

ABU DHABI GLOBAL MARKET  
سوق أبوظبي العالمي

## **UAE Double Tax Treaty Network**

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Aviation Comparative Jurisdiction Report

April 2019



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This publication is a joint project with  **pwc**

## Disclaimer

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This document sets out certain tax considerations of the cross-border lease of an aircraft used in international traffic to an airline customer (lessee) assuming the lessor has no connection to the lessee jurisdiction other than the physical location of the aircraft, and the lessor does not have a permanent establishment (“PE”) or other form of taxable presence in the lessee jurisdiction.

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The materials contained in this publication were assembled in February 2019 and were based on the laws enforceable and information available at that time. The high level information included in this publication is based on publicly available tax technical information, and information made available to us by the Ministry of Finance of the UAE.





# Executive Summary



## Executive Summary

This report was commissioned by Abu Dhabi Global Market (“ADGM”) and prepared by PwC to analyse the suitability of ADGM as a regional aircraft financing and leasing hub from a tax perspective, with a particular focus on the UAE’s extensive double taxation treaty (“DTT”) network. The report considers both operating and finance leases and compares the UAE to the traditional global hubs for aviation finance and leasing activities: Ireland, Singapore, Hong Kong and Cayman Islands (“comparison jurisdictions”).

The commercial case for aircraft financing and leasing businesses to be based in Abu Dhabi is strong. The UAE is home to two of the world’s top airlines and a further two ambitious low cost carriers. It already has one of the world’s busiest airports and both Abu Dhabi and Dubai are currently working on new huge airports to cement their positions as global aviation hubs. The UAE has impressive aviation credentials, and the wider Middle East region is forecast to be the highest growth aviation market over the next twenty years. With Asia, followed by Africa making up the top three fastest growth aviation regions, Abu Dhabi is ideally geographically positioned to serve these high-growth markets. Further, with aircraft debt and leasing funds emerging as an attractive and better understood asset class, Abu Dhabi, with its abundance of wealth, presents an attractive market to raise capital.

ADGM companies benefit from a full English common law environment, a 0% corporate income tax (CIT) rate, no foreign ownership restrictions, no limits on repatriation of profits and no withholding taxes, as well as independent courts and financial services regulator.

We believe there is a strong case for the incorporation of a regional presence in ADGM, whether lessors, banks, advisory firms or other businesses across the sector ecosystem, to be closer to regional clients and business. With a highly competitive SPV regime, benchmarked against the world’s leading jurisdictions, ADGM also serves as an attractive domicile of SPVs for the structuring of aircraft transactions (with the first transactions successfully concluded). ADGM is aiming to build an active community of businesses to serve the local and regional markets in the aviation finance and leasing sector.

We hope that you find this report useful, and it enables you to identify clear opportunities to enhance operational and tax efficiency for your business. We welcome all discussions of ADGM’s offerings and how the ADGM platform can serve your business needs. Please do not hesitate to contact us.



## Tax Analysis

The UAE double tax treaty network is large, especially for a country that historically has had little taxation. With 90 double tax treaties in force presently, the UAE's double tax treaty network is already wider than countries like Cyprus, Hong Kong, Ireland, Luxembourg, Singapore and Mauritius. If one includes the UAE double tax treaties that have been signed but are awaiting ratification or entry into force, the UAE would have a more extensive double tax treaty network than the existing treaty network of the Netherlands and Switzerland.

Only financial free zones established by Federal Decree such as ADGM allow for the establishment of SPVs. Entities established in ADGM are not subject to foreign ownership restrictions, and ADGM is one of two common law jurisdictions in the UAE.

The UAE does not currently tax the receipt of capital gains, dividends, interest, royalties, service fees and other income earned in the UAE or from foreign jurisdictions, which is a significant advantage over comparable European and other jurisdictions. The UAE also does not impose withholding taxes or other forms of non-resident taxation on the repatriation of income out of the UAE.

There is no personal income tax in the UAE. Employment income, carried interest, director fees and other income can be earned by individuals free of tax in the UAE.

The UAE double tax treaties offer on average the lowest withholding tax rate of all comparison jurisdictions (listed on page 5) for foreign dividends (aside from Cyprus and Ireland assuming a 0% withholding tax on dividends from EU treaty partners under the EU Parent-Subsidiary Directive).

The average reduced interest withholding tax rate under UAE double tax treaties is also generally lower than the comparison jurisdictions, and the UAE's double tax treaties offer very competitive reduced royalty withholding tax rates (despite the ability of some of the comparison jurisdictions to benefit from a 0% withholding tax under the EU Interest and Royalties Directive).

The UAE has the most double tax treaties in Africa compared to the comparison jurisdictions, with 13 in-force treaties and 17 treaties awaiting ratification or entry into force, including in-force tax treaties with key markets such as South Africa and Kenya.

The UAE has joined the OECD Inclusive Framework on Base Erosion and Profit Shifting ("BEPS"), and has signed the Multilateral Convention ("MLI") to Implement Tax Treaty Related Measures to Prevent BEPS.

The UAE Ministry of Finance has set certain minimum substance and procedural requirements that, whilst not overly onerous, must be met by ADGM companies in order to receive a Tax Residency Certificate. A UAE Tax Residence Certificate is typically required to access to the UAE treat network, subject to meeting any additional treaty application requirements in the source countries. With the ongoing implementation of new anti 'treaty shopping' measures as a result of the G20/OECD Base Erosion and Profit Shifting initiative, ADGM's SPV product for aircraft financing and leasing is most appropriately utilised by businesses with active operations in the UAE if treaty benefits are commercially important.

The tax treatment of leases generally depends on whether the lease is treated as an operating lease or as a finance/capital lease. Under an operating lease, the lessee would typically recognise tax deductible lease payments as and when they arise. Under a finance lease, payments made by the lessee would generally represent a finance charge on the lease obligation and principal repayments

### Operating Lease

Aircraft operating lease payments either fall within the "shipping and air transport", "business profits" or "royalties" articles under a double tax treaty. Generally if the wording "for the use of, or right to use industrial, commercial, or scientific equipment" is not included in the royalties article then the income should fall under the more favourable "shipping and air transport" or "business profits" articles where there is typically an exemption from any withholding tax in the jurisdiction of the lessee.

### Finance Lease

If a lease is treated as a finance lease then the finance charge may be subject to interest withholding tax in the jurisdiction of the lessee. This withholding tax on interest may be reduced under the interest article of most of UAE's tax treaties.

### IFRS 16 changes - Effective from 1 January 2019

On the whole, the UAE's treaty network tends to be most favourable for finance leases with low treaty withholding tax rates on interest (equivalent) payments. With the recent IFRS 16 changes, lessees are required to recognise nearly all leases on the balance sheet which will reflect their right to use an asset for a period of time and the associated liability that attracts interest. These IFRS 16 changes may result in lease payments being considered as interest payments with withholding tax applied accordingly, increasing the relative strength of the UAE double tax treaty network.





## Countries in which Lease Payments are Subject to 0% tax under the Terms of the UAE Double Tax Treaties

Country	Operating Lease 0%	Finance Lease 0%	Country	Operating Lease 0%	Finance Lease 0%
1 Albania	✓	✓	38 Liechtenstein	✓*	✓*
2 Algeria	✓	✓	39 Lithuania	✓	✓
3 Andorra	✓*	✓*	40 Luxembourg	✓*	✓*
4 Armenia	✓	✓	41 Macedonia	✓	✓
5 Austria	✓	✓*	42 Maldives	✓	✓*
6 Barbados	✓	✓	43 Malta	✓*	✓*
7 Belgium	✓	✓	44 Mauritius	✓	✓
8 Bosnia and Herzegovina	✓	✓	45 Mexico	✓	✓
9 Brunei	✓	✓	46 Moldova	✓	✓
10 Bulgaria	✓	✓	47 Montenegro	✓	✓
11 Canada	✓	✓*	48 Morocco	✓*	✓
12 Chile	✓**	✓	49 Mozambique	✓	✓
13 Comoro Islands	✓	✓	50 Netherlands	✓*	✓*
14 Croatia	✓	✓	51 Panama	✓	✓
15 Cyprus	✓	✓*	52 Poland	✓	✓
16 Czech Republic	✓	✓	53 Portugal	✓*	✓
17 Egypt	✓	✓	54 Romania	✓	✓
18 Estonia	✓	✓*	55 Senegal	✓	✓
19 Fiji	✓	✓	56 Seychelles	✓	✓
20 Finland	✓	✓*	57 Singapore	✓	✓
21 France	✓	✓*	58 Slovenia	✓	✓
22 Georgia	✓	✓	59 South Africa	✓*	✓
23 Germany	✓	✓*	60 Spain	✓*	✓
24 Guinea	✓	✓	61 Sudan	✓	✓
25 Hong Kong	✓	✓*	62 Switzerland	✓*	✓
26 Hungary	✓*	✓*	63 Syria	✓	✓
27 Indonesia	✓	✓	64 Tajikistan	✓	✓
28 Ireland	✓*	✓	65 Thailand	✓	✓
29 Italy	✓	✓	66 Tunisia	✓	✓
30 Japan	✓	✓	67 Turkmenistan	✓	✓
31 Jersey	✓*	✓*	68 Ukraine	✓	✓
32 Jordan	✓	✓	69 United Kingdom	✓*	✓
33 Korea (Rep.)	✓	✓	70 United States	✓**	✓
34 Kosovo	✓	✓	71 Uzbekistan	✓	✓
35 Kyrgyzstan	✓	✓	72 Venezuela	✓	✓
36 Latvia	✓	✓	73 Yemen	✓	✓
37 Lebanon	✓	✓			

\* Exemption also available at domestic level

\*\* Exemption available under the UAE transport tax treaty (applies only to aircraft operated in international traffic)





## Geographic Highlights

**Africa:** On the whole, the countries of Africa have relatively underdeveloped treaty networks. However, the UAE has the most active treaties in Africa compared to the comparison jurisdictions, with 13 in force treaties and 17 treaties awaiting ratification or entry into force, including double tax treaties with key markets such as Algeria, Egypt, Ethiopia, Kenya, Morocco, Nigeria and South Africa. That is on average five times more double tax treaties than the comparison jurisdictions. 22 out of the remaining 23 African countries do not have double tax treaties in force with the UAE or any of the comparison jurisdictions, placing ADGM on an equal footing from a tax perspective but with a strong geographical advantage.

**Central Asia:** The UAE has double tax treaties with all of the central Asian countries, including three that do not have treaties with any of the comparison countries. ADGM also has a strong geographical advantage in this market.

The UAE has equally favourable or better double tax treaties with the following growth aviation markets compared to the comparison jurisdictions:

Country	Operating Lease	Finance Lease	Geographic Advantage	Country	Operating Lease	Finance Lease	Geographic Advantage
Algeria	Advantage (0%)	Advantage (0%)	✓	Malaysia	-	Advantage (5%)	
Egypt	Advantage (0%)	Equal (10%)	✓	Mexico	Equal (0%)	Equal	
India	-	Advantage (5%) <sup>1</sup>	✓	Pakistan	-	Equal (10%)	✓
Indonesia	Equal (5%)	Advantage (5%)		Philippines	Equal (7.5%)	Advantage (10%)	
Iran (no DTT)	Equal	Equal	✓	Sri Lanka	Advantage (10%)	Equal (10%)	✓
Japan	Equal (0%)	Equal (10%)		Thailand	-	Equal (10%)	
Korea (Rep.)	Equal (0%)	-		Turkey	Equal (10%)	Equal (1%)	✓
Lebanon	Advantage (0%)	Advantage (0%)	✓	United States	Equal (0%) <sup>2</sup>	Equal (0%) <sup>3</sup>	

1. When paid to a bank or similar financial institution
2. Exemption only available where aircraft are operated in international traffic (i.e. not U.S. domestically operated aircraft)
3. The rate is 30% for interest that does not qualify as portfolio interest

### IFRS 16 changes - Effective from 1 January 2019

On the whole, the UAE's treaty network tends to be most favourable for finance leases with low treaty withholding tax rates on interest (equivalent) payments. With the recent IFRS 16 changes, lessees are required to recognise nearly all leases on the balance sheet which will reflect their right to use an asset for a period of time and the associated liability that attracts interest. These IFRS 16 changes may result in lease payments being considered as interest payments with withholding tax applied accordingly, increasing the relative strength of the UAE double tax treaty network.





## Strengths and Opportunities

### Strengths

- Income from operating leases is exempted from source country taxation under 65% of UAE double tax treaties which is a higher proportion than the comparison jurisdictions. Out of the remaining UAE double tax treaties that allow operating lease income to be taxed as royalties, 48% of the double tax treaties offer the best royalty withholding tax rate available when compared to all of the comparison jurisdictions.
- Interest (equivalent) income from finance leases is subject to the lowest withholding tax rate available under 82% of UAE double tax treaties when compared to all of the comparison jurisdictions.
- The UAE currently has 13 double tax treaties in force with African countries (including Egypt). This number will grow to 30 once the double tax treaties signed with Angola, Benin, Botswana, Burundi, Cameroon, Chad, Ethiopia, Equatorial Guinea, Gambia, Libya, Mali, Mauritania, Niger, Nigeria, Rwanda, Uganda and Zimbabwe enter into force (see below). The next best jurisdiction is Singapore which has eight double tax treaties in force with African countries (Ireland has six in force double tax treaties and Hong Kong has one double tax treaty).
- The UAE is better or equally beneficial from a double tax treaty perspective as the comparison jurisdictions in Africa except for Botswana, Rwanda and Zambia.
- The UAE is geographically closer to the GCC, Levant (including Turkey) and most African countries (including Egypt) than the comparison jurisdictions (only Ireland is closer to certain African countries).
- The UAE has a double tax treaty with all Central Asian countries.
- 'Favoured nation' clauses in the UAE's double tax treaties with the below jurisdictions offer ADGM entities the best withholding tax rate available on income from dividends, interest and/or royalties. If the below jurisdictions ever negotiate a more favourable withholding tax rate for dividends, interest and/or royalties with any other jurisdiction, then the more favourable withholding tax rate of that treaty should automatically apply to ADGM entities as well. This positions the UAE as one of the most favourable jurisdictions from a tax perspective for finance leasing into Thailand and Ukraine.

