

An enclave enterprise is one whose product(s) is exclusively for export. A highly capital-intensive enterprise is one whose capital investment is not less than TT\$50 million or EC\$50 million (East Caribbean). Benefits to be derived under this act include total or partial relief from corporation tax and customs duty.

The net loss incurred during the tax holiday period, with respect to an approved product, is to be carried forward and written off without limit in computing chargeable profits for the approved enterprise for the five years immediately following the tax holiday period. Dividends or other distributions, excluding interest, which are derived from the profits of an approved product may be wholly or partly exempt from income tax. Where the shareholder or his/her nominee is a non-resident, the exemption applies only in so far as the tax exceeds the tax liability in the country of which the recipient is a resident.

Provisions under the In Aid of Industry Ordinance apply from the first year following the tax holiday period. However, a deduction as an initial allowance for capital expenditures incurred in the manufacture of an approved product is granted only for those expenditures incurred after the expiration of the exemption period.

**In Aid of Industry Ordinance.** This provides incentives to manufacturing trades. Industrial buildings qualify for an initial allowance of 10 per cent in the year in which the expenditure was incurred, provided they house a qualifying trade. An annual allowance of 2 per cent is granted in each of the subsequent 45 years. Qualifying trades are outlined in Schedule 1 of the In Aid of Industry Ordinance.

An initial allowance of 50 per cent of expenditures is granted on plants and machinery, except the manufacture of petroleum, petrochemicals and sugar, for which the initial allowance is 20 per cent. Enterprises enjoying concessions under the Fiscal Incentives Act 1979 are not entitled to claim an initial allowance.

**Hotel Development Act 1963.** Profits derived from new hotels are exempt from tax for five to 10 years, while profits derived from renovated hotels are exempt for a period not to exceed 10 years. Equipment owned by the hotel owner or operator is permitted to depreciate at an accelerated rate of 20 per cent, based on the capital value of the asset in any five of eight accounting periods following the tax holiday. For an approved hotel, losses incurred in the tax-exempt period and for eight subsequent years can be set off against subsequent hotel income without limitation.