods and rights
- less value of charges and debts.

EXEMPTIONS, f.ex:

- Household contents
- Owner-managed small businesses.
- Business assets and shareholdings, so long the business is the taxpayer's main source of income (over 50%) and operations are consistently managed by the taxpayer.
- Pension rights.
- Intellectual property rights in the author's ownership.
- **Main property <300.000€**

VALUATION

GROSS TAX BASE: reduction of 700,000€

# WEALTH TAX

**TAXPAYERS:**  
individuals

Residents of Spain:  
worldwide assets

Non residents:  
Goods/rights  
located in Spain

**TAX RATES:**

Tax base €	Liability €	TR %
0,00	0,00	0,2
167.129,45	334,26	0,3
334.252,88	835,63	0,5
668.499,75	2.506,86	0,9
1.336.999,51	8.523,36	1,3
2.673.999,01	25.904,35	1,7
5.347.998,03	71.362,33	2,1
10.695.996,06	183.670,29	3,5

# WEALTH TAX

## LIMIT OF INCOME-EQUITY

- WT + PIT LIABILITIES CANNOT EXCEED 60% TAXABLE BASE OF PIT
- REDUCTION OF WT: LIMIT 80% WT

## CREDITS

- EDT

# SOLIDARITY TAX ON LARGE FORTUNES (STLF)

- VERY WEALTHY INDIVIDUALS: > € 3,000,000 M



## TAXABLE PERSONS

- = WT
- Spanish Residents
- Non residents



## TAXABLE BASE, VALUATION, ALLOWANCES

- = WT
- Main home <€ 300,000
- Reduction € 700.000

# STLF: TAX RATES

From	To	Tax rate	Tax payable
€ 0	€ 3,000,000	0%	Nil
€ 3,000,000	€ 5,347,998	1.7%	39,916
€ 5,347,998	€ 10,695,996	2.1%	152,224
€ 10,695,996	onwards	3.5%	

- **EXAMPLE: €20M**
- DISCOUNT:
  - HABITUAL ABODE €300,000
  - ALLOWANCE €700,000
- APPLY TR TO €19M

Up to € 10,695,996	Rates 0%, 1.7% and 2.1%	152,224
From € 10,695,996 onwards: remaining € 8.304.004	Rate 3.5%	290,640
<b>TOTAL</b>		<b>442,864</b>

# STLF

## LIMIT OF INCOME-EQUITY

- STLF + WT + PIT LIABILITIES CANNOT EXCEED 60% TAXABLE BASE OF PIT
- REDUCTION OF STLF: LIMIT 80% STLF

## CREDITS

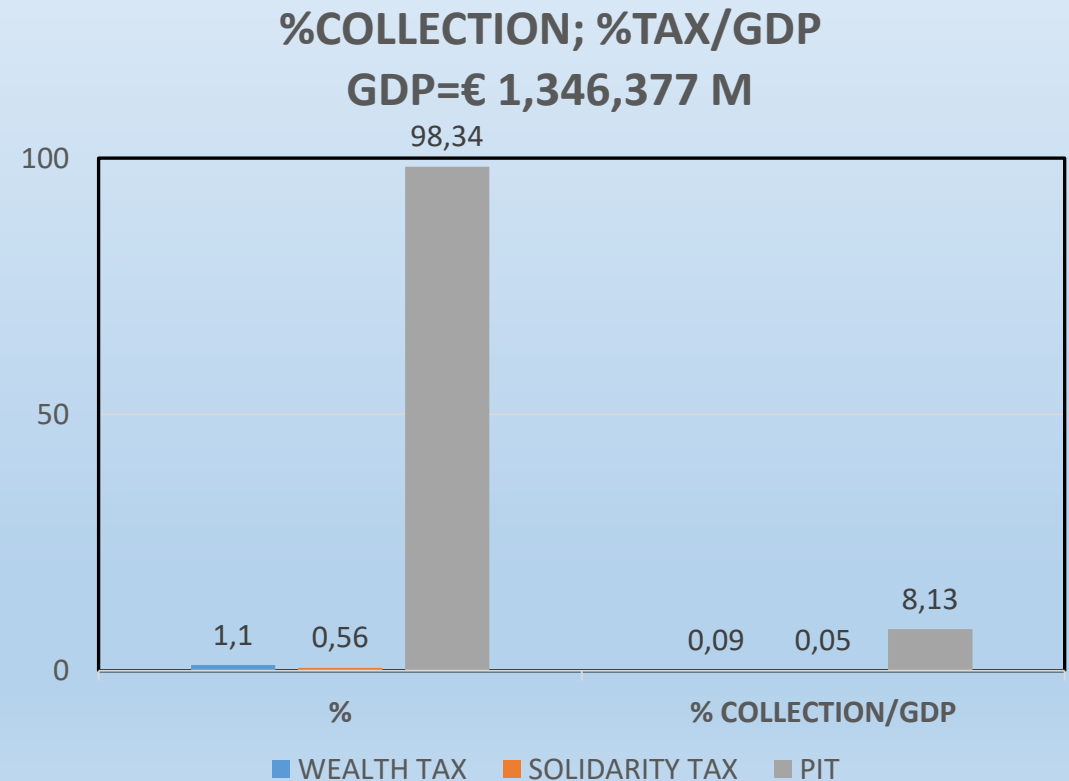
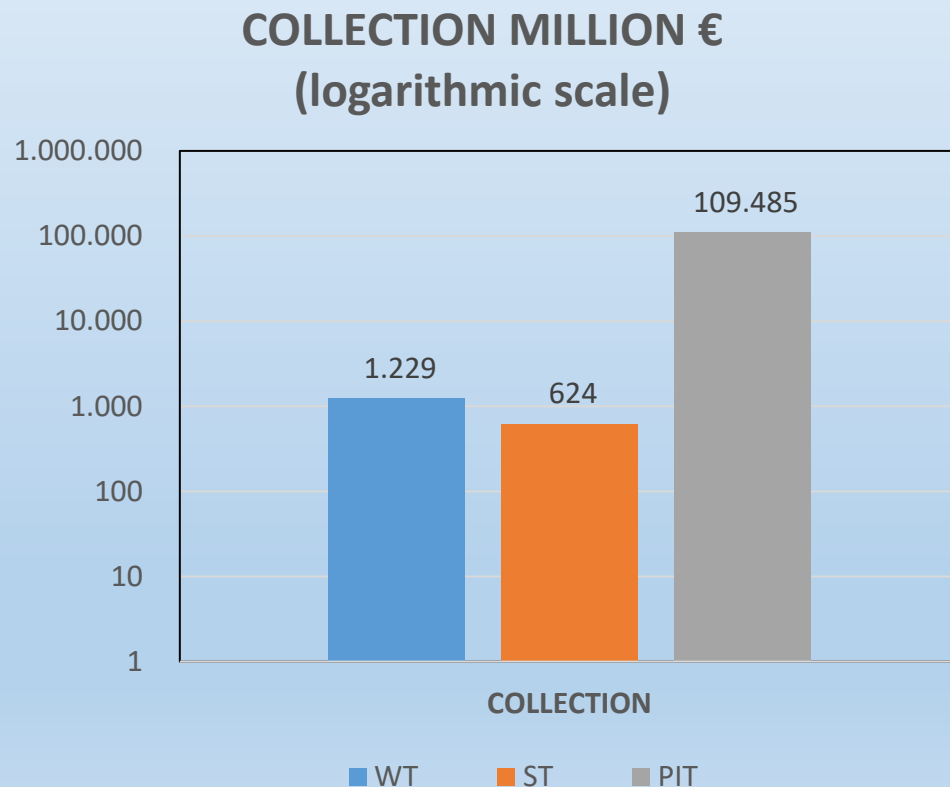
- **WT IS OFFSET**
- OTHERS = WT: EDT

