



COVID-19:  
Government  
Support Package  
Belgium

28 May 2020



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## Cash flow measures

- **Tax Deferrals on a Federal and Regional Level**
- Payment deferral of VAT, income and payroll taxes for businesses **upon request** provided that these taxpayers were negatively impacted by the Corona outbreak for pre 12 March 2020 tax liabilities
- An **automatic** general payment deferral of income taxes, payroll taxes and VAT from 12 March 2020. Accelerated VAT refund possibility in February return.
- Extension of tax return filing dates for Corporate income tax, Non-Resident corporate income tax and legal entities taxation
- Postponement of VAT returns, Annual and Intra-Community sales listing
- Payment deferral of various regional and local taxes (amongst others real estate tax, traffic tax, city tax, taxi tax)
- 'Tax shelter' - postponement of expenditure requirements
- Payment deferral for employers' social contributions and a postponement, exemption, 'bridging right' for self-employed persons in case they have to stop their activities for more than one week

## Liquidity and solvability

Financial "bazooka" - the Belgian National Bank is providing a €50 billion guarantee scheme to lenders such that the government agrees to guarantee up to €50 billion of potential losses

Postponement of loan payments until 30 September 2020 without charge

To safeguard funding for families, the self-employed and businesses, activation of a guarantee scheme for all new loans and credit lines with a maximum duration of 12 months, which banks provide to viable non-financial businesses and self-employed during this period

Loans for payment of commercial rent

Fiscal "bazooka" - 2 major new tax measures are currently under discussion to ensure more liquidity and solvability:

- a carry-back of 2020 year losses
- a special 'recovery reserve' allowing companies to temporarily exempt future profits up to an amount equal to the loss on the closing date of the fiscal year in 2020

The Belgian insurance sector reached an agreement for supporting measures to mitigate the negative impact of the coronavirus crisis on private individuals, households, the self-employed and businesses.

Insurance companies to provide flexibility towards customers in payment difficulties and aim to maintain insurance coverage overall

## Employment support/HR

- Support for temporary unemployment benefits due to force majeure, incl. an increased benefit from 65% to 70%
- Tax impact on cross-border workers (DTT BE-France, DTT BE-Luxembourg, BE-Netherlands and BE-Germany) and employee benefiting from the "expat" special tax concessions
- Employers are allowed to grant their employees facilities for Telework
- Tax and social security incentive for voluntary overtime in critical sectors

Other supporting measures  
- grants

- Tax exempt nuisance and compensation premiums for businesses affected by full or partial closure further to decision of the National Security Council.
- Flexibility according to conditions for support measures and subsidies (VLAIO).
- Measures related to donations of medical equipment and computers
- Moratorium on bankruptcies

## Administration

- ▶ Flexibility to make use of the different tools to overcome difficulties with regard to the continuity of corporate decision making
- ▶ Postponement of non-essential tax audits
- ▶ Extension and postponement of certain tax filings (see cash flow)

# Cash flow support: Federal Government tax payment deferrals

Both for direct and indirect taxes the Federal Government has granted a deferral of payment of taxes.

Depending on the date the income tax was assessed the deferral is treated upon request or awarded automatically.

Income taxes assessed prior to 12 March 2020 require a request for deferral and prove that the payment difficulties are related to the outbreak of the COVID-19 crisis.

## Payment holiday which requires a formal request for tax liabilities assessed prior to 12 March 2020:

- For CIT, PIT, Taxes on legal entities, Payroll WHT, VAT
- Businesses, i.e. individuals and legal entities with a Belgian company number (registered at the Crossroads Bank for Enterprises "CBE"), regardless of their activity
- Not for businesses that have already experienced structural payment difficulties, regardless of the coronavirus

### In practice:

- One request per tax debt through specific request form until (and included) 30 June 2020
- Response to each request within a 30-day period
- Proof of difficulties caused due to COVID-19 crisis to be provided
- Waiver of late payment interests and of administrative penalties due to late payments

## Payment holiday of 2 months on top of the normal payment term for tax liabilities assessed as from 12 March 2020.

- CIT, PIT, Non-residents taxation, taxes on legal entities

### In practice:

- No specific proof required of difficulties caused due to COVID-19 crisis.
- Waiver of late payment interests and of administrative penalties due to late payments
- Not applicable for annual tax for public regulated real estate investment companies which is still due by March 31, 2020

## For more information

Olivier Van Bauwel (BTA)  
[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)  
 Office: +32 2 774 9314

# Cash flow support: Federal Government tax payment deferrals (continued)

Specifically for VAT and Professional/Payroll WHT the payment of taxes is automatically deferred to future fixed dates of payment.

## Payment deferral for VAT:

- Payment for monthly return of February 2020 deferred to 20 May 2020
- Payment for monthly return of March 2020 deferred to 20 June 2020
- Payment for monthly return of April 2020 deferred to 20 July 2020
- Payment for quarterly return - 1st quarter 2020 deferred to 20 June 2020

## Payment deferral for Professional/Payroll WHT:

- Payment for monthly return of March 2020 deferred to 15 June 2020
- Payment for monthly return of April 2020 deferred to 15 July 2020
- Payment for quarterly return - 1st quarter 2020 deferred to 15 June 2020

## In practice

- Automatic payment holiday with no application required

## In practice

- Automatic payment holiday with no application required.

## For more information

Jan Van Moorsel  
[Jan.Van.Moorsel@be.ey.com](mailto:Jan.Van.Moorsel@be.ey.com)  
Office: +32 3 774 9377

## For more information

Hendrik Serruys  
[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)  
+32 3 270 1468

# Cash flow support: Federal Government tax prepayments

Companies and self-employed individuals affected by the Covid-19 outbreak are likely to have insufficient liquidity to make advance tax payments

The government decided to amend the current prepayment regime by increasing the bonification of the third and the fourth quarter of the financial year

This results in a reduction of the penalty for postponing prepayments to the second half of the year

Special anti-abuse measures apply

## Companies with a financial year-end per 31 December 2020 and self-employed individuals

- Increased bonification percentages in the third quarter (deadline: 12 October 2020) and fourth quarter (deadline: 21 December 2020).
- No application of this measure for companies making a capital reduction, distributing a dividend or performing a share buy-back between 12 March 2020 and 31 December 2020.

## Companies with a financial year deviating from the calendar year

- Increased bonification percentages with respect to the third and the fourth quarter for companies with a financial year ending per 30 September 2020 up to 31 January 2021
- No application of this measure for companies making a capital reduction, distributing a dividend or performing a share buy-back between 12 March 2020 and the last day of their respective taxable period

## Anti-abuse measure for companies

- Do not qualify for these increased bonification rates, companies who - in the period of 12 March 2020 and the last day of their respective taxable period
  - made payments of at least 100.000 EUR to tax havens (unless these payments can be justified by valid business reasons);
  - directly hold a share participation in a company located in a tax haven.

