PKF

Indonesia

Tax Guide

2016/17

FOREWORD

A country's tax regime is always a key factor for any business considering moving into new markets. What is the corporate tax rate? Are there any incentives for overseas businesses? Are there double tax treaties in place? How will foreign source income be taxed?

Since 1994, the PKF network of independent member firms, administered by PKF International Limited, has produced the PKF Worldwide Tax Guide (WWTG) to provide international businesses with the answers to these key tax questions.

As you will appreciate, the production of the WWTG is a huge team effort and we would like to thank all tax experts within PKF member firms who gave up their time to contribute the vital information on their country's taxes that forms the heart of this publication.

The PKF Worldwide Tax Guide 2016/17 (WWTG) is an annual publication that provides an overview of the taxation and business regulation regimes of the world's most significant trading countries. In compiling this publication, member firms of the PKF network have based their summaries on information current on 30 April 2016, while also noting imminent changes where necessary.

On a country-by-country basis, each summary such as this one, addresses the major taxes applicable to business; how taxable income is determined; sundry other related taxation and business issues; and the country's personal tax regime. The final section of each country summary sets out the Double Tax Treaty and Non-Treaty rates of tax withholding relating to the payment of dividends, interest, royalties and other related payments.

While the WWTG should not to be regarded as offering a complete explanation of the taxation issues in each country, we hope readers will use the publication as their first point of reference and then use the services of their local PKF member firm to provide specific information and advice.

Services provided by member firms include:

- Assurance & Advisory;
- Financial Planning / Wealth Management;
- Corporate Finance;
- Management Consultancy;
- IT Consultancy;
- Insolvency - Corporate and Personal;
- Taxation;
- Forensic Accounting; and,
- Hotel Consultancy.

In addition to the printed version of the WWTG, individual country taxation guides such as this are available in PDF format which can be downloaded from the PKF website at www.pkf.com

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PKF INTERNATIONAL LIMITED
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MEMBER FIRM

City	Name	Contact Information
Jakarta	Paul Hadiwinata	+62 21 3144003 jkt-office@pkfhadiwinata.com

BASIC FACTS

Full name:	Republic of Indonesia
Capital:	Jakarta
Main languages:	Indonesian
Population:	248.5 million (2013 PRB)
Major religion:	Islam
Monetary unit:	Indonesian Rupiah (IDR)
Internet domain:	.id
Int. dialling code:	+62

KEY TAX POINTS

- Companies resident in Indonesia are subject to income tax on their worldwide income including capital gains. A permanent establishment of a foreign company is subject to tax in Indonesia on its worldwide income.
- Branch profits are taxed at the same rate as corporate profits. A 20% withholding branch profit tax is also payable on after tax income in addition to the corporate tax.
- Indonesian individuals are taxed on their worldwide income.
- Non-resident companies are subject to tax on income, including capital gains, derived from Indonesia.
- VAT is levied at a standard rate of 10% on taxable supplies of goods and most services.
- There is a sales tax on the transfer or importation of luxury goods, at rates between 10% and 75%.
- Stamp duties apply to the transfer of land, and certain documents are subject to Stamp Duty.
- Double tax relief credits are generally available to Indonesian residents in respect of overseas tax paid on foreign-sourced income, up to a maximum of the Indonesian tax payable on the income concerned.
- Generally, residents are subject to a creditable withholding tax of 15% on payments received from fellow Indonesian residents, although dividends are exempt under certain circumstances. Payments to non-residents are generally subject to a final withholding tax of 20%.

A. TAXES PAYABLE

COMPANY TAX

A company will be considered taxable in Indonesia if it has a presence and conducts business in that country. Resolution of this question depends on whether the entity has a 'permanent establishment' in Indonesia. This term is widely defined to include a place of management, branch, representative office, office building, agent, factory or workshop, construction or mining site. Where such a presence exists the permanent establishment is taxable on its worldwide income. Where similar businesses to that carried on by the permanent establishment are conducted in Indonesia, care must be taken to ensure that the 'force of attraction' principle does not result in that business income being taxed in the permanent establishment.

