

## Singapore - Treaty Withholding Rates

This chart is based on information available up to 13 March 2008.

The following chart contains the withholding tax rates that are applicable to dividend, interest and royalty payments by Singaporean companies to non-residents under the tax treaties currently in force. However, Singapore does not impose any withholding tax on dividends under domestic law. The rates provided below are the maximum withholding rates should Singapore impose a withholding tax on dividends in the future.

Where, in a particular case, a treaty rate is higher than the domestic rate, the latter is applicable. If the treaty provides for a rate lower than the domestic rate, the reduced treaty rate may be applied at source.

To minimize withholding taxes and calculate the total tax cost of your cross border transaction the IBFD recommends the decision support tool [International Tax Expert](#).

### Singapore - Treaty Withholding Rates

	Dividends		Interest <sup>1</sup>	Royalties
	Individuals, companies	Qualifying companies		
	(%)	(%)	(%)	(%)
<b>Domestic Rates</b>				
<i>Companies:</i>	<u>0</u>	<u>0</u>	<u>15</u>	<u>10</u>
<i>Individuals:</i>	<u>0</u>		<u>15</u>	<u>10</u>
<b>Treaty Rates</b>				
<i>Treaty With:</i>				
<u>Australia</u>	<u>15</u>	<u>15</u>	<u>10</u>	<u>10</u> <sup>2</sup>
<u>Austria</u>	<u>10</u>	<u>10</u>	<u>5</u>	<u>5</u>
<u>Bahrain</u>	<u>0</u>	<u>0</u>	<u>5</u>	<u>5</u>
<u>Bangladesh</u>	<u>15</u>	<u>15</u>	<u>10</u>	<u>10</u> <sup>3</sup>
<u>Belgium</u>	<u>15</u>	<u>15</u>	<u>10</u>	<u>5</u>
<u>Brunei</u>	<u>10</u>	<u>10</u>	<u>5/10</u> <sup>4</sup>	<u>10</u>
<u>Bulgaria</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>
<u>Canada</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>
<u>China (People's Rep.)</u>	<u>12</u>	<u>7</u> <sup>5</sup>	<u>7/10</u> <sup>4</sup>	<u>10</u>
<u>Cyprus</u>	<u>0</u>	<u>0</u>	<u>7/10</u> <sup>4</sup>	<u>10</u>
<u>Czech Republic</u>	<u>5</u>	<u>5</u>	<u>0</u>	<u>10</u>
<u>Denmark</u>	<u>5</u> <sup>6</sup> / <u>10</u>	<u>0</u> <sup>7</sup>	<u>10</u>	<u>10</u>
<u>Egypt</u>	<u>15</u>	<u>15</u>	<u>15</u>	<u>15</u>
<u>Estonia</u>	<u>10</u>	<u>5</u> <sup>5</sup>	<u>10</u>	<u>7.5</u>
<u>Fiji</u>	<u>15</u>	<u>5</u> <sup>8</sup>	<u>10</u>	<u>10</u>
<u>Finland</u>	<u>10</u>	<u>5</u> <sup>8</sup>	<u>5</u>	<u>5</u>
<u>France</u>	<u>15</u>	<u>10</u> <sup>8</sup>	<u>10</u>	<u>0</u>
<u>Germany</u>	<u>15</u>	<u>5</u> <sup>8</sup>	<u>8</u>	<u>8</u>
<u>Hungary</u>	<u>10</u>	<u>5</u> <sup>5</sup>	<u>5</u>	<u>5</u>
<u>India</u>	<u>15</u>	<u>10</u> <sup>5</sup>	<u>10/15</u> <sup>4</sup>	<u>10/15</u> <sup>9</sup>
<u>Indonesia</u>	<u>15</u>	<u>10</u> <sup>5</sup>	<u>10</u>	<u>15</u>
<u>Israel</u>	<u>10</u>	<u>5</u> <sup>8</sup>	<u>7</u>	<u>5</u>
<u>Italy</u>	<u>10</u>	<u>10</u>	<u>12.5</u>	<u>15/20</u> <sup>10</sup>
<u>Japan</u>	<u>15</u>	<u>5</u> <sup>11</sup>	<u>10</u>	<u>10</u>
<u>Kazakhstan</u>	<u>10</u>	<u>5</u> <sup>5</sup>	<u>10</u>	<u>10</u>
<u>Kuwait</u>	<u>0</u>	<u>0</u>	<u>7</u>	<u>10</u>
<u>Latvia</u>	<u>10</u>	<u>5</u> <sup>5</sup>	<u>10</u>	<u>7.5</u>
<u>Lithuania</u>	<u>10</u>	<u>5</u> <sup>5</sup>	<u>10</u>	<u>7.5</u>
<u>Luxembourg</u>	<u>10</u>	<u>5</u> <sup>8</sup>	<u>10</u>	<u>10</u>
<u>Malaysia</u>	<u>10</u>	<u>5</u> <sup>5</sup>	<u>10</u>	<u>8</u>

