

## Explanation

The inside front and back covers of this book present, in tabular form, the generally applicable withholding ta rates on dividends, interest and royalties paid by a resident of one of the 25 countries listed in this table to a esident of another of these countries.
The diagonal strip from top left to bottom right lists the abbreviated names of the countries included. The number that is quoted in the box where a country's name appears represents the domestic withholding tax rate for outgoing dividends (front cover), interest (back cover, starting at the bottom left) and royalties (back cow, the main a quite on wor wo
 the wper section indicate(s) the rete(s) Wplicable to payments arising from se countiy, hat slisted at the top end of he vertical strip on top ofthe square and made to a resident of the country listed a the right end of the horizontal strip on the right side of the square, while numbers in the lower section indicate the percentag aplicable in the reversed direction.

Where a treaty or the domestic law provides for more than single permitted rate with regard to interest and royalties, the lower of the two rates may carry a footnote reference number. These footnotes have the following meaning:

1. interest paid to the government or the central bank and/or by the government;
2. interest on certain forms of suppliers' credit;
3. interest paid to (particular) financial institutions;
4. royalties for literary, artistic and (sometimes) scientific work
5. royalties for the use of industrial, commercial or scientific equipment;
6. percentage is applied to only part of taxable amount, resulting in an effectively lower rate (indicated in parentheses);
7. compensation for the rendering of (technical) services
8. royaltics for the usc of a trademark or trade-name,
9. interest reccived by an individual or partnership; and
10. MFN rate (based on ourbest rescarch effort).