Company tax is payable by monthly instalments. The collection of tax from interest, royalties, rentals and dividends, professional service fees, technical and management service fees, installation service fees, repair and maintenance service fees is by way of withholding tax. Where the recipient is a tax resident of Indonesia, the tax withheld is taken into account in determining the company's final tax liability (except for tax on interest from banks, space rentals, and construction services which are treated as a final tax). Where the recipient is not a resident, the tax withheld represents a final tax.

Under the Income Tax Law No. 36 Year 2008, which applies from 1 January 2009, corporations were taxed at a single rate of 28%, which was reduced to 25% from 2010 onwards. Corporations with an annual gross income of up to IDR 50 billion are entitled to a tax discount of 50% of the standard rate on taxable income derived from the portion of gross income up to IDR 4.8 billion. As for public companies, corporate tax deduction at 5% will be granted when meeting the following requirements:

1) Minimum listing requirement is 40%;
2) The minimum public ownership is 300 parties where each party holds less than 5% of the paid-in shares; and,
3) The above two conditions must be fulfilled for at least six months (183 days) in a tax year.

CAPITAL GAINS TAX

Capital gains and losses are in the main included as ordinary income and taxed accordingly, except for transactions in stock on the Indonesian stock market and on private property. The gain/loss is ignored and tax is instead charged on the transaction value as follows:

Stock	0.1% of transaction value	Final tax, except for founder shares sold by founder = 0.5% of transaction value
Private property: Land and building	5% of transfer value	Final tax for individuals, foundations and corporations

BRANCH PROFITS TAX

Branch profits are taxed at the same rate as corporate profits. However, a withholding branch profits tax of maximum 20%, subject to protection under a double tax agreement, is also payable on after tax income in addition to the corporate tax. This additional tax is payable irrespective of whether the profits are remitted. Refer to 'Withholding Taxes' below for variations to the above rate. An exemption from withholding tax may be granted to a permanent establishment which reinvests its net profit in Indonesia.

SALES TAX ON LUXURY GOODS

Under VAT Law No.42 Year 2009, effected 1 April 2010, the tariff of sales tax on luxury goods is stipulated with a minimum 10% and a maximum up to 200%, imposed on imported or domestically produced. Currently, the rates of sales tax on luxury goods applied are between 20% up to 125%. For exports however, even where classified as luxury goods, are taxed at a zero per cent tariff. The tax is collected at the manufacturer/import level. Payment of the sales tax is required by the 15th day of the following month and returns need to be submitted by the 20th day of the following month.

Luxury items subject to sales tax	**Tax Rate (%)**
Luxury houses and town houses non-strata title with selling price of IDR 20 billion and above	20
Apartments, condominiums, towns houses strata title and the likes with selling price of IDR 10 billion and above	20
Air balloons and unpowered aircrafts	40
Bullets of fire arms and other types fire arms, except for nation’s use	40
Luxury cruisers, ferries and yachts, except for nation and commercial’s use	75
Aircrafts and helicopters, except for nation and commercial’s use	50

Firearms, revolvers, pistols, except for nation's use	50
Motor vehicles with the capacity of 10 to 15 passengers	10
Motor vehicles of 1500 cc to 2500 cc with the capacity of fewer than 10 passengers	20
Sedan or station wagon with the cylinder up to 1500 cc	30
2-wheel drive motor vehicles other than sedan and station wagon with the cylinder of 2500 cc to 3000 cc	40
4-wheel drive motor vehicles, sedan and station wagon, with the cylinder of 1500 cc to 3000 cc	40
Special purpose vehicles for golf	50
Motorcycles with the cylinder capacity of 250 cc to 500 cc	60
Special purpose vehicles to be used in the snow, beach, mountains and the like	60
Sedan and station wagon with the capacity of more than 3000 cc	125
Diesel sedan and station wagon with the capacity of more than 2500 cc	125
Motorcycles with the capacity cylinder of more than 500 cc	125
Caravan trailer and semi-trailer for housing and camping	125

VALUE ADDED TAX (VAT)

