

Hong Kong and Liechtenstein
Comprehensive Agreement for the Avoidance of Double Taxation

Highlights

Under the agreement:

- double taxation is avoided in that any Hong Kong income tax paid by Liechtenstein residents or companies shall be allowed as a credit against any tax payable in respect of the same incomes in Liechtenstein; and
- profits from international shipping transport earned by Hong Kong residents that arise in Liechtenstein will enjoy full tax exemption.

Hong Kong and France
Comprehensive Agreement for the Avoidance of Double Taxation

Highlights

Under the agreement:

- double taxation is avoided in that any Hong Kong income tax paid by French residents or companies shall be allowed as a credit against any tax payable in respect of the same incomes in France;
- the withholding tax on dividends derived by Hong Kong residents in France will be reduced from the current rate of 25% to 10%;
- the withholding tax rate on royalties derived by Hong Kong residents in France will be reduced from 33.33% to 10%;
- the withholding tax rate on interest derived by Hong Kong residents will be reduced from 18% to 10%. The withholding tax on interest income will be exempted if the recipient is the Hong Kong Special Administrative Region (HKSAR) Government, the Hong Kong Monetary Authority (HKMA), or a financial establishment mutually agreed by both sides, or if the interest is paid on a loan directly or indirectly financed or guaranteed by HKMA;
- profits from international shipping transport earned by Hong Kong residents that arise in France will enjoy full tax exemption; and
- Hong Kong airlines operating flights to France will be taxed at

the much lower corporation tax rate of 16.5% in Hong Kong as against the corporate tax rate of 33.33% in France, which they are subject to currently.

Hong Kong and Japan
Comprehensive Agreement for the Avoidance of Double Taxation

Highlights

Under the agreement:

- double taxation is avoided in that any Hong Kong income tax paid by Japanese residents or companies shall be allowed as a credit against any tax payable in respect of the same incomes in Japan;
- the withholding tax on dividends derived by Hong Kong residents in Japan will be reduced from the current rate of 20% to 5% for a company holding directly or indirectly for a period of six months at least 10% of the voting shares of the company paying the dividends, and at 10% for other cases;
- the withholding tax rate on royalties derived by Hong Kong residents in Japan will be reduced from 20% to 5%;
- the withholding tax on interest derived by Hong Kong residents in Japan will be reduced from the current rate of 20% to 10%. The withholding tax rate will be further reduced to nil if the recipient is the HKSAR Government, HKMA, or if the interest is with respect to debt-claims guaranteed, insured or indirectly financed by the HKSAR Government or HKMA;
- profits from international shipping transport earned by Hong Kong residents that arise in Japan will enjoy full tax exemption; and
- Hong Kong airlines operating flights to Japan will be taxed at the much lower corporation tax rate of 16.5% in Hong Kong as against the corporate tax rate of 30% in Japan, which they are subject to currently.

Hong Kong and New Zealand
Comprehensive Agreement for the Avoidance of Double Taxation

Highlights

Under the agreement:

- double taxation is avoided in that any Hong Kong income tax paid

by New Zealand residents or companies shall be allowed as a credit against any tax payable in respect of the same income in New Zealand;

- the withholding tax on dividends derived by Hong Kong residents in New Zealand will be reduced from the current rate of 30% to 15%. The withholding tax rate will be further lowered to 5% or 0% for qualifying beneficial owners. The withholding tax on dividends will be exempted if the recipient is the HKSAR Government, HKMA, or an institution wholly or mainly owned by HKSAR Government and mutually agreed by both sides;
- the withholding tax on royalties derived by Hong Kong residents in New Zealand will be reduced from the current rate of 15% to 5%;
- the withholding tax on interest derived by Hong Kong residents in New Zealand will be reduced from the current rate of 15% to 10%. The withholding tax on interest will be exempted if the recipient is the HKSAR Government, HKMA or an institution wholly or mainly owned by HKSAR Government and mutually agreed by both sides, or if the interest is received by a Hong Kong financial institution unrelated to the payer;
- profits from international shipping transport earned by Hong Kong residents that arise in New Zealand will enjoy full tax exemption; and
- upon its entry into force, the Hong Kong/New Zealand CDTA will supersede the existing limited double taxation avoidance agreement for airline income providing the same level of benefits.