## In practice - tax credit rates

- Companies:
  - Q1 9.00%
  - Q2 7.50%
  - Q3 **6.75% (instead of 6%)**
  - Q4 **5.25% (instead of 4.5%)**
- Self-employed persons:
  - Q1: 3%
  - Q2: 2.5%
  - Q3: 2,25% (instead of 2%)
  - Q4: 1.75% (instead of 1.5%)
- Due dates for the tax prepayments remain unchanged as well as the percentage of the tax increase in case of insufficient prepayments (2,25% for self-employed persons and 6,75% for companies)
- This measure does not apply to companies who, as from March 12, 2020 up to the end of the taxable period, have made any variable remunerations to chief executives and other leading executives or representatives charged with the executive management

## For more information

Olivier Van Bauwel (BTA)  
[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)  
 Mob: +32 497 597 058

6% VAT rate applies to the delivery, intra-Community acquisition and import of medical protective gear

Payment plans and a waiver for penalties and late payment interest available

No VAT on donations of medical equipment and protective gear

## VAT rate of 6% - Import

- 6% VAT rate applies to the delivery, intra-Community acquisition and import of medical protective gear (mouth masks and hand sanitizer gels) as from 4 May up to 31 December 2020.
  - Until 1 August 2020, the importation of these goods remains exempt from VAT.
- ## Other VAT points for consideration:
- Until June 30, a request can be filed to obtain a payment plan and a waiver for penalties and late payment interests via a special form and under certain conditions, such as having duly filed all returns, absence of fraud and a motivation
  - No VAT on donations of medical equipment and protective gear - under certain conditions, the VAT authorities will not claim VAT on these donations. Similarly no VAT will be applicable on donations of computers to schools
  - Taxpayers making use of the special VAT return 629 will have more time to file - With regard to the first quarter of 2020, the payment is deferred from 20 April 2020 up to and including 20 June 2020

## For more information

Jan Van Moorsel  
[Jan.Van.Moorsel@be.ey.com](mailto:Jan.Van.Moorsel@be.ey.com)  
Office: +32 3 774 9377

# Cash flow support: Federal Government – Social security measures

Both for employers and self-employed individuals the Federal government has introduced supporting measures in the field of social security.

## Employers social security measures

- A delay for payment of social security contributions up to 15 December for payments from 20 March 2020

### In practice:

- Automatic postponement is for all businesses that were forced to close
- Other businesses that were not forced to close, but that were unable to meet the imposed sanitary measures, are allowed to request for a deferral of payment based on a statement of honour ('verklaring op eer') via specific form

## Self-employed social security measures

- So-called 'bridging right' (overbruggingsrecht/droit passerelle) due to force majeure eased. The entitlement to this right will also be extended to self-employed with secondary activity. The same will even apply to pensioners still active as self-employed. Both under the condition that their annual taxable income is limited and that they were forced to close for a period or at least 7 days/month
- Payment deferral or exemption for provisional social security contributions
- Waiver of surcharge due to late payment
- Reduction of provisional contributions for 2020 if profit below legal thresholds

### In practice:

- Measures subject to various conditions relating both to payment periods taken into consideration and forms to use

## For more information

Hendrik Serruys  
[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)  
 +32 3 270 1468

# Cash flow support: Federal Government - Social security/income taxes - voluntary overtime - critical sectors

The current 'voluntary overtime - regime' is extended for overtime performed during the second quarter of 2020.

Both for social security and income taxes, overtime will not be considered as income

This regime applies to so-called critical public and private sectors identified by the Ministerial Decree of 23 March 2020

## Employers social security contributions

- Employees in so-called critical sectors are granted an additional 120 hours overtime, on top of the existing 100 hours, totaling 220 hours that will be paid as net income
- 120 hours overtime salary payments are exempt from payroll tax and social security contributions

## In practice:

- Applies from 1 April up to 30 June 2020
- Critical sectors as identified in Ministerial Decree of 23 March 2020
- Examples of activities: air travel logistics, maritime sector, nuclear sector, companies applying full-continuous shift system, ....

## For more information

Hendrik Serruys  
[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)  
+32 3 270 1468

# Cash flow support: Federal Government tax filing postponement

For certain income taxes an automatic extension of tax return filing dates is granted

Specific filing due dates for entities with a year-end close between 1 October 2019 and 30 December 2019

For VAT a postponement of the deadline to submit VAT returns, intra-Community sales listings and annual sales listings is granted.

## Income Tax filing

- Entities with tax return filing due dates between 16 March and 30 April - automatic extension
- Entities with year-end close between 1 October 2019 and 30 December 2019 - new filing period starting after balance sheet date instead of date of general shareholders meeting
- Applies to: Corporate income taxes (CIT), Non - resident income taxes (companies) and Legal entity taxation

## VAT filing

- VAT return and intra-Community sales listing of April 2020: deadline extended until 5 June 2020
- Taxpayers considered 'starter' and taxpayers holding a license for a monthly refund can benefit a faster VAT refund, provided that the VAT return for April 2020 is filed in time: deadline for filing is extended to 24 May 2020 (instead of 20 May 2020)

## In practice

- Tax returns with filing due dates between 16 March and 30 April 2020 needed to be filed up to 30 April 2020 (midnight)
- No formal request required, the adjusted filing due date has already been integrated in the tax filing platform
- Entities with a year-end close between 1 October 2019 and 30 December 2019: tax return to be filed within a period of 7 months after year-end close (starting as from the first (working) day of the month following the balance sheet date). If this due date cannot be met as a result of the postponement of the general shareholders meeting further to COVID-19 outbreak, an individual extension request can be filed

## In practice - VAT refunds

- For monthly refund license holders the refund deadline is extended until the 24th of the month following the reporting period (i.e. April 2020 should be submitted by 24 May 2020).

## For more information

Olivier Van Bauwel  
[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)  
 Office: +32 2 774 9314

## For more information

Jan Van Moorsel  
[Jan.Van.Moorsel@be.ey.com](mailto:Jan.Van.Moorsel@be.ey.com)  
 Office: +32 3 774 9377

# Cash flow support: Regional Government tax deferrals - administrative and procedural easing

On the various regional levels (Flemish, Walloon and Brussels Capital) tax related measures are in place in order to both support cash flow for businesses and individuals as well as to alleviate the administrative and procedural burden that such taxes may bring along for the taxpayers experiencing difficulties related to the outbreak of the COVID-19 crisis

## Flemish Region: Postponement of the real estate tax assessment for companies (legal personality)

In practice:

- Mailing of the property tax assessments for companies will be postponed until September 2020 (instead of May 2020)
- One-man businesses can apply for a payment plan and/or remission of late payment interests

## Flemish Region: Extension deadline for payment traffic tax and tax on entry into service of vehicles for companies (legal personality)

In practice:

- Additional 4 month period to pay the tax
- Notices of assessment sent from 26 March until 30 September 2020 will already contain a 6 months term of payment
- For notices of assessment sent as from 1 March 2020, the taxpayer is allowed to add an additional 4 months payment term to the indicated standard 2 months payment term
- No late payment interest will be due
- One-man businesses can request for a payment plan and/or remission of late payment interests

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## Flemish region: Inheritance tax and registration duties: extension of deadlines to fulfill fiscal obligations

- This applies e.g. for the filing of the inheritance tax return and for the registration of deeds

In practice:

- Tolerance consisting of an additional 2 month period following the end of the strict corona measures will apply for all filing and registration deadlines
- No specific request required

## Brussels Capital Region:

- City tax (tourism): payment will be suspended from 1 January up to 30 June 2020
- Taxi tax suspended for tax year 2020
- Payment deferral of 2 months of real estate tax for TY 2020
- Extension deadline for payment traffic tax and tax on entry into service of vehicles for companies

## Walloon region: Payment deferral for regional taxes

In practice:

- A general payment deferral of regional taxes will apply corresponding to the entire duration of the corona crisis

