

Tax Treaties withholding tax tables

The following tables give a summary of the withholding taxes provided by the double tax treaties entered into by Cyprus.

Note under Cyprus domestic legislation there is no withholding tax on dividends and interest paid to non-residents of Cyprus at all times thus the treaty rates shown below are NOT applicable.

Paid from Cyprus			
	Dividends % (1)	Interest % (1)	Royalties %
Non-treaty countries	NIL	NIL	NIL (2)
Armenia	NIL (31)	5	5
Austria	10	NIL	NIL
Belarus	5 (18)	5	5
Belgium	10 (8)	10 (6,19)	NIL
Bulgaria	5 (23)	7 (6)	10
Canada	15	15 (4)	10 (5)
China P.R.	10	10	10
Czech Republic	NIL (29)	NIL	NIL (30)
Denmark	NIL (6, 33)	NIL	NIL
Egypt	15	15	10
Estonia	NIL	NIL	NIL
Finland	5 (36)	NIL	NIL
France	10 (9)	10 (10)	10 (16)
Germany	5 (37)	NIL	NIL
Greece	25	10	NIL (12)
Hungary	nil	10 (6)	NIL
India	10(38)	10 (10)	10 (16)
Ireland, Rep. of	NIL	NIL	NIL (12)
Italy	NIL	10	NIL
Kuwait	10	10 (6)	5 (7)
Kyrgyzstan (20)	NIL	NIL	NIL
Lebanon	5	5	NIL
Malta	15	10	10
Mauritius	NIL	NIL	NIL
Moldova	5 (27)	5	5
Montenegro (26)	10	10	10
Norway	NIL	NIL	NIL
Poland	NIL (35)	5 (6)	5
Portugal	10	10	10
Qatar	NIL	NIL	NIL (28)
Romania	10	10 (6)	5 (7)
Russia	5 (17)	NIL	NIL
San Marino	NIL	NIL	NIL
Serbia (26)	10	10	10
Seychelles	NIL	NIL	5
Singapore	NIL	10 (6,25)	10
Slovak Republic	10	10 (6)	5 (7)
Slovenia	5 (32)	5	5
South Africa	NIL	NIL	NIL
Spain(39)	NIL (40)	NIL	NIL
Sweden	5 (8)	10 (6)	NIL
Syria	NIL (8)	10	10
Tadzhikistan (20)	NIL	NIL	NIL
Thailand	10	15 (21)	5 (22)
Ukraine	5 (20)	2	5 (34)
United Arab Emirates	NIL	NIL	NIL
United Kingdom	NIL	10	NIL (3)
United States	NIL	10 (10)	NIL

Received in Cyprus			
	Dividends % (1)	Interest % (1)	Royalties %
Armenia	NIL (31)	5	5
Austria	10	NIL	NIL
Belarus	5 (18)	5	5
Belgium	10 (8)	10 (6,19)	NIL
Bulgaria	5 (23)	7 (6, 24)	10 (24)
Canada	15	15 (4)	10 (5)
China P.R.	10	10	10
Czech Republic	NIL (29)	NIL	NIL (30)
Denmark	NIL (6, 34)	NIL	NIL
Egypt	15	15	10
Estonia	NIL	NIL	NIL
Finland	5 (36)	NIL	NIL
France	10 (9)	10 (10)	NIL (3)
Germany	5 (37)	NIL	NIL
Greece	25 (11)	10	NIL (12)
Hungary	5 (8)	10 (6)	NIL
India	10 (9)	10 (10)	10 (15)
Ireland, Rep. of	NIL	NIL	NIL (12)
Italy	15	10	NIL
Kuwait	10	10 (6)	5 (7)
Kyrgyzstan (20)	NIL	NIL	NIL
Lebanon	5	5	NIL
Malta	NIL	10	10
Mauritius	NIL	NIL	NIL
Moldova	5 (27)	5	5
Montenegro (26)	10	10	10
Norway	NIL (13)	NIL	NIL
Poland	NIL(35)	5 (6)	5
Portugal	10	10	10
Qatar	NIL	NIL	NIL (28)
Romania	10	10 (6)	5 (7)
Russia	5 (17)	NIL	NIL
San Marino	NIL	NIL	NIL
Serbia (26)	10	10	10
Seychelles	NIL	NIL	5
Singapore	NIL	10 (6,25)	10
Slovak Republic	10	10 (6)	5 (7)
Slovenia	5 (32)	5	5
South Africa	NIL	NIL	NIL
Spain(39)	NIL(40)	NIL	NIL
Sweden	5 (8)	10 (6)	NIL
Syria	nil (8)	10 (4)	10
Tadzhikistan (20)	NIL	NIL	NIL
Thailand	10	15 (21)	5 (22)
Ukraine	5 (20)	2	5 (33)
United Arab Emirates	NIL	NIL	NIL
United Kingdom	15 (4)	10	NIL (3)
United States	5 (9)	10 (10)	NIL