Country	Dividends	Interest	Royalties	Country	Dividends	Interest	Royalties
Czech Republic	✓ GCC <sup>1</sup> (5%)	✓ GCC1 (0%)	✓ GCC <sup>1</sup>	Thailand	✓ (5%)	✓ (10%)	-
Indonesia	✓ GCC1 (10%)	✓ GCC1 (5%)	-	Ukraine	✓ (5%)	✓ (0%)	✓ (0%)
Mexico	-	-	✓ 10	Uruguay	✓ (5%)	-	-
Singapore	(0%) <sup>2</sup>	✓ (0%)	✓ 5				

- A rate other than the one stated in the double tax treaty may apply as the treaty contains a favoured nation clause specific to double tax treaties concluded with other GCC countries
- No withholding tax on dividends under domestic law in Singapore

- The UAE-India double tax treaty offers a 5% withholding tax rate for interest paid by Indian borrowers to a UAE bank or a similar financial institution (withholding tax rate of 12.5% in all other cases), which is better than the withholding tax rate offered in all of India's other double tax treaties (with the exception of the India-Switzerland double tax treaty). These favourable rates may make ADGM attractive for finance leasing into India.
- The UAE has a transport tax treaty with the United States which exempts the leasing of aircraft under an operating lease from US taxation provided the aircraft are operated in international traffic. The interest component of finance leases can benefit from a domestic US withholding tax exemption if certain conditions are met.

### Opportunities






- The UAE has 17 double tax treaties with African countries which are in various stages of negotiation, signature or ratification. Singapore has 5 double tax treaties with African countries that are in the process of negotiation, signature or ratification. Hong Kong and Ireland currently only have one double tax treaty that is either under negotiation or has been signed with African countries.







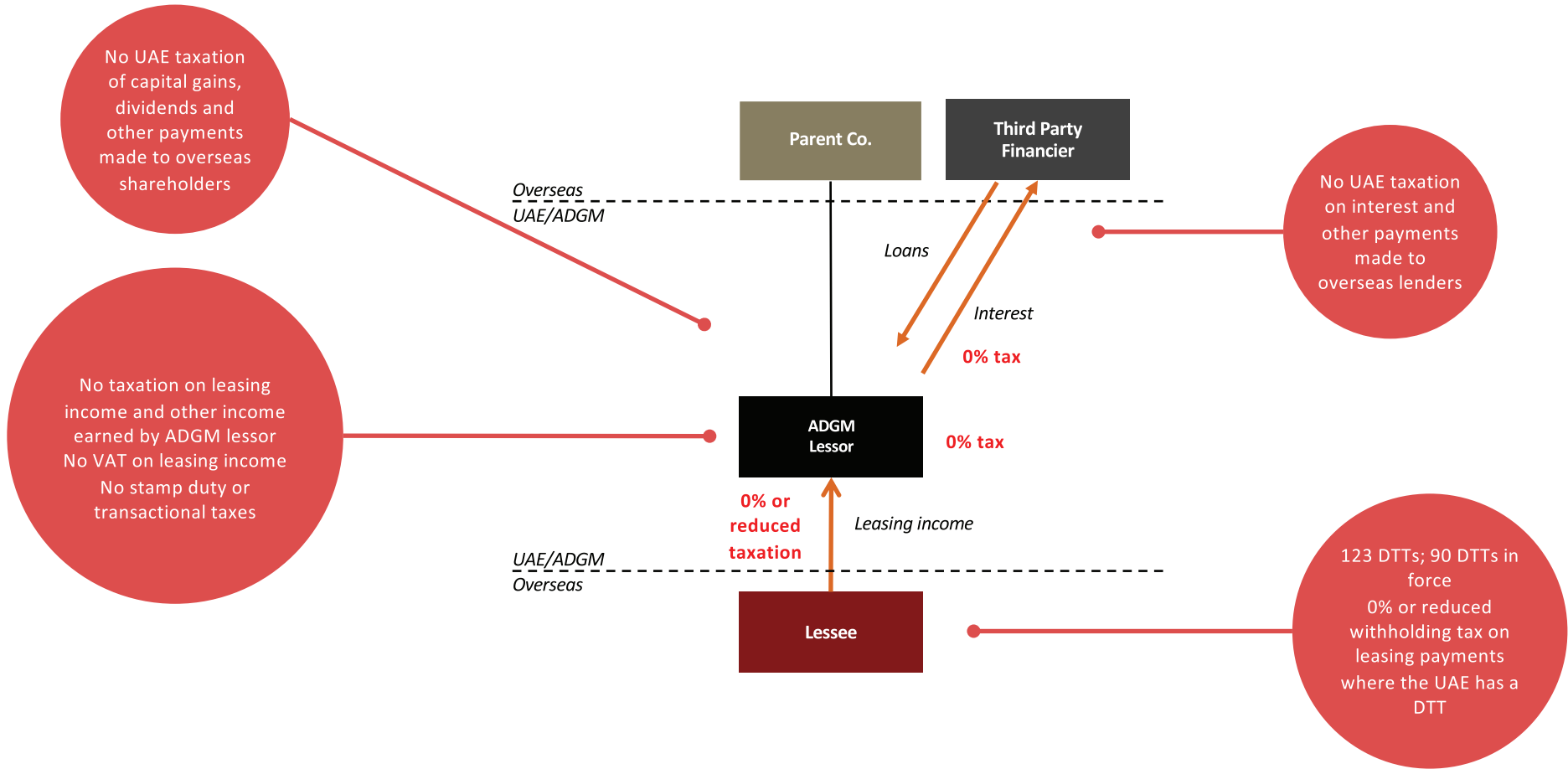
## Comparison of ADGM with other Leasing Centres

	Cayman Islands 	Hong Kong 	Ireland 	Singapore 	ADGM 
<b>Corporate tax rate</b>	No corporate tax imposed in the Cayman Islands	16.5% (will be reduced to 8.25% under new tax regime)	12.5% (25% for non-trading income)	17% (5/10% for approved aircraft lessors)	0% corporate income tax
<b>Tax depreciation</b>	N/A	A lessor is not normally entitled to claim tax depreciation in respect of aircraft acquisition costs for aircraft leased to non-Hong Kong based airlines	Lessors are entitled to claim tax depreciation on the cost of aircraft on a straight line basis at a rate of 12.5% per annum over eight years	Approved aircraft lessors can claim tax depreciation on the aircraft over 5 to 20 years (also may opt to depreciate an aircraft over 3 years under normal rules)	N/A
<b>Withholding tax</b>	No withholding tax	Interest: 0% Royalties: 4.95%	Interest: 20% (0% interest paid to EU or double tax treaty country) Royalties: 0% (20% applies to patent royalties only)	Interest: 15% (0% withholding tax on aircraft financing payments to offshore lenders) Royalties: 10%	No withholding tax
<b>Double tax treaty network</b>	No double tax treaties in-force	39 double tax treaties in-force	73 double tax treaties in-force.	85 double tax treaties in-force; one applicable shipping and air transport tax treaty	90 double tax treaties in-force; two shipping and air transport tax treaties (additional 32 double tax treaties in various stages of negotiation, signature or ratification)
<b>VAT/GST treatment</b>	No VAT/GST	No VAT/GST	Aircraft lease rentals are generally zero-rated for Irish VAT purposes	Cross border leasing is generally zero-rated for GST purposes	VAT was implemented with effect from 1 January 2018. Cross border aircraft leasing is generally zero-rated for VAT purposes
<b>Is stamp duty applicable?</b>	No	No stamp duty is payable	Stamp duty does not apply to aircraft leases	No stamp duty is payable	No
<b>Substance requirements</b>	No	Yes	Yes	Yes	No (certain level of local substance is required to benefit from UAE double tax treaties)
<b>Applicability of transfer pricing legislation</b>	No	There is no comprehensive transfer pricing legislation in Hong Kong	Yes	Yes	No



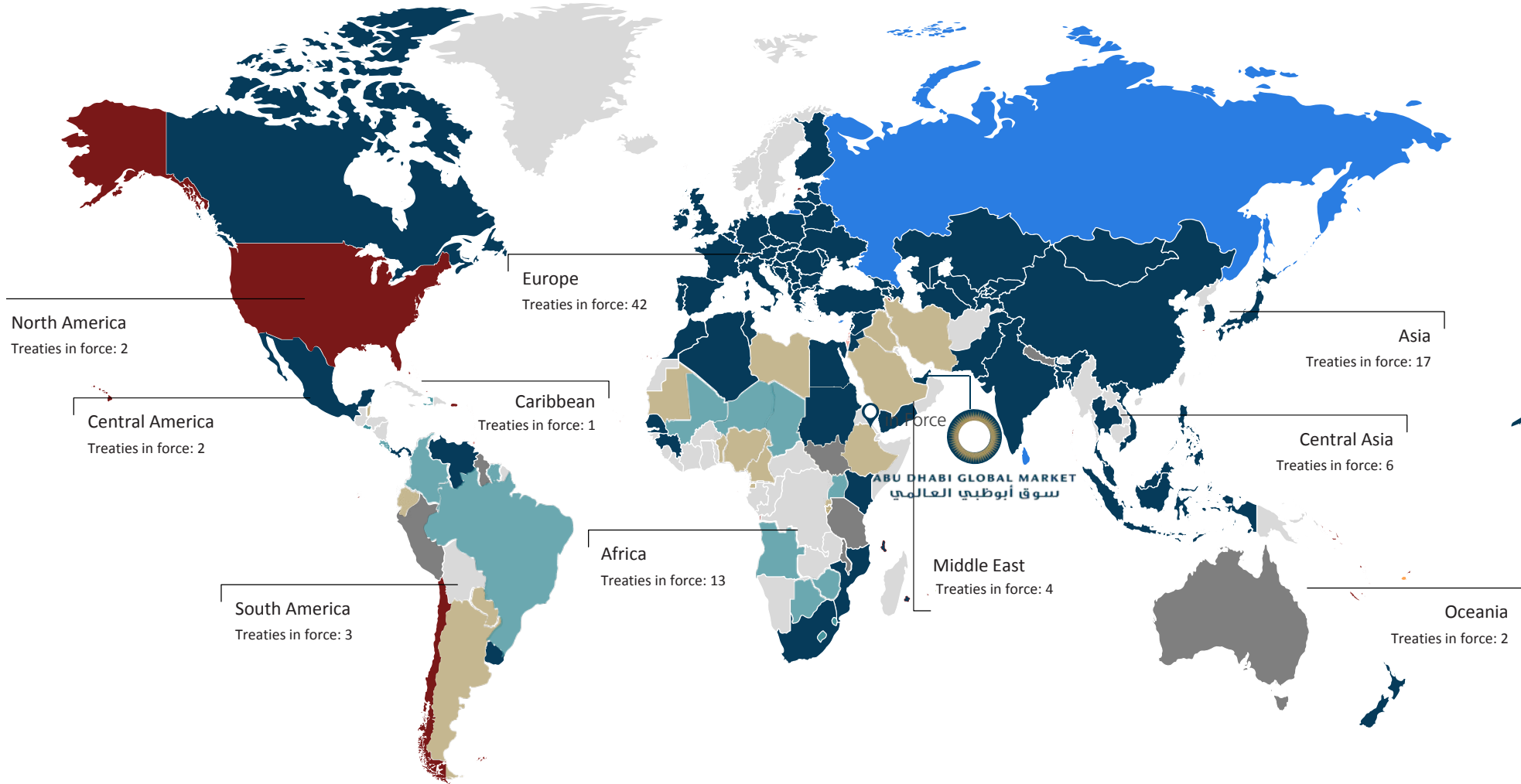


# Double Tax Treaty Application to ADGM Entities – Example of ADGM Value Proposition (ADGM lessor)





## Map of UAE Double Tax Treaties by ontinent



According to Tax Notes database of in-force treaties as at 7 February 2019, subject to change.

**Key :** In Force Shipping and air transport tax treaty In Force (applies to gov't investments only) Pending Signed but not yet ratified Under negotiation No double tax treaty





## List of UAE Double Tax Treaties

List of UAE Double Tax Treaties (Income and Capital)							
In-force double tax treaties (94) <sup>1</sup>				Pending double tax treaties (26)		Signed double tax treaties (but not yet ratified) (7)	Under negotiation (8)
<b>Africa (13)</b>	Uzbekistan	Bosnia and Herzegovina	Portugal	<i>Ratified by both states</i>		<b>Africa (6)</b>	<b>Africa (2)</b>
Algeria	<b>Asia (17)</b>	Bulgaria	Romania	<b>Africa (5)</b>	<b>Europe (1)</b>	Gabon	Malawi
Comoro Islands	Bangladesh	Croatia	Russia <sup>2</sup>	Angola	San Marino	Mali	Tanzania
Egypt	Brunei	Cyprus	Serbia	Burundi	<b>South America (1)</b>	Niger	<b>Asia (2)</b>
Guinea	China (P.R.C.)	Czech Republic	Slovakia	Ethiopia	Paraguay	South Sudan	Mongolia
Kenya	Hong Kong	Estonia	Slovenia	Mauritania	<b>Central America (3)</b>	Uganda	Nepal
Mauritius	India	Finland	Spain	Rwanda	Belize	Zimbabwe	<b>Europe (1)</b>
Morocco	Indonesia	France	Switzerland	<b>Middle East (2)</b>	Costa Rica	<b>South America (1)</b>	Guernsey
Mozambique	Japan	Georgia	Ukraine	Iraq	St Vincent and the Grenadines	Colombia	<b>South America (2)</b>
Senegal	Korea (Rep.)	Germany	United Kingdom	Palestine	<b>North America (1)</b>		Guyana
Seychelles	Malaysia	Greece	<b>Caribbean (1)</b>	<i>Ratified by the UAE</i>	Bermuda		Peru
South Africa	Maldives	Hungary	Barbados	<b>Africa (8)</b>	<b>South America (3)</b>		<b>Oceania (1)</b>
Sudan	Pakistan	Ireland	<b>North America (1)</b>	Benin	Brazil		Australia
Tunisia	Philippines	Italy	Canada	Botswana	Ecuador		
<b>Middle East (4)</b>	Singapore	Jersey	United States <sup>3</sup>	Cameroon	Suriname		
Jordan	Sri Lanka	Kosovo	<b>Central America (2)</b>	Chad			
Lebanon	Thailand	Latvia	Mexico	Equatorial Guinea			
Saudi Arabia	Turkey	Liechtenstein	Panama	Gambia			
Syria	Vietnam	Lithuania	<b>South America (4 )</b>	Libya			
Yemen	<b>Europe (42)</b>	Luxembourg	Argentina	Nigeria			
<b>Central Asia (6)</b>	Albania	Macedonia	Chile <sup>3</sup>	<b>Caribbean (2)</b>			
Azerbaijan	Andorra	Malta	Uruguay	Antigua and Barbuda			
Kazakhstan	Armenia	Moldova	Venezuela	St. Kitts and Nevis			
Kyrgyzstan	Austria	Montenegro	<b>Oceania (2)</b>				
Turkmenistan	Belarus	Netherlands	Fiji				
Tajikistan	Belgium	Poland	New Zealand				

1. According to Tax Notes database of in-force treaties as at 30 April 2019, subject to change (includes the UAE's transport tax treaties with Chile and the United States which provide an exemption for the leasing of aircraft on dry lease terms).
2. Government Investment Income Tax Agreement only. The treaty is a treaty which relates to the dividend, interest and capital gains income of Governments and their financial or investment institutions only.
3. Exemption available for the leasing of aircraft on a bare-boat basis under the UAE transport tax treaty, provided the aircraft are operated in international traffic





## UAE Double Tax Treaties

### Comparison with other major global leasing centres

The tax treatment of leases depends on whether the lease is treated as an operating lease or a finance/capital lease. Under an operating lease, the lessee would typically recognize tax deductible lease payments as and when they arise. Under a finance lease, payments made by the lessee would generally represent interest on the lease obligation and principal repayments.

