SOLUTION BROKER

THE DOSSIER

THE DOCTRINE

Average is not a market condition. It is a choice.

THE TAX QUESTION

Thirty-five per cent, and why that is the wrong number

MALTA BRIEF

Micro Invest at 65 per cent, property up 6.1

RESIDENCE

Five years, six months a year, and one letter

SOON TO BE RELEASED

Malta. Ohne Märchen. A relocation service, engineered by Solution Broker, from September

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Contents

EDITION 1 · 2026

A journal is a claim to have something to say twice a year. This is the first one.

IMPRINT

The Solution Broker Dossier, Edition 1 / 2026. Published by Solution Broker Editions, the publishing imprint of Solution Broker Consulting Ltd., Malta. Editor and responsible for content: Martin Dettmer. Studio portraits by commission. Portrait of Alfons Schwarte by kind permission of Euro Tax Consulting Ltd. Trade marks remain the property of their proprietors.

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EDITORIAL

Nobody asked for this journal.

Nobody asked for this journal. That is precisely why it exists. Markets do not send invitations. They reward the ones who show up before they are asked, and they charge everyone else for the delay.

This is the first edition of The Solution Broker Dossier. It appears twice a year, from Malta, and it does what I advise every client to do: put the position in writing, sign it, and let it be judged.

You will not find ten trends and a mood board in here. You will find a doctrine, the structure behind it, the numbers of the island I work from, and a partnership in the making. Everything in these pages is either evidence or it was cut.

Read it in one sitting. If nothing in here provokes you, you are probably our competitor. If one page makes you want to argue, call. Arguing is how first mandates start.

Valletta, summer 2026. The wall is older than every trend it has survived.

Martin Dettmer

FOUNDER · SOLUTION BROKER CONSULTING LTD. · MALTA

Average is not a market condition. It is a choice.

In thirty years I have never seen a market where the best supplier automatically wins. I have seen a great many where the most visible one does. That is not a comfortable observation, and it irritates nobody more than the people who treat their own quality as an argument. Quality is the ticket to the room. The sale still happens before you speak.

From that follows the first line of the doctrine. Markets are dominated, not served. Serving means waiting for demand and negotiating once it arrives. Dominating means defining the category in which you are compared, and therefore defining what you are compared on. That is not a marketing trick. It is a decision about your own role.

The second line. Prices are defended, not discussed. Every discount is a retroactive admission that the position did not carry. Explain your price and you have already cut it. The price is the last number in a chain that starts much earlier: with the position, with the appearance, with the way a company speaks about itself.

The third line. Authority is built through narrative and system, never through assertion. A company that uses the same symbolic system for years, the same colours, the same language, the same proofs, accumulates something that cannot be bought. A company that chases every trend burns exactly that capital, annually.

MARTIN DETTMER

CEO and founder, Solution Broker Consulting Ltd., Malta. Brand and sales adviser, author of thirty professional titles, holder of more than one hundred registered Community designs at the EUIPO.

THE FOUR LINES

Markets are dominated, not served.

Prices are defended, not discussed.

Authority is built through narrative and system.

Clarity wins. Always.

Clarity wins. Always.

Everything above resolves into one operating principle, and it is the least glamorous sentence in this journal. Clarity in the position, clarity in the offer, clarity in the price. The overwhelming share of what companies treat as a marketing problem is in truth a clarity problem, and no budget has ever solved one.

If your brand does not sell before you speak, you are already discounting.

This journal is an attempt to demonstrate that rather than assert it. You are not holding a brochure in which a company explains how good it is. You are holding the method: a position, a system, the evidence, and the place where all three come together.

Why Malta? Because things converge here that fall apart elsewhere. A European legal framework, a tax architecture that does not punish growth, and a scale at which you actually know the people who decide. I made the move myself, with everything that comes with it. Which is why I know which sentences appear in brochures and which ones hold.

Anyone who has read this far is probably not among those who treat average as a condition.

HOW TO READ THIS EDITION

The first half is the house: what we believe, how we are built, what we have published. It is there so you can judge whether the method is worth an hour of your time.

The second half is the ground: what Malta is actually worth in numbers, what the tax system does and does not do, and what a partnership currently under discussion would mean for a German-speaking entrepreneur.

2022	30	100+
GROUP ESTABLISHED IN MALTA	PROFESSIONAL TITLES PUBLISHED	REGISTERED DESIGNS AT THE EUIPO

POSITION

Explain your price and you have already cut it.

Positioning is not a matter of taste. It is the decision about which league you are compared in. Everything after it, from the imagery to the last negotiation, is the execution of that single decision.

THE HOUSE

Six disciplines. One line of attack.

Solution Broker Consulting has worked out of Malta since 2022 for owner-led industrial and trading companies across Europe, China and the United States. The six disciplines are not departments. They are stations on the same road: from the position, through the appearance, to the close.

01 · STRATEGY & CONSULTING

Positioning, market entry, go-to-market, business model. Where to grow, and how.

02 · BRAND & MARKETING

Identity, brand architecture, performance marketing, content. Become visible and unmistakable.

03 · SALES ENABLEMENT

Sales build-up, process, training, steering systems. Sales that scale instead of depending on individuals.

04 · COACHING & SPEAKING

Executive coaching, keynotes, delivery. Impact in the room, not only on paper.

05 · BOOKS & PUBLISHING

Thirty titles in three volumes. Proof of authority, door opener and channel in one.

06 · RELOCATION & START-UP

Relocation to Malta and beyond, including everything that only begins after incorporation.

The order is not decorative. A brand built before the position is settled has to be rebuilt. A sales force trained before the brand carries will discount its way to target. Publishing without either is vanity. Run in sequence, each discipline reduces the cost of the next one.

Marketing that does not end in a signature is decoration.

From attention to signature.

solutions-broker.com, live since August 2026.

