

TaxNewsFlash

United States



No. 2022-367 December 7, 2022

United States and Croatia sign income tax treaty

The U.S. Treasury Department today announced that officials from the United States and Croatia have signed a comprehensive income tax treaty that closely follows the U.S. Model income tax treaty.

According to today's **Treasury release**, key aspects include:

- Elimination of withholding taxes on cross-border payments of dividends paid to pension funds and on payments of interest
- Reductions in withholding taxes on cross-border payments of dividends other than those paid to a pension fund, as well as royalties
- Modern anti-abuse provisions intended to prevent instances of non-taxation of income as well as treaty shopping
- Robust dispute resolution mechanisms including mandatory binding arbitration
- Standard provisions for the exchange of information to help the revenue authorities of both nations carry out their duties as tax administrators

The new tax treaty will enter into force after the United States and Croatia have notified each other that they have completed their requisite domestic procedures, which in the case of the United States refers to the advice and consent to ratification by the U.S. Senate.

Read text [PDF 475 KB] of the income tax treaty

kpmg.com/socialmedia



The information contained in TaxNewsFlash is not intended to be "written advice concerning one or more Federal tax matters" subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230, as the content of this document is issued for general informational purposes only, is intended to enhance the reader's knowledge on the matters addressed therein, and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.

KPMG International Limited is a private English company limited by guarantee and does not provide services to clients. No member firm has any authority to obligate or bind KPMG International or any other member firm vis-à-vis third parties, nor does KPMG International have any such authority to obligate or bind any member firm.

Direct comments, including requests for subscriptions, to <u>Washington National Tax</u>. For more information, contact KPMG's Federal Tax Legislative and Regulatory Services Group at + 1 202.533.4366, 1801 K Street NW, Washington, DC 20006-1301.

To unsubscribe from TaxNewsFlash-United States, reply to Washington National Tax.

Privacy | Lega