#### Operating lease

Generally aircraft operating lease payments fall within the royalties article of a double tax treaty if the wording in the article includes "for the use of, or the right to use industrial, commercial, or scientific equipment".

If the above "right to use" language is not included in the royalties article then the income should fall within the typically more favourable "shipping and air transport" or "business profits" articles that often provide an exemption from any withholding tax in the jurisdiction of the lessee (provided in the case of the "shipping and air transport" article, that the aircraft is operated in international traffic).

#### Finance lease

If a lease is treated as a finance lease then interest expense may be subject to withholding tax in jurisdiction of the lessee. This withholding tax on interest may be reduced under the interest article of double tax treaty.

Country	Number of double tax treaties in force <sup>1</sup>	Average network withholding tax rate (among all double tax treaties) <sup>1,2</sup>			% of double tax treaties where leasing income is exempt <sup>3</sup>	Additional transport tax treaties where leasing is exempt <sup>4</sup>
		Dividends	Interest	Royalties		
UAE	90 (123 incl. pending double tax treaties)	3.07%	3.96%	5.47%	65%	2
Ireland	↓ 73	↓ 2.79%	↓ 3.14%	↓ 3.51%	↓ 61%	↓ 0
Singapore	↓ 85	↑ 5.26%	↑ 6.98%	↑ 7.35%	↓ 33%	↓ 1
Hong Kong	↓ 39	↑ 3.54%	↑ 4.09%	↑ 5.59%	↓ 44%	↓ 0
Average of comparison jurisdictions	↓ 66	↑ 3.86%	↑ 4.74%	↑ 5.48%	↓ 46%	↓ 0

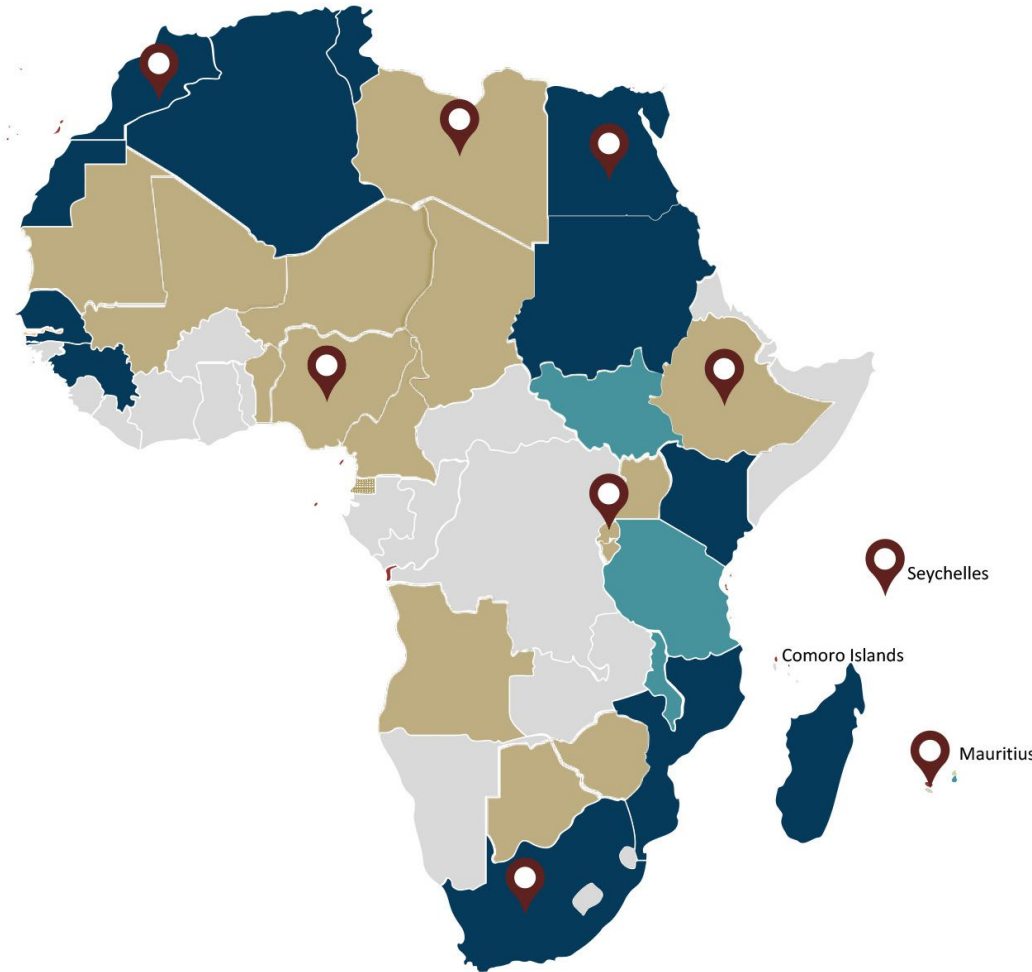
Key: ↗ Advantage UAE  
↖ Advantage comparison jurisdiction

1. According to Tax Notes database of in-force treaties as at 7 February 2019, subject to change.
2. Average takes into account reduced withholding tax rates applicable to qualifying financial and government institutions, and a 0% withholding tax rate under EU directives for the EU comparison jurisdictions.
3. Analysis applies to Article 8 (Shipping and Air Transport) if this article contains the following wording "charter or rent", "charter or rental", "operation or rental of ships or aircraft", "rent", "rental or alienation" or "rental or chartering" but does not contain "incidental to the operation of ships or aircraft in international traffic".
4. Additional number of transport tax treaties which provide an exemption for aircraft leasing and no double tax treaty currently exists.





## Double Tax Treaty Network in Africa



**Key :**

- In Force
- Pending
- Under negotiation
- No double tax treaty
- 📍 Treaty with Singapore

According to Tax Notes database of in-force treaties as at 7 February 2019, subject to change.

- There is no one country that offers pan-African double tax treaty coverage.
- Historically, Singapore has been one of the most favourable jurisdictions from a tax perspective for leasing into Africa, driven by the relative strength of their double tax treaty network in Africa.
- With a number of the fastest growing African economies in close proximity to the Gulf, the UAE has become a gateway for aircraft lessors doing business in Africa. This has been coupled with a fast growing double tax treaty network in the African continent.
- Singapore has nine in-force double tax treaties in Africa. Currently, the UAE has 13 in-force double tax treaties plus 17 double tax treaties awaiting ratification or entry into force.
- The UAE’s double tax treaty network in Africa includes treaties with key markets such as South Africa and Kenya.
- Out of the remaining 23 African countries with which the UAE currently does not have a double tax treaty, 22 also do not have treaties with Singapore (or any of the other comparison jurisdictions), placing the UAE on a comparable footing from a tax perspective but with a strong geographical advantage.



# Operating Lease Summary of Key Findings



## UAE Double Tax Treaty Positioning Compared to all Comparison Jurisdictions

UAE tax positioning									
UAE has tax advantage		UAE double tax treaty equally strong as comparison jurisdictions				UAE (no signed double tax treaty) equal to comparison jurisdictions			
<b>Africa</b>	<b>Asia</b>	<b>Africa</b>	<b>Europe</b>		San Marino*	<b>Africa</b>	<b>Middle East</b>		Dominica
Algeria	Azerbaijan	Angola*	Albania		Slovenia	Burkina Faso	Bahrain		Dominican Republic
Benin*	Maldives	Chad*	Andorra		Spain	Cape Verde	Iran		Grenada
Burundi*	Sri Lanka	Ethiopia*	Austria		Switzerland	Central African Republic	Kuwait		Haiti
Cameroon*	Europe	Libya*	Belgium		Ukraine	Congo (Dem. Rep.)	Asia		Jamaica
Comoro Islands	Kosovo	Mauritius	Bosnia and Herzegovina		United Kingdom	Congo (Rep.)	Afghanistan		Puerto Rico
Egypt	Caribbean	Mauritania*	Bulgaria		Caribbean	Djibouti	Bhutan		St. Lucia
Equatorial Guinea*	Antigua and Barbuda*	Morocco	Cyprus		Barbados	Eritrea	Cambodia		St. Maarten
Gambia*	St. Kitts and Nevis*	South Africa	Estonia		Central America	Eswatini	Korea (Dem. People's Rep.)		Trinidad and Tobago
Guinea	Central America	Uganda*	Finland		Mexico	Gabon	Macau		North America
Mozambique	Costa Rica*	Zimbabwe*	France		North America	Ghana	Nepal*		Greenland
Senegal	Panama	Middle East	Hungary		Bermuda	Guinea-Bissau	Timor-Leste		Central America
Sudan	South America	Palestine*	Ireland		United States**	Ivory Coast	Europe		El Salvador
Tunisia	Chile**	Central Asia	Italy		South America	Lesotho	Gibraltar		Guatemala
<b>Middle East</b>	Colombia*	Kazakhstan	Jersey		Argentina*	Liberia	Guernsey*		Honduras
Iraq*	Ecuador*	Uzbekistan	Latvia		Brazil*	Madagascar	Isle of Man		Nicaragua
Jordan	Paraguay*	Asia	Liechtenstein			Malawi*	Monaco		South America
Lebanon	Uruguay	Armenia	Lithuania			Mali	Norway		Bolivia
Syria	Venezuela	Bangladesh	Luxembourg			Namibia	Sweden		Guyana
Yemen	Oceania	Brunei	Macedonia			Niger	Caribbean		Peru*
<b>Central Asia</b>	Fiji	Georgia	Moldova			Sierra Leone	Anguilla		Oceania
Kyrgyzstan		Indonesia	Malta			Somalia	Aruba		American Samoa
Tajikistan		Japan	Montenegro			South Sudan*	Bahamas		Cook Islands
Turkmenistan		Korea (Rep.)	Netherlands			Tanzania*	British Virgin Islands		Kiribati
		Philippines	Poland			Togo	Cayman Islands		Marshall Islands
		Singapore	Portugal				Cuba		Papua New Guinea
		Turkey	Romania				Curacao		

Highlighted in red, jurisdictions which have an in force, pending or signed double tax treaty with the UAE but no in-force double tax treaty with any of the comparison jurisdictions.

\* UAE double tax treaty has not yet entered into force.

\*\* Exemption available under the UAE transport tax treaty, provided the aircraft is operated in international traffic.