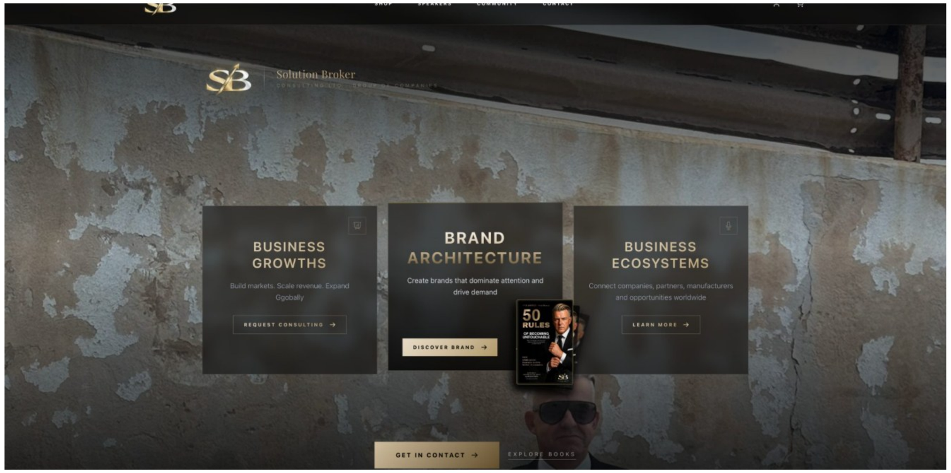
The new platform is not a shop window. It is a route to purchase: six disciplines with separate entrances, the doctrine as the foundation, and the books as evidence. A visitor landing on the home page does not see everything the house can do. He sees where his own problem sits.

Behind it runs a cultivated prospect pool, a continuous presence on LinkedIn and a shop for the series. Reach here is not generated in waves around events. It runs without interruption, which is precisely what a partner cannot buy elsewhere.

6
DISCIPLINES, EACH WITH ITS OWN ENTRY POINT

30
TITLES WORKING AS PROOF AND AS LEAD MAGNET

3
CONTINENTS SERVED FROM ONE MALTA BASE



SOLUTIONS-BROKER.COM · SIX ENTRANCES, ONE ROUTE

Built in Malta. Structured to last.

A Maltese company is easy to register and hard to defend. The difference between a structure that survives an audit and one that collapses under it is substance, and substance is not a slogan. It is a resident director, a real office, qualified people, and a paper trail that matches what the group actually does.

OPERATING COMPANY	Solution Broker Consulting Ltd., registered in Malta, the vehicle for all client mandates
HOLDING	Solution Broker Consulting Holding Ltd., sole shareholder of the operating company
PARTNERSHIP	A Scottish limited partnership inside the group, integrated into the fiscal unit
TAX GROUPING	Fiscal unit in place, with the partnership acting as principal taxpayer from 2025
GOVERNANCE	Resident director, Maltese corporate service provider, annual economic substance declaration
ADVISERS	Maltese audit and tax practice, Maltese counsel, German counsel for IP matters
INDUSTRIAL PROPERTY	Solution Broker® registered as a trade mark, more than one hundred registered designs at the EUIPO

WHY IT IS IN THIS JOURNAL

Because it is the same discipline we sell. A brand without a structure behind it is a claim. A structure without a brand in front of it is a cost centre. We run both, on ourselves, before we recommend either.

2022
YEAR THE GROUP WAS ESTABLISHED IN MALTA

2025
FISCAL UNIT IN PLACE, PARTNERSHIP AS PRINCIPAL TAXPAYER

100+
REGISTERED COMMUNITY DESIGNS AT THE EUIPO

SUBSTANCE

A registration is not a business.
Presence is.

Everything we file, we could show. That is the standard we hold ourselves to, and it is the reason we never comment on tax or law ourselves. Those answers belong to the professionals who carry the liability for them.

PORTRAIT

Martin Dettmer

"Align marketing with sales, or accept mediocrity in both."

ABOUT THE AUTHOR

Three decades, three continents, one sentence.

As CEO and founder of Solution Broker Consulting, I operate at the intersection of branding, sales and strategic business development. Based in Malta, I have built an international consulting platform around a single principle: align marketing with sales, or accept mediocrity in both.

Over a career spanning more than three decades I have worked across Europe and Asia, developing market entry strategies, brand systems and sales architecture for companies that wanted scale and control at the same time. That work includes large-scale flooring concepts, brand collections and point-of-sale systems that turn visual impact into revenue.

Solution Broker Consulting is the vehicle for that philosophy. From Malta I structure international projects, build brand identities and design sales development systems that operate in real commercial environments rather than in presentations.

The work is characterised by clarity and structure. The frameworks connect positioning, perception, proof and power into a single commercial outcome, which is what has made the practice a reference point for companies moving from generic market presence to dominant category positioning.

The thirty titles of the F*ck Average Series are the written form of the same work. They are not a by-product. They are the proof that a system sits behind the advice rather than an opinion.

What I sell is not a service catalogue. It is a decision. Companies come to me when they are tired of competing on price, when the market has stopped seeing a difference between them and the next supplier, and when the sales team is being asked to close what the brand never opened. That is the point where positioning stops being a design question and becomes a commercial one.

Privately I have lived in Malta since 2022, with my long-term partner and a golden retriever who wins every discussion about work-life balance.

Malta is not a postcode on a letterhead. It is the operating base. From here the group runs its own structures, works with its own advisers and tests every recommendation on itself before it is put in front of a client. That is why the relocation practice sits next to the brand practice rather than in a separate company. A founder who moves his life and his business at the same time has one question, not two, and he is entitled to one answer.

