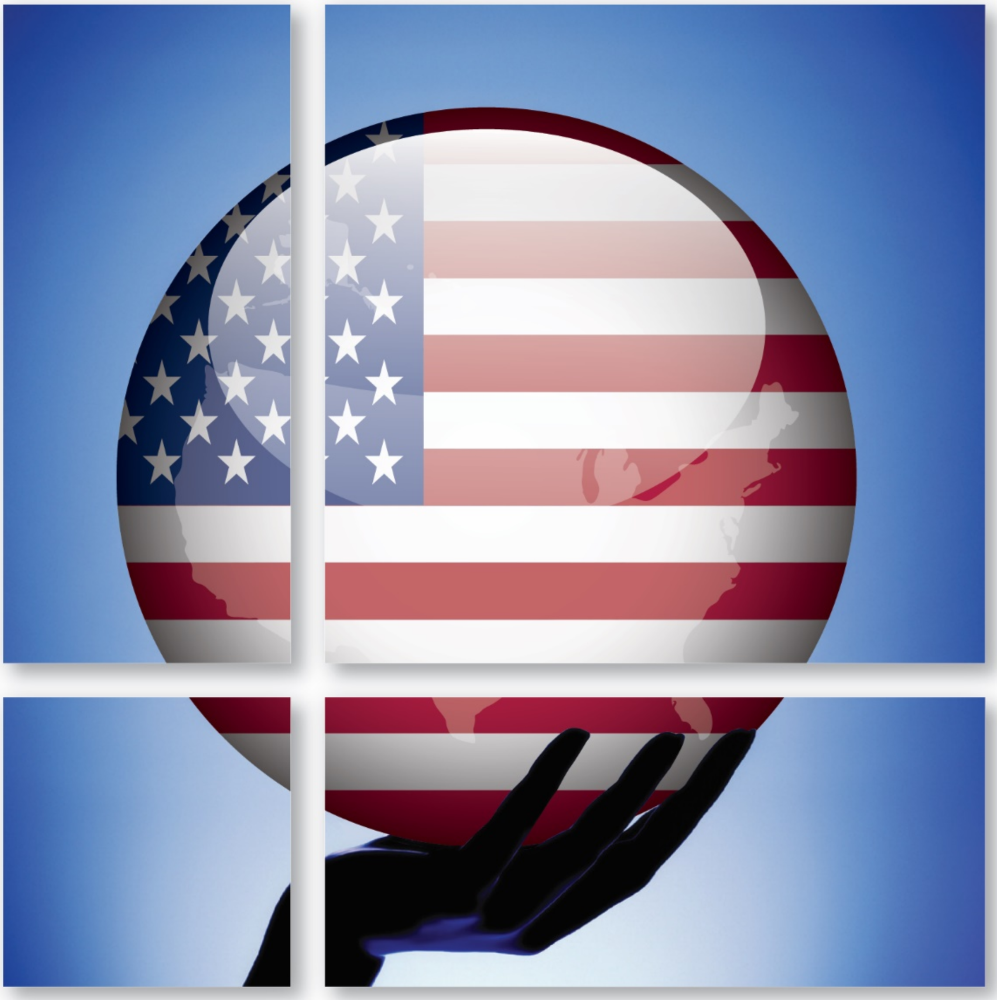

United States

Tax Guide

2015/16

FOREWORD

A country's tax regime is always a key factor for any business considering moving into new markets. What is the corporate tax rate? Are there any incentives for overseas businesses? Are there double tax treaties in place? How will foreign source income be taxed?

Since 1994, the PKF network of independent member firms, administered by PKF International Limited, has produced the PKF Worldwide Tax Guide (WWTG) to provide international businesses with the answers to these key tax questions.

As you will appreciate, the production of the WWTG is a huge team effort and we would like to thank all tax experts within PKF member firms who gave up their time to contribute the vital information on their country's taxes that forms the heart of this publication.

