

Country	Dividend	Interest	Royalty	Fee for Technical Services
	(not being covered under Section 115-O)			
Albania	10%	10% [Note1]	10%	10%
Armenia	10%	10% [Note1]	10%	10%
Australia	15%	15%	10%/15% [Note 2]	10%/15% [Note 2]
Austria	10%	10% [Note1]	10%	10%
Bangladesh	a) 10% (if at least 10% of the capital of the company paying the dividend is held by the recipient company); b) 15% in all other cases	10% [Note1]	10%	No separate provision
Belarus	a) 10%, if paid to a company holding 25% shares; b) 15%, in all other cases	10% [Note1]	15%	15%
Belgium	15%	15% (10% if loan is granted by a bank)	10%	10%
Botswana	a) 7.5%, if shareholder is a company and holds at least 25% shares in the investee-company; b) 10%, in all other cases	10% [Note1]	10%	10%
Brazil	15%	15% [Note1]	a) 25% for use of trademark; b) 15% for others	15%
Bulgaria	15%	15% [Note1]	a) 15% of royalty relating to literary, artistic, scientific works other than films or tapes used for radio or television broadcasting; b) 20%, in other cases	20%
Canada	a) 15%, if at least 10% of the voting powers in the company, paying the dividends, is controlled by the recipient company; b) 25%, in other cases	15% [Note1]	10%-15%	10%-15%
China	10%	10% [Note1]	10%	10%
Columbia	5%	10% [Note1]	10%	10%
Cyprus	a) 10%, if at least 10% of the capital of the company paying dividend is held by the recipient company; b) 15%, in all other cases	10% [Note1]	15%	15%/10%
Czech Republic	10%	10% [Note1]	10%	10%
Denmark	a) 15%, if at least 25% of the shares of the company paying the dividend is held by the recipient company; b) 25%, in other cases	a) 10% if loan is granted by bank; b) 15% for others [Note1]	20%	20%
Estonia	10%	10% [Note1]	10%	10%
Ethiopia	7.50%	10% [Note1]	10%	10%
Finland	10%	10% [Note1]	10%	10%
Fiji	5%	10% [Note 1]	10%	10%
France	10%	10% [Note1]	10%	10%
Georgia	10%	10% [Note1]	10%	10%
Germany	10%	10% [Note1]	10%	10%
Hungary	10%	10% [Note1]	10%	10%
Indonesia	a) 10%, if at least 25% of the shares of the company paying the dividend is held by the recipient company; b) 15%, in other cases	10% [Note1]	15%	No separate provision
Iceland	10%	10% [Note1]	10%	10%
Ireland	10%	10% [Note1]	10%	10%
Israel	10%	10% [Note1]	10%	10%
Italy	a) 15% if at least 10% of the shares of the company paying dividend is beneficially owned by the recipient company; b) 25% in other cases	15% [Note1]	20%	20%
Japan	10%	10% [Note1]	10%	10%
Jordan	10%	10% [Note1]	20%	20%
Kazakhstan	10%	10% [Note1]	10%	10%
Kenya	15%	15% [Note1]	20%	17.50%
Korea	a) 15%, if at least 20% of the capital of the company paying dividend is held by the recipient company; b) 20%, in other cases	a) 10%, if interest is paid to a bank; b) 15%, for others [Note1]	15%	15%
Kuwait	10% [Note 1]	10%	10%	10%
Kyrgyz Republic	10%	10% [Note1]	15%	15%
Latvia	10%	10% [Note1]	10%	10%
Lithuania	5% *, 15%	10% [Note1]	10%	10%
Luxembourg	10%	10% [Note1]	10%	10%
Malaysia	5%	10% [Note1]	10%	10%
Malta	10%	10% [Note1]	10%	10%
Mongolia	15%	15% [Note1]	15%	15%
Mauritius	a) 5%, if at least 10% of the capital of the company paying the dividend is held by the recipient company; b) 15%, in other cases	No Rates Specified	15%	No separate provision
Montenegro	5% (in some cases 15%)	10% [Note1]	10%	10%
Myanmar	5%	10% [Note1]	10%	No separate provision
Morocco	10%	10% [Note1]	10%	10%
Mozambique	7.50%	10% [Note1]	10%	No separate provision
Namibia	10%	10% [Note1]	10%	10%
Nepal	5% **, 10%	10% [Note1]	15%	No separate provision
Netherlands	10%	10% [Note1]	10%	10%
New Zealand	15%	10% [Note1]	10%	10%
Norway	10%	10% [Note1]	10%	10%
Oman	a) 10%, if at least 10% of shares are held by the recipient company; b) 12.5%, in other cases	10% [Note1]	15%	15%
Philippines	a) 15%, if at least 10% of the shares of the company paying the dividend is held by the recipient company; b) 20%, in other cases	a) 10%, if interest is received by a financial institution or insurance company; b) 15% in other cases [Note1]	15% if it is payable in pursuance of any collaboration agreement approved by the Government of India	No separate provision

