

Abidjan, le 08 JUL 2024

Le Directeur Général

N° 053 /MFB / DGI-DLCD

NOTE DE SERVICE

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Destinataires : Tous services

Objet : Notion et règles d'évaluation des avantages en nature

La prise en compte des avantages en nature dans le calcul de l'impôt sur les traitements et salaires a souvent donné lieu, en pratique, à des difficultés d'application.

La présente note a pour objet de définir la notion d'avantages en nature et d'en préciser les règles d'évaluation.

1- Définition et principe d'imposition des avantages en nature

1.1- Définition

Un avantage en nature est un bien alloué ou une prestation accordée à titre gratuit et considéré fiscalement comme un complément de rémunération accordé au salarié dans le cadre de son activité. Cette notion regroupe l'ensemble des frais supportés, en totalité ou en partie, par l'employeur pour le compte de son salarié. Il s'agit notamment des rémunérations consistant en la concession à titre gratuit au salarié d'un bien dont l'employeur est propriétaire ou locataire ou en la fourniture de prestations de services.

1.2- Principe d'imposition

Le Code général des Impôts en son article 118 dispose que pour la détermination des bases d'imposition, il est tenu compte du montant total brut des traitements, y compris les sommes mandatées au titre du pécule, indemnités et émoluments, salaires, pensions et rentes viagères, ainsi que de tous les avantages en argent ou en nature accordés aux intéressés en sus des traitements, soldes, indemnités, émoluments, salaires, pensions et rentes viagères proprement dits.

Ce principe général d'imposition connaît certaines limites.

Lorsqu'intervient un remboursement partiel ou total par le salarié sous forme de prélèvement sur son salaire en contrepartie de l'avantage en nature accordé, le remboursement vient en diminution de la valeur imposable dudit avantage.

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