The PKF Worldwide Tax Guide 2015/16 (WWTG) is an annual publication that provides an overview of the taxation and business regulation regimes of the world's most significant trading countries. In compiling this publication, member firms of the PKF network have based their summaries on information current on 1 January 2015, while also noting imminent changes where necessary.

On a country-by-country basis, each summary such as this one, addresses the major taxes applicable to business; how taxable income is determined; sundry other related taxation and business issues; and the country's personal tax regime. The final section of each country summary sets out the Double Tax Treaty and Non-Treaty rates of tax withholding relating to the payment of dividends, interest, royalties and other related payments.

While the WWTG should not to be regarded as offering a complete explanation of the taxation issues in each country, we hope readers will use the publication as their first point of reference and then use the services of their local PKF member firm to provide specific information and advice.

Services provided by member firms include:

- Assurance & Advisory;
- Financial Planning / Wealth Management;
- Corporate Finance;
- Management Consultancy;
- IT Consultancy;
- Insolvency - Corporate and Personal;
- Taxation;
- Forensic Accounting; and,
- Hotel Consultancy.

In addition to the printed version of the WWTG, individual country taxation guides such as this are available in PDF format which can be downloaded from the PKF website at www.pkf.com

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PKF INTERNATIONAL LIMITED
JUNE 2015

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BASIC FACTS

Full name:	United States of America
Capital:	Washington, D.C.
Main language:	English
Population:	319.43 million (2014 estimate)
Major religion:	Christianity
Monetary unit:	United States Dollar (USD)
Internet domain:	.us
Int. dialling code:	+1

KEY TAX POINTS

- Taxes are chargeable at both the federal and state level.

- Corporations incorporated in the United States (US) are subject to tax on their worldwide income. Foreign corporations are generally subject to tax only on their income effectively connected to a US trade or business.
- For corporations, capital gains are taxed at the same rates applicable to ordinary income.
- The tax on a foreign corporation's US branch's profits and earnings is the same as regular corporate tax, but an additional 30% branch level tax (BLT) is imposed if the after-tax earnings of the branch are not reinvested in the business by the close of the tax year, or are repatriated in a later tax year.
- The US does not impose any VAT, although most states impose single stage sales taxes.
- A US corporation is entitled to a special deduction for dividends received from other domestic corporations. With some exceptions, dividends from foreign corporations are 100% taxable.
- US corporations are taxed on worldwide income, including any foreign branch income. To avoid any double taxation, foreign tax deductions or credits are available on the US return.
- Related party transactions negotiated at arm's length are treated the same as non-related party transactions.
- Taxes are required to be withheld from portfolio dividends, interest, rents, and royalties, and certain other types of income paid to non-US payees. The Foreign Account Tax Compliance Act of 2010 (FATCA) imposes broad reporting and withholding obligations (directly and indirectly) on most non-US entities receiving US-source income.
- US citizens and residents are subject to taxation on their worldwide income. Non-resident individuals are generally subject to tax on their income from US sources.
- Special tax rates apply to capital gains and dividend income of individuals, depending on how long the asset has been held, and the type of capital asset.
- Other taxes which may be levied in addition to state tax include alternative minimum tax (AMT), self-employment tax, social security and Medicare tax and qualified retirement plan tax. Taxes paid to the states and municipalities are deductible on the federal income tax return in the year paid or accrued.

A. TAXES PAYABLE

FEDERAL TAXES AND LEVIES
COMPANY TAX

Company tax is payable by all corporate entities, except for certain exempt organisations and pass-through corporations subject to special rules.

Corporations incorporated in the US are subject to tax on their worldwide income and foreign corporations are generally only subject to tax on their income effectively connected to a US trade or business.

