## WITHHOLDING TAX ANNEXURE: DOUBLE TAXATION AGREEMENT RATES



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Dividend Withholding Tax (DWT) came into effect from 1 April 2012 and Interest Withholding Tax (IWT) from 1 March 2015. The rates quoted below reflect the terms of the Double Taxation Agreements in force between South Africa and the relevant countries. The table was last updated on 15 December 2017.

## HOW TO USE THIS TABLE

Countries refer to the country you are resident in for tax purposes. Treaty rates refer to the tax rate that will apply to your dividends and interest. DTA Article refers to the applicable article within the Double Taxation Agreements in force between South Africa and the specific country.

	DWT		IWT	IWT			DWT	DWT	DWT IWT
Countries	Treaty rates(%)	DTA Article	Treaty rates(%)	DTA Article		Countries	Countries Treaty rates(%)		
Algeria	15 <sup>1</sup>	10	10	11		Lesotho	Lesotho 15	Lesotho 15 10	Lesotho 15 10 10
Australia	15 <sup>1</sup>	10	10	11	1	Luxembourg	Luxembourg 15 <sup>1</sup>	Luxembourg 15 <sup>1</sup> 10	Luxembourg 15 <sup>1</sup> 10 0
Austria	15 <sup>1</sup>	10	0	11	1	Malaysia	Malaysia 10 <sup>1</sup>	Malaysia 10 <sup>1</sup> 10	Malaysia 10 <sup>1</sup> 10 10
Belarus	15 <sup>1</sup>	10	10	11	1	Malta	Malta 10 <sup>1</sup>	Malta 10 <sup>1</sup> 10	Malta 10 <sup>1</sup> 10 10
Belgium	15 <sup>1</sup>	10	10	11	l	Mauritius	Mauritius 10 <sup>1</sup>	Mauritius 10 <sup>1</sup> 10	Mauritius 10 <sup>1</sup> 10 10
Botswana	15 <sup>1</sup>	10	10	11		Mexico	Mexico 10 <sup>1</sup>	Mexico 10 <sup>1</sup> 10	Mexico 10 <sup>1</sup> 10 10
Brazil	15 <sup>1</sup>	10	15	11	1	Mozambique	Mozambique 15 <sup>1</sup>	Mozambique 15 <sup>1</sup> 10	Mozambique 15 <sup>1</sup> 10 8
Bulgaria	15 <sup>1</sup>	10	5	11		Namibia	Namibia 15 <sup>1</sup>	Namibia 15 <sup>1</sup> 10	Namibia 15 <sup>1</sup> 10 10
Cameroon	15 <sup>1</sup>	10	10	11	1	Netherlands	Netherlands 10 <sup>1</sup>	Netherlands 10 <sup>1</sup> 10	Netherlands 10 <sup>1</sup> 10 0
Canada	15 <sup>1</sup>	10	10	11	1	New Zealand	New Zealand 15 <sup>1</sup>	New Zealand 15 <sup>1</sup> 10	New Zealand 15 <sup>1</sup> 10 10
Chile	15 <sup>1</sup>	10	15	11	ĺ	Nigeria	Nigeria 10 <sup>1</sup>	Nigeria 10 <sup>1</sup> 10	Nigeria 10 <sup>1</sup> 10 7.5
China	5	10	10	11	1	Norway	Norway 15 <sup>1</sup>	Norway 15 <sup>1</sup> 10	Norway 15 <sup>1</sup> 10 0
Congo (DRC)	15 <sup>1</sup>	10	10	11		Oman	Oman 10 <sup>1</sup>	Oman 10 <sup>1</sup> 10	Oman 10 <sup>1</sup> 10 0
Croatia	10 <sup>1</sup>	10	0	11		Pakistan	Pakistan 15 <sup>1</sup>	Pakistan 15 <sup>1</sup> 10	Pakistan 15 <sup>1</sup> 10 10
Cyprus	10 <sup>1</sup>	10	0	11		Poland	Poland 15 <sup>1</sup>	Poland 15 <sup>1</sup> 10	Poland 15 <sup>1</sup> 10 10
Czech Republic	15 <sup>1</sup>	10	0	11		Portugal	Portugal 15 <sup>1</sup>	Portugal 15 <sup>1</sup> 10	Portugal 15 <sup>1</sup> 10 10
Denmark	15 <sup>1</sup>	10	0	11	1	Qatar	Qatar 10 <sup>1</sup>	Qatar 10 <sup>1</sup> 10	Qatar 10 <sup>1</sup> 10 10
Egypt	15	10	12	11	1	Romania	Romania 15	Romania 15 10	Romania 15 10 15
Ethiopia	10	10	8	11		Russian Federation	Russian Federation 15 <sup>1</sup>	Russian Federation 15 <sup>1</sup> 10	Russian Federation 15 <sup>1</sup> 10 10
Finland	15 <sup>1</sup>	10	0	11		Rwanda	Rwanda 20 <sup>1</sup>	Rwanda 20 <sup>1</sup> 10	Rwanda 20 <sup>1</sup> 10 10
France	15 <sup>1</sup>	10	0	11		Saudi Arabia	Saudi Arabia 10 <sup>1</sup>	Saudi Arabia 10 <sup>1</sup> 10	Saudi Arabia 10 <sup>1</sup> 10 5
Germany	15 <sup>1</sup>	7	10	8		Seychelles	Seychelles 10 <sup>1</sup>	Seychelles 10 <sup>1</sup> 10	Seychelles 10 <sup>1</sup> 10 0
Ghana	15 <sup>1</sup>	10	10	11		Singapore			
Greece	15 <sup>1</sup>	10	8	11		Slovak Republic			
Hong Kong	10 <sup>1</sup>	10	10	11	ĺ	Spain			
Hungary	15 <sup>1</sup>	10	0	11		Swaziland			
India	10	10	10	11		Sweden			
Indonesia	15 <sup>1</sup>	10	5	11		Switzerland	I		
Iran	10	10	5	11		Taiwan			
Ireland	10 <sup>1</sup>	10	0	11		Tanzania			
Israel	20	-	15	11		Thailand			
Italy	15 <sup>1</sup>	10	10	11		Tunisia			
Japan	15 <sup>1</sup>	10	10	11		Turkey			
Kenya	10	10	10	11		Uganda	,		
Korea (South)	15 <sup>1</sup>	10	10	11		Ukraine	3		
	0	10	0	11		United Arab Emirates	I ┣────────────────────────────────────		

	DWT		IWT	IWT
Countries	Treaty rates(%)	DTA Article	Treaty rates(%)	DTA Article
United Kingdom	10 <sup>1</sup>	10	0	11
United States	15 <sup>1</sup>	10	0	11
Zimbabwe	10 <sup>1</sup>	10	5	11

## Notes to the above table:

1. The above table was compiled based on the maximum Dividend Withholding Tax rate as per the relevant country's DTA. Please note to qualify for a further reduced rate you may need to meet certain minimum requirements. Please refer to www.sars.gov.za and the relevant DTA for more information.

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