The method has not changed in thirty years, only the markets have. Look at what the company actually does better than anyone else, say it in one sentence a customer would repeat, and then rebuild everything that touches the market until it says the same thing. Most companies fail at the second step. They describe themselves in language their competitors could use word for word, and then wonder why the buyer opens the conversation with a discount request. The work is to remove that sentence and replace it with one that only they can say.

Positioning is not a design question. It is the price you are able to ask.

30+	3	1
YEARS IN BRAND, SALES AND BUSINESS DEVELOPMENT	CONTINENTS: EUROPE, ASIA, THE UNITED STATES	PRINCIPLE THAT DECIDES EVERY MANDATE

THE F*CK AVERAGE SERIES

*F*ck Average is not a provocation. It is a filter.*

Thirty books, three volumes, one system. The written form of three decades of mandates.

F*CK AVERAGE.

Why the series carries that name.

The name draws a line, and it is meant to. Anyone who competes in the middle field negotiates in the middle field: on price, on delivery time, on goodwill. F*ck Average is the decision to leave that field. Not louder, not cheaper, but positioned so clearly that comparison stops.

The subtitle carries the order of operations: position, authority, impact, legacy. In that sequence, because each step carries the next. A position nobody understands earns no authority. Authority nobody sees has no impact. And impact that is not written into a system leaves no legacy.

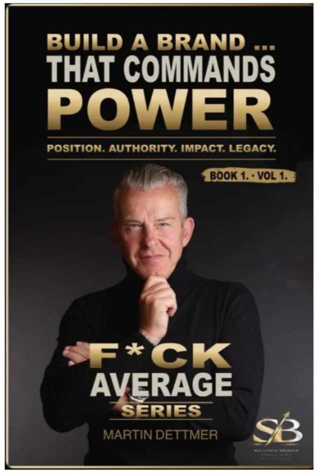
Thirty books sound like marketing until you see the construction. Every book answers one question an owner-led company actually asks, in a sequence a company can actually follow. A reader does not get motivation. He gets an order of operations.

The books are instruments, with a method and examples from real mandates. For clients they are the evidence that the advice is not assembled from opinions. For me they are the archive of a way of working that took three decades to form and had to be written down to become more than experience.

Average is not attacked with volume.
It is left by decision.

30	3	1
BOOKS, EACH ANSWERING ONE REAL QUESTION	VOLUMES: BRAND, SALES, RULES	SYSTEM: POSITION, AUTHORITY, IMPACT, LEGACY

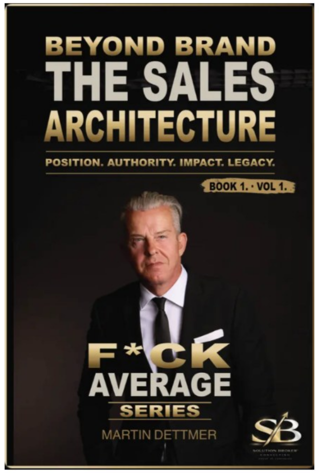
Three volumes. One architecture.



VOL. 1 · LIBRARY EDITION

Build a Brand

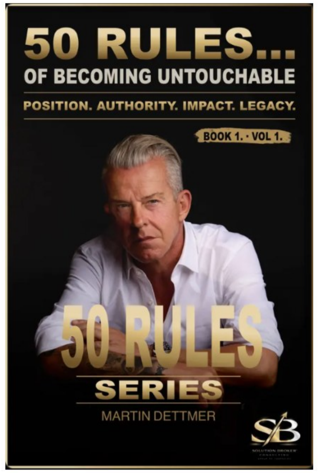
The identity foundation: position, category, symbolic system. A brand that commands power before the first conversation.



VOL. 2 · LIBRARY EDITION

Beyond Brand

The sales architecture: from a finished brand to a functioning sales operation. From attention to signature.



VOL. 3 · FIELD EDITION

50 Rules

Sixteen field books, fifty rules each. Written for daily use rather than for the shelf.

Anyone who writes thirty books needs a system. Anyone without one stops after the third.

SOON AVAILABLE
VOL. 1 · BOOK 1

THE F*CK AVERAGE SERIES · VOL. 1

Build a Brand.

POSITION. AUTHORITY. IMPACT. LEGACY.

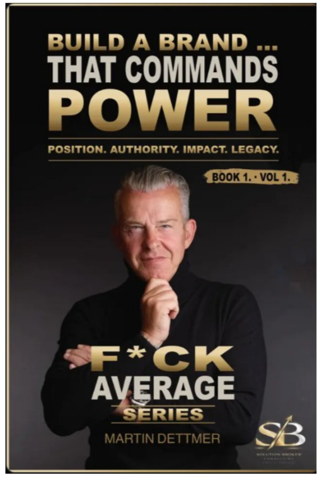
Most brands beg for attention. The strong ones command it.

VOL. 1 · LIBRARY EDITION · SEVEN BOOKS

The identity foundation.

Volume 1 builds the brand before the market is allowed to judge it: position, perception, category, authority, content, design, and finally the person behind it. Seven books, one construction, read in sequence.

This is not about logos, likes or being liked. It is about power: the power to set the frame, to hold the category, and to make comparison feel like a mistake.



B1	Build a Brand ... That Commands Power
B2	Build a Brand ... That Run the Mind
B3	Build a Brand ... That Control Markets
B4	Build a Brand ... That Creates Authority
B5	Build a Brand ... That Weaponizes Content
B6	Build a Brand ... The Design Codex
B7	Build a Brand ... That Builds You

Design is not decoration. It is the visual proof of your position.

SEVEN BOOKS · EBOOK AND PAPERBACK · SOLUTION BROKER EDITIONS, MALTA

THE F*CK AVERAGE SERIES · VOL. 2

Beyond Brand.

SELL. CLOSE. PERFORM. DOMINATE.

