



Double Taxation Relief

Malta boasts its extensive network of OECD Model based double tax treaties. Currently, there over 70 such treaties are in force and Malta continues to seek further collaboration in tax matters with new reputable trading partners as well as emerging economies.

As one of the methods of mitigating double taxation, in most cases the treaties entered into by Malta reduce the rates of withholding taxes that residents of treaty partner jurisdictions are obligated to remit to their local tax authorities when making payments of certain income categories to Malta tax residents. In some cases, however, domestic legislation of the payer jurisdiction may provide for lower or even zero withholding tax rates.

The table below shows the rates of withholding taxes to be deducted by residents of Malta treaty partner jurisdictions from dividend, interest and royalty payments, as per tax treaties that are currently in force.

| TREATY PARTNER | DIVIDENDS (%) | INTEREST (%) | ROYALTIES (%) |
|----------------|---------------|--------------|---------------|
| Andorra | 0 | 0 | 0 |
| Albania | 5/15 | 5 | 5 |
| Australia | 0/15 | 15 | 10 |
| Austria | 15 | 5 | 10 |
| Azerbaijan | 8 | 8 | 8 |
| Bahrain | 0 | 0 | 0 |
| Barbados | 5/15 | 5 | 5 |
| Belgium | 15 | 10 | 10 |
| Botswana | 5/6/15 | 8.5 | 5/7.5 |
| Bulgaria | 0 | 0 | 10 |
| Canada | 15 | 15 | 10 |
| China (P.R.C.) | 5/10 | 10 | 7/10 |
| Croatia | 5 | 0 | 0 |
| Cyprus | 15 | 10 | 10 |
| Czech Republic | 5 | 0 | 5 |
| Denmark | 0/15 | 0 | 0 |
| Egypt | 10 | 10 | 12 |
| Estonia | 5/15 | 10 | 10 |
| Finland | 5/15 | 0 | 0 |
| France | 5/15 | 10 | 10 |
| Georgia | 0 | 0 | 0 |
| Germany | 5/15 | 0 | 0 |
| Greece | 5/10 | 8 | 8 |
| Guernsey | 0 | 0 | 0 |
| Hong Kong | 0 | 0 | 3 |
| Hungary | 5/15 | 10 | 10 |
| Iceland | 5/15 | 0 | 5 |
| India | 10 | 10 | 10 |
| Ireland | 5/15 | 0 | 5 |
| Isle of Man | 0 | 0 | 0 |
| Israel | 0/15 | 5 | 0 |
| Italy | 15 | 10 | 10 |
| Jersey | 0 | 0 | 0 |
| Jordan | 10 | 10 | 10 |
| Korea (R.O.K.) | 5/15 | 10 | 0 |
| Kuwait | 0 | 0 | 10 |
| Latvia | 5/10 | 10 | 10 |

| TREATY PARTNER | DIVIDENDS (%) | INTEREST (%) | ROYALTIES (%) |
|----------------------|---------------|--------------|---------------|
| Lebanon | 5 | 0 | 5 |
| Libya | 5/15 | 5 | 5 |
| Liechtenstein | 0 | 0 | 0 |
| Lithuania | 5/15 | 10 | 10 |
| Luxembourg | 5/15 | 0 | 10 |
| Malaysia | 0 | 15 | 15 |
| Mauritius | 0 | 0 | 0 |
| Mexico | 0 | 5/10 | 10 |
| Moldova | 5 | 5 | 5 |
| Montenegro | 5/10 | 10 | 5/10 |
| Morocco | 6.5/10 | 10 | 10 |
| Netherlands | 5/15 | 10 | 10 |
| Norway | 0/15 | 0 | 0 |
| Pakistan | 15 | 10 | 10 |
| Poland | 0/10 | 5 | 5 |
| Portugal | 10/15 | 10 | 10 |
| Qatar | 0 | 0 | 5 |
| Romania | 5 | 5 | 5 |
| Russia | 5/10 | 5 | 0 |
| San Marino | 5/10 | 0 | 0 |
| Saudi Arabia | 5 | 0 | 5/7 |
| Serbia | 5/10 | 10 | 5/10 |
| Singapore | 0 | 7/10 | 10 |
| Slovakia | 5 | 0 | 5 |
| Slovenia | 5/15 | 5 | 5 |
| South Africa | 5/10 | 10 | 10 |
| Spain | 0/5 | 0 | 0 |
| Sweden | 0/15 | 0 | 0 |
| Switzerland | 0/15 | 0/10 | 0 |
| Syria | 0 | 10 | 18 |
| Tunisia | 10 | 12 | 12 |
| Turkey | 10/15 | 10 | 10 |
| Ukraine | 5/15 | 10 | 10 |
| United Arab Emirates | 0 | 0 | 0 |
| United Kingdom | 0 | 10 | 10 |
| United States | 5/15 | 10/15 | 10 |
| Uruguay | 5/15 | 10 | 5/10 |
| Vietnam | 5/15 | 10 | 5/10/15 |