|  |  | 10 | - | 10 | 10 | 10 | 5 | 10 | 15/1022 | 15/10 ${ }^{\text {s }}$ | 10 | 10 | 5 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 25 | $20^{0 / 1} / 15^{7}$ | 10/04 | 7 | 0 | 0 | 0 | $10^{10}$ | 10 | 0 | 5 | 10 |
| 10 |  |  | 15 | 54/15 | 25*15 | $25^{3 / 15}$ | $\begin{gathered} 25^{*} / 5 / \\ 10^{4} \\ \hline \end{gathered}$ | - | $25^{5} / 15$ | - | - | $25^{5} / 15$ | $\underset{\substack{254 \\ 12.5 /}}{ }$ |
| - 1 | 15/10 $0^{\circ} 0^{\prime}$ | 15 |  | 25/04 | 10 | 10/0 ${ }^{4}$ | 10/04 | 10/04 | 15/10 ${ }^{5}$ | 10 | 10/04 | $\left.\begin{gathered} 10 / 5^{5} \\ 0^{4} \end{gathered} \right\rvert\,$ | 10 |
| 10 | 10/0.1.2 | $\begin{array}{\|c\|} \hline 151 \\ 10^{2} / 0^{\prime} \\ \hline \end{array}$ |  |  |  | $\begin{aligned} & 101 \\ & (7)^{5.6} \end{aligned}$ | $\int_{(6)^{5,506}}^{10 /}$ | $\left.\begin{gathered} 101 \\ (7)^{5,6 \times *} \end{gathered} \right\rvert\,$ | 10 | 10 | $\begin{aligned} & 101 \\ & (6)^{5.6} \end{aligned}$ | $\begin{array}{\|l\|} \hline 101 \\ (7)^{5.6} \end{array}$ | 10 |
| 10 | 10/0' | 15/0' | 10/0' | 10 |  | $2 / 0$ | - | 0 | 20 | 15 | 0 | 5/04 | 10 |
| 10 | 10 | 15/0' | 10/0, ${ }^{1.2}$ | 10/0' |  |  | 3.3 | 0 |  | 10 | 0 | 5/04 | 0 |
| $10 / 0^{1.3}$ | 15 | $\left\|\begin{array}{c} 15 / \\ 10^{2} / 0^{\prime} \end{array}\right\|$ | 10/0.2 | 10/0 ${ }^{1}$ | - |  |  |  | 10 | $\begin{gathered} 15 / 10^{5 / 4} \\ 7.7^{7} \end{gathered}$ | 0 | 5/04 | 10 |
| 10 | 15/0 | - | 10/012 | 10/0 ${ }^{1}$ | 0 | 0 |  |  | 10 | 15* | 10 | 20 | 10 |
| 15 | 15/103 | 15/0' | 15/0.2. | 10/0' | $\left\lvert\, \begin{gathered} 15 / \\ 10^{3} / 0^{\prime} \end{gathered}\right.$ | $10^{1 \%} 0^{\prime}$ | 10/0' |  |  | 20 | - | 15/10 ${ }^{5}$ | 10 |
| 10/0 | 10/0 ${ }^{1}$ | - | 10/012 | 10/0' | 10/0' | $\begin{gathered} 15 / 1 \\ 10^{2: 3 / 7} / 0^{12} \end{gathered}$ | 10/0 ${ }^{1}$ | 10/0' | 20 |  | 20 | 0 | 10 |
| 10 | 15 | - | 10/012 | 10/0 ${ }^{\prime}$ | 0 | 0 | 0 | 10/0 | - | 20 |  | 22.5) ${ }^{6}$ | 10 |
| 10/01 | $15 / 0^{\prime}$ | 15/0 ${ }^{1}$ | 10/0! | 10/0' | 10/0.2. | $\left\lvert\, \begin{gathered} 101 \\ 0,2.23 \end{gathered}\right.$ | 10/0, ${ }^{1.2}$ | 15/0' | 10/0' | 10 | 26/12 |  |  |
| 10/0 ${ }^{1 / 3}$ | 10 | 12.5/0' | 10/0' | 10/0 ${ }^{\prime}$ | 10 | 10/01.2 | 10/0 ${ }^{1}$ | 10/0 ${ }^{1}$ | 10/0 ${ }^{\prime}$ | 10 | 10 |  |  |
| 15/0' | 10/0' | $\begin{gathered} 15 / 10^{2} \\ 0^{1} \end{gathered}$ | 10/012 | 10/0' | 15/0' | 10/0.2 | 10/023 | $\left\lvert\, \begin{gathered} 15 / \\ 10^{3} / 0^{1} \end{gathered}\right.$ | 10/0 ${ }^{1}$ | 0 | 10/0' | 10/0' |  |
| - | 15/02 | $\begin{gathered} 15 / \\ 10^{2} / 0^{1} \end{gathered}$ | 10/0.2 | 10/0 ${ }^{\prime}$ | 0 | 10 | 0 | 10/0 ${ }^{\prime}$ | 10/0 ${ }^{1}$ | 0 | 10/0 ${ }^{1}$ | 10/0 |  |
| 10 | $10 / 0^{123}$ | $\begin{gathered} 15 / \\ 10^{2} / 0^{1} \end{gathered}$ | 10/0,2 | 10/0 | 0 | $\begin{aligned} & 10 / 3 \\ & 0^{23} \end{aligned}$ | 0 | 101\% ${ }^{\prime}$ | 10/01.2 | 0 | 10/0 ${ }^{1}$ | $10 / 0^{123}$ |  |
| 10/01,3 | 10* | - | $10 / 0^{3}$ | 10/0 | 10 | 10/0' | 10/0 ${ }^{\prime}$ | 10/0' | 10/0 ${ }^{1}$ | 10 | 10/0 ${ }^{\prime}$ | 10/013 |  |
| 10/013.3 | $15 / 0^{12,3}$ | ** | 10/01.2 | 10/0' | 0 | 0 | 0 | 10/0' | 10/0 ${ }^{1}$ | 0 | 15/0 ${ }^{\prime}$ | 10/0 |  |
| - | 15 | 15/0' | 10/0,2 | 10/0' | 10/0' | 12/10 | $\begin{gathered} 15 / \\ 10^{2,3 / 3} \end{gathered}$ | 10/0' | 10/0' | 15/0 ${ }^{1}$ | $15 / 0^{\prime}$ | $\begin{gathered} 10 / 5^{3 /} \\ 0^{1} \end{gathered}$ |  |
| 10 | 10/0.1.2 | ** | 10/0,2 | 10/0' | 0 | 0 | 0 | $10 / 0^{1,3}$ | 15/0 ${ }^{\prime}$ | 0 | 10 | 10/0 ${ }^{\prime}$ |  |
| 10 | 5/0 ${ }^{13}$ |  | 15 | $10 / 7^{3}$ | 10/0' | 10/0 ${ }^{1.2}$ | 8/0' |  | 10/0.3 |  |  | 10/0' |  |
|  | $5 / 0$ | - | 15/0 | $10^{1}$ |  |  | $8 / 0$ | $15 / 10^{\circ}$ | $10 / 0$. | 5/0 | $0^{1}$ | 10/0, ${ }^{12}$ |  |
| 10/01.3 | $.3 \begin{aligned} & 10 / \\ & 0.123 \\ & \hline \end{aligned}$ | 15/0 ${ }^{1}$ | 10/0,2, | 10/0 ${ }^{\prime}$ | 0 | 0 | 10* | 10/0' | 10/0 ${ }^{\prime}$ | 0 | 10/0 ${ }^{1}$ | 10/0 |  |
| 10 | $\begin{aligned} & 10 / \\ & 0^{23} \end{aligned}$ | $\begin{gathered} 15 / 10^{2 \%} \\ 0^{\prime} \end{gathered}$ | 10/0 ${ }^{1}$ | 10 | - | $\begin{gathered} 101 \\ 0^{1.23} \end{gathered}$ | 0 | 15/0.2. | 10/0 ${ }^{1}$ | 0 | 12/0 ${ }^{\prime}$ | 10 |  |
| 10/0' | $\begin{aligned} & 10 \\ & 0^{23} \end{aligned}$ | $25 \% 0^{1}$ | 10/0.2 | 10/0' | 0 | 0 | 0 | $\begin{aligned} & 101 \\ & 0^{1.3} \end{aligned}$ | $10 / 0^{1.3}$ | 0 | 15/0 ${ }^{1}$ | 10 |  |
| 10/0.3.3 | $10 / 0^{2,3}$ | - | 10"10 | 10/0' | 0 | 0 | 0 | 10/0 ${ }^{\prime}$ | 10 | 0 | 12.5 | 10/012. |  |
| 10/0, ${ }^{\text {, }}$ | ${ }^{10 / 0^{1,2}}$ | - | 10/0 ${ }^{2}$ | 10/0' | 0 | 0 | 0 | $\begin{gathered} 15 / \\ 10^{3} / 0^{\prime} \end{gathered}$ | 10/0 ${ }^{1}$ | 0 | $\begin{aligned} & 101 \\ & 0^{1.2} \end{aligned}$ | 10/0 |  |
| 10/0.3.3 | 0 | - | 0 | 10/0 ${ }^{1}$ | 0 | 0 | 0 | $\begin{gathered} 15 / 10^{3} \\ 10^{1} \end{gathered}$ | $10 / 0^{1.3}$ | 0 | 10/01.2 | 10/0 |  |



See front cover for the explanation