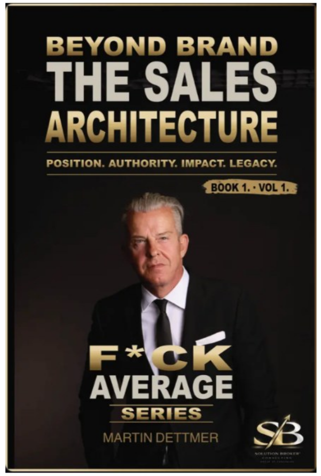
A strong brand without a sales system is a museum. Beautiful, respected, broke.

VOL. 2 · LIBRARY EDITION · SEVEN BOOKS

The sales architecture.

Volume 2 covers the stretch that is missing in most houses: from a finished brand to a functioning sales operation. Structure, closing, performance, trust, presence, ethics and the stage.

Deals are not lost at the end. They are lost by everything that happened before it. These seven books build the everything.



B1	Beyond Brand ... The Sales Architecture
B2	Beyond Brand ... The Closing Architecture
B3	Beyond Brand ... The High-Performance Self Architecture
B4	Beyond Brand ... The Price of Trust
B5	Beyond Brand ... Own the Room
B6	Beyond Brand ... The Influence of Ethics
B7	Beyond Brand ... The Art of Stage

Trust is not a soft factor. It is the hardest currency in business.

SEVEN BOOKS · EBOOK AND PAPERBACK · SOLUTION BROKER EDITIONS, MALTA

THE F*CK AVERAGE SERIES · VOL. 3 · FIELD LIBRARY

50 Rules.

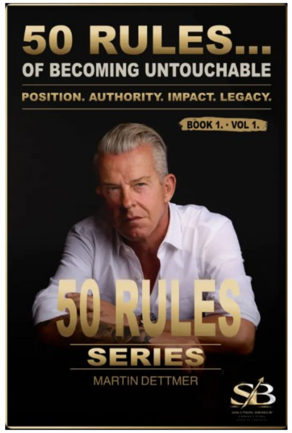
READ. APPLY. WIN.

Untouchable is not arrogance. It is position.

VOL. 3 · FIELD LIBRARY · SIXTEEN BOOKS

Written for the desk, not the shelf.

The Field Library is the working edition of the series: fifty rules per book, one discipline per book, sixteen disciplines from becoming untouchable to strategic negotiation. No motivation, no theory for its own sake. Read. Apply. Win.



01	Becoming Untouchable	09	Branding
02	Business Warfare	10	Become the Brand
03	Start Ups	11	Commanding Marketing
04	Closing Deals	12	Great Leadership
05	Reverse Psychology	13	Absolute Power
06	Full Commitment	14	Crisis Control
07	Find Your Why	15	Impactful Storytelling
08	The Infinite Business Battle	16	Strategic Negotiation

Half commitment produces full mediocrity.

SIXTEEN BOOKS · EBOOK AND PAPERBACK · SOLUTION BROKER EDITIONS, MALTA

One system.
Every shelf.

The series is published progressively, volume by volume, under the house imprint Solution Broker Editions. One metadata system across thirty titles, one image standard across every cover, and three routes to the reader.

AMAZON	Print and Kindle worldwide, through Kindle Direct Publishing. The route for reach, and the shelf where a category is claimed in public.
APPLE BOOKS	The digital editions for the reader who works on the move, formatted for the device that is already in his pocket.
SOLUTIONS-BROKER.COM	The direct shop for the Library and Field Editions, and the one channel where the series connects to the practice behind it: the doctrine, the disciplines, and the first conversation.

A book is the cheapest way to test how an adviser thinks.
The series is thirty invitations to do exactly that.

30	3	2
TITLES UNDER SOLUTION BROKER EDITIONS	CHANNELS: AMAZON, APPLE BOOKS, DIRECT	EDITIONS: LIBRARY AND FIELD

A brand nobody converts is an expensive picture.

Beyond Brand · The Sales Architecture. Volume 2, Book 1, Library Edition.

The name of the series is a statement rather than provocation for its own sake. F*ck Average means that anyone who competes in the middle field negotiates in the middle field. The subtitle carries the order of operations: position, authority, impact, legacy. In that sequence, because each step carries the next.

Beyond Brand covers the stretch that is missing in most houses: from a finished brand to a functioning sales operation. A brand nobody converts is an expensive picture. A sales force without a brand is a price war with extra steps.

The books are deliberately not advice literature. They are instruments, with a method, a sequence and examples from real mandates. A reader does not get motivation. He gets an order of operations.

For clients they are the evidence that the advice is not assembled from opinions. For me they are the archive of a way of working that took three decades to form and had to be written down to become more than experience.

THE ORDER OF OPERATIONS

Position → Authority → Impact → Legacy

In that sequence, because each step carries the next.

Justified by tax. Decided by ambition.

No entrepreneur relocates because he likes a tax rate. He relocates because he has something in mind that no longer works where he is. Tax is the justification he gives his surroundings. The reason is growth, succession, an exit, or the plain realisation that three-year planning at the old location has stopped being planning.

Sell only the structure and you sell effort: forms, deadlines, compliance. Sell the perspective behind it and you sell a decision. That is the difference between a mandate and a conversation that quietly dies.

In practice the client falls between two stools. Once before signing, convinced but not acting, because what is missing between information and decision is not more information. And once after incorporation, when the offer ends at the registry entry while his need is only starting.

Which is why the offer is built in three stages, and why the third one is the stage the market does not have.

STAGE 1 · ORIENTATION

Location comparison across Malta, Cyprus, Dubai and Portugal. Feasibility, tax logic, timeline and investment frame in one decision-ready document.

STAGE 2 · EXECUTION

Structure and incorporation, banking, residency, compliance and ongoing administration in the chosen location. Entirely in professional hands.

STAGE 3 · LANDING & GROWTH

Positioning, brand, sales build-up, market access, first customers and the AI enablement of the newly assembled team.

