

Tax rates as per IT Act vis a vis Tax Treaties

Name of Country	Dividend (not being covered under section 115-O)		Interest		Royalty		Fee for Technical Services	
	Tax rate	IT Act	Tax rate	IT Act	Tax rate	IT Act	Tax rate	IT Act
Albania	10%	20%	10%[Note2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Armenia	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Australia	15%	20%	15%	20%	[Note 3]	25%(Note 6)	[Note 3]	25%(Note 6)
Austria	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Bangladesh	10% (if at least 10% of the capital of the company paying the dividend is held by the recipient)	20%	10% [Note 2]	20%	10%	25%(Note 6)	No separate provision	
Belarus	10% if paid to a company holding 25% shares; otherwise 15%	20%	10% [Note 2]	20%	15%	25%(Note 6)	15%	25%(Note 6)
Belgium	15%	20%	15% (10% if granted by a bank)	20%	10%	25%(Note 6)	10%	25%(Note 6)
Botswana	7.5% (if shareholder is a company and holds at least 25% shares in the investee-company); otherwise 10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Brazil	15%	20%	15% [Note 2]	20%	25% for use of trademark; 15% for others	25%(Note 6)	No separate provision	
Bulgaria	15%	20%	15% [Note 2]	20%	15% of royalty relating to literary, artistic, scientific works other than films or tapes used for radio or television broadcasting; 20% in other cases	25%(Note 6)	20%	25%(Note 6)
Canada	15% if at least 10% of the shares of the company paying the dividends is held by the recipient of dividend; 25% in other cases	20%	15% [Note 2]	20%	10%-20%	25%(Note 6)	10%-20%	25%(Note 6)
China	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)

Cyprus	10% if at least 10% of the capital of the company paying dividend is held by the recipient, 15% in all other cases	20%	10% [Note 2]	20%	15%	25%(Note 6)	10%	25%(Note 6)
Czech Republic	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Denmark	15% if at least 25% of the shares of the company paying the dividend is held by the recipient; 20% in other cases	20%	10% if loan is granted by bank; 15% for others [Note 2]	20%	20%	25%(Note 6)	20%	25%(Note 6)
Germany	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Finland	15%	20%	10% [Note 2]	20%	15%-20% during 1997-2001, 15% for subsequent years; 10% for equipment royalty	25%(Note 6)	Same as in case of royalty	25%(Note 6)
France	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Greece	20%	20%	20%	20%	25%(Note 6)	25%(Note 6)	No separate provision	
Hungary	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Indonesia	10% if at least 25% of the shares of the company paying the dividend is held by the recipient; 15% in other cases	20%	10% [Note 2]	20%	15%	25%(Note 6)	No separate provision	
Iceland	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Ireland	10%-15%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Israel	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Italy	15% if at least 10% of the shares of the company paying dividend is beneficially owned by the recipient company; 20% in other cases	20%	15% [Note 2]	20%	20%	25%(Note 6)	20%	25%(Note 6)
Japan	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Jordan	10%	20%	10% [Note 2]	20%	20%	25%(Note 6)	20%	25%(Note 6)
Kazakstan	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)

Kenya	15%	20%	15% [Note 2]	20%	20%	25%(Note 6)	17.5%	25%(Note 6)
Korea	15% if at least 20% of the capital of the company paying dividend is held by the recipient; 20% in other cases	20%	10% if interest is paid to a bank; 15% for others [Note 2]	20%	15%	25%(Note 6)	15%	25%(Note 6)
Kuwait	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Kyrgyz Republic	10%	20%	10%	20%	15%	25%(Note 6)	15%	25%(Note 6)
Latvia	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Libyan Arab Jamahiriya	20%	20%	20%	20%	25%(Note 6)	25%(Note 6)	No separate provision	
Luxembourg	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Malaysia	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Malta	10% if at least 25% of the shares of the company paying dividend is held by the recipient company; 15% in other cases	20%	10% [Note 2]	20%	15%	25%(Note 6)	10%	25%(Note 6)
Mangolia	15%	20%	15% [Note 2]	20%	15%	25%(Note 6)	25%	25%(Note 6)
Mauritius	5% if at least 10% of the capital of the company paying the dividend is held by the recipient; 15% in other cases	20%	20% [Note 2]; Nil in some cases	20%	15%	25%(Note 6)	No separate provision	
Montenegro	5% (in some cases 15%)	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Myanmar	5%	20%	10%	20%	10%	25%(Note 6)	No separate provision	
Morocco	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Namibia	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Nepal	10% if at least 10% of the shares of the company paying the dividend is held by the recipient; 20% in other cases	20%	10% if interest is paid to bank 15% for others [Note 2]	20%	15%	25%(Note 6)	No separate provision	
Netherlands	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
New Zealand	15%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)

Norway	15% if at least 25% of the capital of the company paying the dividend is held by the recipient; 20% in other cases	20%	15% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Oman	10% if at least 10% of shares are held by the recipient; 12.5% in other cases	20%	10% [Note 2]	20%	15%	25%(Note 6)	15%	25%(Note 6)
Philippines	15% if at least 10% of the shares of the company paying the dividend is held by the recipient; 20% in other cases	20%	10% if interest is received by a financial institution or insurance company; 15% in other cases	20%	15% if it is payable in pursuance of any collaboration agreement approved by the Government of India	25%(Note 6)	No separate provision	
Poland	15%	20%	15% [Note 2]	20%	22.5%	25%(Note 6)	22.5%	25%(Note 6)
Portuguese Republic	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Qatar	5%-10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Romania	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Russian Federation	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Saudi Arabia	5%	20%	10%	20%	10%	25%(Note 6)	No separate provision	
Serbia	5% (if recipient is company and holds 25% shares) otherwise 15%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Singapore	10% if at least 25% of the shares of the company paying the dividend is held by the recipient; 15% in other cases	20%	10% if loan is granted by a bank/similar institute including an insurance company; 15% for others	20%	10%	25%(Note 6)	10%	25%(Note 6)
Slovenia	5-15%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
South Africa	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Spain	15%	20%	15% [Note 2]	20%	[Note 4]	25%(Note 6)	[Note 4]	25%(Note 6)
Sri Lanka	7.5%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)