# COLLECTION 2022: WT + STLF

WT: TAXPAYERS	COLLECTION (M €)
228,000	1,229

STLF PER REGION	# TAXPAYERS	COLLECTION (M€)
Andalucía	865	29,7
Aragón	8	0,0
Asturias	10	0,1
Baleares	9	0,0
Canarias	3	0,0
Cantabria	9	0,4
Castilla-La Mancha	5	0,0
Castilla y León	5	0,0
Cataluña	322	2,0
Extremadura	4	0,0
Galicia	91	9,8
Madrid	10.302	555,0
Murcia	15	0,0
La Rioja	3	0,0
Valencia	17	0,2
Ceuta, Melilla &NON RESIDENTS	342	26,2
<b>Total</b>	<b>12.010</b>	<b>623,6</b>

# COLLECTION 2022: (WT + STLF) comparison to PIT



Example: Individual of Madrid with total assets = €10M.  
He owns habitual abode and has obtained a net income (PIT) of €50,000.

Wealth	10.000.000 €
Exempted	(700.000 €)
Main residence	(300.000 €)
Taxable Base	9.000.000 €
Gross tax Liability [39.915,97 + [(9.000.000 – 5.347.998,03) x 2,1%]	116.608 €
Limit: ADD tax liabilities STGF + IRPF + IP (116.608 + 12.150 + 0)	128.758 €
Limit 60% Tax Base PIT (50.000 €)	30.000 €
Maximum to pay under STLF (30.000 – 12.150)	17.850 €
Additional floor: 80 % STLF liability (116.608*0,2)	23.321,60 €

Base liquidable – Hasta euros	Cuota – Euros	Resto Base liquidable – Hasta euros	Tipo aplicable – Porcentaje
0,00	0,00	3.000.000,00	0,00
3.000.000,00	0,00	2.347.998,03	1,7
5.347.998,03	39.915,97	5.347.998,03	2,1
10.695.996,06	152.223,93	En adelante	3,5

The maximum tax amount, by virtue of the limitation of 60% PIT Tax Base, should be €17,850. However, the reduction that can be made is limited to 80% of the STLF tax quota, so the final amount due will be €23,321.60.

Example: Individual of Cataluña, with total assets = €45M.  
He owns habitual abode.

CALCULATION WT: Wealth	45.000.000 €
Exempted	(700.000 €)
Main residence	(300.000 €)
Taxable Base	44.000.000 €
WEALTH tax Liability [183.670 + [(44.000.000 – 10.695.996) x 3,5%]	<b>1.349.310 €</b>
CALCULATION STLF: Taxable Base	44.000.000 €
STFL tax Liability [152.223,93 + [(44.000.000 – 10.695.996) x 3,5%]	<b>1.317.864 €</b>
Limit: TAX LIABILITY UNDER WEALTH TAX	<b>1.349.310 €</b>
STLF liability	<b>0 €</b>

WT: Taxable base	Liability	Rest Tax Base up to (x) euros	Tax Rate (%)
0,00	0,00	167.129,45	0,2
167.129,45	334,26	167.123,43	0,3
334.252,88	835,63	334.246,87	0,5
668.499,75	2.506,86	668.499,76	0,9
1.336.999,51	8.523,36	1.336.999,50	1,3
2.673.999,01	25.904,35	2.673.999,02	1,7
5.347.998,03	71.362,33	5.347.998,03	2,1
10.695.996,06	183.670,29	en adelante	3,5

STLF does not impact regions where WT is payable.

The credit may not cover the full STLF.



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**THANK YOU  
QUESTIONS?**