3
STAGES, WITH LIABILITY CLEANLY SEPARATED BETWEEN THEM

90
DAYS IN WHICH THE FIRST COMMERCIAL RESULT SHOULD BE VISIBLE

0
STATEMENTS ON TAX OR LAW MADE BY SOLUTION BROKER

Nobody relocates for the tax rate.
People relocate because growth is supposed to follow.

What happens after the registry entry.

Holding a Maltese company is not a business model. The entrepreneur who arrives faces the same questions as any founder: who here should know him, who buys from him, who he works with, and how he says in one sentence what he stands for in a market that has never heard of him.

Stage three answers exactly that. It is not a courtesy. It is a paid stage with its own deliverable. And it works forwards: a client who hears in the first meeting that somebody will build the market entry after incorporation decides the incorporation faster.

DELIVERABLE	WHAT IS PRODUCED	WINDOW
Positioning	One sentence that carries in the new market, and the category it is judged in	Week 1–3
Brand and appearance	Identity, imagery, documents, site for the target market	Week 2–8
Sales build-up	Process, materials, price architecture, steering	Week 4–12
Market access	First qualified conversations through network and own reach	from Week 6
AI enablement	Binding policy, playbook, prompt library, documented training record	2–8 days on site

6
WEEKS FROM POSITIONING TO FIRST APPEARANCE IN THE TARGET MARKET

4
LOCATIONS COMPARED: MALTA, CYPRUS, DUBAI, PORTUGAL

1
POINT OF CONTACT FOR BRAND, SALES AND MARKET ACCESS

Four numbers that moved.

What changed on the island over the past months, in the areas an owner-led company actually feels. Sources are named under each item.

INCENTIVES

MICRO INVEST LIFTED TO 65 PER CENT

The tax credit for small companies and the self-employed rises from 45 to 65 per cent of eligible cost, and from 65 to 85 per cent in Gozo. The three-year cap moves from 50,000 to 65,000 euro.

Malta Enterprise, Micro Invest 2026 to 2030.

PROPERTY

PRICES UP 6.1 PER CENT

Residential prices rose 6.1 per cent year on year in the fourth quarter of 2025. Apartments led at 6.2 per cent, terraced houses trailed at 3.0.

Global Property Guide, Malta price history.

FINANCING

MORTGAGES AT 1.95 PER CENT

The average mortgage rate stood at 1.95 per cent in June 2026, among the lowest in the euro area. Gross rental yields averaged 3.92 per cent in the first quarter.

Global Property Guide, first quarter 2026.

SUPPLY

PERMITS UP 41 PER CENT

More than 12,300 residential units were approved in 2025, forty-one per cent above the previous year. Transactions reached 13,339 units worth 3.97 billion euro.

Global Property Guide, full year 2025.

A market with cheap money, rising supply and rising prices is a market in motion.
Motion is where positions are taken.

Neutral by constitution. Aligned by interest.

Every entrepreneur who considers a base in the Mediterranean eventually asks the question quietly: how exposed is this place. Malta answers it with a constitutional clause and a long habit of pragmatism.

The archipelago became independent from the United Kingdom in 1964 and joined the Non-Aligned Movement in 1973, at a point when most small states were choosing a side in the Cold War. Malta chose not to. Neutrality was written into the constitution in 1987. It prohibits membership of a military alliance, forbids foreign military bases and restricts the use of Maltese territory for military purposes.

The wording is deliberately flexible, which is why successive governments have been able to read it pragmatically. After years of swinging between an opening to the eastern bloc and an orientation towards Western Europe, Malta joined the European Union in 2004. A declaration attached to the accession treaty makes clear that participation in the Union's common foreign and security policy does not put its neutrality in question.

The result is a country that observers describe as militarily neutral and politically aligned. It sits inside the single market, inside the euro and inside the European legal order, while keeping out of alliance obligations.

For a company, that combination is worth more than it sounds. Legal certainty and market access come from Brussels. The absence of alliance exposure comes from the constitution. Neither is a marketing claim, and both are older than the current cycle.

1964
INDEPENDENCE FROM THE UNITED KINGDOM

1987
NEUTRALITY WRITTEN INTO THE CONSTITUTION

2004
ACCESSION TO THE EUROPEAN UNION

WHAT IT MEANS AT THE DESK

A European framework without alliance obligations, English as an official language, and a jurisdiction small enough that the people who decide are reachable. That is the operating case for the island, before a single tax rate is mentioned.

The small economy that keeps outgrowing the bloc.

The Central Bank of Malta published its projection to 2028 on 20 August 2026. The picture is unusual for the euro area: resilient growth, a shrinking deficit, a falling debt ratio and inflation inside the target corridor.

3.8 %
GDP growth 2026, then 3.6 per cent in 2027 and 3.8 per cent again in 2028

2.2 %
HICP inflation 2026, with 2.2 per cent expected again for 2028

1.6 %
General government deficit 2028, down from 2.2 per cent in 2026

44.2 %
Debt-to-GDP in 2028, down from 46.1 per cent in 2026

WHAT CARRIES THE GROWTH

Private consumption remains the main driver and is projected to keep expanding at a brisk pace. For an economy of this size that is a remarkably stable base, because it depends less on single large investments than comparable economies do.

WHERE THE RISKS SIT

The bank names the duration and intensity of the Middle East conflict and supply bottlenecks as downside risks. On inflation it sees upside risk from services prices. Fiscally, additional spending remains possible, particularly on energy support measures.

WHAT AN ENTREPRENEUR READS INTO IT

A debt ratio below fifty per cent means room to manoeuvre. A state that is not financed to the limit does not need to reach for companies at short notice. Growth carried by private consumption means a functioning domestic market on the ground. Incorporate here and you find demand rather than only a letterbox. And inflation inside the corridor makes multi-year calculation possible again. That is currently not a given anywhere.

