DOUBLE TAX TREATIES : LIST OF COUNTRIES

Under Tax Treaties, withholding tax on dividends is normally calculated at a lower rate than usual (zero rate can even be applied). Likewise, reduced rates of withholding tax are applied to **interest, dividend and royalty payments**; Luxembourg does not apply withholding tax to interest in any case).

Tax paid in one country is normally allowed as a credit against tax due on the same income in the other country. Luxembourg generally considers income earned abroad exempt.

	Dividends	Substantial Holdings	Interest	Royalties
Recipient	%	%	%	%
Resident corporations	0	0	0	0
Resident individuals	15	15	10	0
Nontreaty countries (Nonresident corporations and individuals)	15	15	0	0
Treaties	**Dividends**	**Substantial Holdings**	**Interest**	**Royalties**
Austria	15	5/0	-	-
Belgium	15	10/0	-	-
Brazil	25/15	15	-	-
Bulgaria	15	5	-	-
Canada	15	5	-	-
China, P.R (13)	10	5	-	-
Czech Republic	15	5/0	-	-
Denmark	15	5/0	-	-
Estonia			-	-
Finland	15	5/0	-	-
France	15	5/0	-	-
Germany	15	10/0	-	-
Greece	7.5	7.5/0	-	-
Hong Kong	0/10	3	-	-
Hungary	15	5/0	-	-
Iceland	15	5	-	-
Indonesia	15	10	-	-
Ireland	15	5/0	-	-
Israel	15	10	-	-
Italy	15	5/0	-	-
Japan	15	5	-	-
Korea (Rep. of)	15	10	-	-
Malaysia	10	5/0	-	-
Malta	15	5/0	-	-
Mauritius	10	5	-	-
Mexico	15	5	-	-
Mongolia	15	5/0	-	-
Morocco	15	10	-	-
Netherlands	15	2.5/0	-	-
Norway	15	5	-	-
Poland	15	5/0	-	-
Portugal	15	15/0	-	-
Romania	15	5	-	-
Russia	15	10	-	-
San Marino	15	0/15	-	-
Singapore	10	5	-	-
Slovakia	15	5/0	-	-
Slovenia	15	5/0	-	-
South Africa	15	5	-	-
Spain	15	5/0	-	-
Sweden	15	0	-	-
Switzerland	15	5/0	-	-
Thailand	15	5	-	-

Trinidad & Tobago	10	5	-	-
Tunisia	10	10	-	-
Turkey	20/15	5	-	-
Ukraine			-	-
United Kingdom	15	5/0	-	-
United States of America	15	5/0	-	-
Uzbekistan	15	5	-	-
Vietnam	15	10/5	-	-

Membership of 10 new States
The 27th of april 2006, have been approved the Convention avoiding the double taxation of associated companies with the 10 new states :
Czech Republic, Estonia, Cyprius, Lettonia, Lituanie, , Hungary, Malta, Poland, Slovenia, Slovakia

The Convention's aim is to insure, in a definite time, the avoidance of double taxation for European Member States associated companies.

Indeed, double taxation arising from these situations can produce capital flows disturbing within the EU working.

Source : **Administration des contributions directes du Grand-Duché de Luxembourg**