Notes:

- 1) Under Cyprus Legislation there is never any WHT on dividends and interest paid to non-residents of Cyprus.
- 2) Royalties earned on rights used within Cyprus are subject to WHT of 10%.
- 3) A rate of 5% on film and TV royalties.
- 4) Nil if paid to a government or for export guarantee.
- 5) Nil on literary, dramatic, musical or artistic work.
- 6) Nil if paid to the government of the other state.
- 7) This rate applies for patents, trademarks, designs or models, plans, secret formulas, or processes, or any industrial, commercial, or scientific equipment, or for information concerning industrial commercial or scientific experience.
- 8) A rate of 15% if received by a company controlling less than 25% of the voting power.
- 9) A rate of 15% if received by a person controlling less than 10% of the voting power.
- 10) Nil if paid to a government, bank or financial institution.
- 11) The treaty provides for WHT on dividends but Greece does not impose any withholding tax in accordance with its own legislation.
- 12) A Rate of 5% on film royalties.
- 13) A rate of 5% if received by a person controlling less than 50% of the voting power.
- 14) This rate applies to individual shareholders regardless of their percentage of shareholding. Companies controlling less than 10% of the voting shares are also entitled to this rate.
- 15) A rate of 10% for payments of a technical, managerial, or consulting nature.
- 16) Treaty rate is 15% therefore restricted to Cyprus legislation rate.
- 17) A rate of 10% if a dividend is paid by a company in which the beneficial owner has invested less than US\$100,000.
- 18) If investment is less than €200,000, dividends are subject to 15% WHT which is reduced to 10% if the recipient company controls 25% or more of the paying company.
- 19) No WHT for interest on deposits with banking institutions.
- 20) Kyrgyzstan, Tajikistan and Ukraine apply the USSR/Cyprus treaty.
- 21) A rate of 10% on interest received by a financial institution or when it relates to sale on credit of any industrial, commercial, or scientific equipment or of merchandise.
- 22) This rate applies for any copyright of literary, dramatic, musical, artistic, or scientific work. A 10% rate applies for industrial, commercial or scientific equipment. A 15% rate applies for patents, trade marks, designs or models, plans, secret formulas, or processes.
- 23) This rate applies to companies holding directly at least 25% of the share capital of the company paying the dividend. In all other cases the WHT is 10%.
- 24) This rate does not apply if the payment is made to a Cyprus international business entity by a resident of Bulgaria owning directly or indirectly at least 25% of the share capital of the Cyprus entity.
- 25) A rate of 7% if paid to a bank or financial institution.
- 26) Serbia and Montenegro apply the Yugoslavia/Cyprus treaty.
- 27) This rate applies if received by a company (excluding partnerships) that holds directly 25% of the shares. A rate of 10% applies in all other cases.
- 28) Applies to any consideration for the use of, or the right to use, any copyright of literary, artistic or scientific work (including cinematograph films and films, tapes discs for radio or television broadcasting), computer software, any patent, trademark, design or model, plan, secret formula or process, or for the information concerning industrial, commercial, or scientific experience.
- 29) This rate applies if received by a company (excluding partnership) which holds directly at least 10% of the shares for an uninterrupted period of no less than one year. 5% applies in all other cases.
- 30) 10% for patent, trademark, design or model, plan, secret formula or process, computer software or industrial, commercial, or scientific equipment, or for information concerning industrial, commercial, or scientific experience.

- 31) A rate of 5% if a dividend is paid by a company in which the beneficial owner has invested less than €150,000.
- 32) The provisions of the Parent-Subsidiary EU directive are applicable.
- 33) A rate of 15% if received by a company controlling less than 10% of the share capital of the paying company or the duration of any holding is less than one uninterrupted year. A rate of 15% also applies if received by an individual.
- 34) A 5% WHT will be levied on payment of royalties in respect of any copyright of scientific work, any patent, trade mark, secret formula, process or information concerning industrial, commercial or scientific experience. 10% WHT will be levied in all other cases.
- 35) This rate applies if the recipient company (partnership is excluded) holds directly 10% of the share capital of the paying company for an uninterrupted period of at least 2 years. 5% in all other cases.
- 36) A rate of 15% applies if received by a company controlling less than 10% of the voting power in the paying company and in all cases if received by an individual.
- 37) A rate of 15% if received by a company holding less than 10% of the share capital of the paying company and in all cases if received by an individual.
- 38) A rate of 15% if received by a company holding less than 10% of the shares of the paying company and in all cases if received by an individual.
- 39) The treaty with Spain is expected to be effective during 2014 in relation to WHT. The WHT provision of the treaty will be effective after the period of 3 months from the date of exchange of notes between the two countries.
- 40) A rate of 5% if received by a company holding less than 10% of the share capital of the paying company and in all cases if received by an individual or a company not limited at least partly by shares.