

VH/6481/00.01.00/2023

1.0

ANNUAL INFORMATION RETURN ON TRANSFERRED FOREIGN DIVIDENDS (VSULKOSE)

DATA FORMAT SPECIFICATION 2024

TABLE OF CONTENTS

1	INTRODUCTION	2
2	DESCRIPTION OF THE INFORMATION FLOW AND SUBMITTAL OF FILES	3
3	MAKING CORRECTIONS	4
4	PERIOD OF VALIDITY	4
5	CHANGES ON THE PREVIOUS YEAR	5
6	DATA FORMAT SPECIFICATION	5
7	AUTOMATED CHECK PROCESSES	6
8	MESSAGES	7
9	INSTRUCTIONS AND EXAMPLES	7
9.1	Date of decision to distribute dividends.....	7
9.2	Date from which dividends have been withdrawable.....	7
9.3	The mathematical value of shares or their fair market value.....	7
9.4	Tax paid to foreign jurisdictions	7
9.5	Quantity of shares	8
9.6	ISIN code of share.....	8
10	COUNTRY CODES	8

Change history

Date	Version	Description
31.1.2024	1.0	First release concerning the 2024 taxable year.

1 INTRODUCTION

This guidance explains the structure of the required inbound file and the check procedures that follow. For more information, see [General description for electronic filing of information returns \(pdf\)](#) (*tax.fi > About us > IT developers > Data format specifications > General description for electronic filing of information returns*).

If the company made the decision to distribute dividends in a currency that is not the euro, you must convert the amounts and report their euro equivalents using the current exchange rate valid on the date of conversion.

2 DESCRIPTION OF THE INFORMATION FLOW AND SUBMITTAL OF FILES

To check the method of identification required by this information flow, the required role and the place in the flow where authorisations are checked, go to [Methods of sign-in, roles and rights to represent organisations](#) (*Ilmoitin.fi > Instructions and templates > Methods of sign-in, roles*).

This is an information return for reporting dividend payments from foreign companies, paid to both natural and legal persons resident in Finland. The following statutes define the legal basis of the information-reporting requirement: § 15 of the Act on Assessment Procedure (Laki verotusmenettelystä; Lagen om beskattningsförfarande 1558/1995), and the official decision of the Tax Administration on common obligations to submit information.

The information-reporting requirement concerns

- dividends based on shares of foreign corporations and FDR certificates, i.e. share certificates recorded in the Finnish book-entry system and
- dividends on any other foreign shares.

Dividends from a foreign company transferred to a non-resident taxpayer are not reported in this annual information return. Dividend income derived from long-term savings contracts (act on long-term savings / Laki sidotusta pitkäaikaissäätämisestä 1183/2009) is not reported, either.

Listed companies in Sweden can distribute profits through special shares (inlösenaktier) that are designed for buyback by the company, i.e. for redemption. After the company has distributed these shares to its shareholders, the company buys them back at a predetermined date and at a predetermined price. In addition, the shares that are distributed this way can be subject to public trading before the predetermined date when the company has agreed to buy them back. The predetermined, agreed redemption price is taxable as dividend income, and the price is also seen as the acquisition cost for the share for tax purposes. The annual information return for transferred foreign dividends (VSULKOSE) must be submitted in order to inform the Tax Administration of the predetermined redemption prices, which are reported in the same way as dividends. It is deemed that the shareholder has received the income from a share designed for redemption at the time when the shareholder receives the right to get the share, in accordance with the company's decision to distribute profits. If the shareholder sells a share designed for redemption in a public stock exchange, and if the shareholder sells it back to the company i.e. the redemption is carried out, it is treated as a conveyance subject to capital-gains tax. As a result, the gain is calculated by subtracting the amount equated with dividend income from the received selling price – or from the received buyback price. The entire amount equated with dividend income is subtracted even if only a part of the dividends were

subject to tax. The annual information return to be submitted when these shares have been sold or redeemed is Itemization of sales and purchases of securities and derivatives (VSAPUUSE).

In situations where a parent company of a Swedish enterprise group distributed dividends in the form of corporate stocks in one of its subsidiaries, the value of such distribution is sometimes (when circumstances match the “Lex ASEA” requirements in Sweden’s tax rules) not subject to taxation of dividend income. The tax law in Finland contains no rules similar to those Swedish rules. As a result, the value of dividends in the form of corporate stocks is treated as subject to taxation. It is necessary to include the value in the Annual information return concerning transferred foreign dividends (VSULKOSE). The reportable amount of dividends is in this case the market value of the stocks on the day when the dividends are available for withdrawal. This value is also the purchase price, i.e. the ‘acquisition price’ of the corporate stocks.

The value of SCRIP shares and/or cash dividend is reported in the annual information return on transferred foreign dividends (VSULKOSE) in the same way as other dividends.

If an individual taxpayer who is a Finnish tax resident receives income from an ETF, UCITS or AIF fund, it is taxable as capital income (not as dividend income), regardless of whether the vehicle for collective investment is an incorporated fund or a fund based on a contractual arrangement. The types of payment that must be used for reporting are 3J or 2D, on the information return on payments taxable under the Income Tax Act (VSTVERIE).

The checking of the year concerned by this information return is based on the value entered in Date of commencement of the payment (159–166/287) VVVV, which is found in position 162–166.

