

Chapter 6

Income Tax on Partnerships

A Partnership is defined as "a contract whereby two or more persons bind themselves to contribute money, property, or industry to a common fund, with the intention of dividing the profits among themselves". Two or more persons may also form a partnership for the exercise of profession (Art. 1767 of the Civil Code). Partnership has a juridical personality separate and distinct from that of each of the partners. It may be constituted in any form, except where immovable property or real rights are contributed thereto, in which case a public instrument shall be necessary.

Kinds of Partnership for Tax Purposes:

1. General Professional Partnership (GPP)

A partnership formed by persons for the purpose of exercising their common profession, no part of income of which is derived from engaging in trade or business. Under Section 26 of the Tax Code and pertinent revenue regulations, a GPP is not subject to income tax and consequently to creditable withholding tax. However, a GPP is required to file income tax return for the purpose of furnishing information as to the share of each partner in the net income of the partnership which each partner shall include in his individual income tax return. For this purpose, the *net income* of a GPP shall be computed in the same manner as a corporation.

It shall be noted, however, that the tax exemption of GPPs shall pertain only to its ordinary income. Hence, a GPP is subject to final withholding taxes on its passive incomes as well as capital gains tax.

Partners shall be liable for income tax only on their separate and individual capacities. Each partner shall report as gross income his or her *distributive share* (actual or constructive) in the net income of the partnership. Income payments made periodically or at the end of the taxable year made by a GPP to the partners, such as drawings, advances, sharings, allowances, stipends, etc. is subject to 15% creditable withholding tax if the amount of income payment is more than P720,000, otherwise, 10% (RR 11-2018; TRAIN Law).

Partnership Taxation Problems And Answers

Dr. H. C. Mehrotra, Dr. S. P. Goyal



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