The US levies corporate tax on a graduated scale as follows:

Taxable Income Exceeding (USD)	Taxable Income Not Exceeding (USD)	Tax
0	50,000	15%
50,000	75,000	7,500 + 25% of excess over USD 50,000
75,000	100,000	13,750 + 34% of excess over USD 75,000
100,000	335,000	22,250 + 39% of excess over USD 100,000
335,000	10,000,000	113,900 + 34% of excess over USD 335,000
10,000,000	15,000,000	3,400,000 + 35% of excess over USD 10,000,000
15,000,000	18,333,333	5,150,000 + 38% of excess over USD 15,000,000
18,333,333	-	Flat 35%

It should be noted that personal service corporations pay a flat 35% tax on all income. Corporations in a controlled group share in the benefits of the lower brackets.

Generally, large US corporations, defined as having at least USD 1 million gross taxable income in any of its 3 previous tax years, are required to prepay its estimated tax liability in up to four instalments. Corporations not meeting the large corporation income test can opt to pay 100% of the prior year tax under the "safe harbour" method. Penalties and interest may be assessed if estimated instalments are less than 100% of the actual liability.

The US imposes income taxation at both the business and personal levels. Corporate earnings, taxed first to the corporation and again later when distributed as dividends to shareholders, may be taxed at a combined effective federal rate exceeding 50%. Therefore, business is increasingly being conducted through flow-through entities such as traditional partnerships, limited liability companies (LLC), and certain tax-election corporations ('S corporations'). S corporations may not have non-resident individuals or corporations as shareholders. Foreign-owned businesses in the US may not derive as much benefit from these structures as domestic businesses due to the interaction of US withholding and branch profits taxes.

US flow-through entities are often used by non-US persons as holding companies for US and non-US businesses and assets. Significant planning opportunities are available for both US domestic and foreign taxpayers through the use of 'hybrid' entities. These companies are treated as flow-through entities by one jurisdiction and as taxable entities by another. US rules are often flexible in allowing US taxpayers to select the desired tax status of the entity under the "check-the-box" regime.

Corporate tax returns and payments are due by the 15th day of the third month following the end of the corporation's fiscal year. The original due date for calendar year taxpayers is March 15. An automatic extension of six months to file the return may be granted if requested by the original due date of the return. Extensions to file a return, however, do not extend the time for payment of tax due. Failure to pay could result in an invalid extension.

CAPITAL GAINS TAX

For corporations, the excess of the net gains from the sale of capital assets over net losses from the sale of assets or net capital gains is taxed at the same rates applicable to ordinary income. However, capital losses may only be used to offset capital gains and the excess of losses over gains may be carried back three years or forward five years. Losses must be applied to the earliest carry back year before any carry forwards maybe used.

ALTERNATIVE MINIMUM TAX (AMT)

The US imposes an alternative minimum tax on certain corporations at a rate of 20%. The AMT income is derived from regular taxable income adjusted by specified items that received preferential treatment under the regular tax system. Such 'tax preference' items may include accelerated depreciation, depletion and intangible drilling costs. In addition, an AMT net operating loss deduction can only offset up to 90% of the current year alternative minimum taxable income. The AMT is imposed if the tax on the alternative minimum taxable income is greater than the regular tax. It does not apply to small corporations, defined as corporations with less than USD 7.5 million of average annual gross receipts over a three-year period.

BRANCH PROFITS TAX

A foreign corporation's US branch's profits and earnings is subject to the same tax as U.S. resident corporation In addition a 30% branch level tax (BLT) is imposed on the after-tax earnings of the US branch that are not reinvested in the business by the close of the tax year or that are repatriated in a subsequent tax year. The branch level taxable base is adjusted for any changes in the net equity of the US branch. The BLT may be reduced or eliminated by any relevant tax treaties or replaced by the secondary withholding tax.

In addition to the branch profits tax, a branch level interest tax of 30% is imposed on any interest paid by the US branch to a foreign entity not engaged in the same business activity. The tax also is assessed on any excess interest deducted on the US tax return over the amount actually paid.

SALES TAX

Sales taxes are imposed at the state and municipality levels and vary in rates and in bases. In general, sales tax is imposed on tangible goods sold to the final consumer. A ‘use’ tax is imposed on goods purchased for use in a business but only when no sales tax has been collected. Generally, vendors must register and collect sales tax in states where they are considered to be 'doing business'.