VAT at the general rate of 10% is imposed on importers, manufacturers, wholesalers and retailers and on the provision of most services. While the VAT laws permit amendments of the rates for individual items, currently the products with a rate other than 10% are cigarettes and used cars. Services such as package deliveries and travel agents are taxed at 1%, while factoring is imposed at 5% on the fees received. Exports of taxable goods are effectively excluded from VAT by being subject to the tax at a nil rate. Under VAT Law Number 42 Year 2009, which took effect from 1 April 2010, the export of services is subject to 0% VAT. However the Ministry of Finance (MoF) Regulation further defines that the zero-rated VAT is only applicable to the following services:

1) Sub-contracting services with certain requirements:
   - The buyer or recipient of taxable service is outside the Customs area and is a non-resident taxpayer and does not have a permanent establishment as specified in Income Tax Law;
   - Specification and material are provided by the buyer or the recipient of the taxable service;
   - Materials are defined as raw materials, work in process and/or supporting material to be further processed into finished taxable goods;
   - Ownership of finished goods is in the hand of the buyer or the recipient of the taxable service;
   - The sub-contracting entrepreneur delivers the products by request from the buyer or the recipient of the taxable service to outside the Customs area;
2) Construction services including construction planning, construction work and construction supervision located outside the Customs area;
3) Repair and maintenance services which are attached to services of movable goods utilised outside the customs area;

VAT is payable by the end of the following month of the relevant transaction prior to the submission deadline of the monthly tax return. In the case of certain services rendered by non-residents of Indonesia such as the use of intangible taxable goods and/or offshore services, the recipient of these services has an obligation, by way of self-assessment, to pay and report import VAT by the 15th of the following month. Goods excluded from VAT:

- Basic necessities;
- Mining taken from natural resources;
- Food served in hotels and restaurants, including food and drinks provided by catering services;
- Money, gold and securities.

Services excluded from VAT:

- Medical, social and religious services;
- Postal and account transfer services;
- Banking, insurance and non-banking financial leasing;
- Educational services;
- Finance leasing;
- Art and entertainment services;
- Radio and television broadcasting services, other than advertisements;
- Public transportation services, i.e. land, sea and domestic air transportation (effective 1 April 2010);
- Manpower and recruitment services;
- Hotel and boarding house services;
- Services provided by the government relating to public administration and formality requirements;
- Parking services (effective 1 April 2010);
- Public telephone (by coin) services (effective 1 April 2010);
- Food and catering services (effective 1 April 2010).

FRINGE BENEFITS TAX (FBT) / BENEFITS IN KIND

Benefits in kind received by employees, including discounted or free housing, are not taxable to the employee nor deductible to the provider/employer. However, company cars and cellular phones provided to the employee are deductible at 50% of the acquisition cost by way of depreciating those assets over their useful lives (8 years and 4 years), while cellular phone refill vouchers and repair expenses can be claimed as deduction at 50%.

A full deduction however applies to food and drinks provided to employees in the workplace and employee benefits required for job performance such as protective clothing and uniforms, transportation costs to and from the place of work, accommodation for ship crews and the like, and also for housing provided in remote areas approved by the Minister of Finance.

LOCAL TAXES

Provincial tax is charged mostly at 10% i.e. hotel and restaurant services, parking services.

STAMP DUTY ON LAND RIGHT TRANSFER

Effective from 1 January, 2011, Stamp Duty on building and/or land right transfer is charged under the provincial government at 5% of the transfer cost.

OTHER TAXES:
DOCUMENTARY STAMP TAX

Stamp Duty is of a nominal amount of IDR 6,000 or IDR 3,000. The types of documents upon which Stamp Duty is payable include:

- Letters of agreement, prepared for the purpose of evidencing acts, facts or conditions of a civil nature;
- Notarial deeds;
- All documents bearing a sum of money including letters of promise to pay, securities or cheques.

LAND AND BUILDING TAX

Land and building tax is payable annually on land, buildings and permanent structures, although the effective rates are typically 0.5% of the value of the property.

