

## DOUBLE TAXATION AVOIDANCE TREATIES IN FORCE

Country	Duration to constitute permanent establishment		Maximum tax rates applicable in the State of Source		
	Building Site etc	Furnishing of services	<i>Dividends</i>	<i>Interest(i)</i>	<i>Royalties</i>
Barbados	6 months	(iv)	5%	5%	5%
Belgium	> 6 months	(iv)	5% & 10%	10%	Exempt
Botswana	> 6 months	> 6 months (ii)	5% & 10%	12%	12.5%
China	> 12 months	> 12 months(iii)	5%	10%	10%
Congo	> 12 months	> 12 months	0% & 5%	5%	Exempt
Croatia	> 12 months	(iv)	Exempt	Exempt	Exempt
Cyprus	> 12 months	> 9 months (ii)	Exempt	Exempt	Exempt
Egypt	> 6 months	> 6 months	5% & 10%	10%	12%
France	> 6 months	(iv)	5% & 15%	same rate as under domestic law	15%
Germany (new)	> 12 months	(iv)	5% & 15%	Exempt	10%
Guernsey	> 12 months	> 9 months	Exempt	Exempt	Exempt
India	> 9 months	> 3 months	5% & 15%	7.5%	15%
Italy	> 6 months	(iv)	5% & 15%	same rate as under domestic law	15%
Kuwait	> 9 months	(iv)	Exempt	Exempt	10%
Lesotho	> 6 months	> 6 months (ii)	10%	10%	10%
Luxembourg	> 6 months	(iv)	5% & 10%	Exempt	Exempt
Madagascar	> 6 months	(iv)	5% & 10%	10%	5%
Malaysia	> 6 months	(iv)	5% & 15%	15%	15%

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Malta	> 12 months	> 12 months	Exempt	Exempt	Exempt
Monaco	> 12 months	> 12 months	Exempt	Exempt	Exempt
Mozambique	> 6 months	> 6 months (ii)	8%, 10% & 15%	8%	5%
Namibia	> 6 months	> 6 months (ii)	5% & 10%	10%	5%
Nepal	> 6 months	> 6 months (ii)	5%, 10% & 15%	10% & 15%	15%
Oman	> 6 months	(iv)	Exempt	Exempt	Exempt
Pakistan	> 6 months	(iv)	10%	10%	12.5%
Rwanda	> 6 months	> 6 months	10%	10%	10%
People's Republic of Bangladesh	>12 months	> 12 months	10%	normal rate	normal rate
Senegal	> 9 months	> 9 months (i)	Exempt	Exempt	Exempt
Seychelles	> 12 months	> 6 months (ii)	Exempt	Exempt	Exempt
Singapore	> 9 months	(iv)	Exempt	Exempt	Exempt
South Africa	> 12 months	> 6 months (ii)	5% & 10%	10%	5%
Sri Lanka	> 6 months	> 6 months (ii)	10% & 15%	10%	10%
State of Qatar	> 6 months	> 6 months (ii)	Exempt	Exempt	5%
Swaziland	> 6 months	> 6 months(ii)	7.5%	5%	7.5%
Sweden (New)	> 12 months	(iv)	0% & 15%	Exempt	Exempt
Thailand	> 6 months	> 6 months (ii)	10%	10% & 15%	5% & 15%
Tunisia	> 12 months	(iv)	Exempt	2.5%	2.5%

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Uganda	> 6 months	> 4 months (ii)	10%	10%	10%
United Arab Emirates	> 12 months	> 12 months	Exempt	Exempt	Exempt
United Kingdom	> 6 months	(iv)	10% & 15%	Same rate as under domestic law	15%
Zimbabwe	> 6 months	(iv)	10% & 20%	10%	15%
Zambia	> 9 months	(iv)	5% & 15%	10%	5%

- i. where interest is taxable at rate provided in the domestic law of the State of source or at reduced treaty rate, provision is usually made in the treaty to exempt interest receivable by a Contracting State itself, its local authorities, its Central Bank/all banks carrying on bona fide banking business and any other financial institutions as may be agreed upon by both Contracting States.
- ii. within any 12-month period
- iii. within any 24-month period
- iv. no specific provision made in respect of furnishing of services.