The question of whether sellers are required to collect and pay sales taxes on sales of goods and services ordered via the internet or other electronic means is currently unsettled in the US. Foreign sellers who merely ship products ordered over the internet to the US will typically not be subject to state and local taxation although many states are becoming increasingly aggressive in this area. Some states impose an "economic nexus" standard whereby a business connection is established and sales tax collection obligation created if a certain threshold of sales are destined for such state.

VALUE ADDED TAX (VAT)

The US does not impose any VAT.

FRINGE BENEFITS TAX (FBT)

The US does not impose any corporate level taxes on fringe benefits provided to its employees. However, certain fringe benefits are taxable to employees receiving the benefits and are required to be reported on their personal income tax returns. The US does require employers and employees to each pay certain payroll related taxes including:

(1) A portion of an employee's Social Security (FICA), taxable at 6.2% of the wage base (currently in 2015 USD 118,500, annually adjusted).

(2) Federal unemployment tax (FUTA) at 6.2% of the first USD 7,000 of wages (less credits of up to 5.4% for state unemployment tax).

(3) State unemployment tax (SUT) which varies from state to state.

(4) Medicare at 1.45% of total wages paid (with no wage limitation cap).

(5) Additional Medicare 0.9% (0.009) on employees only for wages in excess of USD 200,000 (USD 250,000 for couples filing joint returns).

LOCAL TAXES

Most states and some municipalities of the US impose income or franchise taxes on corporations. Tax rates vary as do the measurement of tax bases. Most states allow income to be apportioned to a state if business is conducted in more than one state. Historically, a three-factor allocation formula consisting of tangible assets, sales and receipts, and payroll has generally been used. However, many states are moving to formulas that are more heavily weighted to sales. Increasingly, US states utilize the single sales factor to apportion income and tax bases. Most states begin with federal taxable income in the computation of their taxable base, but many states require adjustments to calculate state taxable income.

Several states have imposed a tax on gross margin or gross sales in lieu of a tax on net income. It is also important to note that state income taxes are not subject to the provisions of the various US income tax treaties and, therefore, some states consider foreign companies to be subject to their state income tax even if the company is not subject to US federal income tax by virtue of a double tax treaty.

While particular rules vary from state to state, state tax authorities generally assert income or franchise tax jurisdiction over a business whose presence within the state is sufficient to form a "nexus" with that state. Unbound by treaty terms, states often seek to define "nexus" broadly, setting a lower evidentiary hurdle than what may be needed to find a permanent establishment under US income tax treaties.

Accordingly, a non-US company operating in the US should remain aware of potential state income tax liabilities, even where treaty benefits may be claimed at the US federal income tax level. It is also important to note that foreign sellers may be required to collect state sales tax even if not subject to state or local income taxes.

Other taxes that may be levied at the state level include real and personal property tax, franchise tax, intangibles tax, transfer tax, and tax on capital. Taxes paid to the states and municipalities are deductible on the federal income tax return in the year paid or accrued.

OTHER TAXES

In addition to corporation income taxes, the US also imposes the following taxes.

ACCUMULATED EARNINGS TAX

Corporations accumulating over USD 250,000 of prior and current period earnings and profits may be subject to this tax. The tax is imposed at rate of 20% on 'accumulated taxable income'. The amount of accumulated taxable income subject to tax is reduced by earnings retained for the reasonable needs of the business.

PERSONAL HOLDING COMPANY (PHC) TAX

Closely-held corporations that receive substantial income from passive activities and do not distribute this income to shareholders are subject to the PHC tax. The tax is imposed at a rate of 20% on the undistributed income. This tax is in addition to the regular corporate tax.

