

## Withholding Tax Rates on Dividends and Interest under Japan's Tax Treaties

The list below gives general information on maximum withholding tax rates in Japan on dividends and interest under Japan's tax treaties (as of 12 January 2023)

Recipient's Country (Alphabetical Order)	Maximum Tax Rates (%)			Remarks
	Dividends	Interest	Redemption	
<b>Australia</b>	10/15 *1	0 *2 /10	0 *2 /10	*1: 15% for REIT under certain conditions *2: Financial institutions and government entities are exempt under certain conditions
<b>Austria</b>	0 *1 /10	0 *2	0 *2	*1: Pension funds are exempt under certain conditions *2: 15.315% for revenue bonds Effective from 1 January 2019
<b>Bangladesh</b>	15	10 *	10 *	
<b>Belgium</b>	0 *1/10	0 *2/10	0 *2/10	*1: Pension funds are exempt under certain conditions *2: .Interests paid by an enterprise to an enterprise is also 0% Pension funds and Government entities are exempt under certain conditions Effective from 1 January 2020
<b>Brazil</b>	12.5	12.5 *	15.315	
<b>Brunei</b>	10	10 *	10 *	
<b>Bulgaria</b>	15	10 *	10 *	
<b>Canada</b>	15	10 *	10 *	
<b>Chile</b>	0 *1 /15	4 *2 /10 *3	4 *2 /10 *3	*1: Pension funds are exempt under certain conditions *2: 4% for banks, etc. *3: 15% for interest from 2017 to 2018 and 10% from 1 January 2019 Effective from 1 January 2017
<b>China</b>	10	10 *	10 *	

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<b>Columbia</b>	<b>0*1/10/15*2</b>	<b>0*3/10</b>	<b>0*3/10</b>	*1 : Pension funds are exempt under certain conditions *2 : 15% for REIT *3 : Pension funds, Financial institutions and government entities are exempt under certain conditions Effective from 1 January 2023
<b>Croatia</b>	<b>5/10 *1</b>	<b>0 *2/5</b>	<b>0 *2/5</b>	*1: 10% for REIT *2: Government entities are exempt under certain conditions Effective from 1 January 2020
<b>Czech Republic</b>	<b>15</b>	<b>10 *</b>	<b>10 *</b>	
<b>Denmark</b>	<b>0 *1 /15</b>	<b>0 *2</b>	<b>0 *2</b>	*1: Pension funds are exempt under certain conditions (except for REIT : 15%) *2: 10% for revenue bonds (not exempt) Effective from 1 January 2019
<b>Ecuador</b>	<b>5 / 10 *1</b>	<b>0 *2 /10</b>	<b>0 *2 /10</b>	*1: 10% for REIT *2: Government entities are exempt under certain conditions Effective from 1 January 2020
<b>Egypt</b>	<b>15</b>	<b>-</b>	<b>15.315</b>	
<b>Estonia</b>	<b>10 *1</b>	<b>0 *2 /10</b>	<b>0 *2 /10</b>	*1: Shares deriving at least 50% of their value from immovable property is 15.315% *2: Government entities are exempt under certain conditions Effective from 1 January 2019
<b>Finland</b>	<b>15</b>	<b>10</b>	<b>0</b>	
<b>France</b>	<b>10</b>	<b>0 * /10</b>	<b>0 * /10</b>	* Pension funds, financial institutions and government entities are exempt under certain conditions
<b>Georgia</b>	<b>5 *1</b>	<b>0 *2 /5</b>	<b>0 *2 /5</b>	*1: 10% for REIT *2: Government entities are exempt under certain conditions Effective from 1 January 2022
<b>Germany</b>	<b>15 / 15.315 *1</b>	<b>0 *2</b>	<b>0 *2</b>	*1: 15.315% for REIT *2: 15.315% for revenue bonds (not exempt). Effective from 1 January 2017
<b>Hong Kong</b>	<b>10</b>	<b>10 *</b>	<b>10 *</b>	Effective from 1 January 2012