As appearing on Income tax of India website on 4.12.14

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	(not being covered under Section 115-O)				
Poland	10%		10% [Note1]	15%	15%
Portuguese Republic	10%***/15%		10%	10%	10%
Qatar	a) 5%, if at least 10% of the shares of the company paying the dividend is held by the recipient company; b) 10%, in other cases		10% [Note1]	10%	10%
Romania	10%		10% [Note1]	10%	10%
Russian Federation	10%		10% [Note1]	10%	10%
Saudi Arabia	5%		10% [Note1]	10%	No separate provision
Serbia	a) 5%, if recipient is company and holds 25% shares; b) 15%, in any other case		10% [Note1]	10%	10%
Singapore	a) 10%, if at least 25% of the shares of the company paying the dividend is held by the recipient company; b) 15%, in other cases		a) 10%, if loan is granted by a bank or similar institute including an insurance company; b) 15%, in all other cases	10%	10%
Slovenia	a) 5%, if at least 10% of the shares of the company paying the dividend is held by the recipient company; b) 15%, in other cases		10%	10%	10%
South Africa	10%		10% [Note1]	10%	10%
Spain	15%		15% [Note1]	10%/20% [Note 3]	20% [Note 3]
Sri Lanka	7.50%		10% [Note1]	10%	10%
Sudan	10%		10% [Note1]	10%	10%
Sweden	10%		10% [Note1]	10%	10%
Swiss Confederation	10%		10% [Note1]	10%	10%
Syrian Arab Republic	a) 5%, if at least 10% of the shares of the company paying the dividend is held by the recipient company; b) 10%, in other cases		10% [Note1]	10%	No separate provision
Tajikistan	a) 5%, if at least 25% of the shares of the company paying the dividend is held by the recipient company; b) 10%, in other cases		10% [Note1]	10%	No separate provision
Tanzania	5%****, 10%		10%	10%	No separate provision
Thailand	a) 15%, if dividend is paid by an industrial company and at least 10% of capital of such company is held by the recipient company; b) 20%, in other cases		a) 10%, if it is received by a financial institutions or insurance company; b) 25% for others [Note1]	15%	No separate provision
Trinidad and Tobago	10%		10% [Note1]	10%	10%
Turkey	15%		a) 10% if loan is granted by a bank, etc.; b) 15% in other cases [Note1]	15%	15%
Turkmenistan	10%		10% [Note1]	10%	10%
Uganda	10%		10% [Note1]	10%	10%
Ukraine	a) 10%, if at least 25% of the shares of the company paying the dividend is held by the recipient company; b) 15%, in other cases		10% [Note1]	10%	10%
United Arab Emirates	10%		a) 5% if loan is granted by a bank/similar financial institute; b) 12.5%, in other cases	10%	No separate provision
United Mexican States	10%		10% [Note1]	10%	10%
United Kingdom	15%/10% (Note 4)		a) 10%, if interest is paid to a bank; b) 15%, in other cases [Note1]	10%/15% [Note 2]	10%/15% [Note 2]
United States	a) 15%, if at least 10% of the voting stock of the company paying the dividend is held by the recipient company; b) 25% in other cases		a) 10% if loan is granted by a bank/similar institute including insurance company; b) 15% for others	10%/15% [Note 2]	10%/15% [Note 2]
Uruguay	5%		10% [Note1]	10%	10%
Uzbekistan	10%		10% [Note1]	10%	10%
Vietnam	10%		10% [Note1]	10%	10%
Zambia	a) 5%, if at least 25% of the shares of the company paying the dividend is held by a recipient company for a period of at least 6 months prior to the date of payment of the dividend; b) 15% in other cases		10% [Note1]	10%	10%

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¶If the beneficial owner is a company (other than a partnership) which holds directly at least 10 per cent of the capital of the company paying the dividends.
¶¶5% if beneficial owner of shares is a company and it holds at least 10% of shares of the company paying the dividends.
¶¶¶ if the beneficial owner is a company that, for an uninterrupted period of two fiscal years prior to the payment of the dividend, owns directly at least 25 per cent of the capital stock of the company paying the dividends.
¶¶¶¶5% if recipient company owns at least 25% share in the company paying the dividend.
1. Dividend/interest earned by the Government and certain specified institutions, <i>inter-alia</i> , Reserve Bank of India is exempt from taxation in the country of source (subject to certain condition).
2. Royalties and fees for technical services would be taxable in the country of source at the rates prescribed for different categories of royalties and fees for technical services. These rates shall be subject to various conditions
3. Royalties and fees for technical services would be taxable in the country of source at the following rates:
a. 10 per cent in case of royalties relating to the payments for the use of, or the right to use, industrial, commercial or scientific equipment;
b. 20 per cent in case of fees for technical services and other royalties.
4. (a) 15 per cent of the gross amount of the dividends where those dividends are paid out of income (including gains) derived directly or indirectly from immovable property within the meaning of Article 6 by an investment
(b) 10 per cent of the gross amount of the dividends, in all other cases