B. DETERMINATION OF TAXABLE INCOME

Corporate taxable income is determined by ascertaining assessable gross income and reducing it by allowable deductions. Allowable deductions must be segregated into ordinary and special deductions. Corporations are taxed at the entity level. For flow through entities such as partnerships, limited liability companies and ‘S’ corporations, taxable income is determined in a similar fashion. However, these entities flow through the income or loss and special deductions to its shareholders / members / partners who are taxed on their own returns.

DEPRECIATION AND DEPLETION

Property, plant and equipment may be written off over its effective useful life as established under a statutory cost recovery system. For property acquired or placed in service after 31 December 1986, the capitalized costs must be depreciated using the Modified Accelerated Cost Recovery System (MACRS) over a life of three to 39 years. Most tangible personal property is in the three, five and seven year category while real property is categorised as 27.5 or 39 years for residential and non-residential property, respectively. However, depreciation on certain components of buildings and real property improvements can be accelerated to shorter lives through the use of cost segregation studies designed to identify the proper categorization of costs for tax asset classification purposes.

For some smaller corporations, an election may be made to treat the cost of assets as an expense rather than as a depreciable capital expenditure. The maximum deduction for the year 2014 is USD 500,000 and is limited to taxable income determined without regard to the above election. This expense benefit is phased out on a dollar for dollar basis if qualified purchases exceed a certain threshold amount (USD 2,000,000). This expensing election is significantly reduced in 2015.

Taxpayers may qualify for 50% bonus depreciation for qualified property, long production property or non-commercial aircraft placed in service before 1 January 2015. The property must be new or "original use" to be eligible for bonus depreciation. A deduction for depletion is allowable for expenditures on natural resources. Generally, depletion may be calculated using either a cost or percentage method. Cost depletion is based on the adjusted basis of the property and an estimate of the number of units that make up the deposit and the number of units extracted during the year.

Under the percentage depletion method, a flat percentage of gross income is taken as the depletion deduction. It may not exceed 50% (100% for oil and gas properties) of the taxable income from the property before the depletion deduction.

For independent oil and gas producers and royalty owners, the depletion deduction may not exceed

65% of the taxpayer's taxable income.

STOCK / INVENTORY

Inventories are generally stated at the lower of cost or market value on the first in, first out (FIFO) method, or cost only on the last in, first out (LIFO) method. Uniform capitalization rules may require the inclusion in inventory or capital accounts of certain otherwise deductible indirect and administrative costs incurred for real or personal property produced or acquired for resale.

CAPITAL GAIN AND LOSSES

See discussion above.

DIVIDENDS

A US corporation is entitled to a special deduction for dividends received from other domestic corporations. A deduction is allowed for 70% of the dividends received from corporations owned less than 20% by the recipient corporation. The deduction increases to 80% if the corporation is owned more than 20% but less than 80% by the recipient corporation and increases to 100% if the ownership is 80% or more. With some exceptions, dividends from foreign corporations are 100% taxable.

INTEREST DEDUCTIONS

A taxpayer generally may deduct business interest paid or accrued within the tax year on indebtedness. However, such debt must pertain to the debt of the taxpayer and must result from a genuine debtor-creditor relationship. Numerous exceptions and limitations exist regarding the deductibility of interest. For example, if a corporation's debt to equity ratio exceeds 1.5 to 1, then interest expense deductions on certain related party debt may be disallowed or deferred. In general interest accrued and payable to a foreign related party is not deductible until paid.

LOSSES

Generally, net operating losses from a trade or business may be carried back two years or forward 20 years to be applied against taxable income. By default, a corporation must first carry back its net operating losses unless it makes an election to forgo such carry-back.

A successor corporation may use carryovers of a predecessor to a limited extent in a change of ownership, a subsidiary liquidation or a specified reorganisation.

FOREIGN SOURCE INCOME

US corporations are taxed on worldwide income, including any foreign branch income. To mitigate or minimize any double taxation, foreign tax deductions or credits are available to offset the US tax on the foreign source income.