Malta	0	0	7/10 <sup>19</sup>	10
Mauritius	0	0	0	0
Mexico	0	0	5/15 <sup>4</sup>	10
Mongolia	10	5 <sup>5</sup>	5/10 <sup>4</sup>	5
Myanmar	10	5 <sup>5</sup>	8/10 <sup>4</sup>	10/15
Netherlands	15	0 <sup>5</sup>	10	0
New Zealand	15	15	15	15
Norway	15	5 <sup>5</sup>	7	7
Oman	5	5	7	8
Pakistan	10/12.5/15 <sup>12</sup>	10/12.5/15 <sup>12</sup>	12.5	10
Papua New Guinea	15	15	10	10
Philippines	25	15 <sup>13</sup>	15	15/25 <sup>14</sup>
Poland	10	10	10	10
Portugal	10	10	10	10
Qatar	0	0	5	10
Romania	5	5	5	5
Slovak Republic	10	5 <sup>8</sup>	0	10
South Africa	15	5 <sup>8</sup>	0	5
South Korea	15	10 <sup>5</sup>	10	15
Sri Lanka	15	15	10	15
Sweden	15	10 <sup>5</sup>	10/15 <sup>15</sup>	0
Switzerland	15	10 <sup>5</sup>	10	5
Taiwan	16	16	16	15
Thailand	20	20 <sup>5</sup>	10/25	15
Turkey	15	10 <sup>5</sup>	7.5/10 <sup>4</sup>	10
United Arab Emirates	5	5	7	5
United Kingdom	15	5 <sup>8</sup>	10	10
Vietnam	12.5	5/7 <sup>17</sup>	10	5/15 <sup>18</sup>

1. Many of the treaties provide for an exemption for certain types of interest, e.g. interest paid to public bodies and institutions, banks or financial institutions, or in relation to sales on credit, approved industrial undertakings or approved loans. Such exemptions are not considered in this column.

2. The rate does not apply to royalty payments in respect of the operations of mines, quarries or exploitation of natural resources and literary or artistic copyrights.

3. The rate does not apply to royalty payments in respect of literary or artistic copyrights (including film royalties).

4. The lower rate applies to interest received by a bank or financial institution.

5. The rate generally applies to participations of at least 25% of capital or voting shares, as the case may be.

6. The lower rate applies to dividends received by pension funds or similar institutions providing pension schemes.

7. The rate applies to dividends paid to a company which holds directly at least 25% of the payer's capital for an uninterrupted period of at least 1 year, and the dividends are declared in that period.

8. The rate generally applies to participations or control of at least 10% of capital or voting power, as the case may be.

9. The higher rate applies to royalty payments for the use or right to use industrial, scientific or commercial equipment.

10. The higher rate applies to copyright on literary and other artistic work.

11. The rate applies to dividends paid to a company which holds directly at least 25% of the payer's voting shares during a 6-month period prior to the year-end for which the distribution of profits occur.

12. 10% for dividends paid to the beneficial owner by a company engaged in an industrial undertaking, 12.5% for dividends paid to the beneficial owner by a company not engaged in an industrial undertaking, and 15% in all other cases.

13. 15% for dividends paid to a company or partnership which holds at least 15% of the voting stock of the payer during the part of the payer's taxable year preceding the payment and during the whole of its prior taxable year.

14. The lower rate applies to approved royalties and royalties arising from the use of cinematographic films or tapes for television or broadcasting.

15. The lower rate applies to interest paid to a financial institution in respect of an industrial undertaking.

16 . The domestic rate applies; there is no reduction under the treaty. In respect of dividends, the aggregate of dividend withholding tax and corporate income tax on the payer's profits cannot exceed 40% of the taxable income from which the dividends are declared.

17 . 5% for dividends paid to a company which contributed directly or indirectly more than 50% of the payer's capital or more than USD 10 million, 7.5% for dividends paid to a company which contributed between 25% to 50% of the payer's capital.

18 . The lower rate generally applies to royalty payments for the use or right to use any patent, design or model, plan, secret formula or process or any industrial, commercial or scientific equipment or experience, as the case may be.

19 . The lower rate applies to interest received by a bank.

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