Source: Central Bank of Malta projection, reported in The Malta Independent, 20 August 2026.

Thirty-five per cent, and why that is the wrong number.

Malta charges thirty-five per cent corporate income tax, the highest headline rate in the European Union. That is the figure printed in comparison tables, and it describes half of the reality.

The system works in two steps. The company first pays the full thirty-five per cent to the Commissioner for Revenue. Once profits are distributed, the shareholder may claim a refund. On active trading income it amounts to six sevenths of the tax paid, which leaves an effective burden of five per cent.

Passive royalty and interest income attracts the five-sevenths refund and an effective rate of roughly ten per cent. Where double taxation relief applies, the refund is two thirds and the effective rate around twelve and a half. A shareholding of at least five per cent in a non-resident subsidiary can qualify as a participating holding, under which dividends and capital gains are exempt.

INCOME TYPE	REFUND	EFFECTIVE	BASIS
Active trading income	6/7	5 %	Income Tax Act, Art. 48(4)(a)
Passive royalties and interest	5/7	approx. 10 %	Income Tax Act, Art. 48(4)(b)
With double taxation relief	2/3	approx. 12.5 %	Income Tax Act, Art. 48(4)(c)
Participating holding	full exemption	0 %	Income Tax Act, Art. 12(1)(u)

THE SUBSTANCE QUESTION

Since the tightening under ATAD II and BEPS Action 5, registration alone no longer carries. What is required is a Malta-resident director, physical premises, qualified staff for the core income generating activities, and an annual economic substance declaration with the Malta Business Registry.

AND THE MINIMUM TAX

Groups with consolidated turnover at or above seven hundred and fifty million euro fall under Malta's implementation of the OECD minimum tax, which lifts the effective rate to fifteen per cent. Below that threshold, and therefore across the entire mid-market, the refund system is unchanged.

THE SENTENCE WORTH REMEMBERING

The headline rate is a negotiating tool for people who want you to look elsewhere. The effective rate is a function of what you actually do in Malta. Build the substance and the arithmetic follows. Skip it and the arithmetic is the least of the problems.

Sources: Income Tax Act (Malta) and published analyses of the refund system, 2026. This article is an overview and not tax advice. Individual cases belong with a Maltese practice.

The cheapest capital on the island is a tax credit.

Malta Enterprise reopened its Micro Invest scheme for the period 2026 to 2030, and the terms are materially better than before. For a small company that is investing anyway, the scheme converts ordinary spending into a credit against tax.

ELEMENT	PREVIOUSLY	FROM 2026
Credit rate, Malta	45 per cent	65 per cent
Credit rate, Gozo	65 per cent	85 per cent
Cap per three years	50,000 euro	65,000 euro
Additional cap	on request	plus 20,000 euro for Gozo operations, family businesses, women-led and social enterprises
Wage element	not available	up to 780 euro per employee a year in Malta, 1,020 in Gozo
Eligible applicants	small companies	small companies, the self-employed, and for the first time social enterprises

THE WAGE ELEMENT IS THE NEW PART

Pay rises of at least three per cent granted to employees with more than four years of service now attract their own annual benefit. For a company that has just relocated and is building a team, that turns retention into a funded policy rather than a cost line.

WHERE WE STOP

Eligibility, cost categories and filing deadlines are a matter for a Maltese practice. We flag the instrument and its size. We do not file it, and we do not advise on it.

Source: Malta Enterprise Micro Invest guidelines 2026 to 2030 and published commentary, 2026. Not tax advice.

A market in motion, financed at under two per cent.

Anyone relocating a company also relocates a household, and the two decisions are usually taken in the wrong order. The property market is not a footnote to the structure. It is the part the family will judge the move by.

Residential prices rose 6.1 per cent year on year in the fourth quarter of 2025, or 3.6 per cent after inflation. Across the full year the increase was roughly 5.8 per cent nominal. Apartments led the market at 6.2 per cent, maisonettes followed at 5.3, terraced houses at 3.0 and other houses at 2.5.

Volume moved with price. Malta recorded 13,339 property transactions in 2025, almost six per cent more than the year before, and the value of those transactions rose about 12.5 per cent to 3.97 billion euro.

Supply is answering. More than 12,300 residential units were approved in 2025, forty-one per cent above the previous year, with the fourth quarter alone up more than half.

6.1 %
PRICE GROWTH YEAR ON YEAR, FOURTH QUARTER 2025

3.92 %
AVERAGE GROSS RENTAL YIELD, FIRST QUARTER 2026

1.95 %
AVERAGE MORTGAGE RATE, JUNE 2026

HOW TO READ IT

Rising prices with rising supply and cheap financing is not a bubble signal on its own. It is what a market looks like when demand is real and credit is available.

The practical consequence for a relocation is sequencing. Rent first, buy second, and let the residence question settle before capital is committed to an address.

Source: Global Property Guide, Malta residential market analysis, 2026. Not investment advice.

Five years, six months a year, and one letter.

A Union citizen who has lived in Malta lawfully and genuinely for five consecutive years may apply for permanent residence. The word genuinely carries the whole weight of that sentence. What is assessed is not the registration. It is proof of actual presence.

Identità requires evidence, for each of the five years, of at least six months spent in Malta. On top of that comes a letter to the chief executive of the authority stating the date of arrival and listing every absence over the past five years. All documents must be in English or Maltese.

The document issued is valid for ten years. Processing takes roughly thirty working days.

WHERE IT FAILS IN PRACTICE

On completeness. Five years without collected evidence cannot be reconstructed afterwards. Tenancy agreements, invoices, bank statements and travel records are not paperwork here. They are the application.

And on the two-year rule. The status is lost after an absence of more than two consecutive years. Anyone who relocates and then works mostly in the old market risks precisely that.