## Walloon region: various tax procedural or administrative measures with respect to:

- Tax litigation
- Tax collection
- Tax audits
- Kilometre-based charge

In practice:

- Tax litigation objection periods and negative administrative decisions will be frozen during the crisis, but positive decisions will be applied
- Pending collection procedures will be eased
- Physical tax audits are suspended
- Administrative fines related to the kilometre-based charge will be mitigated

## For more information

Olivier Van Bauwel

[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)

Office: +32 2 774 9314

# Cash flow support: Federal Government - Other tax measures

The tax shelter is tax incentive to encourage the production of audiovisual works and performing arts in Belgium. The conditions to fulfill the requirements of this tax incentive would be eased mainly by extending the expenditure periods

Circular letter - Impairment of trade receivables - COVID19

With regard to the interest deduction limitation rule, a circular letter clarifies the impact of COVID-19 related payment modalities on grandfathered loans

The annual corporate contribution is postponed, as well as the annual tax relating to premiums, employer's contributions or personal contributions

The payroll tax exemption for night & shift work is maintained for companies forced to apply social distancing rules

## The 'Tax shelter' initiative

- Both for the audiovisual sector and performing arts the government allows more room for fulfilling the requirements and have extended the expenditure periods

### In practice

- Audiovisual sector: current term of 18 months (or 24 months in case of animated films) extended by 12 months
- Performing arts: current 24-month period extended by 12 months
- Proof by the producer of a direct link between corona measures of the government and the impossibility to make the expenditures within the 'normal' period.

## New interest deduction limitation regime - Grandfathered loans

- Addendum to Circular letter regarding grandfathered loans clarifies that the granting of specific payment modalities further to the COVID-19 outbreak will not be regarded as an important or fundamental modification

### In practice

- For loans concluded before 17 June 2016 this means they remain subject to the 5:1 thin capitalization rules in case COVID-19 related payment modalities are granted

## Circular letter

- Circular letter confirms that the COVID-19 crisis can be considered as an exceptional circumstance, justifying the tax exemption for impairments of trade receivables for corporate income tax purposes

### In practice

- Impairment on trade receivables are only tax deductible if it can be demonstrated that they are well defined and probable based on the facts and circumstances.
- The circular letter states that the COVID-19 crisis can be effectively considered as a justification for such impairments

## Annual corporate contribution

- The payment of the annual corporate contribution for the financing of the social status of the self-employed is deferred from 30 June to 31 October 2020

## Payroll tax exemption - night & shift work

- The tax authorities will apply a tolerance for companies that made use of the payroll tax exemption for shift work prior to the COVID-19 outbreak and that were forced to implement social distancing regulations, resulting in a short interruption between 2 shifts.

## Annual tax relating to premiums, employer's contributions or personal contributions

- The tax due between 16 March 2020 and 30 June 2020 shall be payable no later than the 20th day of the month following the month in which the premiums or contributions were paid and at the latest on 20 July 2020.

## For more information

Olivier Van Bauwel  
[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)  
 Office: +32 2 774 9314

# Cash flow support: Federal Government - Other tax measures

The Government supports the donations in kind of various medical aid and equipment useful for combating the pandemic.

Donations of computers to schools are also fiscally stimulated

Two non-cumulative tax measures would be put in place to support such donations:

- For companies and self-employed, a temporary modification of the general rule covering the deduction of professional costs (art. 49 ITC) is implemented

- For private persons and self-employed individuals, the specific tax reduction for donations is temporarily extended to donations in kind

## Donations in kind by companies and self-employed individuals

The general cost deduction provision (art. 49 ITC) will allow the deduction of costs made for the donation of equipment or products aimed at combatting the pandemic

The same measure goes for the donation of computers to schools.

The donated goods do not necessarily need to be obtained (or produced) in the context of the professional activity of the donator

### In practice

#### Specific conditions apply:

- The donations should be made between 1 March 2020 and 31 July 2020; For the donation of computers the measure extends to donations up to 1 September 2020
- The donations of equipment or products aimed at combatting the pandemic should be made to hospitals and other institutions (retirement homes, schools and universities, public services, humanitarian help organizations and all institutions exempt from VAT and import duties with regard to the import of the latter goods)
- Donations of computers should be made to schools

## Donations in kind by private persons and self-employed individuals

The specific tax reduction for donations in cash is extended to donations in kind of medical equipment, protective gear and computers

### In practice

#### Specific conditions apply

- The donations should be made between 1 March 2020 and 30 June 2020
- The donor should be subject to personal income taxation (or non-resident income taxation provided the non-resident obtains at least 75% of his professional income in Belgium) and the donated goods may not be obtained or produced in the context of the professional activity of the donor
- The donations of equipment or products aimed at combatting the pandemic should be made to hospitals (related to a university or Public Social Welfare Office), the Belgian Red Cross and institutions for disabled persons, elderly people and protected minors
- Donations of computers made to schools

- The valuation of the goods is based on the purchase invoice. In the absence thereof, the value of the goods is estimated on a lump-sum basis for various kinds of face protection
- By Royal Decree the list of qualifying goods may be extended
- Specific valuation applies for the donation of computers

### For more information

Olivier Van Bauwel  
[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)  
 Mob: +32 497 597 058

# Liquidity and solvability: Guarantee scheme for individuals and companies affected by the corona crisis - Federal measure

To safeguard funding for families, the self-employed individuals and non-financial businesses, the federal government, on the initiative of the Finance Minister and with the support of the National Bank of Belgium, has come to an agreement with the financial sector for a new guarantee scheme.

The scheme that has been agreed means that the government agrees to intervene with a total guarantee of €50 billion.

## Who is eligible?

- All non-financial businesses
- the self-employed and
- mortgage borrowers struggling with payments as a result of the corona crisis

## What does it cover?

- Postponement of loan payments with a maximum delay of six months until 31 October 2020 at the latest without charge
- Activation of a guarantee scheme for all new loans and credit lines with a maximum duration of 12 months, which banks provide to viable non-financial businesses and the self-employed
- The aim is funding to the economy will be maintained

## How is it accessed?

- Both for requests made before 30 April 2020 and after, payment deferral can be obtained up to 31 October 2020 (with a maximum delay of six months)
- Individuals or businesses that meet the conditions need to contact the bank
- The National Bank of Belgium, together with Febelfin, will set up a monitoring system to monitor the guarantee scheme as well as the sector's commitments

## Practicalities/characteristics

- A total guarantee amount of €50 billion.
- All new additional loans and credit lines with a maximum maturity of 12 months (excl. refinancing loans) provided until 31 October 2020 will be covered by the guarantee scheme
- Upon expiry of the guarantee scheme, the amount of losses incurred on loans under the guarantee scheme will be assessed
- The burden will be shared between the financial sector and the public sector
- The first 3% of losses will be borne entirely by the financial sector. For losses between 3% and 5%, 50% of the losses will be borne by the financial sector and 50% by the government. For losses higher than 5%, 80% of the losses will be borne by the government and 20% by the financial sector

## For more information

**Peter Suykens**  
[Peter.Suykens@be.ey.com](mailto:Peter.Suykens@be.ey.com)  
 Tel: +32 473 730 262

**Philip Peerens**  
[Philip.peerens@be.ey.com](mailto:Philip.peerens@be.ey.com)  
 Tel: +32 486 955 799

The Belgian Government recently agreed on draft legislation containing 2 new tax measures for businesses suffering from the economic fallout of the COVID-19 outbreak. The proposal will now need to be approved in the parliament.

