

Double Taxation Treaties – Situation as at 1 January 2012



The network of effective double taxation treaties between Serbia and other countries has been further extended as of 1 January 2012 for two new countries: Iran and Montenegro.

Please find below the list of 49 double taxation treaties of Serbia effective as at 1 January 2012:

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

26	Kuwait	10/5	10	10
27	Latvia	10/5	10	10/5**
28	Libya	10/5	10	10
29	Lithuania	10/5	10	10
30	Malaysia	20	10	10
31	Malta	10/5	10	10/5**
32	Moldova	15/5	10	10
33	Montenegro	10	10	10/5**
34	Netherlands	15/5	0	10
35	Norway	15	0	10
36	Pakistan	10	10	10
37	Poland	15/5	10	10
38	Qatar	10/5	10	10
39	Romania	10	10	10
40	Russia	15/5	10	10
41	Slovak Republic	15/5	10	10
42	Slovenia	10/5	10	10/5**
43	Spain	10/5	10	10/5***
44	Sri Lanka	12.50	10	10
45	Sweden	15/5	0	0
46	Switzerland	15/5	10	0****
47	Turkey	15/5	10	10
48	Ukraine	10/5	10	10
49	United Kingdom	15/5	10	10

* If the recipient company holds at least 25% (20% in DTT with Switzerland) 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, or 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, the tax shall not exceed 10% of the gross amount of the royalties.

*** For the use of, or the right to use, any copyright of literary, artistic or scientific work **except for computer software** and including cinematography films or films or tapes used for radio or television broadcasting, the tax shall not exceed 5% of the gross amount of the 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, the tax shall not exceed 10% of the gross amount of the royalties.

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

Foreign Tax Residence Certificates

This is also a reminder for you to send to your non-resident business partners the POR-2 form (which needs to be certified by foreign competent authorities). This will allow for prompt application of the double taxation treaty provisions at source in Serbia.

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