● Exemption available under UAE double tax treaty

◐ Lower withholding tax available under UAE double tax treaty

○ No domestic withholding tax on royalties or equipment rental under domestic law

◑ No further relief available under double tax treaty with the UAE and/or comparison country – the lower (or equal) domestic rate will apply

○ No treaty with the UAE or comparison country; domestic rate applies







### UAE Double Tax Treaty Positioning Compared to all Comparison Jurisdictions

Source country	Ireland	Singapore	Hong Kong	Source country	Ireland	Singapore	Hong Kong	Source country	Ireland	Singapore	Hong Kong
<b>Africa</b>				Indonesia	✓	✓	=	Hungary	=	=	=
Algeria	✓	✓	✓	Japan	✓	✓	=	Ireland	-	=	=
Comoro Islands	✓	✓	✓	Korea (Rep.)	=	✓	✓	Italy	=	✓	✓
Egypt	=	✓	✓	Malaysia	x	x	x	Jersey	=	=	=
Guinea	✓	✓	✓	Maldives	✓	✓	✓	Kosovo	✓	✓	✓
Kenya	✓	x*	x	Pakistan	x	x	✓	Latvia	=	=	=
Mauritius	✓	=	✓	Philippines	=	=	=	Liechtenstein	=	=	=
Morocco	=	=	=	Russia	x	x	x	Lithuania	=	✓	✓
Mozambique	✓	✓	✓	Singapore	=	-	✓	Luxembourg	=	=	=
Senegal	✓	✓	✓	Sri Lanka	✓	✓	✓	Macedonia	=	✓	✓
Seychelles	✓	x	✓	Thailand	x	x	=	Malta	=	=	=
South Africa	=	=	=	Turkey	=	=	✓	Moldova	=	✓	✓
Sudan	✓	✓	✓	Vietnam	x	x	=	Montenegro	=	✓	✓
Tunisia	✓	✓	✓	<b>Caribbean</b>				Netherlands	=	=	=
<b>Middle East</b>				Barbados	✓	=	✓	Poland	=	✓	✓
Jordan	✓	✓	✓	<b>Central America</b>				Portugal	=	✓	=
Lebanon	✓	✓	✓	Mexico	=*	✓	✓	Romania	=	✓	✓
Syria	✓	✓	✓	Panama	✓	✓	✓	Serbia	x	✓	✓
Yemen	✓	✓	✓	<b>Europe</b>				Slovakia	x	=	✓
<b>Central Asia</b>				Albania	=	=	✓	Slovenia	=	=	✓
Kazakhstan	✓	=	✓	Andorra	=	=	=	Spain	=	=	=
Kyrgyzstan	✓	✓	✓	Austria	=	✓	=	Switzerland	=	=	=
Tajikistan	✓	✓	✓	Belarus	x*	=	✓	Ukraine	=	✓	✓
Turkmenistan	✓	✓	✓	Belgium	=	✓	=	United Kingdom	=	=	=
Uzbekistan	=	=	✓	Bosnia and Herzegovina	=	✓	✓	<b>North America</b>			
<b>Asia</b>				Bulgaria	=	✓	✓	Canada	x*	✓	=
Armenia	=	✓	✓	Croatia	=	✓	✓	United States*	=	=*	=
Azerbaijan	✓	✓	✓	Cyprus	=	=	✓	<b>South America</b>			
Bangladesh	✓	=	✓	Czech Republic	x	x	=	Chile*	✓	✓	✓
Brunei	✓	=	=	Estonia	=	✓	✓	Uruguay	✓	✓	✓
China (P.R.C.)	x	x	x	Finland	=	✓	✓	Venezuela	✓	✓	✓
Georgia	=	=	✓	France	=	=	=	<b>Oceania</b>			
Hong Kong	x	=	-	Germany	x	x	✓	Fiji	✓	✓	✓
India	x	=	=	Greece	x	✓	✓	New Zealand	=	x	x

**Key:**

- ✓ UAE is in an advantageous position in comparison with relevant other jurisdiction
- = UAE is in an equal position in comparison with relevant other jurisdiction

- x UAE is in a disadvantageous position in comparison with relevant other jurisdiction
- \* Exemption available provided the aircraft is operated in international traffic





## Double Tax Treaty Comparison with key Jurisdictions

Exempt under BP or SAT articles of DTT (0% WHT)

Source country	UAE	Cayman Islands	Hong Kong	Ireland	Singapore
Albania	●			●	●
Algeria	●*				
Andorra	○	○	○	○	○
Armenia	●			●	
Austria	●		●	n/a	n/a
Azerbaijan	n/a				
Bangladesh	n/a				n/a
Barbados	●				●
Belarus	n/a			●*	n/a
Belgium	●		●	n/a	n/a
Bosnia and Herzegovina	●*			●	
Brunei	●*		●*		●*
Bulgaria	●			●	n/a
Canada	n/a		n/a	●*	n/a
Chile	●*			n/a	
China (P.R.C.)	n/a		n/a	n/a	n/a
Comoro Islands	●				
Croatia	●			●	
Cyprus	●			n/a	●
Czech Republic	n/a		n/a	●	n/a
Egypt	●			n/a	n/a
Estonia	●			n/a	n/a
Fiji	●				n/a

Royalties (where lease payments are not exempt under BP or SAT articles)

UAE	Cayman Islands	Hong Kong	Ireland	Singapore	Domestic WHT rate (royalties)	UAE DTT WHT rate (royalties)	Best comparison DTT rate (royalties)
n/a			n/a	n/a	15%	5%	5%
n/a					9.6/24% <sup>4</sup>	10%	
○	○	○	○	○	0%	0%	0%
n/a			n/a		10%	5%	5%
n/a		n/a	●	●	20%	0%	0%
●					0/14% <sup>5</sup>	10%	
●				●	20%	10%	10%
n/a				n/a	15%	0%	8%
●			n/a	●	15%	5%	5%
n/a		n/a	●	● <sup>6</sup>	30%	5%	0%
n/a			●		10%	5%	0%
n/a		n/a		n/a	10%	5%	5%
n/a			n/a	●	10%	5%	5%
●		●	n/a	●	25%	10%	10%
n/a			●		20%	n/a	5%
●		●	● <sup>7</sup>	● <sup>7</sup>	10%	10%	5%
n/a					10%	0%	
n/a			n/a		15%	5%	0%
n/a			●	n/a	10%	0%	0%
● <sup>2</sup>		●	n/a	●	15/35% <sup>8</sup>	10% <sup>2</sup>	5%
n/a			●	●	20%	10%	10%
n/a			● <sup>3</sup>	●	10%	0%	5%
n/a				●	15%	10%	10%

**Key :**

- Full exemption available for the lease of aircraft under double tax treaty (or EU directive for withholding tax)
- Further relief available under royalties article of double tax treaty (UAE has tax advantage)
- Further relief available under royalties article of double tax treaty but not full exemption (equally strong as comparison jurisdictions)
- No withholding tax on royalties or equipment rental under domestic law
- Further relief available under royalties article of double tax treaty but not as favourable as double tax treaty with the UAE
- Further relief available under royalties article of double tax treaty but not full exemption (comparison jurisdiction has tax advantage)
- No further relief available under double tax treaty – the lower (or equal) domestic rate will apply
- No treaty; zero domestic withholding tax rate applies
- \* Exemption available for the lease of aircraft under SAT article provided the aircraft is operated in international traffic





## Double Tax Treaty Comparison with key Jurisdictions

Source country	Exempt under BP or SAT articles of DTT (0% WHT)					Royalties (where lease payments are not exempt under BP or SAT articles)							
	UAE	Cayman Islands	Hong Kong	Ireland	Singapore	UAE	Cayman Islands	Hong Kong	Ireland	Singapore	Domestic WHT rate (royalties)	UAE DTT WHT rate (royalties)	Best comparison DTT rate (royalties)
Finland	●			●	n/a	n/a			n/a	●	20%	0%	0%
France	n/a		●	n/a	n/a	●		n/a	●	●	33.33/75% <sup>9</sup>	0%	0%
Georgia	●			●	●	n/a		n/a	n/a		5/15% <sup>10</sup>	0%	0%
Germany	n/a			●	n/a	●		n/a	●		15%	10%	8%
Greece	n/a			n/a		●		● <sup>3</sup>			20%	5%	0%
Guinea	●					n/a					15%	0%	
Hong Kong	n/a		n/a	●		●		n/a	n/a		4.95%/5%	5%	3%
Hungary	○	○	○	○		n/a	○	○	○	○	0%	0%	0%
India	n/a			●*	n/a	●		n/a	●	●	10%	10%	10%
Indonesia	n/a		n/a		n/a	●		●	●		20%	5%	5%
Ireland	○	○	○	n/a	○	○	○	n/a	○	○	0%	0%	3%
Italy	●*		n/a	n/a	n/a	n/a		●	●	●	30%	10%	0%
Japan	●		●	n/a	n/a	n/a		n/a	●	●	10%	10%	10%
Jersey	○	○	○	○	○	○	○	○	○	○	0%	0%	0%
Jordan	●					n/a					10%	10%	
Kazakhstan	n/a				n/a	●				● <sup>1</sup>	15%	10%	10%
Kenya	n/a		● <sup>11</sup>		●	●					20%	10%	
Korea (Rep.)	●			●*	n/a	n/a		n/a	●		20%	0%	0%
Kosovo	●										10%	0%	
Kyrgyzstan	●*					n/a					10%	5%	
Latvia	○ <sup>12</sup>			○ <sup>1</sup>	○	○ <sup>12</sup>		○ <sup>1</sup>	○		0/15% <sup>10</sup>	5%	0%
Lebanon	●					n/a					7.5%	5%	
Liechtenstein	○	○	○	○	○	○	○	○	○	○	0%	0%	3%

**Key :**

- Full exemption available for the lease of aircraft under double tax treaty (or EU directive for withholding tax)
- Further relief available under royalties article of double tax treaty (UAE has tax advantage)
- Further relief available under royalties article of double tax treaty but not full exemption (equally strong as comparison jurisdictions)
- No withholding tax on royalties or equipment rental under domestic law
- Further relief available under royalties article of double tax treaty but not as favourable as double tax treaty with the UAE
- Further relief available under royalties article of double tax treaty but not full exemption (comparison jurisdiction has tax advantage)
- No further relief available under double tax treaty – the lower (or equal) domestic rate will apply
- No treaty; zero domestic withholding tax rate applies
- \* Exemption available for the lease of aircraft under SAT article provided the aircraft is operated in international traffic





## Double Tax Treaty Comparison with key Jurisdictions

Exempt under BP or SAT articles of DTT (0% WHT)

Source country	UAE	Cayman Islands	Hong Kong	Ireland	Singapore
Lithuania	●			n/a	n/a
Luxembourg	○	○	○	○	○
Macedonia	●*			●*	
Malaysia	n/a		n/a	n/a	n/a
Maldives	●				
Malta	○	○	○	○	○
Mauritius	●				n/a
Mexico	●*		n/a	●*	n/a
Moldova	●			●	
Montenegro	●			●	
Morocco	○	○	○	○	○
Mozambique	●				
Netherlands	○	○	○	○	○
New Zealand	n/a		n/a	n/a	n/a
Pakistan	n/a			●	n/a
Panama	●*			n/a	n/a
Philippines	n/a				n/a
Poland	●*			●	n/a
Portugal	●		●	n/a	n/a
Romania	●		○	●	n/a
Russia	n/a		●	●	●
Senegal	●				
Serbia	n/a			●*	

Royalties (where lease payments are not exempt under BP or SAT articles)

UAE	Cayman Islands	Hong Kong	Ireland	Singapore	Domestic WHT rate (royalties)	UAE DTT WHT rate (royalties)	Best comparison DTT rate (royalties)
n/a			● <sup>1,3</sup>	●	0/10% <sup>13</sup>	5%	5%
n/a	○	○	○	○	0%	0%	0%
n/a			n/a		10%	5%	0%
●		●	●	●	10%	10%	8%
					10%	0%	
○	○	○	○	○	0%	0%	3%
n/a				●	15%	0%	0%
n/a		●	n/a	●	25%	10%	10%
n/a			n/a		12%	6%	5%
n/a			n/a		9%	10%	10%
○	○	○	○	○	0% <sup>14</sup>	10%	10%
n/a					20%	0%	
n/a	○	○	○	○	0%	0%	0%
●		●	●	● <sup>1</sup>	15%	10%	5%
●			n/a	●	15%	12%	0%
n/a			●	●	12.5%	5%	5%
●				●	7.5%	10%	15/25%
n/a			n/a	●	20%	5%	10%
n/a		n/a	● <sup>3</sup>	●	0/25/35% <sup>15</sup>	5%	10%
n/a		●	n/a	●	16/50% <sup>16</sup>	3%	3%
●		n/a	n/a	n/a	20%	Gov't only	0%
n/a					20%	5%	
●			n/a		20/25% <sup>22</sup>	10%	10%

**Key :**

- Full exemption available for the lease of aircraft under double tax treaty (or EU directive for withholding tax)
- Further relief available under royalties article of double tax treaty (UAE has tax advantage)
- Further relief available under royalties article of double tax treaty but not full exemption (equally strong as comparison jurisdictions)
- No withholding tax on royalties or equipment rental under domestic law
- Further relief available under royalties article of double tax treaty but not as favourable as double tax treaty with the UAE
- Further relief available under royalties article of double tax treaty but not full exemption (comparison jurisdiction has tax advantage)
- No further relief available under double tax treaty – the lower (or equal) domestic rate will apply
- No treaty; zero domestic withholding tax rate applies
- \* Exemption available for the lease of aircraft under SAT article provided the aircraft is operated in international traffic





## Double Tax Treaty Comparison with key Jurisdictions

Source country	Exempt under BP or SAT articles of DTT (0% WHT)					Royalties (where lease payments are not exempt under BP or SAT articles)							
	UAE	Cayman Islands	Hong Kong	Ireland	Singapore	UAE	Cayman Islands	Hong Kong	Ireland	Singapore	Domestic WHT rate (royalties)	UAE DTT WHT rate (royalties)	Best comparison DTT rate (royalties)
Seychelles	n/a				●	●				n/a	15%	5%	8%
Singapore	●			●	n/a	n/a		n/a	n/a	n/a	2/3% <sup>18</sup>	5%	5%
Slovakia	n/a			●	n/a	●	○	n/a	●	n/a	19/35%	10%	5%
Slovenia	●			●	●	n/a	○	n/a	n/a	n/a	15%	5%	5%
South Africa	○	○	○	○	○	○	○	○	○	○	0%/15% <sup>19</sup>	10%	0%
Spain	○	○	○	○	○	○	○	○	○	○	0% <sup>20</sup>	0%	5%
Sri Lanka	n/a				n/a	●			●	●	15%	10%	15%
Sudan	●*					n/a					15%	5%	
Switzerland	○	○	○	○	○	○	○	○	○	○	0%	0%	0%
Syria	●*					n/a					7%	18%	
Tajikistan	●*					n/a					15%	10%	
Thailand	n/a		n/a	●*	n/a	●		●	n/a	●	15%	15%	8%
Tunisia	●*					n/a					15/25% <sup>21</sup>	7.5%	
Turkey	n/a			n/a	n/a	●		●	●	●	20%	10%	10%
Turkmenistan	n/a					●					15%	10%	
Ukraine	●			●	n/a	n/a		n/a	●	●	15%	0% <sup>1</sup>	7.5%
United Kingdom	○	○	○	○	○	○	○	○	○	○	0%	0%	0%
United States	●*		n/a <sup>22</sup>	●	●*	n/a		n/a	n/a	n/a	30%	n/a	0%
Uruguay	n/a					●					12%	5%	
Uzbekistan	●			●	●	n/a		n/a	n/a	n/a	20%	10%	5%
Venezuela	●*					n/a					34%	10%	
Vietnam	n/a		n/a	●	n/a	●	○	●	n/a	●	10%	10%	5%
Yemen	●*					n/a					10%	10%	

