

Double Taxation Treaties – Updated situation as at 1 January 2014



The network of effective double taxation treaties between Montenegro and other countries has been further extended as of 1 January 2014 for two new countries: Azerbaijan and United Arab Emirates (UAE).

Please find below the list of 40 double taxation treaties of Montenegro effective as at 1 January 2014:

No.	Country	Dividends*	Interest	Royalties
1	Albania	15/5	10	10
2	Azerbaijan	10	10	10
3	Belarus	15/5	8	10
4	Belgium	15/10	15	10
5	Bosnia & Herzegovina	10/5	10	10
6	Bulgaria	15/5	10	10
7	China	5	10	10
8	Croatia	10/5	10	10
9	Cyprus	10	10	10
10	Czech Republic	10	10	10/5***
11	Denmark	15/5	0	10
12	Egypt	15/5	15	15
13	Finland	15/5	0	10
14	France	15/5	0	0
15	FYROM (Macedonia)	15/5	10	10
16	Germany	15	0	10
17	Hungary	15/5	10	10
18	Ireland	10/5	10	10/5**
19	Italy	10	10	10
20	Kuwait	10/5	10	10
21	Latvia	10/5	10	10/5**

22	Malaysia	9	10	10
23	Malta	10/5	10	10/5**
24	Moldova	15/5	10	10
25	Netherlands	15/5	0	10
26	North Korea	10	10	10
27	Norway	15	0	10
28	Poland	15/5	10	10
29	Romania	10	10	10
30	Russia	15/5	10	10
31	Serbia	10	10	10/5**
32	Slovak Republic	15/5	10	10
33	Slovenia	10/5	10	10/5**
34	Sri Lanka	12.50	10	10
35	Sweden	15/5	0	0
36	Switzerland	15/5	10	0****
37	Turkey	15/5	10	10
38	UAE	10/5*****	10	10/5**
39	Ukraine	10/5	10	10
40	United Kingdom	15/5	10	10

*If the recipient company holds at least 25% (20% in DTT with Switzerland and 10% in DTT with Ireland) of the paying company, the lower of the two rates shown applies.

**For the use of, or the right to use, any copyrights of literary, artistic or scientific work, including cinematography films, films and tapes for television and radio, the tax shall not exceed 5% of the gross amount of the royalties.

For the use of, the right to use, any patent, trade mark, design or model, plan secret formula or process, or for the use of, or the right to use, industrial, commercial or scientific equipment or for information concerning industrial, commercial or scientific experience, tax shall not exceed 10% of the gross amount of royalties.

***For the use of, or the right to use, any copyrights of literary, artistic or scientific work **except for computer software** and including cinematography films or films or tapes used for radio or television broadcasting, tax shall not exceed 5% of the gross amount of royalties.

For the use of, or the right to use, any patent, trade mark, design or model, plan, secret formula or process and computer software, or for the use of, or the right to use, industrial, commercial or scientific equipment or for information concerning industrial, commercial or scientific experience, tax shall not exceed 10% of the gross amount of royalties.

****Provided by the Protocol to the treaty between Montenegro and Switzerland. Valid until Switzerland imposes withholding tax on royalties.

*****The lower rate applies if the beneficial owner is a company which holds directly or indirectly at least 5% of the capital of the Montenegrin company.

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