Where US shareholders have more than a 50% interest in a foreign subsidiary, certain income of the foreign subsidiary may be taxed as if received directly by the US shareholder. Other special rules apply to certain types of foreign corporations with US shareholders.

INVESTMENT TAX CREDIT

The Investment Credit comprises four components:

(1) The rehabilitation credit;

(2) The energy credit;

(3) The qualifying advanced coal project credit; and,

(4) The qualifying gasification project credit.

For flow-through entities, the credits must be allocated to the individual partners/shareholders on a pro rata basis. Generally, the credit is 10% of qualifying expenses (20% in the case of certified historic structures).

It should be noted that no investment credit is allowed for investment credit property to the extent it is financed with nonqualified non-recourse debt.

INCENTIVES

In addition to investment tax credits, other preferential tax incentives are available for activities such as those related to export, activities engaged in US possessions, qualified private activity bonds, research and development expenditures, and for hiring certain specified individuals.

Also, a deduction of up to 9% of taxable income is available for certain US manufacturing/production activities.

OTHER

Other issues that need to be mentioned include the following:

(1) Deductions are generally allowable for charitable contributions, but for corporations may not exceed 10% of taxable income computed without regard to the contributions. Excess contributions may be carried forward for five years.

(2) Organisational and business start-up expenditures are deductible up to USD 10,000, subject to certain limitations and the remainder must be written off over 180 months.

(3) Meals and entertainment expenses are limited to 50% of expenses incurred in most circumstances. Certain entertainment expenses are entirely non-deductible if considered lavish or where no business purpose was connected with the entertainment activity.

(4) Bad debts, except for certain financial institutions, are deductible only under the specific write-off method for receivables that become uncollectible in whole or in part during the tax year. Other debts can only be deducted for tax purposes if worthlessness can be proved as a result of an identifiable event.

(5) Life insurance premiums paid on key employees are deductible only to the extent that they are:

 (a) Included in the employees' compensation;

(b) Not unreasonable in amount (statutory limited amount);

(c) The employer is not directly or indirectly a beneficiary.

C. FOREIGN TAX RELIEF

A US corporation or a foreign corporation engaged in business in US may elect to claim either a credit or a deduction for income taxes paid to another country if the taxes are connected with or related to its business and if the income is also taxed by the US. Generally, the tax credit is available only if such foreign tax is based on foreign source income. The tax credit may not reduce the US tax liability on income from US sources. Any unused foreign tax credit in one year may be carried back to the prior year and forward ten years.

D. CORPORATE GROUPS

Affiliated groups of US corporations (parent has 80% ownership) are permitted to offset the losses of one affiliate against the profits of another via the filing of consolidated federal income tax returns. A parent's usage of prior subsidiary losses before its acquisition may be limited. State and local rules vary from federal rules in this regard and may not permit loss offsetting. Some may also require, alternatively, that returns are filed to include results of all related companies, including companies that are not includable in a federal consolidated income tax return.

E. RELATED PARTY TRANSACTIONS

Related party transactions negotiated at arm's length are treated the same as non-related party transactions. However, in general, a deduction may not be taken by one party until the transaction has been included in gross income by the other party. The Internal Revenue Service may make any adjustments necessary to reflect the income of the related parties.

For multi-national groups, additional emphasis is placed on the 'transfer price' among members of the group. Several methods are provided to determine a proper arm's length price including the use of unrelated third party comparables, the comparable profits and the profit split methods. Significant compliance burdens now apply in these situations. Failure to maintain contemporaneous documentation of pricing determinations could result in substantial penalties (up to 40% of the tax adjustment due). US regulations require taxpayers to conduct transfer pricing studies to determine the 'best method' under the applicable circumstances.

Transfer pricing determinations must often meet standards in multiple jurisdictions. US rules for determining transfer pricing may vary from the rules of other countries that have introduced transfer pricing standards and from OECD guidelines. US states are increasingly interested in both multi-national and multi-state transfer pricing and may at times take positions differing from those of the Internal Revenue Service (IRS).