The joint measures, described as a fiscal 'bazooka', would consist of:

- a carry-back of current year losses
- a special 'recovery reserve' allowing companies to temporarily exempt future profits to the amount of losses incurred in 2020 with a maximum of € 20mio

### Carry-back of losses of 2020

- Both for companies and self-employed individuals, it would be possible to impute expected losses of the current taxable period on the taxes due relating to profits of the previous taxable period
- Measure would also allow to reclaim tax prepayments already paid in 2020

### In practice - Self Employed

- For self-employed persons, the measure would take the form of a new exemption for possible losses of income year 2020, which in practice is considered as an anticipated loss deduction (new economic exemption)
- A special tax form as an annex to the tax return would be made available
- Not applicable to self-employed taxed on lump-sum taxable basis
- Technically, taxpayers who claim the exemption for TY 2020 (income year 2019) will need to take back the exemption next year (TY2021) so as to entirely (or partially) neutralize the loss
- In the absence of a loss or if the loss is less than the exemption, a tax increase will apply

### In practice - Companies

- Companies may also apply for a temporary exemption of CIT for part (or the entirety) of the result of the taxable period for TY 2019 or 2020 that relates to the accounting years closed in the period between 13 March 2019 up to and including 12 March 2020
- Exempted amount may not exceed the result of the taxable period nor an amount of € 20mio
- Companies that have already paid CIT for the tax years targeted by this measure, prior to the entry into force thereof, may file an administrative appeal. In other cases a request for a modification of the tax return is allowed. In case the latter has not been filed yet, the exemption will be claimed in the tax return
- In practice a temporary exempted reserve will be deducted from the total amount of reserved taxable profits at the end of the taxable period closed in the period between 13 March 2019 up to 12 March 2020. As a consequence, companies will pay no (or less) CIT for TY 2019 or 2020, or part of the paid taxes may be repaid
- In case prepayments were already made then repayment is promised to follow quickly

- Whereas the system aims at introducing a (limited) carry-back, specific and complex anti-abuse provisions apply for excess exemptions
- Tax exempt amount for TY 2019 (or 2020) and the loss of taxable period 2020 (or 2021) should correspond as close as possible. A tolerance of 10% applies
- A difference in excess of 10% of the estimated/exempted loss and effective loss will be sanctioned with a special assessment

### Excluded companies:

- Companies performing payments (or attributions) of dividends, share buybacks or capital reductions in the course of the taxable periods relating to tax year for which the exemption was requested
- Some types of companies excluded (a.o. Investment companies, cooperative participation companies, companies subject to the special tax regime for shipping companies, real estate investment companies,...)
- Companies holding shares of or making payments in excess of € 100k (except if supported by economic reasons) to companies in tax havens

### Peter Moreau

[peter.moreau@be.ey.com](mailto:peter.moreau@be.ey.com)

+32 2 774 91 87

### Olivier Van Bauwel

[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)

Mob: +32 497 597 058

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- a carry-back of current year losses
- a special 'recovery reserve' allowing companies to fiscally exempt future profits to the amount of losses incurred in 2020 with a maximum of € 20mio

### COVID-19 'recovery reserve'

- Companies would be allowed to create a special reserve corresponding to the amount of losses suffered in 2020 with a maximum of € 20mio
- Would apply for 3 consecutive taxable periods relating to tax years 2022, 2023 and 2024
- Subject to conditions of not reducing the equity position as well as maintaining 85% employment related costs

### In practice

- Tax exempt reserve limited to the accounting loss at the end of the financial year 2020
- The reserve can be built up at the end of the accounting years relating to tax years 2022, 2023 or 2024
- The reserve is subject to the intangibility condition, meaning that the reserve may become taxable ultimately at the occasion of a liquidation of the company, or use of the reserve (such as distribution)

### Excluded companies:

- Companies making payments to companies located in tax havens (unless supported from an economic perspective and unless they do not exceed 100k€) or having share participations in companies situated in tax havens
- Companies performing a capital decrease, a share buy-back or paying dividends in the period 12 March 2020 until the day of filing the tax return relating to a tax year in which a reserve is built up.
- To the extent a company that has built up a recovery reserve would pay dividends, decrease capital or performs a share buy-back, this will lead to a total or partial taxation of the previously recorded reserves.
- Investment companies, cooperative participation companies, companies subject to the special tax regime for shipping companies, real estate investment companies, ...

**Peter Moreau**

[peter.moreau@be.ey.com](mailto:peter.moreau@be.ey.com)

+32 2 774 91 87

**Olivier Van Bauwel**

[Olivier.van.bauwel@be.ey.com](mailto:Olivier.van.bauwel@be.ey.com)

Mob: +32 497 597 058

# Liquidity and solvability: Measures from the insurance sector - Federal measure

The Belgian insurance sector reached an agreement for supporting measures.

Facilitated by the National Bank, with the backing of the FSMA and the Federal Government.

Insurance companies to provide flexibility towards customers in payment difficulties and aim to maintain insurance coverage.

## Who is eligible?

- Individuals laid off temporarily because of the Covid-19 virus
- Companies affected by the Covid-19 crisis

## What does it cover?

- Pension, death, disability and hospitalization under group insurance (contracted by employers): Payment of premiums due by employers deferred until 30 September 2020
- Mortgage loans contracted with insurance companies: Suspension of interest and capital repayments as well as payment of premiums on mortgage protection insurance until 30 September 2020
- Home insurance premiums linked to mortgage loans falling due between 30 March and 30 September 2020: Payment deferral until 30 September 2020
- All other types of insurance: adequate solution on a case-by case basis

## Companies:

- Insurances for accidents at work, third-party liability, etc.: subsequent premium adjustments in case of any reduction in business activity
- Companies forced to suspend activities: payment deferral for all premiums falling due between 30 March and 30 September 2020
- Loans granted to companies: loan repayment delay (interest and capital repayments) until 30 September 2020

## How is it accessed?

### Natural persons:

- Pension, death, disability and hospitalization under employer group insurance: No further formalities
- Mortgage loans contracted with insurance companies, home insurance premiums linked to mortgage loans and other insurances: proof by insurance policy-holder of financial difficulties / loss of employment

### Companies:

- Insurances for accidents at work, third-party liability: adjustment made automatically
- By agreement with their insurer

## Practicalities/characteristics

- Direct contact between insurance policy holder and insurance company required
- As for loans granted to companies, the insurers will also follow the conditions already set for the banking sector (see previous slide)

## For more information

**Peter Suykens**  
[Peter.Suykens@be.ey.com](mailto:Peter.Suykens@be.ey.com)  
 Tel: +32 473 730 262

**Philip Peerens**  
[Philip.peerens@be.ey.com](mailto:Philip.peerens@be.ey.com)  
 Tel: +32 486 955 799

The COVID-19 crisis has forced all Belgian federated regional governments to take supporting measures.

These measures are meant to directly provide for financial aid or breathing space for affected sectors and businesses.