IMPORT DUTIES

Import duties are payable at the following rates:

Group	Goods	Rate (%)
Automobiles	Passenger and commercial vehicles	5 - 40
Automobiles parts		0 - 10
Vessels	Ship, boats, and floating structure	0 - 5
Electronic goods		0 – 12.5
Footwear		5 – 25
Beverages, ethyl alcohol and alcoholic drinks	Ethyl alcohol, beer, wine, spirits, and other beverages.	5 – 30
Essential oils and resinoids	Odoriferous substances	5 – 150
Agricultural products	Animal and vegetable products	0 – 25
Textile, textile products and accessories	Bags, harnesses, apparels, and clothing accessories, etc	5 – 15
Other	Chemicals, pharmaceutical products, rubber, etc	0 – 25

B. DETERMINATION OF TAXABLE INCOME

Taxable income is calculated under normal accounting principles adjusted for specific tax rules. A deduction is allowed for all outgoings and expenses incurred for obtaining, collecting and maintaining taxable income. Deductions are not allowed in relation to the following items:

- Benefits in kind such as free housing (see also 'Fringe benefits tax/benefits in kind' above);
- Income tax payments (including penalties);
- Capital expenditure (see 'Depreciation' below);
- Private expenses;
- Non-business gifts, aid and donations, except 'zakat' (Islamic alms) and other compulsory religious donations approved by the government;
- Profit distributions;
- Employers' contributions for life, health, and accident insurance and contributions to non-approved pension funds unless the contributions are treated as taxable income of employees;
- Provisions (except for financial institutions);
- Dividends;
- Expenses related to income which are taxed at a final rate, i.e. interest on loans related to time deposits;
- Expenses related to income which are exempt from tax, i.e. interest on loans used to buy shares where dividends to be received are not subject to income tax;
- Salaries or compensation received by a partnership or firm as members where their participation

is not divided into shares;

INVESTMENT INCENTIVES

Taxpayers investing in certain business sectors and/or in certain areas/locations may be entitled to taxation incentives in the form of:

- A reduction in net income up to a maximum of 30% (5% per year for six years) from the total investment realised;
- Accelerated depreciation and amortisation;
- Tax loss compensations for a longer period but not exceeding 10 years;
- A reduction in withholding taxes on dividends to 10% unless a lower rate applies under the relevant tax treaty.

DEPRECIATION

Where fixed assets (either tangible or intangible) have a beneficial life of greater than one year, tax relief for the cost of acquisition is available through depreciation. The following depreciation rates are applicable:

Beneficial Life	Straight-line method (%)	Declining-balance method (%)
A. Non building:		
1 – 4 years	25	50
4 – 8 years	12.5	25
8 – 16 years	6.25	12.5
16 – 20 years	5	10
B. Building:		
Permanent	5	-
Non-permanent	10	-

Note: Depreciation of property is taken into account commencing the month, instead of the year, that the property is acquired which means that the first year depreciation is accounted for on a pro rata basis, while the net book value is depreciated accordingly over its remaining beneficial years, unless it is retired or sold within its beneficial life.

STOCK / INVENTORY

Taxpayers may value inventory using either the 'first-in, first-out' (FIFO) or Average Cost methods. Whichever method is selected, it must be consistently applied.

CAPITAL GAINS AND LOSSES

Gains and losses on capital items are taxable in Indonesia without special treatment being afforded to such items, except for gains and losses on sales of share certificates of listed companies and on sales of land and buildings as previously mentioned.

DIVIDENDS

An exemption exists under particular circumstances for dividends received by companies incorporated in Indonesia where the payer is also an Indonesian company. In the absence of a tax treaty, withholding tax at 20% is levied on dividend payments to non-residents. Reference should be made to the section on withholding tax and the individual treaties.

INTEREST DEDUCTIONS

While the Minister of Finance is empowered to prescribe required debt equity ratios for foreign companies, no limit has been set to date. Due to the existence of this power, however, caution should be exercised to ensure debt is not considered equity, with the result that the related interest and borrowing costs are disallowed.

LOSSES

While loss carry backs are not permitted, losses may be carried forward for up to 5 years. The period over which losses are able to be carried forward can be extended by decree from the Minister of Finance.