Sudan	10%	20%	10%	20%	10%	25%(Note 6)	No separate provision	
Sweden	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Swiss	10%	20%	10% [Note 5]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Syrian Arab Republic	10% (5% if shareholder is a company holding at least 10% shares)	20%	10%	20%	10%	25%(Note 6)	No separate provision	
Tajikistan	10% (5% if shareholder is a company and holds 25% shares)	20%	10%	20%	10%	25%(Note 6)	No separate provision	
Tanzania	10% if at least 10% of the shares of the company paying the dividend is held for a period of at least 6 months prior to the date of payment of the dividend; 15% in other cases	20%	12.5%	20%	20%	25%(Note 6)	No separate provision	
Thailand	15% if dividend is paid by an industrial company and at least 10% of capital of such company is held by the recipient; 20% in other cases	20%	10% for financial institutions and insurance company; 20% for others [Note 2]	20%	15%	25%(Note 6)	No separate provision	
Trinidad and Tobago	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Turkey	15%	20%	10% if recipient is bank, etc.; 15% in other cases [Note 2]	20%	15%	25%(Note 6)	15%	25%(Note 6)
Turkmenistan	10%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
Uganda	10%	20%	10%	20%	10%	25%(Note 6)	10%	25%(Note 6)
Ukraine	10%-15%	20%	10% [Note 2]	20%	10%	25%(Note 6)	10%	25%(Note 6)
United Arab Emirates	5% if at least 10% of the capital of the company paying dividend is held by the recipient; 15% in other cases	20%	5% if loan is granted by a bank/similar financial institute; 12.5% for others	20%	10%	25% (Note 6)	No separate provision	

United Arab Republic	10%	20%	20%	20%	25% (Note 6)	25% (Note 6)	No separate provision
United Kingdom	15%/10%(Note 7)	20%	10% if interest is paid to a bank; 15% for others [Note 2]	20%	[Note 3]	25% (Note 6)	[Note 3] 25%(Note 6)
United States	15% if at least 10% of the voting stock of the company paying the dividend is held by the recipient; 20% in other cases	20%	10% if loan is granted by a bank/similar institute including insurance company; 15% for others	20%	[Note 3]	25% (Note 6)	[Note 3] 25%(Note 6)
Uruguay	5%	20%	10% [Note 2]	20%	10%	25% (Note 6)	10% 25%(Note 6)
Uzbekistan	15%	20%	15% [Note 2]	20%	15%	25% (Note 6)	15% 25%(Note 6)
Vietnam	10%	20%	10% [Note 2]	20%	10%	25% (Note 6)	10% 25%(Note 6)
Zambia	5% if at least 25% of the shares of the company paying the dividend is held for a period of at least 6 months prior to the date of payment of the dividend; 15% in other cases	20%	10% [Note 2]	20%	10%	25% (Note 6)	

1. 10 per cent of the gross amount of the interest on loans made or guaranteed by a bank or other financial institution carrying on bona fide banking or financing business or by an enterprise which holds directly or indirectly at least 10 per cent of the capital of the company paying the interest.

2. Dividend/interest earned by the Government and certain institutions like the Reserve Bank of India is exempt from taxation in the country of source.

3. Royalties and fees for technical services would be taxable in the country of source at the following rates :

a. 10 per cent in case of rental of equipment and services provided along with know-how and technical services ;

b. any other case—

i. during first five years of the agreement—

- 15 per cent if the payer is Government or specified organisation;

- 20 per cent in other cases;

ii. subsequent years, 15% in all cases.

Income of Government and certain institutions will be exempt from taxation in the country of source.

4. Royalties and fees for technical services would be taxable in the country of source at the following rates :

a. 10 per cent in case of royalties relating to the payments for the use of, or the right to use, industrial, commercial or scientific equipment;

b. 20 per cent in case of fees for technical services and other royalties.

5. 10 per cent of the gross amount of the interest on loans made or guaranteed by a bank or other financial institution carrying on bona fide banking or financing business or by an enterprise which holds directly or indirectly at least 20 per cent of the capital of the company paying the interest.

6. Up to Assessment 2013-14, Royalty and fees for technical service was to be taxed as under:-

Agreement entered between Non-Resident and Indian concern or government-	Tax Rate
After 31 March 1976 but before 1 June 1997	30%
After 31 May 1997 but before 1 June 2005	20%
After 31 May 2005	10%

From Assessment Year 2014-15, Royalty and fees for technical service is to be taxed at the rate of 25% if agreement is made at any time after 31 March 1976.

7. (a) 15 per cent of the gross amount of the dividends where those dividends are paid out of income (including gains) derived directly or indirectly from immovable property within the meaning of Article 6 by an investment vehicle which distributes most of this income annually and whose income from such immovable property is exempted from tax;

(b) 10 per cent of the gross amount of the dividends, in all other cases

[As amended by Finance Act, 2013]