**Key :**

- Full exemption available for the lease of aircraft under double tax treaty (or EU directive for withholding tax)
- Further relief available under royalties article of double tax treaty (UAE has tax advantage)
- Further relief available under royalties article of double tax treaty but not full exemption (equally strong as comparison jurisdictions)
- No withholding tax on royalties or equipment rental under domestic law
- Further relief available under royalties article of double tax treaty but not as favourable as double tax treaty with the UAE
- Further relief available under royalties article of double tax treaty but not full exemption (comparison jurisdiction has tax advantage)
- No further relief available under double tax treaty – the lower (or equal) domestic rate will apply
- No treaty; zero domestic withholding tax rate applies
- \* Exemption available for the lease of aircraft under SAT article provided the aircraft is operated in international traffic





## Double Tax Treaty Comparison with key Jurisdictions

1. A rate other than the one stated in the double tax treaty may be applicable with respect to royalties as the treaty contains a favoured nation clause.
2. A rate other than the one stated in the double tax treaty may apply as the treaty contains a favoured nation clause specific to double tax treaties concluded with other GCC countries.
3. No withholding tax under EU directive.
4. Royalties paid for the use of industrial equipment in the frame of an international leasing contract is subject to a tax allowance of 60% applied on the basis of such withholding tax. Thus, the effective tax rate of withholding tax will be  $9.6\% = 24\% * (1 - 60\%)$ .
5. Rental income and royalties are subject to a 14% rate. However, there is a potential exemption if a non-resident lessor of aircraft is tax resident of a state which has a double tax treaty with Azerbaijan.
6. In the case of equipment leasing, the 5% rate is levied on 60% of the gross amount of royalties.
7. If the operating lease payments are treated as royalties for the use of (or the right to use) industrial, commercial, or scientific equipment, the rate applies on 60% of the gross amount of the lease payments.
8. Royalties paid to non-residents are subject to withholding tax at a rate of either 15% or 35% (section 36 of the ZDP). The 35% rate applies to royalties derived by recipients who are not resident in:
  - another EU Member State or an EEA country; or
  - a country with which the Czech Republic has concluded (i) a tax treaty, (ii) a TIEA (Cayman Islands signed an Exchange of Information Agreement with the Czech Republic on 26 October 2012), or (iii) a multilateral agreement providing for exchange of information to which both the Czech Republic and that country are a party.
9. A 33 1/3% withholding tax is levied on the gross amount of patent royalties paid by resident companies to non-resident companies. This withholding tax is not final; it is credited against the corporate income tax assessed under the general rules, but any excess is not refundable. With effect from 1 January 2013, a 75% withholding tax (previously 50%) applies to royalties paid to companies situated in a non-cooperative state or territory (NCST), unless the paying company proves that the payments are not motivated by tax avoidance.
10. Payments of royalties and other non-specified services from a Georgian source to an entity registered in a tax haven or offshore jurisdiction are subject to withholding tax at the rate of 15%.
11. Exemption available under transport tax treaty provided the aircraft is operated in international traffic.
12. Payments for aircraft used in international flights and payments for the use of industrial, commercial, or scientific equipment are exempt. Royalty payments may attract withholding tax at a rate of 15% if they are made to companies in tax havens (includes companies registered in the Cayman Islands and Hong Kong). In certain cases, the company may obtain State Revenue Service (SRS) relief from withholding tax, provided that the payment has not been made to reduce the taxable base.
13. Equipment rental are not subject to withholding tax. Anti-avoidance measures include the rules aimed at counteracting transactions with residents of listed tax havens (includes entities registered in the Cayman Islands, Hong Kong and the UAE). Payments made by Lithuanian entities to foreign entities registered or organised in a listed tax haven are not deductible for corporate income tax purposes, unless certain conditions are met.
14. As of 1 January 2011, payments made to non-residents for the right to use, chartering, rent and maintenance of aircraft operating in international traffic are exempt from the 10% withholding tax (article 6-I-C-4° of the GTC).
15. All royalties (including payments in respect of know-how, leasing of equipment and technical assistance) are subject to a 25% final withholding tax. A 35% withholding tax applies to royalties paid or made available to persons resident in a black-listed jurisdiction without a permanent establishment in Portugal. However, there is a potential domestic exemption for payments made by public service companies (which includes certain airlines).
16. With effect from 1 January 2013, a 50% withholding tax applies to income paid to a country with which Romania does not have any signed convention providing for exchange of information, to the extent such payments result from artificial transactions.
17. Special withholding tax rules apply in case of non-resident entities from tax havens. Withholding tax is payable at the rate of 25% on royalties, income from lease of immovable property and other assets, and service fees paid to non-resident entities from tax havens (includes companies registered in the Cayman Islands and Hong Kong).
18. Rentals and charter fees paid to non-resident lessors of aircraft are subject to withholding tax of 2%. The withholding tax rate is 3% if paid to a resident of tax haven country (which includes Cayman Islands).
19. Non-residents that carry on business as an owner or charterer of ships or aircraft are exempt from income tax on their receipts and accruals derived from a source or deemed source located within South Africa (section 10(1)(cG)). The exemption only applies "if a similar exemption or equivalent relief is provided by the country of which such person is resident".
20. Aircraft lease rental income arising from aircraft operating in international air traffic is exempt from the income tax on non-residents (article 14 of the LIRNR).
21. The withholding tax rate is increased to 25% if the non-resident recipient is based in a tax haven jurisdiction.
22. The transport tax treaty covers shipping activities only and does not include aircraft.





# Finance Lease Summary of Key Findings



## UAE Double Tax Treaty Positioning Compared to all Comparison Jurisdictions

UAE tax positioning													
UAE has tax advantage			UAE double tax treaty equally strong as comparison jurisdictions			UAE (no signed double tax treaty) equal to comparison jurisdictions							
<b>Africa</b>	India**	●	<b>Africa</b>	Maldives	○	Malta	○	<b>Africa</b>	Asia	Curaçao	○		
Algeria	●	Indonesia	●	Angola*	○	Montenegro	●	Burkina Faso	Afghanistan	○	Dominica	○	
Burundi*	●	Malaysia	●	Benin*	●	Netherlands	○	Cape Verde	Bhutan	○	Dominican Republic	○	
Cameroon*	●	Philippines	●	Chad*	○	Sri Lanka	●	Serbia	Central African Republic	○	Cambodia	○	
Comoro Islands	●	<b>Caribbean</b>	●	Egypt	●	Thailand	●	Spain	Congo (Dem. Rep.)	○	Korea (Dem. People's Rep.)	○	
Equatorial Guinea*	●	Barbados	●	Ethiopia*	○	Vietnam	●	Switzerland	Congo (Rep.)	○	Macau	○	
Gambia*	●	<b>Europe</b>	●	Libya*	○	<b>Europe</b>	○	Turkey	Djibouti	○	Nepal*	○	
Guinea	●	Albania	●	Mauritius	●	Andorra	○	Ukraine	Eritrea	○	<b>Middle East</b>	Trinidad and Tobago	○
Kenya	●	Kosovo	●	Morocco	●	Austria	○	United Kingdom**	Eswatini	○	Bahrain	○	
Mauritania*	●	San Marino*	●	Nigeria*	○	Belarus	○	<b>North America</b>	Gabon	○	Iran	○	
Mozambique	●	<b>Caribbean</b>	●	Uganda*	○	Belgium**	●	Bermuda	Ghana	○	Kuwait	○	
Senegal	●	Antigua and Barbuda*	●	Zimbabwe*	○	Bosnia and Herzegovina	○	Canada	Guinea-Bissau	○	Oman	○	
Seychelles	●	St. Kitts and Nevis*	●	<b>Middle East</b>	○	Cyprus	○	<b>Central America</b>	Ivory Coast	○	Europe	○	
Sudan	●	<b>Central America</b>	○	Iraq*	○	Czech Republic	○	Mexico	Lesotho	○	Gibraltar	○	
Tunisia	●	Costa Rica*	●	Palestine*	○	Estonia	○	Panama	Liberia	○	Guernsey*	○	
<b>Middle East</b>	○	<b>South America</b>	○	Saudi Arabia*	●	Finland	○	<b>South America</b>	Madagascar	○	Isle of Man	○	
Jordan	●	Colombia*	●	Syria	○	France	○	Argentina*	Malawi*	○	Monaco	○	
Lebanon	●	Paraguay*	●	<b>Central Asia</b>	○	Germany	○	Brazil*	Mali	○	Norway	○	
Yemen	●	Uruguay	●	Kazakhstan	○	Hungary	○	○	Namibia	○	Sweden	○	
<b>Central Asia</b>	○	Venezuela	○	<b>Asia</b>	○	Ireland	○	○	Niger	○	<b>Caribbean</b>	<b>Oceania</b>	
Kyrgyzstan	●	<b>Oceania</b>	○	Armenia	○	Italy	○	○	Sierra Leone	○	Anguilla	American Samoa	
Tajikistan	●	Fiji	○	Bangladesh	○	Jersey	○	○	Somalia	○	Aruba	Cook Islands	
Turkmenistan	●	○	○	China (P.R.C.)	○	Latvia	○	○	South Sudan*	○	Bahamas	Kiribati	
<b>Asia</b>	○	○	○	Georgia	○	Liechtenstein	○	○	Tanzania*	○	British Virgin Islands	Marshall Islands	
Azerbaijan	●	○	○	Hong Kong	○	Lithuania	○	○	Togo	○	Cayman Islands	Papua New Guinea	
Brunei	●	○	○	Japan	○	Luxembourg	○	○	Cuba	○	○	○	

### Key :

Highlighted in red, jurisdictions which have an in force, pending or signed double tax treaty with the UAE but no in-force double tax treaty with any of the comparison jurisdictions.

\* UAE double tax treaty has not yet entered into force.

\*\* On the assumption that interest is paid by the borrower to a UAE bank or a similar financial institution, higher rates of withholding tax apply in all other cases.

\*\*\* A rate other than the one stated in the double tax treaty may apply as the treaty contains a favoured nation clause.

● Zero withholding tax rate available under UAE double tax treaty

○ Lower withholding tax available under UAE double tax treaty

○ No domestic withholding tax

○ No further relief available under double tax treaty with the UAE and/or comparison country – the lower (or equal) domestic rate will apply

○ No treaty with the UAE or comparison country; domestic rate applies







### UAE Double Tax Treaty Positioning Compared to all Comparison Jurisdictions

Source country	Ireland	Singapore	Hong Kong	Source country	Ireland	Singapore	Hong Kong	Source country	Ireland	Singapore	Hong Kong
<b>Africa</b>				Indonesia	✓	✓	✓	Hungary	=	=	=
Algeria	✓	✓	✓	Japan	=	=	=	Ireland	-	✓	=*
Comoro Islands		✓	✓	Korea (Rep.)	x	=	=	Italy	=	✓	✓
Egypt	=	✓	✓	Malaysia	✓	✓	✓	Jersey	=	=	=
Guinea	✓	✓	✓	Maldives	=	=	=	Kosovo	✓	✓	✓
Kenya	✓	✓	✓	Pakistan	=	=	=	Latvia	=	=	✓
Mauritius	✓	=	✓	Philippines	✓	✓	✓	Liechtenstein	=	=	=
Morocco	=	=	=	Russia	x	x	x	Lithuania	=	✓	✓
Mozambique	✓	✓	✓	Singapore	✓	-	✓	Luxembourg	=	=	=
Senegal	✓	✓	✓	Sri Lanka	✓	=	✓	Macedonia	x	✓	✓
Seychelles	✓	✓	✓	Thailand	=	=	=	Malta	=	=	=
South Africa	x	x	=	Turkey	=	=	=	Moldova	x	✓	✓
Sudan	✓	✓	✓	Vietnam	=	=	=	Montenegro	=	=	=
Tunisia	✓	✓	✓	<b>Caribbean</b>				Netherlands	=	=	=
<b>Middle East</b>				Barbados	✓	✓	✓	Poland	x*	✓	✓
Jordan	✓	✓	✓	<b>Central America</b>				Portugal	x	=	=
Lebanon	✓	✓	✓	Mexico*	✓	✓	=*	Romania	x	✓	=
Syria	=	=	=	Panama	=	=	✓	Serbia	=	✓	✓
Yemen	✓	✓	✓	<b>Europe</b>				Slovakia	x	x	✓
<b>Central Asia</b>				Albania	✓	✓	✓	Slovenia	x	=	✓
Kazakhstan	✓	=	✓	Andorra	=	=	=	Spain	=	✓	✓
Kyrgyzstan	✓	✓	✓	Austria	=	=	=	Switzerland	=	✓	✓
Tajikistan	✓	✓	✓	Belarus	=	=	✓	Ukraine	=	✓	✓
Turkmenistan	✓	✓	✓	Belgium*	✓	✓	=*	United Kingdom	=	=	=
Uzbekistan	x	x	✓	Bosnia and Herzegovina	=	✓	✓	<b>North America</b>			
<b>Asia</b>				Bulgaria	x	✓	✓	Canada	=	=	=
Armenia	=	✓	✓	Croatia	x	✓	✓	<b>Oceania</b>			
Azerbaijan	✓	✓	✓	Cyprus	=	=	=	Fiji	✓	✓	✓
Bangladesh	✓	=	✓	Czech Republic	=	=	=	New Zealand*	=	x*	x*
Brunei	✓	✓	✓	Estonia	=	=	=	<b>South America</b>			
China (P.R.C.)	✓	=	=	Finland	=	=	=	Uruguay	✓	✓	✓
Georgia	=	✓	✓	France	=	=	=	Venezuela	✓	✓	✓
Hong Kong	=	=	-	Germany	=	=	=				
India*	✓	✓	✓	Greece	x	✓	✓				

**Key:**

- ✓ UAE is in an advantageous position in comparison with relevant other jurisdiction
- = UAE is in an equal position in comparison with relevant other jurisdiction

- x UAE is in a disadvantageous position in comparison with relevant other jurisdiction
- On the assumption that interest is paid by the borrower to a bank or a similar financial institution, higher rates of withholding tax apply in all other cases





