

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