At the Flemish level short, medium and long term aid is provided by the Flanders Participation Company (FPC)

### Flemish Government

- Short term: Corona crisis guarantee
- Extension of the existing "generic" guarantee scheme of the Flanders Participation Company (FPC) for € 300 million, with € 100 million to ensure that businesses and the self-employed can also have a bridging loan guaranteed

#### In practice

- For existing non-bank debts (up to 12 months) (i.e. social security, VAT, unpaid rent) and also for existing bank debts provided that banks agree to grant a 3 month payment deferral or agree to preserve the credit lines
- Up to 75% of the contracts covered by the guarantee
- **One-off lower premium: 0.25% instead of 0.5%**
- **Extension up to 50% guarantee for short term credit lines with duration of at least 3 months**
- **Extension applicable until 31/12/2020**

### Flemish Government - Short term

- Repayment suspension FPC loans
- Specifically for SME's making use of Start-up loans, 'co-financing' and 'co-financing+', granted by FPC: automatic repayment suspension of capital and/or interest for three months (to be extended to six months if necessary)

### Flemish Government - Medium term

- Subordinated loans over three years by FPC

#### In practice

- Only for SME's (focus on start-ups and scale-ups)
- Aiming at bringing effective employment to a minimum of 80% of their workforce or keep their workforce at work in the short term
- Loans for an amount of € 25.000 up to € 2Mio at a deferred interest rate of 4.5 (SME) or 5% (Start-ups/scale-ups).
- Not for companies in difficulties prior to the COVID-19 crisis
- Qualifying companies can apply for the support up to 15 November 2020
- Can not be combined with a nuisance or compensation premium

### Flemish government - Long term

- Increase of the guarantee capacity of the 'Gigarant guarantee scheme' (€3 billion instead of €1,5 billion) by FPC
- For a maximum period of 6 years

#### In practice

- Not for companies in difficulties prior to the COVID-19 crisis
- Reduction of the cash premium compared to the current Gigarant premium
- Only for the businesses that cannot benefit from the Federal Guarantee Scheme
- Employment engagement required
- Guarantees may be granted up to 31 December 2020

### For more information

**Peter Suykens**

[Peter.Suykens@be.ey.com](mailto:Peter.Suykens@be.ey.com)

Tel: +32 473 730 262

**Philip Peerens**

[Philip.peerens@be.ey.com](mailto:Philip.peerens@be.ey.com)

Tel: +32 486 955 799

The COVID-19 crisis has forced all Belgian federated regional governments to take supporting measures.

These measures are meant to directly provide for financial aid or breathing space for affected sectors and businesses.

### Walloon Government

- Extraordinary Crisis Fund of €350 million:
  - €233 million to support SMEs and self-employed in the sectors affected by the crisis (e.g. catering, tourism, events), and this through a lump-sum compensation package
  - €115 million to support the health and social sectors
  - €2 million for local authorities to compensate for the support they provide to businesses and the self-employed
- The regional investment vehicles SOWALFIN, SOGEPa and SRIW will provide a response to companies in cash flow difficulties through bank guarantees or loans, and this in close consultation with the banking sector
- An “automatic” loan intervention (up to max. €15.000) and an additional guarantee intervention (75% of the requested bank credit, with a maximum of €30.000) by Sowalfin for self-employed and companies requiring additional treasury, provided that the loan requests have been approved by partner banks. This mixed support is globally limited to 5.000 credits and cannot be combined with the €5.000 cq €2.500 compensation premium

### Walloon government

- SOWALFIN guaranties:
- up to 50% on existing credit lines with banks and this for €500.000
  - up to 75% on increases of existing credit lines
  - up to 75% on new short term credit lines
- SOGEPa:
- issues credits equivalent to bank loans in order to face up to the deadlines of businesses in the short term
  - secures public guarantees of bank loans up to 75%
  - sustains direct credit support up to €200.000 to counter immediate cash issues
- SRIW:
- Extension of the 'GELIGAR guarantee scheme' for non-SME's:
- 75% automatic guarantee up to €1.5Mio for existing short term bank credit lines for companies affected by COVID-19
  - Equal guarantee for increases of such credit lines

### Brussels Government

- €20 million support for cashflows of affected business' by granting government guarantees (via the Brussels Guarantee fund) for bank loans
- A delegated assignment for “Finance & Invest.Brussels” agency with the possibility to grant loans at a lowered interest rate to core suppliers of the food and beverage sector, so as to allow them to allot extended deadlines of payment to the catering businesses. Catering businesses employing more than 50 employees can obtain a loan at a lowered interest rate
- Moratorium on the repayment of loans granted by “Finance & Invest.Brussels” for affected companies

### For more information

**Peter Suykens**  
[Peter.Suykens@be.ey.com](mailto:Peter.Suykens@be.ey.com)  
 Tel: +32 473 730 262

**Philip Peerens**  
[Philip.peerens@be.ey.com](mailto:Philip.peerens@be.ey.com)  
 Tel: +32 486 955 799

All regional governments have put general supporting measures in place that provide for a cash stimulus for businesses forced to entirely or partially close during the COVID-19 outbreak

Other measures are aimed at alleviating strict conditions with regard to grants and subsidies.

#### **Flemish region: SME Growth Subsidy: subsidy intended to help attract missing strategic knowledge/expertise within SMEs that is required to establish new growth**

- Measure has been extended to include strategic tipping point/ because of the Coronavirus

#### **In practice:**

- Exploring new markets or revising the supply chain can be considered as such a tipping point to make a grant application

#### **Flemish region: Increased flexibility in terms of conditions for support measures and subsidies**

- For beneficiaries/applicants that as a result of the crisis, encounter difficulties to meet the deadlines set for certain subsidies

#### **In practice:**

Eligible VLAIO-subsidies for such an extension are:

Development projects, Research projects, STRES & STS applications, Ecology premium plus

- Thematic ICON-projects, ICON-projects w.r.t. interdisciplinary cooperative research
- Baekeland mandates, Innovation mandates (IM), ...

COVID-19: EMEIA EY Government Support Package

#### **Flemish region: VLAIO R&D project grants: subsidy intended to boost innovative R&D projects**

- Covid-19 related project proposals will be treated as a priority

#### **In practice:**

- R&D projects with an innovation, clearly helping to fight the Covid-19 impact

#### **Flemish region: Compensation premium**

- A tax exempt cash incentive specifically for businesses that remain open but have a large loss of turnover due to the restrictive measures are now receiving support
- It is currently understood that this premium is aimed at the following sectors: event sector, (para) medical professions (i.e. dentists and physiotherapists), catering. We await further guidance on the exact sectors to be included

#### **In practice:**

- € 3,000 premium. (€ 1,500 for self-employed with secondary activity)
- Loss of turnover of 60% in the period between March 15, 2020 and April 30 (compared to the same period last years)
- To be requested by an application at VLAIO

#### **Flemish region: advance payment of commercial rent**

- Businesses forced to close and experiencing serious difficulties to pay commercial rent may rely on the FPC to pay a max. of 2 months rent upfront, provided that the lessor cancels one or two months rent
- The measure applies as of April

#### **In practice:**

- FPC grants a loan of €25.000 max. Repayment possible over a period of 18 months at 2% interest rate
- Banks will treat the loan requests
- Applies only on businesses that were forced to close

#### **Walloon region: compensation premium**

- A € 2.500 tax exempt cash incentive for self-employed persons and companies that remain open but have a large loss of turnover due to the restrictive measures in March and April 2020 and who benefited from the so-called 'bridging right' (overbruggingsrecht/droit passerelle) in the months of March or April.