## Double Tax Treaty Comparison with key Jurisdictions

Source country	Interest					Domestic WHT rate (interest)	UAE DTT WHT rate (interest)	Best comparison DTT rate (interest)
	UAE	Cayman Islands	Hong Kong	Ireland	Singapore			
Albania	●			●	●	15%	0%	5%
Andorra	○	○	○	○	○	0%	0%	0%
Algeria	●					10%	0%	
Armenia	●			● <sup>1,5</sup>		10%	0%	0%
Austria	○	○	○	○	○	0%	0%	0%
Azerbaijan	●					10%	7%	
Bangladesh	●				●	20%	10%	10%
Barbados	●				●	15%	0%	12%
Belarus	●			●	●	10%	5%	5%
Belgium	● <sup>6</sup>		● <sup>7</sup>	● <sup>3</sup>	●	30%	0/5% <sup>6</sup>	15%
Bosnia and Herzegovina	●			●		10%	0%	0%
Brunei	●		● <sup>4</sup>		● <sup>4</sup>	15%	0%	5/10% <sup>4</sup>
Bulgaria	●			● <sup>3</sup>	●	10%	2%	5%
Canada	○	○	○	○	○	0/25% <sup>8</sup>	10%	10%
China (P.R.C.)	●		●	●	● <sup>4</sup>	10%	7%	7%
Comoro Island	●					10%	0%	
Croatia	●			●		15%	5%	0%
Cyprus	○	○	○	○	○	0%	0%	0%
Czech Republic	● <sup>2</sup>		●	●	●	15%/35% <sup>9</sup>	0% <sup>2</sup>	0%
Egypt	●			●	●	20%	10%	10%
Estonia	○	○	○	○	○	0%	0%	0%
Fiji	●				●	10%	0%	10%
Finland	○	○	○	○	○	0%	0%	0%
France	○	○	○	○	○	0/75% <sup>10</sup>	0%	0%
Georgia	●			●	●	5%	0%	0%
Germany	○	○	○	○	○	0%	0%	0%
Greece	●			● <sup>3</sup>		15%	5%	5%
Guinea	●					10%	0%	
Hong Kong	○	○	n/a	○	○	0%	0/5%	0/10%
Hungary	○	○	○	○	○	0%	0%	0%

**Key :**

- Full exemption available under double tax treaty (or EU directive for withholding tax)
- Further relief available under interest article of double tax treaty (UAE has tax advantage)
- Further relief available under interest article of double tax treaty (UAE equally strong as comparison jurisdictions)
- No withholding tax on interest under domestic law
- Further relief available under interest article of double tax treaty but not as favourable as double tax treaty with the UAE
- Further relief available under interest article of double tax treaty but not full exemption (comparison jurisdiction has tax advantage)
- No further relief available under double tax treaty – the lower (or equal) domestic rate will apply
- No treaty; zero domestic withholding tax rate applies





## Double Tax Treaty Comparison with key Jurisdictions

Source country	Interest					Domestic WHT rate (interest)	UAE DTT WHT rate (interest)	Best comparison DTT rate (interest)
	UAE	Cayman Islands	Hong Kong	Ireland	Singapore			
India	🟢 <sup>4</sup>			🟡	🟡 <sup>4</sup>	20%	5/12.5% <sup>4</sup>	10%
Indonesia	🟢 <sup>2</sup>		🟢		🟢	20%	5% <sup>2</sup>	10%
Ireland	🟢		🟢 <sup>6</sup>	n/a	🟡	20%	0%	0%
Italy	🟢		🟡	🟢 <sup>3</sup>	🟡	26%	0%	10%
Japan	🟢		🟢	🟢	🟢	20%	10%	10%
Jersey	🟡	🟡	🟡	🟡	🟡	0%	0%	0%
Jordan	🟢					10%	7%	
Kazakhstan	🟢				🟢 <sup>1</sup>	15%	10%	10%
Kenya	🟢					15/25%	10%	
Korea (Rep.)	🟡		🟡	🟢	🟡	20%	10%	0%
Kosovo	🟢					10%	5%	
Kyrgyzstan	🟢					10%	0%	
Latvia	🟡 <sup>11</sup>			🟡 <sup>11</sup>	🟡 <sup>11</sup>	0/5/15% <sup>11</sup>	2.5%	0%
Lebanon	🟢					10%	0%	
Liechtenstein	🟡	🟡	🟡		🟡	0%	0%	0%
Lithuania	🟢			🟢 <sup>3</sup>	🔴	10%	0%	10%
Luxembourg	🟡	🟡	🟡		🟡	0%	0%	0%
Macedonia	🟡			🟢		10%	5%	0%
Malaysia	🟢		🟡	🟡	🟡	15%	5%	10%
Maldives	🟡	🟡	🟡	🟡	🟡	0%	0%	
Malta	🟡	🟡	🟡	🟡	🟡	0%	0%	0%
Mauritius	🟢				🟢	0/15% <sup>12</sup>	0%	0%
Mexico	🟢 <sup>4</sup>		🟢 <sup>4</sup>	🟡 <sup>4</sup>	🟡 <sup>4</sup>	10/15/21% <sup>13</sup>	4.9/10% <sup>4</sup>	4.9/10% <sup>4</sup>
Moldova	🟡			🟡		12%	6%	5%
Montenegro	🔴			🔴		9%	10%	10%
Morocco	🔴			🔴	🔴	10%	10%	10%
Mozambique	🟢					20%	0%	
Netherlands	🟡	🟡	🟡	🟡	🟡	0%	0%	0%
New Zealand	🟡		🟢 <sup>14</sup>	🟡	🟢 <sup>14</sup>	15%	10%	0%
Pakistan	🔴			🔴	🔴	10%	10%	10%

**Key :**

- 🟢 Full exemption available under double tax treaty (or EU directive for withholding tax)
- 🟢 Further relief available under interest article of double tax treaty (UAE has tax advantage)
- 🟢 Further relief available under interest article of double tax treaty (UAE equally strong as comparison jurisdictions)
- 🟡 No withholding tax on interest under domestic law
- 🟡 Further relief available under interest article of double tax treaty but not as favourable as double tax treaty with the UAE
- 🟡 Further relief available under interest article of double tax treaty but not full exemption (comparison jurisdiction has tax advantage)
- 🔴 No further relief available under double tax treaty – the lower (or equal) domestic rate will apply
- 🟡 No treaty; zero domestic withholding tax rate applies





## Double Tax Treaty Comparison with key Jurisdictions

Source country	Interest					Domestic WHT rate (interest)	UAE DTT WHT rate (interest)	Best comparison DTT rate (interest)
	UAE	Cayman Islands	Hong Kong	Ireland	Singapore			
Panama	🟢			🟢	🟢	12.5%	5%	5%
Philippines	🟢				🟡	10/20/30% <sup>15</sup>	10%	15%
Poland	🟡			🟢 <sup>3</sup>	🟡	20%	5%	0/10%
Portugal	🟡		🟡	🟢 <sup>3</sup>	🟡	0/25/35% <sup>16</sup>	10%	0/10%
Romania	🟡		🟡	🟢 <sup>3</sup>	🟡	16/50% <sup>17</sup>	3%	3%
Russia	🔴		🟢	🟢	🟡	20%	Gov't only	0%
Senegal	🟢					16%	5%	
Serbia	🟢			🟢		20/25% <sup>18</sup>	10%	10%
Seychelles	🟢				🟡	15%	0%	12%
Singapore	🟢				n/a	15%	0%	5%
Slovakia	🟡			🟢	🟢	19/35%	10%	0%
Slovenia	🟡			🟢 <sup>3</sup>	🟡	15%	5%	5%
South Africa	🟡		🟡	🟢	🟢	15%	10%	0%
Spain	🟢		🟡	🟢	🟡	19%	0%	0%
Sri Lanka	🟢				🟢	20%	10%	10%
Sudan	🟢					7%	0%	
Switzerland	🟢		🟢	🟢	🟡	35%	0%	0%
Syria	🔴					7.5%	7.5/10%	
Tajikistan	🟢					12%	0%	
Thailand	🟢 <sup>1,4</sup>		🟢 <sup>19</sup>	🟢 <sup>19</sup>	🟢 <sup>1,4</sup>	15%	10/15%	10/15%
Tunisia	🟢 <sup>21</sup>					5/20/25% <sup>20</sup>	2.5/5/10% <sup>21</sup>	
Turkey	🔴			🔴	🔴	1% <sup>22</sup>	10% <sup>22</sup>	7.5/10% <sup>22</sup>
Turkmenistan	🟢					15%	0%	
Ukraine	🟢 <sup>1</sup>			🟢 <sup>1</sup>	🟡	15%	0%	0%
United Kingdom	🟢		🟢	🟢	🟢	20%	0% <sup>4</sup>	0%
Uruguay	🟢					12%	10%	
Uzbekistan	🔴			🟡	🟡	10%	10%	5%
Venezuela	🟢					4.95/34% <sup>23</sup>	10%	
Vietnam	🔴		🔴	🔴	🔴 <sup>2</sup>	5%	10%	5/10%
Yemen	🟢					10%	0%	

### Key :

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- 🟡 Further relief available under interest article of double tax treaty but not full exemption (comparison jurisdiction has tax advantage)
- 🔴 No further relief available under double tax treaty – the lower (or equal) domestic rate will apply
- ⬜ No treaty; zero domestic withholding tax rate applies





## Double Tax Treaty Comparison with key Jurisdictions

1. A rate other than the one stated in the double tax treaty may be applicable with respect to interest as the treaty contains a favoured nation clause.
2. rate other than the one stated in the double tax treaty may be applicable with respect to interest as the treaty contains a favoured nation clause specific to double tax treaties concluded with other GCC countries.
3. No withholding tax under EU directive.
4. The lower rate applies to interest paid to a bank or financial institution.
5. The 0% rate applies to interest paid to the state or any institution wholly owned by the state. The 5% rate applies, inter alia, to interest paid to banks. The 10% rate applies in other cases.
6. The zero rate applies to payments to financial institutions.
7. The 0% rate applies, inter alia, to interest paid to banks and interest on commercial debt-claims. Conditions may apply.
8. Interest paid to an arm's length non-resident is exempt from withholding tax effective 1 January 2008. There is no withholding tax where the beneficial owner of the interest is resident in the other country and dealing at arm's length with the payer.
9. Czech-source interest paid to Czech tax non-residents is subject to 15% withholding tax, unless subject to domestic exemption or a double tax treaty stipulates otherwise. Interest paid by Czech tax residents to entities that are residents of countries outside of the European Union and European Economic Area, and countries with which the Czech Republic does not have an enforceable double tax treaty or TIEA, are subject to 35% withholding tax.
10. In general, no withholding tax is levied on interest paid to non-resident companies. Only interest paid to a company located in an non-cooperative state or territory (NCST) is subject to a final withholding tax at a rate of 75%, unless the taxpayer proves that the payments are not motivated by tax avoidance.
11. With effect from 1 January 2014, interest paid to non-resident companies is exempt from withholding tax, except in the case of payments to tax-haven ("blacklisted" jurisdictions) entities (includes entities registered in the Cayman Islands and Hong Kong).
12. There is no withholding tax in Mauritius for payments made by the holder of a Global Business License or Banking License to non-residents not carrying out any business in Mauritius.
13. 10% rate applies to interest paid to foreign government financing entities, to duly registered foreign banks and other entities that provide financing with funds obtained by issuing publicly traded debt instruments abroad, registered with the Ministry of Finance. Otherwise a 15% or 21% withholding tax rate applies.
14. Interest is generally exempt if paid to an independent financial institution.
15. Interest is generally subject to withholding tax of 30%. Interest on foreign loans, i.e. those payable in foreign currency to OBUs and FCDUs, is subject to withholding tax at 10%. Any other form of interest on foreign loans payable to non-resident foreign corporations is subject to a withholding tax of 20%.
16. A 35% withholding tax applies to (i) interest paid to accounts held on behalf of non-identified third parties, and (ii) interest paid to persons resident in a black-listed jurisdiction without a permanent establishment in Portugal. However, there is a potential domestic exemption for payments made by public service companies (which includes certain airlines).
17. With effect from 1 January 2013, a 50% withholding tax applies to interest paid to a country with which Romania does not have any signed convention providing for exchange of information, to the extent such payments result from artificial transactions.
18. An increased withholding tax of 25% applies to interest paid by resident entities to entities resident in a jurisdiction with a preferential tax regime (includes entities registered in the Cayman Islands and Hong Kong).
19. The 10% rate applies to (i) interest paid to a bank or financial institution (including an insurance company) and (ii) interest paid with respect to indebtedness arising as a consequence of a sale on credit of any equipment, merchandise, or services, except where the sale was between persons not dealing with each other at arm's length.
20. A reduced final withholding tax rate of 5% applies to interest paid to non-resident banks. The withholding tax rate is increased to 25% if the non-resident recipient is based in a tax haven jurisdiction.
21. The 2.5% rate applies if the beneficial owner of the interest is a financial institution; this rate will be raised to a maximum of 5% if Tunisia revises upward the rate provided under its domestic law. The 10% rate applies in other cases.
22. Finance leasing is subject to a withholding tax rate of 1%.
23. Interest paid to non-resident financial institutions is subject to a final withholding tax at the rate of 4.95%.