F. WITHHOLDING TAXES - NON-US PAYEES

Taxes are required to be withheld from portfolio dividends, interest, rents, and royalties, and certain other types of income paid to non-US payees. The statutory rate is 30% but reduced rates may apply if the recipient is qualified to obtain the benefits of a US tax treaty. Foreign persons or entities may also be exempted from withholding if the US source income is connected with conduct of a trade or business in the US. This exemption is not available unless the foreign recipient provides notice to the

US payor prior to payment. Portfolio interest is exempt from withholding. Portfolio interest includes interest earned on US bank deposits and portfolio debt obligations.

Special withholding tax rules apply to non-US partners in US partnerships and non-US members of an LLC that conducts a trade or business in the US. A 35% withholding tax rate is applied to a foreign partner's annual allocable share of the partnership's US source income (whether an individual or corporation). Special withholding tax rules also apply to direct or indirect sales or other dispositions of US real property by foreigners. A 10% withholding rate applies to the gross amount realised or sales price on the disposition unless specific permission is granted for a reduction in the withholding.

A further, more recent, addition to the framework of US withholding obligations is found in the Foreign Account Tax Compliance Act of 2010 (FATCA). Intended as a countermeasure against perceived tax abuse through the use of foreign accounts, FATCA imposes broad reporting and withholding obligations (directly and indirectly) on most non-US entities receiving US-source income, including the proceeds from sale or disposition of US property that can produce interest or dividends. While many FATCA rules focus on what the law refers to as ''FFIs", or foreign financial intuitions, FATCA's impact extends to financial and non-financial operating companies. Further, FATCA compliance may be required as a condition to eligibility for benefits under any applicable US tax treaty.

G. EXCHANGE CONTROL

No direct exchange controls exist. Transactions in currency of USD 10,000 or more must be reported to the US Department of Treasury. Multiple related transactions must be treated as a single transaction for disclosure purposes.

The direct or indirect transportation of currency or other monetary instruments exceeding USD 10,000 to a foreign jurisdiction must also be reported. Transfers through normal banking procedures that do not involve the physical transportation of currency are not required to be disclosed. However, US financial institutions are required to report cash transactions exceeding USD 10,000.

H. PERSONAL TAX

US citizens and other resident individuals are subject to the same tax rules. Taxes are assessed on worldwide income reduced by certain adjustments, deductions, and exemptions. Non-resident individuals are generally subject to tax on their income from US sources. Certain credits are available to reduce the tax computed.

Generally, income consists of compensation from employment services, interest and dividends, income or loss from self-employment, capital gains and losses, rents and royalties and income or loss from pass-through entities. Allowable deductions include medical expenses, home mortgage and investment interest, state, local and real estate taxes, casualty losses, charitable contributions and other business and investment related miscellaneous deductions.

Limitations exist for the amount of losses and deductions that may be claimed by a taxpayer. Most deduction limitations are based upon the income levels of the individual. Income tax rates vary depending upon the filing status of the taxpayer. The five categories of filing status are:

(1) Single;

(2) Married filing a joint return;

(3) Married filing separate returns;

(4) Head of household; and,

(5) Qualifying widow(er) with dependent child.

The current maximum personal income tax rate is 39.6%.

Effective 1 January 2013, a new 3.8% tax applies on certain net investment income for taxpayers with modified adjusted gross incomes in excess of USD 200,000 (USD 250,000 for married filing joint returns). Examples of income that would be subject to the 3.8% investment tax are dividends, interest, royalties, capital gains, passive income from businesses, and net rental income.

The US requires employers to withhold federal and state income taxes, social security and Medicare from an employee's salary. These taxes must be remitted to the government on a periodic basis. Self-employed individuals are required to make quarterly estimated payments equal to at least 90% of their actual tax liability in most cases. Higher income individuals may need to pay in 100% of the current year's tax or 110% of the prior year's tax. Penalties and interest may be assessed for underpayment of these taxes.