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Hungary	10	10 *	10 *	
Iceland	0 *1 / 15	0 *2	0*2	*1: Pension funds are exempt under certain conditions (except for REIT :15% ) *2: 10% for revenue bonds Effective from 1 January 2019
India	10	10 *	10	
Indonesia	15	10 *	10	
Ireland	15	10	10	
Israel	15	10 *	10	
Italy	15	10	10	
Jamaica	10	0*/10	0*/10	*Government entities are exempt under certain conditions. Effective from 1 January 2021
Kazakhstan	15	10 *	10 *	
Kuwait	10	0 * /10	0 * /10	*Government entities are exempt under certain conditions. Effective from 1 January 2014
Latvia	0 / 10 *1	0 *2	0 *2	*1: 10% for REIT /10% for individual *2: 10% for revenue bonds (not exempt) /10% for individual Effective from 1 January 2018
Lithuania	0 / 10 *1	0 *2	0 *2	*1: 10% for REIT /10% for individual *2: 10% for revenue bonds (not exempt) /10% for individual Effective from 1 January 2019
Luxembourg	15	10 *	10 *	
Malaysia	15	10 *	10 *	
Mexico	15	10 * /15	10 * /15	* 10% for banks
Morocco	10	0*/10	0*/10	* Financial institutions and government entities are exempt under certain conditions Effective from 1 January 2023

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	Dividends	Interest	Redemption	
Netherlands	0 *1 /10	0 *2 /10	0 *2 /10	*1: Pension funds are exempt under certain conditions *2: Pension funds, financial institutions and government entities are exempt under certain conditions Effective from 1 January 2012.
New Zealand	15	0 * /10	0 * /10	* Banks and government entities are exempt under certain conditions. Effective from 1 January 2014
Norway	15	10 *	10 *	
Oman	10	0 * /10	0 * /10	* Government entities are exempt under certain conditions Effective from 1 January 2015
Pakistan	10	10 *	10 *	
Peru	10	0 * /10	0 * /10	*Government entities are exempt under certain conditions Effective from 1 January 2022
Philippines	15	10 *	10 *	
Poland	10	10 *	10 *	
Portugal	10	5 * /10	5 * /10	* 5% for financial institutions Effective from 1 January 2014
Qatar	10	0 * /10	0 * /10	*Pension funds, financial institutions and government entities are exempt under certain conditions. Effective from 1 January 2016
Romania	10	10*	10*	
Russia	0 *1 /10 *2	0 *3	0 *3	*1: Pension funds are exempt under certain conditions *2: Shares deriving at least 50% of their value from immovable property is 15% *3: 10% for revenue bonds (not exempt) Effective from 1 January 2019
Saudi Arabia	10	0 * /10	0 * /10	* Government entities are exempt under certain conditions Effective from 1 January 2012
Serbia	10	0 * /10	0 * /10	*Government entities are exempt under certain conditions Effective from 1 January 2022

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	Dividends	Interest	Redemption	
Singapore	15	10 *	10 *	
Slovakia	15	10 *	10 *	
Slovenia	5	0 * /5	0 * /5	* Government entities are exempt under certain conditions Effective from 1 January 2018
South Africa	15	10 *	10 *	
South Korea	15	10 *	10 *	
Spain	0 *1*2 / 5*2	0 *3	0 *3	*1: Pension funds are exempt under certain conditions *2: 10% for REIT *3: 10% for revenue bonds (not exempt) Effective from 1 January 2022
Sri Lanka	20	- *	15.315	* Banks are exempt
Sweden	10	0 *	0 *	*10% for revenue bonds (not exempt) Effective from 1 January 2015
Switzerland	0 *1 /10	0	0	*: Pension funds are exempt under certain conditions. Effective from 1 January 2023
Taiwan	10	10	10	Administrative authorities or the Central Bank are exempt under certain conditions. Effective from 1 January 2017
Thailand	-	10 * /25	10 * /25	* 10% for financial institutions
Turkey	15	10 * /15	10 * /15	* 10% for financial institutions
United Arab Emirates	10	0 * /10	0 * /10	*Government entities are exempt under certain conditions Effective from 1 January 2015
United Kingdom	0 *1 /10	0 *2	0 *2	*1: Pension funds are exempt under certain conditions. *2: Exempt under certain conditions 10% for revenue bonds (not exempt) Effective from 1 January 2015