# UAE Double Tax Treaty Network and Rates



## UAE Double Tax Treaty Network & Rates (1/6)

Country	Signature Date	In Force Date	Effective Date	Dividends		Interest		Royalties	
				Domestic	Double Tax Treaty	Domestic	Double Tax Treaty	Domestic	Double Tax Treaty
<b>Albania</b>	14-Mar-14	26-Mar-15	26-Mar-15	15	0/5/10	15	0	15	5
<b>Algeria</b>	24-Apr-01	25-Jun-04	31-Dec-04	15	0	10/40	0	4.8/24	10
<b>Andorra</b>	28-Jul-15	1-Aug-2017	1-Jan-18	0	0	0	0	5	0
<b>Angola</b>	8-Feb-18	Not yet in force	Text not available	5/10	Pending	10/15	Pending	10	Pending
<b>Antigua &amp; Barbuda</b>	15-Jan-17	Not yet in force	Not yet effective	25	0	25	0	25	0
<b>Argentina</b>	3-Nov-16	Not yet in force	Not in force	0/35	10/15	15.05/35	12	35	10
<b>Armenia</b>	20-Apr-02	19-Dec-04	1-Jan-04	10	3	0/10	0	10	5
<b>Australia</b>	Under negotiation	N/A	N/A	0/30	Pending	0/10	Pending	30	Pending
<b>Austria</b>	23-Sep-03	1-Sep-04	1-Jan-05	27.5	0	0	0	20	0
<b>Azerbaijan</b>	20-Nov-06	25-Jul-07	1-Jan-08	10	10	10	7	14	5/10
<b>Bangladesh</b>	27-Mar-00	1-Jan-13	1-Jul-13	20	5/10	20	10	20	10
<b>Barbados</b>	22-Sep-14	18-Feb-16	1-Jan-17	0/15/25	0	0/15	0	15	0
<b>Belarus</b>	30-Sep-96	6-Jan-04	1-Jan-95	12	5/10	0/10	5	15	5/10
<b>Belgium</b>	18-Sep-06	30-Apr-07	30-Apr-07	30	5/10	30	5	30	5
<b>Belize</b>	2-Oct-15	Not yet in force	Not yet effective	0	0	0	0	0	0
<b>Benin</b>	4-Mar-13	Not yet in force	Not yet effective	5/7/10/15	0	15	0	12	0
<b>Bermuda</b>	2-Dec-15	Not yet in force	Text not available	0	Pending	0	Pending	0	Pending
<b>Bosnia and Herzegovina</b>	27-Jun-07	16-Nov-08	1-Jan-09	5	5/10	10	0	10	5
<b>Botswana</b>	12-Oct-18	Not yet in force	Text not available	7.5	Pending	15	Pending	15	Pending
<b>Brazil</b>	12-Nov-18	Not yet in force	Text not available	0	Pending	15/25	Pending	15/25	Pending
<b>Brunei</b>	5-May-13	21-Nov-14	1-Jan-15	0	0	2.5	0	10	5
<b>Bulgaria</b>	9-Jun-02	25-May-04	1-Jan-04	5	5	10	2	10	5
<b>Burundi</b>	16-Feb-17	Not yet in force	Not yet effective	15	0	15	0	15	0





## UAE Double Tax Treaty Network & Rates (2/6)

Country	Signature Date	In Force Date	Effective Date	Dividends		Interest		Royalties	
				Domestic	Double Tax Treaty	Domestic	Double Tax Treaty	Domestic	Double Tax Treaty
Cameroon	17-Jul-17	Not yet in force	Not yet effective	16.5	10	0/16.5	7	15	10
Canada	1-Jul-93	28-Aug-94	1-Jan-95	25	5/10/15	0/25	10	25	0/10
Chad	4-Sep-18	N/A	N/A	20	Pending	25	Pending	25	Pending
China (P.R.C.)	27-Mar-00	2-Jan-01	1-Jan-02	10	7	10	7	10	10
Colombia	12-Nov-17	Not yet in force	Not yet effective	5	5/15	5/15	10	15	10
Comoro Islands	26-Mar-15	2-Jan-18	1-Jan-19	10	0	10	0	10	0
Costa Rica	3-Oct-17	Not yet in force	Not yet effective	5/15	5	0/15	5	25	12
Croatia	13-Jul-17	28-Sep-18	1-Jan-19	12	5	15	5	15	5
Cyprus	27-Feb-11	2-Apr-13	1-Jan-14	0	0	0	0	5/10	0
Czech Republic	30-Sep-96	2-Aug-97	1-Jan-98	15/35	5 <sup>1</sup>	15/35	0 <sup>1</sup>	15/35	10 <sup>1</sup>
Ecuador	9-Nov-16	Not yet in force	Not yet effective	0/10 <sup>2</sup>	10	22/35 <sup>2</sup>	10	22/35 <sup>2</sup>	10/15
Egypt	12-Apr-94	16-Jul-95	1-Jan-96	5/10	0	0/20	10	20	10
Equatorial Guinea	19-Oct-16	Not yet in force	Not yet effective	25	0	25	0	10	0
Estonia	20-Apr-11	29-Mar-12	1-Jan-11	0	0	0	0	10	0
Ethiopia	12-Apr-15	Not yet in force	Not yet effective	10	5	10	5	5	0/5
Fiji	2-Sep-12	20-Dec-13	20-Dec-13	9	0	10	0	15	10
Finland	12-Mar-96	26-Dec-97	1-Jan-97	20	0	0/20	0	20	0
France	19-Jul-89	1-Jul-90	1-Jul-90	15/30/75 <sup>2</sup>	0	0/75 <sup>2</sup>	0	33.33/75 <sup>2</sup>	0
Gambia	27-Jul-15	Not yet in force	Not yet effective	15	0	15	0	15	0
Georgia	25-Nov-10	28-Apr-11	1-Jan-12	5	0	5/15 <sup>2</sup>	0	5/15 <sup>2</sup>	0
Germany	1-Jul-10	14-Jul-11	1-Jan-09	25	5/10/15	0/25	0	15	10
Greece	18-Jan-10	17-Dec-14	1-Jan-14	15	5	15	5	20	10
Guernsey	Under negotiation	N/A	N/A	0	Pending	0	Pending	0	Pending







## UAE Double Tax Treaty Network & Rates (3/6)

Country	Signature Date	In Force Date	Effective Date	Dividends		Interest		Royalties	
				Domestic	Double Tax Treaty	Domestic	Double Tax Treaty	Domestic	Double Tax Treaty
<b>Guinea (Conakry)</b>	13-Nov-11	9-Jul-14	9-Jul-14	10	0	10	0	15	0
<b>Guyana</b>	Under negotiation	N/A	N/A	20	Pending	20	Pending	20	Pending
<b>Hong Kong</b>	11-Dec-14	10-Dec-15	1-Jan-16	0	5	0	5	4.95	5
<b>Hungary</b>	30-Apr-13	4-Oct-14	1-Jan-15	0	0	0	0	0	0
<b>India</b>	29-Apr-92	22-Sep-93	1-Jan-94	0	10	20	5/12.5	10	10
<b>Indonesia</b>	30-Nov-95	8-Nov-96	1-Jan-97	20	5/10 <sup>3</sup>	20	5 <sup>3</sup>	20	5
<b>Iraq</b>	3-Oct-17	Not yet in force	Text not available	0	Pending	15	Pending	15	Pending
<b>Ireland</b>	1-Jul-10	6-Feb-11	12-Jun-09/1-Jan-11	20	0	0/20	0	20	0
<b>Italy</b>	22-Jan-95	5-Nov-97	1-Jan-93	1.2/26	5/15	12.5/26	0	30	10
<b>Japan</b>	2-May-13	24-Dec-14	1-Jan-15	15/20	5/10	20	10	20	10
<b>Jersey</b>	20-Apr-16	15-Feb-17	1-Jan-17	0	0	0	0	0	0
<b>Jordan</b>	5-Apr-16	10-Jan-17	1-Jan-18	0	7	10	7	10	10
<b>Kazakhstan</b>	22-Dec-08	27-Nov-13	1-Jan-14	15/20 <sup>2</sup>	5	15/20 <sup>2</sup>	10	15/20 <sup>2</sup>	10
<b>Kenya</b>	21-Nov-11	22-Feb-17	1-Jan-18	10	5	15/25	10	20	10
<b>Korea (R.O.K.)</b>	22-Sep-03	2-Mar-05	1-Jan-03	20	5/10	14/20	10	20	0
<b>Kosovo</b>	20-May-16	3-Jul-17	1-Jan-17	0	5	10	5	10	0
<b>Kyrgyzstan</b>	7-Dec-14	16-Dec-16	1-Jan-16	10	0	10	0	10	5
<b>Latvia</b>	11-Mar-12	11-Jun-13	1-Jan-14	0/20 <sup>2</sup>	5	0/15 <sup>2</sup>	2.5	0/15 <sup>2</sup>	5
<b>Lebanon</b>	17-May-98	21-May-99	1-Jan-00	10	0	5/10	0	7.5	0/5
<b>Libya</b>	1-Apr-13	Not yet in force	Not yet effective	0	0	0	5	0	10
<b>Liechtenstein</b>	1-Oct-15	24-Feb-17	1-Jan-18	0	0	0	0	0	0
<b>Lithuania</b>	30-Jun-13	19-Dec-14	1-Jan-15	0/15 <sup>2</sup>	0/5	10	0	10	5
<b>Luxembourg</b>	20-Nov-05	19-Jun-09	1-Jan-10	15	5/10	0	0	0	0





## UAE Double Tax Treaty Network & Rates (4/6)

Country	Signature Date	In Force Date	Effective Date	Dividends		Interest		Royalties	
				Domestic	Double Tax Treaty	Domestic	Double Tax Treaty	Domestic	Double Tax Treaty
Macedonia (FYR)	26-Oct-15	7-Feb-17	1-Jan-18	10	5	10	5	10	5
Malawi	Under negotiation	N/A	N/A	10	Pending	15	Pending	15	Pending
Malaysia	28-Nov-95	10-Feb-00	1-Jan-01	0	0	15	5	10	10
Maldives	17-Oct-17	21-Jun-18	1-Jan-17	0	0	0	0	10	0
Mali	6-Mar-18	Not yet in force	Text not available	10	Pending	10/13	Pending	17.5	Pending
Malta	13-Mar-06	18-May-07	1-Jan-08	0	0	0	0	0	0
Mauritania	21-Oct-15	Not yet in force	Not yet effective	10	0	10	0	0	0
Mauritius	18-Sep-06	31-Jul-07	1-Jan-08	0	0	0/15	0	0/15	0
Mexico	20-Nov-12	9-Jul-14	1-Jan-15	10	0	4.9/10/15/21/35/40 <sup>2</sup>	4.9/10	25/35/40 <sup>2</sup>	10 <sup>2</sup>
Moldova	10-Jul-17	26 July-18	1 Jan-17	6	5	12	6	12	6
Mongolia	Under negotiation	N/A	N/A	20	Pending	20	Pending	20	Pending
Montenegro	26-Mar-12	10-Dec-13	1-Jan-14	9	5/10	9	10	9	5/10
Morocco	9-Feb-99	2-Jul-00	1-Jan-01	15	5/10	10	10	10	10
Mozambique	24-Sep-03	15-Apr-04	1-Jan-04	10/20	0	20	0	20	0/5
Nepal	Under negotiation	N/A	N/A	5	Pending	15	Pending	15	Pending
Netherlands	8-May-07	2-Jun-10	2-Jun-10/1-Jan-11	15	5/10	0	0	0	0
New Zealand	23-Sep-03	29-Jul-04	1 Sep 04/1 Jan 05	0/15/30	15	0/15	10	15	10
Niger	10-December-18	Not yet in force	Text not available	10	Pending	15/25	Pending	16	Pending
Nigeria	19-Jan-16	Not yet in force	Not yet effective	0/7.5/10	7.5	0/7.5/10	7.5	7.5/10	7.5
Pakistan	7-Feb-93	30-Nov-94	1-Jan-95	12.5	10/15	10	10	15	12
Palestine	24-Sep-12	Not yet in force	Not yet effective	10	0	0	0	10	0
Panama	13-Oct-12	23-Oct-13	1-Jan-14	5/10/20	5	5/12.5	5	12.5	5
Paraguay	16-Jan-17	Not yet in force	Not yet effective	15	15	30	6/15	30	15





## UAE Double Tax Treaty Network & Rates (5/6)

Country	Signature Date	In Force Date	Effective Date	Dividends		Interest		Royalties	
				Domestic	Double Tax Treaty	Domestic	Double Tax Treaty	Domestic	Double Tax Treaty
Philippines	22-Sep-03	2-Oct-08	1-Jan-09	15/30	10/15	10/20/30	10	30	10
Poland	31-Jan-93	21-Apr-94	1-Jan-95	19	5	20	5	20	5
Portugal	17-Jan-11	22-May-12	1-Jan-12/21-Jun-12	25/35 <sup>2</sup>	5/15	25/35 <sup>2</sup>	10	25/35 <sup>2</sup>	5
Romania	11-Apr-93	23-Jan-96	1-Jan-97	5	3	16	3	16	3
Russia*	7-Dec-11	23-Jun-13	1-Jan-14	15	Gov't only	20	Gov't only	20	Gov't only
Rwanda	1-Nov-17	Not yet in force	Text not available	15	Pending	15	Pending	15	Pending
San Marino	11-Jul-18	Not yet in force	Text not available	5	0	13	0	20	10
Saudi Arabia	23-May-18	Not yet in force	Text not available	5	Pending	5	Pending	15	Pending
Senegal	22-Oct-15	2-Jul-17	1-Jan-15	10	5	16	5	20	5
Serbia	13-Jan-13	2-Jul-13	1-Aug-13	20/25 <sup>2</sup>	5/10	20/25 <sup>2</sup>	10	20/25 <sup>2</sup>	10
Seychelles	19-Sep-06	23-Apr-07	1-Jan-08	15	0	15	0	15	5
Singapore	1-Dec-95	30-Aug-96	1-Jan-92	0	0 <sup>3</sup>	15	0 <sup>3</sup>	10	5 <sup>3</sup>
Slovakia	21-Dec-15	1-Apr-17	1-Jan-18	0/35 <sup>2</sup>	0	19/35 <sup>2</sup>	10	19/35 <sup>2</sup>	10
Slovenia	12-Oct-13	27-Aug-14	1-Jan-15	15	5	15	5	15	5
South Africa	23-Nov-15	23-Dec-16	1-Jan-17	20	5/10	15	10	15	10
South Sudan	Under negotiation	N/A	N/A	10	Pending	10	Pending	10	Pending
Spain	5-Mar-06	2-Apr-07	2-Apr-07	19	5/15	19	0	24	0
Sri Lanka	24-Sep-93	1-Apr-04	1-Apr-04	14	10	20	10	20	10
St. Kitts and Nevis	24-Nov-16	Not yet in force	Not yet effective	15	0	15	0	15	0
St. Vincent and the Grenadines	25-Nov-18	Not yet in force	Not yet effective	0	Pending	15/20	Pending	15/20	Pending
Sudan	18-Mar-01	28-Nov-01	1-Jan-02	0/1	0	7	0	15	5
Suriname	4-Nov-18	Not yet in force	Text not available	25	Pending	0	Pending	0	Pending