C. FOREIGN TAX RELIEF

Where an Indonesian resident has foreign branches (or earns other foreign source income), the income of those branches will be taxable in Indonesia. Where such income has been subject to foreign tax, tax credits will be granted, subject to a maximum of the Indonesian tax payable on the income concerned.

D. CORPORATE GROUPS

The consolidation of returns is not allowed.

E. RELATED PARTY TRANSACTIONS

The revenue authorities will disallow a deduction for excessive/non-arm's length transactions between related parties.

F. WITHHOLDING TAX

Generally, residents are subject to a creditable withholding tax of 15% with any balance being payable or refundable, while non-residents are subject to a final withholding tax of 20%. Withholding taxes are collected when the taxable transaction takes place or payment becomes due. The rates of withholding tax are as follows:

	Residents[1] (%)	**Non-residents[1] (%)**
Dividends[2]	15	20
Interest	15	20
Royalties	15	20
Prizes and awards	15	20
Rental and other income related to the use of property, other than land/space rental	2	20
Technical, management, consulting, and other services	2	20

NOTES:
1) All percentage rates are on gross amounts unless otherwise noted.
2) Withholding tax on dividends paid to Indonesian corporate shareholders will be exempt only if the following conditions are met:
   (i) The dividend is sourced from retained earnings;
   (ii) The recipient holds 25% share or more in the payer.

3) A 100% withholding tax is imposed, in addition to the applicable tax rate, on individuals and corporations, other than non-tax residents, who do not possess a tax identification number (NPWP).

Note: Effective 1 January 2009, dividends distributed to an individual resident taxpayer are subject to final tax at a maximum rate of 10%.

FINAL WITHHOLDING TAXES

The following transactions are subject to a final withholding tax. These taxes apply to residents and permanent establishments of non-residents.

• Sale of listed shares[1]	0.1% of the gross proceeds
• Additional tax on sale of listed Founder shares; by a founder shareholder[1]	0.5% of the IPO price
• Sale of land or buildings[1]	5% of the sales value (final tax for individuals, foundations and corporations). An extra 5% stamp duty for the land and/or building acquisition rights is payable by the purchaser
• Interest or discount on Government CDs and savings deposits and interest or discount on bonds[2]	20% (except for banks and certain approved pension and mutual funds; and loan interest on simple houses)
• Asset revaluation approved by the Tax Office	10% of the difference between the book value and the revalued amount of the assets (unless current year tax losses, which will firstly be applied against the revaluation difference)
• Prizes from lotteries	25% of gross proceeds
• Land and/or building rental (include service charge)	10% of gross proceeds

NOTES:
1 These rates also apply to non-residents (subject to the application of a double tax treaty).
2 No withholding tax is payable in respect of savings, deposits or Government CDs with a principal amount up to IDR 7,500,000.

By the issuance of Government Regulation No. 51 dated 20 July 2008, Construction Services are subject to final tax with the following tax rates:
a) 2% on construction services provided by qualified small enterprises;
b) 4% on construction services provided by non-qualified enterprises;
c) 3% on construction services provided by enterprises other than those mentioned in (a) and (b) above;
d) 4% on construction planning and supervisory services provided by qualified enterprises; and,
e) 6% on construction planning and supervisory services provided by non-qualified enterprises.

(Note that the above Government Regulation is effective as of 1 January 2008.)

GOVERNMENT REGULATION NO. 46 YEAR 2013 REGARDING 1% FINAL TAX

On 12 June 2013, Government Regulation No. 46 Year 2013 ('GR-46') has been issued and effected from 1 July 2013. GR-46 stipulates that individual and corporate taxpayers, except permanent establishments, with annual income up to IDR 4.8 billion are subject to final tax at 1%. GR-46 is intended for small and medium enterprises (SMEs), including individual businesses with small / medium range trading and services activities (other than professional services, such as: lawyers, accountants, translators, insurance agents, etc.). Specific criteria of the SME's applicable for 1% final tax is stipulated under the minister of finance regulation and the director general of taxes regulation.