#### **Brussels region**

- A € 3,000 tax exempt cash incentive specifically for taxi businesses
- A € 2,000 tax exempt **compensation premium for entrepreneurs and micro businesses (0-5 FTE) experiencing a significant loss of turnover**

#### **For more information**

Wouter Desmet

[Wouter.desmet@be.ey.com](mailto:Wouter.desmet@be.ey.com)

Office: +32 9 242 5106

All regional governments have put general supporting measures in place that provide for a cash stimulus for businesses forced to entirely or partially close during the COVID-19 outbreak

Other measures are aimed at alleviating strict conditions with regard to grants and subsidies.

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### **Flemish, Walloon & Brussels Capital region: Nuisance premium**

- A tax exempted cash incentive specifically for businesses that are required to entirely close further to health decisions taken by the National Security Council
- Depending on the region, the premium is attributed either to all businesses and stores forced to close (Flemish region) or limited to certain sectors, identified by their (VAT) NACE codes (Brussels & Walloon region)

#### **In practice:**

- Premium for businesses varies from € 2,500 - € 5,000 depending on the region and whether it concerns a full or partial closure
- For the Flemish region, further 160€/day, in case of prolongation after April 4
- Upon request and subject to various regional conditions
- Duration subject to the health & safety measures imposed by the National Security Council

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#### **For more information**

**Wouter Desmet**  
[Wouter.desmet@be.ey.com](mailto:Wouter.desmet@be.ey.com)  
Office: +32 9 242 5106

# Employment support/HR - Temporary unemployment benefits due to the coronavirus

Measures implemented by the Belgian Government due to the coronavirus outbreak, have a significant financial impact on Belgian companies. Normally there are two distinct regimes of temporary unemployment, one regime for force majeure and one for a (temporary) lack of work due to economic circumstances.

On Friday 20th March, the Belgian government decided to drastically simplify the mechanism of temporary unemployment benefits to allow companies to suspend the employment of their workers during this crisis, while the latter receive unemployment benefits.

## Who is eligible?

- All employees can qualify for temporary unemployment benefits, irrespective of their employment (no requirements with respect to prior employment for a specified period)

## Practicalities

- The amount of the temporary unemployment benefit is increased to 70 % (instead of 65 %) of the last monthly salary (with a maximum of 2754.76 EUR)
- On top of this monthly temporary unemployment benefit, a supplement of 5.63 EUR a day (paid by the National Employment Service - RVA/ONEM)
- A professional withholding tax of 15% will be applied to the unemployment benefit for unemployment benefits paid from 1 May up to 31 December 2020
- A temporary unemployment benefit must be taken for the whole day (thus not possible to work in the morning and to be unemployed in the afternoon (or vice versa))
- Simplified regime will be applicable until 30 June 2020, provided that the precautionary measures are still in place (all to be considered as demands for the temporary unemployment regime for force majeure)

COVID-19: EMEIA EY Government Support Package

## Support measures

- The new simplified regime of temporary unemployment was decided on Friday 20 March 2020, and from that date, all demands for temporary unemployment will be considered as demands for the temporary unemployment regime for force majeure
- The examples provided by the administration related to "force majeure" have also been broadened vastly to include "companies which (partially) close because they do not have teleworking tasks for (all) their workers and who cannot respect the social distancing measures in the exercise of work and in the transport which they organize (for example, construction companies)." Are also included Belgian companies that have to stop their production process and can thus no longer employ their employees because some of their suppliers do not supply any more

## Administration

### *Administrative formalities - employers*

- Submittal of an electronic application (ASR 5/DRS 5), to the local office of the RVA/ONEM. As to the reason for the temporary unemployment benefits, the employer only has to mention "Coronavirus"
- To be introduced via the website of the social security administration (<http://www.socialsecurity.be/>)
- The employer does no longer have the obligation to supply the specific control card for temporary unemployment, the C3.2A, to his employees

### *Administrative formalities - employees*

- Inform the trade union or the HVW/CAPAC, the Auxiliary Unemployment Benefits Service through the simplified C3.2A Corona form

## For more information

**Hendrik Serruys**

[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)

+32 3 270 1468

**Karla Vuyts- EY Law**

[Karla.Vuyts@be.ey.com](mailto:Karla.Vuyts@be.ey.com)

+32 496 507 424

One of the measures from the federal government to counter the Covid-19 virus is telework. Homeworking became mandatory for all companies that are able to make their employees work from home.

Telework offers many benefits and it can also be implemented immediately by creating the right policies.

### Who is eligible?

- Telework measures are applicable to both employees and directors

### Support measures

- *Providing IT material and internet by the employer:* If employees are also allowed to make personal/private use of this free provision, a flat-rate benefit in kind will be charged (PC: 72 euros/year, internet: 60 euros/year), subject to social security and taxation.
- *Work at home allowance:* to compensate for costs other than the internet (incl. costs for electricity, heating, purchase of office equipment,...)
  - up to a maximum of € 126.94 per month can be granted free of social security and tax as a cost proper to the employer. As of 1 April € 129.48 (indexed)
  - If no structural basis for work at home is provided, a maximum of € 40 per month can be granted free of social security and tax as a cost proper to the employer

### Support measures

- *Reimbursement of the private PC and private internet by the employer:* employers who do not provide IT material and internet to the employees can reimburse part of the costs that the employees bear themselves for the purchase of a PC and internet that they use on a structural and regular basis for telework. The reimbursement must correspond to the professional use of this PC and the internet and can be granted tax-free and free of social security as a cost proper to the employer. If the amount reimbursed to the employee does not exceed € 20 of the effective cost of professional use of the PC and € 20 of the effective cost of professional use of the Internet, no additional proof is required. If more than € 20 is reimbursed per use, a double proof will be required for a tax-free refund:
  - the reimbursement is intended to cover costs proper to the employer;
  - the reimbursement was actually spent on such costs

### How is it accessed?

- If working from home is done on a structural basis it should be stated in the employment contract or work agreements
- To grant the work at home allowance, a prior agreement must be concluded with the Ruling Commission

### Practicalities

- After discussions with the Ruling Commission, it was agreed to install a so-called FAST TRACK procedure, whereby the aforementioned approval can be obtained immediately under minimum conditions (formal but shortened application, temporary nature, no double use,...)

### For more information

Hendrik Serruys  
[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)  
 +32 3 270 1468

# Employment support/HR - Tax impact on cross-border workers and employee benefiting from the “expat” special tax concessions

Since homeworking becomes mandatory for all companies that are able to make their employees work from home, Belgium reached an agreement with the Netherlands, France, Luxemburg and Germany, as regards the DTT that the normal cross-border work pattern can be invoked as a fiction during the so-called COVID-19 period

The impact on the determination of the travel exclusion for Belgian employees benefiting from the Belgian special (expatriate) tax concessions is still under discussion.

## Who is eligible?

- Cross-border workers benefiting from the provisions in the DTT Belgium-France, Belgium-Luxembourg, Belgium - Netherlands and Belgium - Germany
- Employees benefiting from the “expat” special tax concessions

## Support measures

### *DTT Belgium - France*

- Teleworking days performed in the resident state will be considered performed in the normal working state, insofar as this teleworking is a direct consequence of the COVID-19 outbreak. Applies from 14 March 2020 up to 30 June 2020. Period may be extended if both parties to the DTT agree to do so.