Special tax rates apply to capital gains and dividend income of individuals. The tax rate is based on the length of time that the asset is held, the type of capital asset, and the overall tax bracket of the individual. Many dividends also receive a preferential tax rate.

Non-resident individuals are typically subject to tax on income from US sources and are generally not taxed on US source capital gains unless the gains are directly or indirectly related to sales of US real property. Many non-resident individuals do not receive preferential tax rates on dividend income. The current preferential rate for qualified dividends and long term capital gains is 20% (23.8% total inclusive of the net investment income tax).

In addition to the regular income tax, individuals may also be liable for other taxes on their tax returns. These taxes include the alternative minimum tax (AMT), self-employment tax, social security and Medicare tax and qualified retirement plan tax. Most states and some municipalities also impose income taxes that vary in rates and bases. The US imposes other taxes on individuals such as gift tax and estate tax.

I. TREATY AND NON-TREATY WITHHOLDING TAX RATES

	Dividends (%)	**Dividends Substantial Holdings[1] (%)**	**Interest[2] (%)**	**Royalties[3] (%)**
Non-treaty countries:	30	30	30	30
Treaty countries - Resident corporations and individuals:	Nil	Nil	Nil	Nil
Treaty countries - Non-resident corporations and individuals:				
Australia	15	5/0	10	5
Austria	15	5	0	0/10

	Dividends (%)	Dividends Substantial Holdings[1] (%)	Interest[2] (%)	Royalties[3] (%)
Bangladesh	15	10	10	10
Barbados	15	5	5	5
Belgium	15	5/0	0	0
Bulgaria	10	5	5	5
Canada	15	5	0	0
China	10	10	10	10
Cyprus	15	5	10	0
Czech Republic	15	5	0	10
Denmark	15	5/0	0	0
Egypt	15	5	15	15
Estonia	15	5	10	5/10
Finland	15	5/0	0	0
France	15	5	0	0
Germany	15	5	0	0
Greece	30	30	0	0/30
Hungary	15	5	0	0
Iceland	15	5	0	0/5
India	25	15	15	15/10
Indonesia	15	10	10	10
Ireland, Republic of	15	5	0	0
Israel	25	12.5	17.5	15/10
Italy	15	5/0	10	0/5/8
Jamaica	15	10	12.5	10
Japan	10	5/0	10	0
Kazakhstan	15	5	10	10
Korea, Republic of	15	10	12	15/10
Latvia	15	5	10	5/10
Lithuania	15	5	10	5/10
Luxembourg	15	5	0	0
Malta	15	5	10	10
Mexico	10	5/0	15	10
Morocco	15	10	15	10

	Dividends (%)	Dividends Substantial Holdings[1] (%)	Interest[2] (%)	Royalties[3] (%)
Netherlands	15	5/0	0	0
New Zealand	15	5/0	10	5
Norway	15	15	10	0
Pakistan	30	15	30	0/30
Philippines	25	20	15	15
Poland	15	5	0	10
Portugal	15	5	10	10
Romania	10	10	10	10/15
Russia	10	5	0	0
Slovak Republic	15	5	0	0/10
Slovenia	15	5/0	5	5
South Africa	15	5	0	0
Spain	15	10	10	5/8/10
Sri Lanka	15	15	10	10
Sweden	15	5/0	0	0
Switzerland	15	5/0	0	0/30
Thailand	15	10	15	5/8/15
Trinidad and Tobago	30	30	30	0/15
Tunisia	20	14	15	15
Turkey	20	15	15	10
Ukraine	15	5	0	10
United Kingdom	15	5/0	0	0
Venezuela	15	5/0	10	10

NOTES:

1 Refer to the relevant treaty for details of the necessary interest that the recipient needs to hold in the payor in order for this rate to apply.

2 Certain interest paid by banks and insurance companies to non-residents are exempt.

3 For copyright royalties the individual treaties should be consulted due to rate variations. Royalties may include personal property rentals.

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