REQUIREMENT	WHAT IS ACTUALLY ASKED FOR
Duration	More than five years of lawful residence, five consecutive years of genuine residence
Evidence of presence	At least six months in Malta in each of the five years, documented
Covering letter	Letter to the CEO of Identità with date of arrival and all absences
Forms	Form P and the data protection declaration, completed in full
Language	All documents in English or Maltese
Validity	Ten years, lost after more than two consecutive years of absence
Exception	Swiss nationals cannot apply on this basis

WHY IT IS WORTH THE PAPERWORK

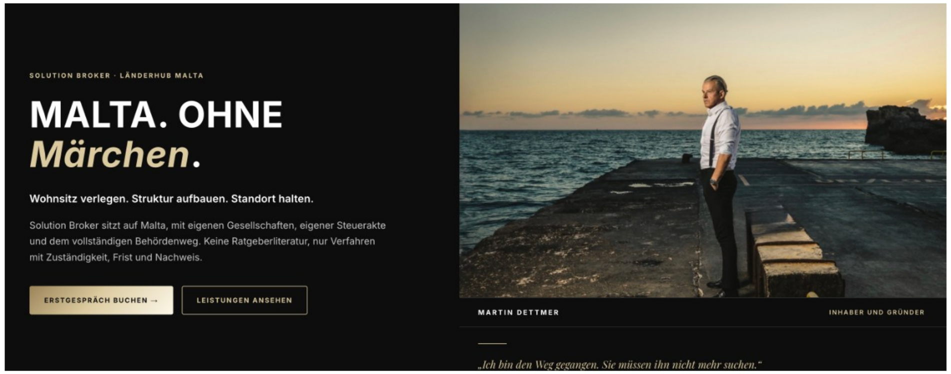
Permanent residence turns a stay into a position. It ends the annual renewal cycle, it settles the question of where the centre of life sits, and it is the single strongest piece of evidence that a relocation was real rather than administrative.

Source: Identità, Expatriates Unit, permanent residence for EU nationals, retrieved August 2026. Not legal advice.

Relocation. Engineered by Solution Broker.

From September, Solution Broker offers a relocation service for entrepreneurs and companies making Malta their base, whether that means a residence, an operating company or both. Not a referral list. An engineered route: residence, structure, property, in the right order, with a named owner for every step.

The service is carried by several defined sales channels and by a dedicated internet platform in addition to solutions-broker.com. It rolls out in German for the German market first; further markets follow once the German market runs. What remains before launch is execution, not negotiation. Access, pricing and the first cases follow in Edition 2.



MALTA. OHNE MÄRCHEN. THE PLATFORM · IN GERMAN FOR THE GERMAN MARKET FIRST

RESIDENCE

Moving the residence: registration, presence evidence and the paperwork that makes a relocation real rather than administrative.

COMPANY

Building the structure: incorporation, substance, banking, and the operating routine that stands up to inspection.

PROPERTY

Holding the position: rent first, buy second, and an address chosen after the residence question is settled.

Malta. Ohne Märchen. The name is the promise: Malta, without the fairy tales.

Who delivers what.

STAGE	EURO TAX CONSULTING	SOLUTION BROKER
01 Orientation	Technical substance, calculation, legal frame	Editing, presentation, marketing, sales
02 Execution	Full responsibility	No involvement in professional statements
03 Growth	Technical support in the background, referral into the client base	Full responsibility, including AI enablement
Across all	Client access, events, location network	Reach, stage, content, closing route

CONTRIBUTION BEFORE SHARE

Remuneration follows the actual share of delivery, in both directions and traceable at any time.

CLEAR LIABILITY LINES

Tax and law with Euro Tax, brand and sales with Solution Broker. No overlap in liability.

CLIENT PROTECTION BOTH WAYS

Referred contacts remain assigned to the referring house, beyond the first mandate.

MEASURE FIRST, COMMIT LATER

Exclusivity and firm commitments follow the pilot, measured against four agreed numbers.

STATUS

The model on this page is the state of the discussion, not a signed agreement. It is printed because the direction is settled even where the detail is not, and because a reader deserves to know who does what before he asks either house for anything.

The structure is half the decision. The other half is the reason to take it.

Two things that work from Monday.

AI Enablement

Since February 2025 the EU AI Act has obliged every company using AI to equip its staff with sufficient AI literacy. The duty does not depend on company size. The evidence expected is documented training with a written policy.

Practically every company falls under it and almost none has a policy. A company relocating to Malta rebuilds team and processes anyway. Rules set during the build do not have to be corrected later.

WHAT THE CLIENT RECEIVES

A binding AI policy issued by the management, role-based use cases from real daily operations, a playbook and a company prompt library, documentation as evidence of the training obligation, and two follow-up sessions within sixty days.

Voice Vanguard™

Not a chatbot and not a call centre, but a voice infrastructure. It answers inbound calls, understands intent, accesses internal systems and runs full conversations in natural language, around the clock and in the tone of the house.

Designed, built and operated in house. No reseller, no licensed third-party engine. Deployable on premise, hosted on European servers, with no routing through third countries.

WHY IT MATTERS IN ADVISORY WORK

Because first contact is currently a matter of chance. Enquiries arrive in the evening, at weekends and across time zones. A caller who does not get through calls the next provider. Fixed price, one set-up fee and a monthly flat rate, with no charge per call.

Feb 2025
AI LITERACY DUTY IN FORCE, REGARDLESS OF COMPANY SIZE

8
WEEKS FROM KICKOFF TO GO-LIVE ON VOICE VANGUARD

24/7
AVAILABILITY WITHOUT ADDITIONAL HEADCOUNT

Both work without a pilot and without an event. That is rare, and therefore valuable.

FROM THE NETWORK

Dispatches from five markets.