### *Frontier worker regime*

- Belgian and French authorities considered the Covid-19 as “force majeure” situation (beyond control of the employer and the employee) and issued an additional protocol to the DTT Belgium and France, applicable as from 14 March 2020.
- Presence of French frontier worker (i.e. employee residing in the French border zone, working in the Belgian border zone) teleworking at his home in France for the benefit of his Belgian employer will not be taken into account for the calculation of the 30-day period
- French frontier workers remain exclusively taxable in France during the COVID-19 crisis  
COVID-19: EMEIA EY Government Support Package

### *DTT Belgium - Luxembourg : 24 days threshold*

- In the same vein and based on a force majeure scenario, an agreement has been reached on taxation of cross border workers between Belgium and Luxembourg
- The homeworking days performed in Belgium by Belgian residents, employees of Luxembourg companies will not be counted towards the 24-day threshold
- Belgian frontier workers teleworking at their home in Belgium remain taxable in Luxembourg

### *DTT Belgium - The Netherlands*

- Teleworking days performed in the resident state will be considered performed in the normal working state, insofar as this teleworking is a direct consequence of the COVID-19 outbreak. Applies from 11 March up to 31 May. Period may be extended if both parties to the DTT agree to do so.

### *DTT Belgium - Germany*

- The same as for the Be-Ne treaty, the normal cross-border work pattern can be invoked as a fiction during the so-called COVID-19 period, determined as from March 11 until May 31 unless extension

### *Travel exclusion for people benefiting from the “expat” status*

- Belgian employees benefiting from the special tax concessions who returned to their home country to telework from their home country residence and who are still considered as tax resident in that jurisdiction - will in principle be taxed in their country of residence during the COVID-19 period (i.e. if they work from home in their country of residency), unless a special protocol or agreement would be made between both jurisdictions
- In the situation where the expatriates are non-residents in both the country of origin and Belgium, the lockdown period will lead to a direct impact on the travel exclusion. Different approaches are currently being considered to reduce the impact of containment on the travel exclusion
- EY is in close contact with the Belgian tax authorities with regards to the impact of Covid-19 on the foreign travel exclusion. An official statement is expected to be received on or around the first week of April

## For more information

Hendrik Serruys  
[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)  
 +32 3 270 1468

# Employment support/HR - Telework - An international social security perspective

More and more people are faced with travel restrictions and measures forcing them to work at home due to the coronavirus outbreak. For employees working in a cross-border situation, their extended mandatory presence in a specific country inevitably gives rise to questions about the impact on the applicable social security scheme.

Telework on Belgian territory due to the coronavirus will have no impact on the applicable social security scheme for as long as the Belgian Government's emergency measures apply.

## Who is eligible?

- Frontier workers (i.e. employees living in an EEA Member State but working in another EEA Member State who are usually subject to the social security scheme of the country where they are working)
- Due to the increased (and often imposed) use of telework, many frontier workers may exceed this 25% threshold of working in their country of residence (generally assessed over a 12 month period) and could consequently be faced with a switch in social security coverage. For their employers, the change of applicable social security scheme would entail an impact on employment cost and a substantial increase in administrative efforts (e.g. registering with foreign social security authorities to make payments and declarations in the country of residence of the frontier worker)

## Support measures?

- The Belgian authorities confirmed that the periods of telework performed in Belgium by frontier workers due to the coronavirus will exceptionally not be taken into account for the determination of the applicable social security scheme
- As such, a switch to the social security scheme of the country of residence of the frontier worker (i.e. Belgium) can be avoided

## How is it accessed?

- The frontier workers' physical presence in Belgium between 14 March 2020 and 5 April 2020 will not be taken into account by the NSSO to determine the applicable social security scheme

## Practicalities

- No formalities need to be completed in this respect
- The specific period will be extended in accordance with extensions of these emergency measures
- This measure will capture the vast majority of the cross-border population which could be heavily impacted. Some very specific situations will still need to be reviewed on a case-by-case basis

## For more information

Hendrik Serruys  
[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)  
 +32 3 270 1468

The COVID-19 crisis has forced all Belgian federated entities to take supporting measures. The majority of these measures are meant to directly provide for financial aid or provide breathing space for the affected sectors and businesses.

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**Flemish Government - 'Encouragement premium' for temporarily less work:**

- The Flemish government has strengthened this existing premium. The premium also applies to employees of companies who suffer a substantial decrease of at least 20% of sales, production or orders in the month prior to the interruption of business (compared to the same month in the previous year)
- The premium amounts to €68 and €172 per month and is paid as an additional amount on top of temporary unemployment benefits
- The employer must demonstrate this substantial decrease by drawing up a plan. He also has to give proof of the redistributive measures are being taken
- This extension only applies for the period 1/4/20 to 30/6/20. The application must always be made in full months

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**For more information**

Hendrik Serruys  
[Hendrik.Serruys@be.ey.com](mailto:Hendrik.Serruys@be.ey.com)  
+32 3 270 1468

In principle, the general (shareholders) meeting (GM) is held as a physical meeting at the registered office of the company or association. Because of the Covid-19 measures, physical meetings must be avoided or have become impossible.

A new Royal Decree (RD) provides 2 options allowing more flexibility regarding the organization of general shareholders' meetings (as well as board meetings)

The rules are limited in time, but may be extended by RD.

They apply to all companies and associations and legal persons governed by the Companies code, to non-profit associations, foundations and European political parties and foundations, to professional associations, and to European Economic Interest Groupings

### Option 1: General (shareholders) meeting (GM) without physical presence

**Board can, prior to general meeting and regardless of statutory authorization, oblige the participants of the GM:**

- to vote via a voting form which is made available by the board or which is available via a website;
- to grant a proxy with voting instructions to a proxy holder to be appointed by the board **shareholders meeting**
- both options to be offered to participants of GM simultaneously

#### In practice:

##### Proxy:

- If a proxy is granted, board can appoint a proxy holder. Proxy must contain voting instructions for each point on the agenda and proxy holder must take instructions into account
- Voting forms and proxies must reach the listed company at the latest on the fourth day preceding the day of the general meeting.
- Non-listed entities may also require that these documents reach them before this deadline
- No mandatory formalities apply. Scanned or photographed copy of completed and signed documents can be sent by e-mail or in attachment to an e-mail

##### Q & A:

- Board may order participants to GM to send their questions in writing.
- Board may also require that the questions be submitted no later than the fourth day preceding the day of the general meeting
- Written questions will be answered in writing at the latest on the day of the general meeting (but before the vote) or orally if the general meeting is held by telephone or video conference
- Answers to written questions should be notified in a reasonable way. Listed companies publish answers on their website

### Option 1: GM without physical presence (cont'd)

#### Remote meeting

- Bureau members, board members, statutory auditor and proxy holders may hold GM by telephone or video conference (unless physical meeting can be held taken into account social distancing rules)
- For authentic deeds, physical appearance of one proxy holder or director duly authorized thereto before the notary public suffices
- Legal persons preferring making use of the flexibility, can change any convocation, which has already been announced or sent out when this RD (retroactively) came into force
- No obligation to re-apply the convocation and participation formalities
- Listed companies need to announce changes via a press release and on their website, no later than the sixth day preceding the GM. They are also exempt from the usual obligations with regard to convocations and other documents to be made available for the shareholders
- For non-listed companies e-mail suffices to share documents

#### For more information

Peter Suykens

[Peter.Suykens@be.ey.com](mailto:Peter.Suykens@be.ey.com)