GR-46 is not applicable to construction services which the income is subject to final tax under the Government Regulation No. 51 Year 2008 as latest amended by the Government Regulation No. 40 Year 2009. The following incomes are excluded from GR-46 final tax application; however they are subject to normal income tax rates:

1) Employment income.
2) Capital income, such as: interest, dividends, royalties, non-business – related capital gains, etc.
3) Other income, such as: debt forgiveness and/or gifts.

Under GR-46 final tax regime, tax losses cannot be carried forward and incurred from other non-final income.

WITHHOLDING TAX - ARTICLE 22

Article 22 income tax is typically applicable to the following:

1) The import of goods. A creditable withholding tax of 2.5% for importers with an import license or 7.5% imposed if the importer does not possess the appropriate import license;
2) The sale of goods to the government requiring payment from the State Treasury, the State Budget General Directorate, or certain state owned companies. The tax rate applied for these transactions is 1.5% of its selling price; and,
3) The sale/purchase of steel, cars, cement and paper products. The tax rates are: purchase of steel: 0.30%; automotive products: 0.45%; cement: 0.25%; and paper products: 0.10% of its selling price.
4) The sale/purchase of high value luxury goods is subject to 5% tax.

An additional 100% withholding tax is imposed on individuals or corporations, other than non-tax residents, who do not possess a NPWP.

G. EXCHANGE CONTROL

While the importation of capital is relatively uninhibited, foreign investment must be approved. Similarly, foreign currency can be transferred essentially free of control although minor reporting requirements do exist. Importantly, repatriation of capital, other than resulting from the sale of existing shares to Indonesians, is prohibited for the period the investor enjoys any tax holiday.

H. PERSONAL TAX

Residents of Indonesia are taxed on their worldwide income. Non-residents are only taxed on income derived from Indonesia. An individual will be a resident of Indonesia if they are present in Indonesia for more than 183 days or reside in Indonesia during a fiscal year and intend to stay in Indonesia. Certain tax treaties modify the above rules. Individual taxable income is progressively taxed at the following rates:

Taxable Income (IDR)	**(IDR)**
0 – 50,000,000	0 + 5% on excess
50,000,001 – 250,000,000	2,500,000 + 15% on excess
250,000,001 – 500,000,000	32,500,000 + 25% on excess
Above 500,000,000	95,000,000 + 30% on excess

An additional 20% tax is imposed on individuals, other than non-tax residents, who do not possess a NPWP.

ALLOWABLE DEDUCTIONS

In determining the annual taxable income of an individual, the following may be deducted from gross income

	(IDR)
Occupational support: 5% of gross income, up to maximum of	6,000,000
Pension: 5% of gross income, up to maximum of	2,400,000
Non-taxable income (effective 1 January 2015): - For the taxpayer	36,000,000
- Additional for a married taxpayer	3,000,000
- Additional for each lineal family member related by blood	3,000,000 each

A married female employee is only allowed non-taxable income for herself if she has a certificate from the local authorities that her husband does not work. Non-resident individuals are subject to a final tax of 20% where the payments represent compensation for work performed in Indonesia regardless of where paid. Lump sum pension payments and severance pay on individual residents are subject to final tax on the gross amount at the following rates:

Lump Sum Pensions Payments	
Taxable Income	**(IDR)**
0 – 50,000,000	exempt/non-taxable income
Above 50,000,000	5%

Severance pay	
Taxable Income	**(IDR)**
0 – 50,000,000	exempt/non-taxable income
50,000,001 – 100,000,000	5%
100,000,001 – 500,000,000	2,500,000 + 15% on excess
Above 500,000,000	62,500,000 + 25% on excess

However, pension payments made to non-resident individuals are taxed under Article 26 of Income Tax Law at a rate of 20% on the gross amount. Where home leave or education costs are reimbursed, the amount of the reimbursement is taxable in full on the employee. Note that food and beverages provided at the workplace by an employer to its employees are not subject to tax but deductible for the employer.

