

**Highlights of the Comprehensive Avoidance of Double Taxation
Agreements (CDTAs) signed with six countries**

(A) Barbados

- double taxation will be avoided in that any tax paid in Barbados, whether directly or by deduction, by Hong Kong companies in accordance with the CDTA will be allowed as a credit against the tax payable in Hong Kong on the same income, subject to the provisions of the tax laws of Hong Kong;
- income derived by a Hong Kong resident from employment exercised in Barbados will be exempt from tax in Barbados if, among others, the resident's aggregate stay in Barbados in any relevant 12-month period does not exceed 183 days;
- Barbados's withholding tax for Hong Kong residents on dividends will be exempt, while the withholding tax rates on interest and royalties will be capped at 5 per cent (if charged in future); and
- profits from international traffic (including shipping and air transport) earned by Hong Kong enterprises arising in Barbados will not be taxed in Barbados.

(B) Jordan

- double taxation will be avoided in that any tax paid in Jordan, whether directly or by deduction, by Hong Kong companies in accordance with the CDTA will be allowed as a credit against the tax payable in Hong Kong on the same income, subject to the provisions of the tax laws of Hong Kong;
- income derived by a Hong Kong resident from employment exercised in Jordan will be exempt from tax in Jordan if, among others, the resident's aggregate stay in Jordan in any relevant 12-month period does not exceed 183 days;

- Jordan's withholding tax rates for Hong Kong residents on dividends, interest and royalties will be reduced from up to 10 per cent to a cap at 5 per cent; and
- profits from international shipping transport earned by Hong Kong enterprises arising in Jordan will not be taxed in Jordan.

(C) Kyrgyz Republic

- double taxation will be avoided in that any tax paid in the Kyrgyz Republic, whether directly or by deduction, by Hong Kong companies in accordance with the CDTA will be allowed as a credit against the tax payable in Hong Kong on the same income, subject to the provisions of the tax laws of Hong Kong;
- income derived by a Hong Kong resident from employment exercised in the Kyrgyz Republic will be exempt from tax in the Kyrgyz Republic if, among others, the resident's aggregate stay in the Kyrgyz Republic in any relevant 12-month period does not exceed 183 days;
- Kyrgyz Republic's withholding tax rate for Hong Kong residents on dividends will be capped at 5 per cent or 10 per cent (depending on the percentage of their shareholdings); while that on interest and royalties will be reduced from up to 10 per cent to a cap at 8 per cent; and
- profits from international traffic (including shipping and air transport) earned by Hong Kong enterprises arising in the Kyrgyz Republic will not be taxed in the Kyrgyz Republic.

(D) Maldives

- double taxation will be avoided in that any tax paid in Maldives, whether directly or by deduction, by Hong Kong companies in accordance with the CDTA will be allowed as a credit against the tax payable in Hong Kong on the same income, subject to the provisions of the tax laws of Hong Kong;
- income derived by a Hong Kong resident from employment exercised in Maldives will be exempt from tax in Maldives if, among others, the resident's aggregate stay in Maldives in any relevant 12-month period does not exceed 183 days;

- Maldives' withholding tax rate for Hong Kong residents on dividends will be capped at 5 per cent or 10 per cent (depending on the percentage of their shareholdings); and
- profits from international shipping transport earned by Hong Kong enterprises arising in Maldives will enjoy a 50 per cent tax reduction in Maldives; while those from international air transport will not be taxed in Maldives.

(E) Norway

- double taxation will be avoided in that any tax paid in Norway, whether directly or by deduction, by Hong Kong companies in accordance with the CDTA will be allowed as a credit against the tax payable in Hong Kong on the same income, subject to the provisions of the tax laws of Hong Kong;
- income derived by a Hong Kong resident from employment exercised in Norway will be exempt from tax in Norway if, among others, the resident's aggregate stay in Norway in any relevant 12-month period does not exceed 183 days; and
- Norway's withholding tax rate for Hong Kong residents on dividends will be reduced from up to 25 per cent to a cap at 15 per cent; while that on interest and royalties will be capped at 5 per cent (if charged in future).

(F) Rwanda

- double taxation will be avoided in that any tax paid in Rwanda, whether directly or by deduction, by Hong Kong companies in accordance with the CDTA will be allowed as a credit against the tax payable in Hong Kong on the same income, subject to the provisions of the tax laws of Hong Kong;
- income derived by a Hong Kong resident from employment exercised in Rwanda will be exempt from tax in Rwanda if, among others, the resident's aggregate stay in Rwanda in any relevant 12-month period does not exceed 183 days;
- Rwanda's withholding tax rates for Hong Kong residents on dividends, interest and royalties will be reduced from up to 15 per

cent to caps at 7.5 per cent, 8 per cent and 9 per cent respectively;
and

- profits from international traffic (including shipping and air transport) earned by Hong Kong enterprises arising in Rwanda will not be taxed in Rwanda.