Tel: +32 473 730 262

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### Option 2: Postponement of the general meeting to a later date

Board may decide to postpone GM and have it take place within ten weeks as of the final date on which the general meeting must legally take place

#### In practice

- Companies with a financial year concurring with calendar year: normal deadline is June 30, 2020. GM can be postponed until September 8, 2020
- Decision to postpone to be taken before 30 June 2020 (or a later date in case of an extension).
- Board must notify the participants to GM of the postponement in a timely manner
- Convocation formalities for deferred GM required
- Listed companies: announce postponement via a press release and on their website - no later than the fourth day preceding the day of the general meeting
- RD provides option to postpone meetings already convened, but not held
- Board cannot postpone GM that must be convened at the initiative of the statutory auditor or a shareholder with at least 10 percent of the shares or capital
- Postponement is not allowed either for GM that must be convened following the application of the stop loss procedure

### Board meetings

- Unanimous written decisions of collegial government body suffices;
- Meetings can be held by telephone or videoconference

### Postponement filing annual accounts

- Filing due date for annual accounts extended by 10 weeks
- Extension also applies to foreign companies, associations of foundations with Belgian branch

### Limitation in time

- RD measures apply from 1 March 2020 up to and including 30 June 2020. Extension of the measures possible
- RD applies to every meeting of an administrative body and to every GM that must be held or meetings that should have been held since 1 March 2020 but were not held. It also applies to the convocations in relation to these meeting

### For more information

Peter Suykens

[Peter.Suykens@be.ey.com](mailto:Peter.Suykens@be.ey.com)

Tel: +32 473 730 262

# Temporary moratorium in order to protect enterprises affected by COVID-19

The measures taken under COVID-19 put many companies in financial difficulties. According to Graydon, 34 percent of all companies would not be able to handle the corona crisis if the lockdown were extended until May 3. For another 40 percent, the danger is less acute although they can barely survive.

The federal government is aware of this and has recently enacted a Royal Decree, providing temporary protection mechanisms.

The Royal Decree has the following aims:

- To ensure continuity of economic activities
- To avoid bankruptcies
- To stimulate new credits

## Who is eligible?

- Enterprises negatively affected by COVID-19 and its consequences
- Not yet experiencing cessation of payments before March 19, 2020

## What mechanisms?

- Prohibition to seize assets (exception for real estate and retaining attachment of ship)
- No bankruptcy, judicial dissolution or transfers under judicial authority at request of creditors (unless filed by public prosecutor or done voluntarily)
- Prohibition to terminate existing contracts due to default (exception for employment contracts)
- Suspension/extension of judicial reorganization procedures (protection of enterprises with a judicially approved reorganization plan)
- Newly granted credits are protected against later bankruptcies

## How is it accessed?

- Automatically applicable
- *However*, courts can find an enterprise to not be eligible in order to combat abuse of rights (action may be filed by each party with an interest or the public prosecutor)

## Practicalities

- In force from April 24 until and including June 17, 2020 (may be extended or followed up by new support measures)
- Moratorium on bankruptcies results in the suspension of the obligation to file for bankruptcy even if conditions are met
- Claimable debts, when able, must still be paid and as soon as possible in order to limit the economic consequences for other enterprises
- General contractual sanctions may still be invoked (e.g.: exception of non-performance, set-off of debts and right of retention)
- Terms of payments provided in judicially approved reorganization plans are extended and all other terms related to the judicial reorganization procedure are suspended
- Credit payments during 'suspect period' towards bankruptcy cannot be opposed by curator (bankruptcy administrator)

## For more information

Peter Suykens

[Peter.Suykens@be.ey.com](mailto:Peter.Suykens@be.ey.com)

Tel: +32 473 730 262

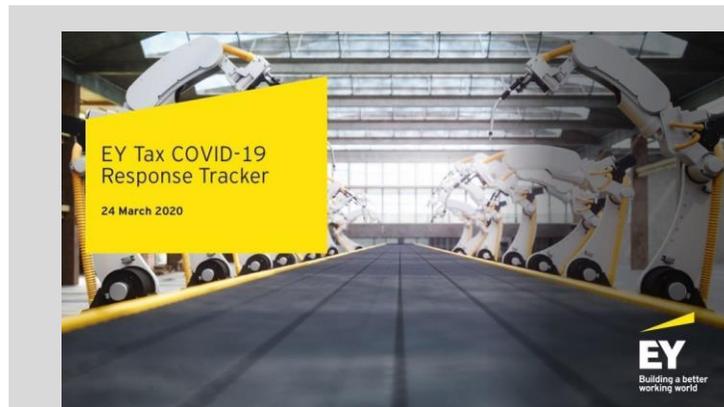
Our tracker provides a snapshot of the policy changes that have been announced in jurisdictions around the world in response to the COVID-19 crisis.

Policy changes across the globe are being proposed and implemented on a daily basis.

The document will be updated on an ongoing basis but not all entries will necessarily be up to date as the process moves forward.

#### Key jurisdictions covered by the Response Tracker include:

- ▶ Australia
- ▶ Austria
- ▶ Belgium
- ▶ Brazil
- ▶ Canada
- ▶ China
- ▶ Colombia
- ▶ Cyprus
- ▶ Czech Republic
- ▶ Denmark
- ▶ France
- ▶ Germany
- ▶ Greece
- ▶ Hong Kong
- ▶ Indonesia
- ▶ Italy
- ▶ Japan
- ▶ Luxembourg
- ▶ Malaysia
- ▶ New Zealand
- ▶ Norway
- ▶ Puerto Rico
- ▶ Singapore
- ▶ Slovak Republic
- ▶ Slovenia
- ▶ South Korea
- ▶ Spain
- ▶ Sweden
- ▶ Switzerland
- ▶ Taiwan
- ▶ Thailand
- ▶ Ukraine
- ▶ United Kingdom
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# Contact



**Peter Moreau**

COVID-19 coördinator  
International Tax  
[peter.moreau@be.ey.com](mailto:peter.moreau@be.ey.com)  
+32 2 774 91 87



**Steven j. Claes**

Tax policy  
[steven.claes@be.ey.com](mailto:steven.claes@be.ey.com)  
+32 2 774 94 20



**Hendrik Serruys**

People advisory services  
[hendrik.serruys@be.ey.com](mailto:hendrik.serruys@be.ey.com)  
+32 3 270 14 68



**Olivier Van Bauwel**

Cash tax management  
[olivier.van.bauwel@be.ey.com](mailto:olivier.van.bauwel@be.ey.com)  
+32 2 774 93 14



**Wouter Desmet**

Grants & Stimuli  
[wouter.desmet@be.ey.com](mailto:wouter.desmet@be.ey.com)  
+32 9 242 51 06



**Jan Van Moorsel**

Indirect taxes  
[jan.van.moorsel@be.ey.com](mailto:jan.van.moorsel@be.ey.com)  
+32 2 774 93 77



**Peter Suykens**

Commercial law and  
contracts  
[peter.suykens@be.ey.com](mailto:peter.suykens@be.ey.com)  
+32 2 774 64 40



**Karla Vuyts**

Employment law  
[karla.vuyts@be.ey.com](mailto:karla.vuyts@be.ey.com)  
+32 496 507 424



**Philip Peerens**

Financial law  
[Philip.peerens@be.ey.com](mailto:Philip.peerens@be.ey.com)  
+32 486 955 799

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