SOCIAL SECURITY

Under the government regulations, employers are required to register themselves and their employees for social security program managed by social security agency so called BPJS (formerly known as Jamsostek). While the employers must pay certain portion of the premium contributions, the employees' contributions are normally collected through payroll deductions from their gross regular salaries/wages.

Currently, the BPJS premiums contributions consist of **BPJS Employment Insurance** and **BPJS Health Insurance** as the following:

Description	Borne by employer	Borne by employee
BPJS Employment Insurance		

- Working accident coverage	0.24% up to 1.74%	-
- Death insurance	0.3%	-
- Old age savings	3.7%	2%
BPJS Health Insurance		
- Health care	4%	1%

Note that the requirement of participating in BPJS social security applies to all employees, including expatriates who have been working in Indonesia for more than six months.

I. TREATY AND NON-TREATY WITHHOLDING TAX RATES

Withholding taxes are levied on corporations and individuals, residents and non-residents as follows:

	Dividends Portfolio (%)	Dividends Holdings (%)	Interest (%)	Royalties (%)
Resident corporations	0	0	15	15
Resident individuals	15	15	15	15
Non-resident corporations and individuals of a non-treaty country	20	20	20	20
Treaty countries:				
Algeria	15	15	15/0	15
Australia	15	15	10/0	15/10
Austria	15	10	10/0	10
Bangladesh	15	10	10	10
Belgium	15	10	10/0	10
Brunei Darussalam	15	15	15/0	15
Bulgaria	15	15	10/0	10
Canada	15	10	10/0	10
China	10	10	10/0	10
Croatia	10	10	10/0	10
Czech Republic	15	10	12.5/0	12,5
Denmark	20	10	10/0	15
Egypt	15	15	15/0	15
Finland	15	10	10/0	15/10
France	15	10	15/10/0	10
Germany	15	10	10/0	15/10
Hong Kong	10	5	10/0	5
Hungary	15	15	15/0	15
India	15	10	10/0	15
Iran	7	7	10/0	12
Italy	15	10	10/0	15/10
Japan	15	10	10/0	10

	Dividends Portfolio (%)	Dividends Holdings (%)	Interest (%)	Royalties (%)
Jordan	10	10	10/0	10
Korea, Republic of South	15	10	10/0	15
Korea, Democratic People's Republic of North	10	10	10/0	10
Kuwait	10	10	5/0	20
Luxembourg	15	10	10/0	12.5
Malaysia	10	10	10/0	10
Mexico	10	10	10/0	10
Mongolia	10	10	10/0	10
Morocco	10	10	10/0	10
Netherlands	10	10	10/0	10
New Zealand	15	15	10/0	15
Norway	15	15	10/0	15/10
Pakistan	15	10	15/0	15
Papua New Guinea	15	15	10/0	10
Philippines	20	15	15/10/0	15
Poland	15	10	10/0	15
Portugal	10	10	10/0	10
Qatar	10	10	10/0	5
Romania	15	12.5	12.5/0	15/12.5
Russia	15	15	15/0	15
Seychelles	10	10	10/0	10
Singapore	15	10	10/0	15
Slovak Republic	10	10	10/0	15/10
South Africa	15	10	10/0	10
Spain	15	10	10/0	10
Sri Lanka	15	15	15/0	15
Sudan	10	10	15/0	10
Suriname	15	15	15/0	15
Sweden	15	10	10/0	15/10
Switzerland	15	10	10/0	10
Syria	10	10	10/0	20/15
Taiwan	10	10	10/0	10
Thailand	20	15	15/0	15
Tunisia	12	12	12/0	15
Turkey	15	10	10/0	10
Ukraine	15	10	10/0	10
United Arab Emirates	10	10	5/0	5

	Dividends Portfolio (%)	Dividends Holdings (%)	Interest (%)	Royalties (%)
United Kingdom & Northern Ireland	15	10	10/0	15/10
United States of America	15	10	10/0	10
Uzbekistan	10	10	10/0	10
Venezuela	15	10	10/0	20
Vietnam	15	15	15/0	15
Zimbabwe	20	10	10/0	15

The above rates provide only a guide and it is necessary to consult the individual treaties and legislation.

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