3 MAKING CORRECTIONS

For year-specific instructions for making corrections, go to [Making corrections to annual information returns](#) (*tax.fi > About us > IT developers > Data format specifications > Annual information returns & Instructions > Making corrections to annual information returns*).

4 PERIOD OF VALIDITY

The file formatting and checks according to this specification come into force on 26 March 2024 and continue to be in force until a new version of the specification is released.

For information about deadlines for filing, see the year-specific schedule on [IT developers](#) (*tax.fi > About us > IT developers*). The schedule is available in Finnish and Swedish.

5 CHANGES ON THE PREVIOUS YEAR

Version	ID	Data element	Description
1.0	44-47/058	Payment year	Year changed
	159-166/287	Date from which dividends have been withdrawable	Year changed
	281, 282, 287, 293		There have been updates to the code terms
	Check #1907		New check added

6 DATA FORMAT SPECIFICATION

Position	ID	P/V	T	L/T	Description	Format	Values
1-8	000	P	T		Identifier	AN8	VSULKOSE
9	082	V			Deletion	A1	D
10					Reserve space		
11-21	083	P	T	*	Personal ID or Business ID of beneficiary	YTUNNUS HETU	
22-34	281	P		H	Gross amount of dividends	R10,2	
35-43	280	V		H	Expenses relating to dividend distribution	R6,2	
44-47	058	P	T		Payment year	VVVV	2024
48-57	282	V			Tax withheld at source on dividends	R7,2	
58-69					Reserve space		
70-104	085	V	ET	V/P *	Beneficiary's name	AN35	
105-116	293	V			The mathematical value of shares or their fair market value	R9,2	
117-139					Reserve space		
140-150	010	P	T		Business ID of the account operator or other intermediary who transferred the dividends	YTUNNUS2	
151-158	286	P	T	*	Date of decision to distribute dividends See 9.1 Date of decision to distribute dividends	PPKKVVVV	
159-166	287	P	T	*	Date from which dividends have been withdrawable	PPKKVVVV	2024

					See 9.2 Date from which dividends have been withdrawable		
167-175					Reserve space		
176-245	051	P	T		Name of the dividend –distributing company	AN70	
246-247	034	P	T	*	Country code of the dividend –distributing company See 10 Country codes	MAA TUNNUS	
248	291	P			Type of the dividend-distributing company at decision date 1= Stock-exchange listed company 2= Other type of company	N1	1,2
249-265	292	P		*	Quantity of shares See 9.5 Quantity of shares	+D10,6	
266-277	097	V	ET		ISIN code of share	ISINKOODI	
265-282					Reserve space		
283-296	198	P			Software-generated timestamp	PPKKVVVV HHMMSS	
297-331	048	P			Software application that produced the file	AN35	
332-343	014	P	T		Name of the software that produced the file	Y- TUNNUS_AN2	
344-378	041	P			Name of contact person	AN35	
379-413	042	P			Contact person's phone number	PUHELIN2	
	999	P			Final identifier	+N8	

7 AUTOMATED CHECK PROCESSES

New/ Chan ged	ID	Description of rule
	034	The Country Code of the distributing company (034) must refer to another country, not to Finland. #146; Distributing company cannot have FI as country code.
	292	The entry in Quantity of shares (292) must be a non-zero value. #1284; The Quantity of shares (292) cannot be zero.
C	083 085	#1909; If a dummy code is used for the Personal ID or Business ID of beneficiary (083), you must give the Beneficiary's name (085).

New/ Chan ged	ID	Description of rule
C	286 287	#1908; Date of decision to distribute dividends (286) must be earlier than or equal to the Date from which dividends have been withdrawable (287)
New	281	#1907; Gross amount of dividends (281) can not be 0.

8 MESSAGES

New/ Chan ged	ID	Description of the message
	280 281	The maximum level of Expenses (280) is ten per cent of the gross dividends (281) #1332; Are you certain that the expenses are this big?

9 INSTRUCTIONS AND EXAMPLES

9.1 Date of decision to distribute dividends

Enter the date when the company has made the decision to distribute the dividends. If you do not know this date, enter an approximate date that you consider probable and likely.

9.2 Date from which dividends have been withdrawable

The date from which dividends have been withdrawable must be in the calendar year for which the annual information return is submitted. The withdrawal date of is the payment date reported by the company.

9.3 The mathematical value of shares or their fair market value

You can report the mathematical value or fair market value of the shares owned by the dividend beneficiary if the type of dividend-distributing company is Other.

9.4 Tax paid to foreign jurisdictions

When assessment of the Finnish tax on the dividends is made, any tax on them that has been paid to foreign countries is taken into account, however, credit is only given to the extent that the relevant tax convention provides.

9.5 Quantity of shares

You must indicate how many shares (pcs) in the distributing company the beneficiary owns, or has rights to receive distributions for, on the date of the decision to distribute dividends, the clearance date.

9.6 ISIN code of share

The ISIN code of shares is only reported if the account operator files the data on behalf of the payor. If the same account operator pays dividends from several book-entry accounts to the same recipient, and the dividends are paid on the basis of shares with the same ISIN code, you only need to file one annual information return for the dividends.

10 COUNTRY CODES

For all country codes of the ISO 3166 standard, see [List of country codes](#).