Consulting is hard to prove. Projects are easy to show. An extract from what has been steered out of Malta over the past months.

DUBLIN, IRELAND

BRAND PRESENCE AND SAMPLING

Brand appearance and display programme for an Irish flooring supplier, including showroom system and sample logistics.

ORADEA, ROMANIA

COLLECTION AND SHOWROOM

Launch of a collection for the Romanian market with its own showroom concept and matched display architecture.

SOFIA, BULGARIA

ENTRY INTO SOUTH EAST EUROPE

Support for a trading house building range, price architecture and sales process from the ground up.

TEL AVIV, ISRAEL

PRIVATE LABEL

Development of an own brand for the Israeli market, from trade mark filing through to the brand book.

COLOMBO, SRI LANKA

EUROPEAN MARKET ANALYSIS

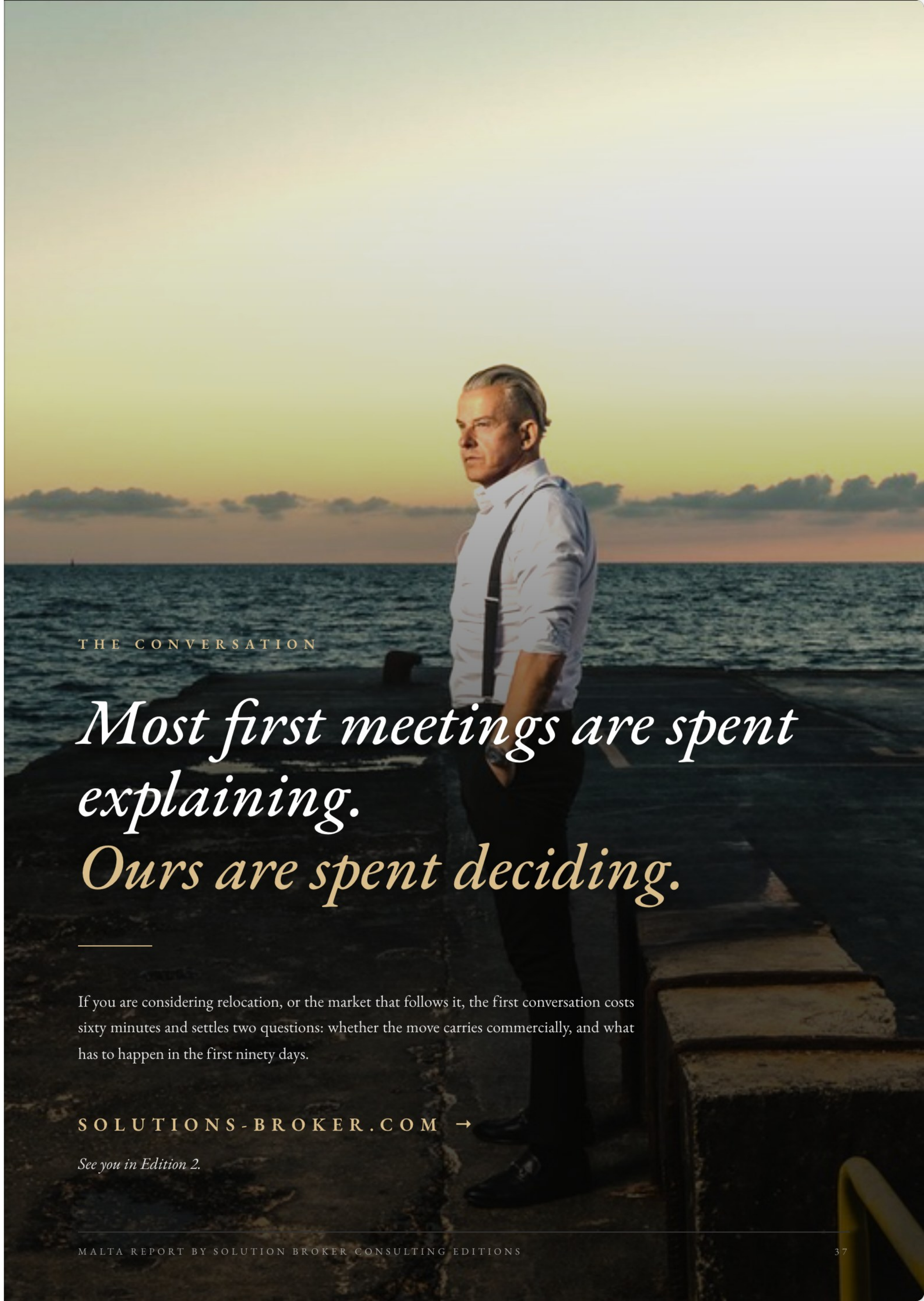
Analysis of European market access for an Asian manufacturer, including positioning and target customer profile.

SHANGHAI, CHINA

PRODUCTION AND IMAGE STANDARD

Steering of sampling and photo production for European brand programmes, on a single consistent image standard.

Malta	**BAU 2027**	**EUIPO**
SEAT OF THE GROUP SINCE 2022	TRADE FAIR APPEARANCE IN PREPARATION, MUNICH	MORE THAN ONE HUNDRED REGISTERED DESIGNS



THE CONVERSATION

Most first meetings are spent explaining.
Ours are spent deciding.

If you are considering relocation, or the market that follows it, the first conversation costs sixty minutes and settles two questions: whether the move carries commercially, and what has to happen in the first ninety days.

SOLUTIONS-BROKER.COM →

See you in Edition 2.

Those who do not stand out negotiate on price.
Those who do, negotiate on terms.

Solution Broker Consulting Ltd. works from Malta for owner-led companies across Europe, Asia and the United States. Six disciplines, one principle, and a system that has been written down.

This journal was written by the author. AI tools were used for research, editing and formatting support. The author holds full editorial responsibility for the content.

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