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	Dividends	Interest	Redemption	
United States of America	0 *1 /10	0 *2	0 *2	*1: Pension funds are exempt under certain conditions. Large holders of a REIT are not exempt (=15.315%). For definition of large holders, please refer to the article 10. of the treaty for double taxation between U.S.A. and Japan. *2: 10% for revenue bonds (not exempt) Effective from 1 November 2019
Uruguay	10	0 * /10	0 * /10	*Financial institutions and government entities are exempt under certain conditions Effective from 1 January 2022
Uzbekistan	10	0*/5	0*/5	*Government entities are exempt under certain conditions. Effective from 1 January 2021
Vietnam	10	10 *	10 *	
Zambia	0	10	10	

Source: Official Website of Ministry of Finance, Japan, etc.

Notes:

1. The dividends and interest may be taxed at reduced rates or exempt from tax in Japan if the income received by non-resident or foreign corporation investors is not derived from a permanent establishment situated in Japan.

2. The above list does not give comprehensive details of tax rates. For a full understanding of reduced tax rates, please consult the respective Double Tax Treaties (DTT).

(\* Note: Interest received by Government entities or Central Banks is tax exempt under certain conditions).

Also, please refer to the MOF's official website:

[http://www.mof.go.jp/english/tax\\_policy/tax\\_conventions/press\\_release/index.htm](http://www.mof.go.jp/english/tax_policy/tax_conventions/press_release/index.htm)

3. In accordance with the Special Taxation Measure Law, the tax rate imposed on dividends derived from listed shares, etc.\*\* is 15.315%\*\*\* until 31 December 2037.

15.315% tax will be also imposed on redemption profits derived from discount bonds such as T-bills, from 1 January 2016. In cases where the DTT rate is lower than 15.315% rate, the DTT rate will be applied.

\*\* Includes OTC shares and listed investment trusts (ETF, REIT and Nikkei 300).

\*\*\*Excludes large individual shareholders who hold more than 3% of the total issued shares as of record date.

4. The Special Taxation Measure Law provides for a tax hike on dividend and interest income effective 25 years to finance the reconstruction of the areas affected by the Great East Japan Earthquake.

Year	Until	From 1 Jan. 2013	From 1 Jan. 2014	From
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Item	31 Dec. 2012	To 31 Dec. 2013	To 31 Dec. 2037	1 Jan. 2038
Dividend for listed shares	7%	7.147%	15.315%	15%
Dividend for unlisted shares or dividend of more than 3% large individual shareholders	20%	20.42%	20.42%	20%
Interest	15%	15.315%	15.315%	15%

5. In certain cases, foreign investors must submit a certificate of residency to apply for a DTT.

(1) In cases where there is an Article of Limitation on Benefit in a DTT, some investors (ex. US residents, UK pension funds etc.) will be required to submit a certificate of residency and a form 17 (Attachment Form for Limitation on Benefit Article) attached to the DTT application form.

(2) In the case of tax exemption under the new type of DTT (those which entered into effect on or after April 1, 2004), some investors (ex. parent company, governmental entity) will have to submit a certificate of residency etc. to apply tax exemption for dividends or interest.

6. Others:

(1) Text of new treaty or revision to existing treaty signed but yet to come into force:

Azerbaijan, Argentina

(2) Reached agreement in principle on new treaty or revision to existing treaty: Algeria

(3) Negotiations ongoing: Nigeria, Finland, Greece, Tunisia, Ukraine

(4) Czech Republic/Slovakia: The Convention between Japan and the former Czechoslovakia is applicable to present-day Czech Republic and Slovakia.

(5) Former USSR except for Russia, Uzbekistan and Georgia:

The Convention between Japan and the former USSR is applicable to present-day,

Armenia, Azerbaijan, Belarus, Kyrgyz Republic, Moldova, Ukraine, Tajikistan and Turkmenistan.