

Investing in mining in Latin America and the Caribbean

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Digging deeper – The latest trends in mining from Canada, Latin America and the Caribbean

A webinar series

Investing in mining in Latin America and the Caribbean

Wednesday, November 10, 2021
12 – 1 p.m. ET

Presenters

Moderator



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Geographic Footprint within the Caribbean

Our firm is strategically placed with offices in 12 locations serving **fourteen (14) jurisdictions** in the Eastern and wider Caribbean. Through affiliates across the region, Dentons is capable of providing a wide range of legal and corporate services. This vast network of jurisdictions allows us to meet the demands of our global clients in a flexible and consolidated manner.

14
Countries

12
Locations

30+
Lawyers

-
- Cayman Islands
 - Jamaica
 - British Virgin Islands
 - Anguilla
 - St. Kitts and Nevis
 - Montserrat
 - Antigua & Barbuda
 - Dominica
 - St. Lucia
 - St. Vincent and the Grenadines
 - Barbados
 - Grenada
 - Trinidad and Tobago
 - Guyana

Structuring toolkit

CARICOM Tax Treaties



One of the most important features of this regional network has been the Caribbean Community (CARICOM) which is comprised of fifteen jurisdictions including five (5) UK dependencies which are associate members. One of the most appealing component of this Caribbean bloc is the CARICOM Tax treaty. A treaty signed and ratified between each of the above permanent member states which offers favorable rates and serves as an important tool for regional structuring.

Barbados Tax Treaties



Barbados has positioned itself as a bridge to the global business community through its 40+ country double tax treaty network.

These treaties create a legal understanding between Barbados and a number of global superpower jurisdictions.

This places Barbados as a strategic component to various corporate structures which are tax reliant.

Guyana Mining Operations and Structure

Mining Operations:-

Guyana's geographic landscape provides for a wide range of mining opportunities, specifically Gold, Diamond, Bauxite (Tarakulli and Bonasika Deposit), Quarry Stone and Sand and Loam. This also includes the following sub categories:-

Semi-precious Stones

- Laterite
- Amethyst
- Green Quartz
- Black Pearl
- Agate
- Jasper
- Manganese
- Kaolin
- Sand resources

Industrial Minerals

- Coalin
- Silica Sand
- Kyanite
- Feldspar
- Mica
- Ilmenite
- Columbite-tantalite
- Manganese
- Soapstone

Base Metal

- Copper
- Lead
- Zinc
- Molybdenite
- Tungsten
- Nickel

General Tax incentives:-

The Government of Guyana views mining operations as an integral component to its economic success and with this considered it offers a wide array of operational concessions which would be key to the efficiency to any operation.

Main Exemptions (among others):-

1. Exemption from VAT on machinery and equipment.
2. Exemption from customs duty on plant machinery and equipment.
3. Exemption from Excise tax on operational goods.
4. Wider exemptions as Agreed between the government and the operating entity.

Structuring efficiency:-

Considering the tax treaties referenced in the previous slide, the structure on the right lends itself as a key tax efficient structure. This often allows the company to capitalize and repatriate income (in the form of dividends) at favorable rates up to its Parent company.

1. CARICOM tax treaty between Guyana and Barbados. 0% Withholding tax on dividends.
2. Barbados – Canada Tax treaty with a 0%-5%-withholding tax on dividends.

Canadian
Parent Co.

Barbados
HoldCo

Guyana
Op Co

Thank you

Moderator



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