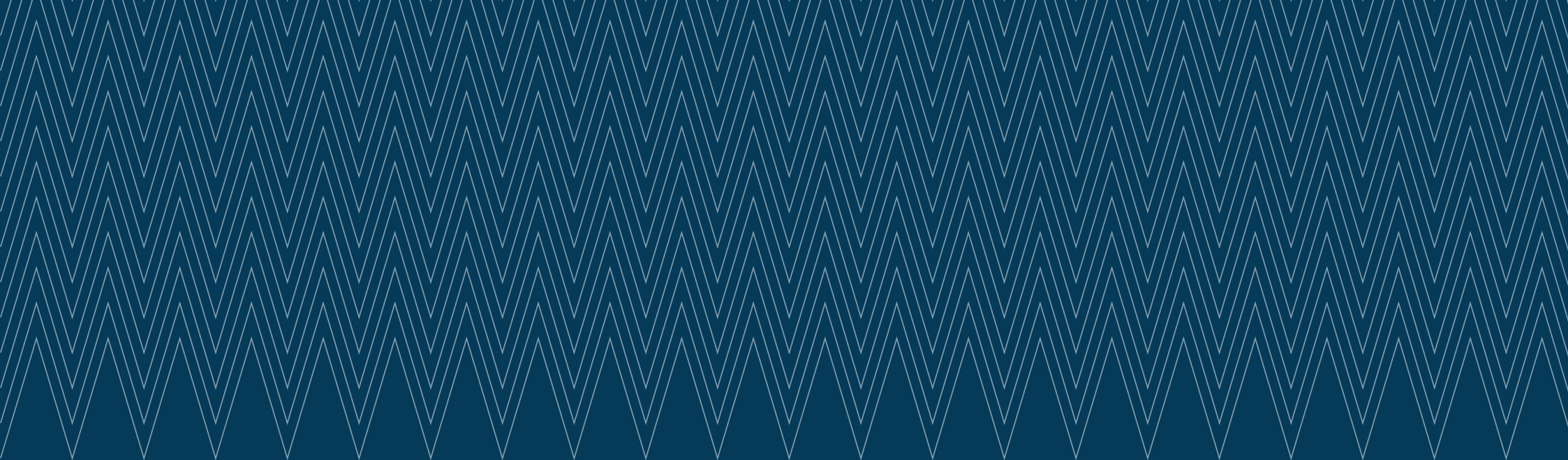




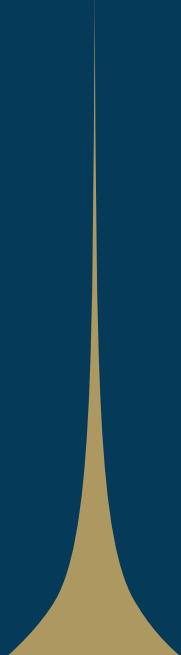
## UAE Double Tax Treaty Network & Rates (6/6)

Country	Signature Date	In Force Date	Effective Date	Dividends		Interest		Royalties	
				Domestic	Double Tax Treaty	Domestic	Double Tax Treaty	Domestic	Double Tax Treaty
Switzerland	6-Oct-11	21-Oct-12	1-Jan-12/1-Jan-13	35	5/15	0	0	0	0
Syria	26-Jan-00	11-Jun-01	1-Jan-02	0	0	7.5	10	7	18
Tajikistan	17-Dec-95	27-Mar-00	27-Mar-00	12	0	12	0	15	10
Tanzania	Under negotiation	N/A	N/A	10	Pending	0/10	Pending	15	Pending
Thailand	1-Mar-00	28-Dec-00	1-Jan-01	10	5/10 <sup>3</sup>	15	10/15 <sup>3</sup>	15	15
Tunisia	10-Apr-96	27-May-97	1-Jan-97	5/25 <sup>2</sup>	0	5/20/25 <sup>2</sup>	10	15/25 <sup>2</sup>	7.5
Turkey	29-Jan-93	26-Dec-94	1-Jan-95	15	10/12	10	10	20	10
Turkmenistan	9-Jun-98	24-Nov-99	1-Jan-00	15	0	15	0	15	10
Uganda	9-Jun-15	Not yet in force	Text not available	15	Pending	15/20	Pending	15	Pending
Ukraine	22-Jan-03	9-Mar-04	1-Jan-05	15	5 <sup>3</sup>	15	3 <sup>3</sup>	15	0/10 <sup>3</sup>
United Kingdom	12-Apr-16	25-Dec-16	1-Jan-17	0	0	20	0/20	20	0
Uruguay	12-Oct-14	13-Jun-16	1-Jan-17	7	5/7 <sup>3</sup>	7/12/25 <sup>2</sup>	10	12/25 <sup>2</sup>	5/10
Uzbekistan	26-Oct-07	25-Feb-11	1-Jan-12	10	5/15	10	10	20	10
Venezuela	11-Dec-10	20-Jun-11	1-Jan-12	34	5/10	34	10	34	10
Vietnam	16-Feb-09	12-Apr-10	1-Jan-11	0	5/15	5	10	10	10
Yemen	13-Feb-01	25-Aug-01	1-Jan-02	10	0	10	0	10	10
Zimbabwe	16-Jun-18	Not yet in force	Text not available	10/15	Pending	0	Pending	15	Pending





# Appendices





## Obtaining a UAE Tax Residency Certificate

UAE company or individual seeking to obtain double tax treaty relief would typically need to provide the tax authority in the source country a Tax Residence Certificate (“TRC”) evidencing its UAE tax residence. Such TRC can be obtained through the UAE Ministry of Finance (“MoF”)’s website<sup>1</sup>

A TRC is issued for a specific double tax treaty and is valid for one year.

The UAE MoF will only issue a TRC to companies after they have been in existence for one year, subject to certain exceptions. Individuals would need to be resident in the UAE for at least 183 days in order to obtain a TRC.

The MoF has signed memorandum of understandings (“MoUs”)<sup>2</sup> on transparency and information exchange with Abu Dhabi Global Market, Dubai International Financial Centre, Dubai Multi Commodities Centre, Fujairah Free Zone Authority, Jebel Ali Free Zone, Ras Al Khaimah Free Trade Zone, Ras Al Khaimah Investment Authority, RAK International Corporate Centre and the Umm Al Quwain Free Trade Zone Authority.

These MoUs have been signed to ensure the implementation of international standards of transparency in the exchange of information for tax purposes, as per OECD regulations and principles.



1. <https://www.mof.gov.ae/en/mservices/Corporate/VTAX/Pages/tax.aspx>

2. <https://www.mof.gov.ae/En/strategicPartnership/taxAgreement/Pages/infoExchange.aspx>

3. <https://www.mof.gov.ae/en/mservices/Individual/VTAX/Pages/tax.aspx>

### **Requirements for companies**

The following documents<sup>1</sup> need to be submitted:

- Valid trade licence;
- Certified articles of association;
- Copy of Emirates ID, passport and UAE residence visa for a shareholder / manager / director of the company;
- Certified audited financial statements;
- Certified copies of bank statements for at least 6 months during the year for which a TRC is requested;
- Certified tenancy contract/title deed; and
- Treaty application form from the country in which the TRC is to be submitted (if applicable).

The fees for obtaining the certificates are as follows:

- AED 100 + AED 7 (e-Dirham fee) for submitting the application; and
- AED 10,000 + AED 7 (e-Dirham fee) paid via e-dirham card per certificate.

The issuance of a TRC usually takes 5-10 working days from date of electronic application.

### **Requirements for individuals**

The following documents<sup>3</sup> need to be submitted:

- Copy of passport, and valid UAE residence visa;
- A certified copy of (residential) tenancy contract / title deed;
- Certified copies of bank statements for at least 6 months during the year for which a TRC is requested;
- Source of income/salary certificate;
- Immigration report of residency (Exit & Entry report).
- The fees for obtaining the certificates are as follows:
  - AED 100 + AED 7 (e-Dirham fee) for submitting the application; and
  - AED 2,000 + AED 7 (e-Dirham fee) paid via e-dirham card per certificate.
- The issuance of a TRC usually takes 5-10 working days from date of electronic application.





## UAE Tax Framework

- The UAE does not levy capital taxes, stamp duty or other transactional taxes on the incorporation of entities, the issuance of shares and on loan or other transaction documents.
- There is currently no Federal or Emirate-level personal income tax.
- Corporate taxation in the UAE is governed by Emirate-level Corporate Tax Decrees. Under these decrees, corporate tax may be imposed on companies and branches operating in the relevant Emirates at rates of up to 55%.
- In practice (with the exception of upstream oil and gas exploration and production companies, certain petrochemical companies, and branches of foreign banks licensed by the UAE Central Bank) the Emirate level Corporate Tax Decrees are not currently enforced, and corporate tax is not currently levied on most UAE and foreign companies operating in the UAE.
- Entities which are established within a designated free trade zone (FTZ) in the UAE are subject to the rules and regulations (and tax regime) of that FTZ, rather than the "onshore" Emirate Corporate Tax Decrees.
- FTZs generally offer companies and branches (i) a complete exemption from all taxes, or (ii) a 0% tax rate. The length of these (renewable) tax breaks varies from 15 to 50 years.

## VAT

- The UAE introduced VAT effective from 1 January 2018. The standard rate of VAT is 5%, with certain transactions being exempted or zero-rated.





## UAE substance requirements

- The UAE currently has no formal substance requirements for tax purposes or for the application of double tax treaty benefits. However, at a minimum, a leased office space, local bank account, UAE resident general manager/director and locally audited financial statements would be required in order to obtain a UAE TRC (see above).

## Economic substance requirements

- As part of the commitment made to the EU, the UAE Cabinet issued the Cabinet of Ministers Resolution No.31 of 2019 (concerning economic substance regulations in the UAE, “the Regulations”), requiring all in-scope UAE entities (“Relevant Entities”) that carry on certain activities (“Relevant Activities”) to have demonstrable economic substance in the UAE from 30 April 2019.
- The introduction of the Regulations in the UAE brings the UAE in line with other jurisdictions that have recently issued economic substance legislation (e.g. Cayman Islands, Bermuda, Mauritius), and affirms the UAE’s commitment to addressing concerns around the shifting of profits derived from certain mobile business activities to “no or nominal tax jurisdictions” without corresponding local economic activities. This should also be seen as the UAE making positive progress towards meeting the EU’s requirements to be removed from the EU list of non-cooperative jurisdictions for tax purposes (the EU blacklist).
- The Regulations should have limited impact on UAE based lessors, banks and other businesses that have genuine commercial operations and management in the UAE (aside from complying with additional disclosure requirements going forward).

## BEPS

- The UAE has joined the OECD Inclusive Framework on Base Erosion and Profit Shifting (“BEPS”), and has recently ratified the Multilateral Convention (“MLI”) to Implement Tax Treaty Related Measures to Prevent BEPS.
- The UAE, along with most of its treaty partners, has elected to include a so-called Principle Purpose Test (“PPT”) in their covered double tax treaties. The PPT is a general anti-abuse rule which denies treaty benefits where one of the main purposes of a transaction or arrangement is to access the double tax treaty, unless it can be shown that granting benefits would be appropriate in the circumstances.
- Once the MLI is ratified (by the UAE and the relevant treaty partner countries) and enters into force, it is important that UAE entities seeking to claim double tax treaty relief have appropriate operational substance in the UAE and they should support a principal commercial purpose. This is in addition to meeting the minimum substance and procedural requirements set by the UAE MoF and any treaty partner country specific requirements.







## Website Links

Country	Link	Country	Link
Albania	<a href="http://www.taxsummaries.pwc.com/ID/Albania-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Albania-Corporate-Withholding-taxes</a>	Libya	<a href="http://www.taxsummaries.pwc.com/ID/Libya-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Libya-Corporate-Withholding-taxes</a>
Algeria	<a href="http://www.taxsummaries.pwc.com/ID/Algeria-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Algeria-Corporate-Withholding-taxes</a>	Luxembourg	<a href="http://www.taxsummaries.pwc.com/ID/Luxembourg-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Luxembourg-Corporate-Withholding-taxes</a>
Armenia	<a href="http://www.taxsummaries.pwc.com/ID/Armenia-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Armenia-Corporate-Withholding-taxes</a>	Macedonia	<a href="http://www.taxsummaries.pwc.com/ID/Macedonia-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Macedonia-Corporate-Withholding-taxes</a>
Austria	<a href="http://www.taxsummaries.pwc.com/ID/Austria-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Austria-Corporate-Withholding-taxes</a>	Malaysia	<a href="http://www.taxsummaries.pwc.com/ID/Malaysia-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Malaysia-Corporate-Withholding-taxes</a>
Azerbaijan	<a href="http://www.taxsummaries.pwc.com/ID/Azerbaijan-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Azerbaijan-Corporate-Withholding-taxes</a>	Malta	<a href="http://www.taxsummaries.pwc.com/ID/malta-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/malta-Corporate-Withholding-taxes</a>
Barbados	<a href="http://www.taxsummaries.pwc.com/ID/Barbados-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Barbados-Corporate-Withholding-taxes</a>	Mauritius	<a href="http://www.taxsummaries.pwc.com/ID/Mauritius-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Mauritius-Corporate-Withholding-taxes</a>
Belarus	<a href="http://www.taxsummaries.pwc.com/ID/Belarus-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Belarus-Corporate-Withholding-taxes</a>	Mexico	<a href="http://www.taxsummaries.pwc.com/ID/Mexico-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Mexico-Corporate-Withholding-taxes</a>
Belgium	<a href="http://www.taxsummaries.pwc.com/ID/Belgium-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Belgium-Corporate-Withholding-taxes</a>	Moldova	<a href="http://www.taxsummaries.pwc.com/ID/Moldova-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Moldova-Corporate-Withholding-taxes</a>
Bosnia and Herzegovina	<a href="http://www.taxsummaries.pwc.com/ID/Bosnia-and-Herzegovina-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Bosnia-and-Herzegovina-Corporate-Withholding-taxes</a>	Montenegro	<a href="http://www.taxsummaries.pwc.com/ID/Montenegro-Corporate-Withholding-taxes">www.taxsummaries.pwc.com/ID/Montenegro-Corporate-Withholding-taxes</a>
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