Tax Rates for Dividends, Interest, Royalties and Technical Fees
(As at 30/08/2026)

The following table shows the maximum rates of tax those countries / regions with a Comprehensive Double Taxation Agreement / Arrangement with Hong Kong can charge a Hong Kong resident on payments of dividends, interest, royalties and technical fees.

Country / Region	Effective From	Dividends		Interest (%)	Royalties (%)	Technical Fees (%)
		Qualifying Companies (%)	**Others** (%)			
Armenia	Year of Assessment 2026/2027	0	5	5	5	NA
Austria	Year of Assessment 2012/2013	0	10	-	3	NA
Bahrain	Year of Assessment 2026/2027	-		-	5	NA
Bangladesh	Year of Assessment 2025/2026	10	15	10	10	10
Barbados	Pending	-		5	3/5	NA
Belarus	Year of Assessment 2018/2019	5		5	3/5	NA
Belgium	Year of Assessment 2004/2005	0/5	15	10	5	NA
Brunei	Year of Assessment 2011/2012	-		5/10	5	15
Cambodia	Year of Assessment 2020/2021	10		10	10	10
Canada	Year of Assessment 2014/2015	5	15	10	10	NA
Chinese Mainland	Year of Assessment 2007/2008	5	10	7	5/7	NA
Croatia	Year of Assessment 2025/2026	5		5	5	NA
Cyprus	Pending	-		-	3	NA

Czech	Year of Assessment 2013/2014	5		-	10	NA
Estonia	Year of Assessment 2020/2021	0	10	0/10	5	NA
Finland	Year of Assessment 2019/2020	5	10	-	3	NA
France	Year of Assessment 2012/2013	10		10	10	NA
Georgia	Year of Assessment 2022/2023	5		5	5	NA
Guernsey	Year of Assessment 2014/2015	-		-	4	NA
Hungary	Year of Assessment 2012/2013	5	10	5	5	NA
India	Year of Assessment 2019/2020	5		10	10	10
Indonesia	Year of Assessment 2013/2014	5	10	10	5	NA
Ireland	Year of Assessment 2012/2013	-		10	3	NA
Italy	Year of Assessment 2016/2017	10		12.5	15	NA
Japan	Year of Assessment 2012/2013	5	10	10	5	NA
Jersey	Year of Assessment 2014/2015	-		-	4	NA
Jordan	Pending	5		5	5	NA
Korea	Year of Assessment 2017/2018	10	15	10	10	NA
Kuwait	Year of Assessment 2014/2015	5		5	5	NA
Kyrgyzstan	Pending	5	10	8	8	NA

Latvia	Year of Assessment 2018/2019	0	10	0/10	0/3	NA
Liechtenstein	Year of Assessment 2012/2013	-		-	3	NA
Luxembourg	Year of Assessment 2008/2009	0	10	-	3	NA
Macao SAR	Year of Assessment 2021/2022	5		5	3	NA
Malaysia	Year of Assessment 2013/2014	5	10	10	8	5
Maldives	Pending	5	10	10	10	10
Malta	Year of Assessment 2013/2014	-		-	3	NA
Mauritius	Year of Assessment 2024/2025	0	5	5	5	NA
Mexico	Year of Assessment 2014/2015	-		4.9/10	10	NA
Netherlands	Year of Assessment 2012/2013	0	10	-	3	NA
New Zealand	Year of Assessment 2012/2013	0/5	15	10	5	NA
Nigeria	Pending	7.5		7.5	7.5	10
Norway	Pending	5	15	5	5	NA
Pakistan	Year of Assessment 2018/2019	10		10	10	12.5
Portugal	Year of Assessment 2013/2014	5	10	10	5	NA
Qatar	Year of Assessment 2014/2015	-		-	5	NA
Romania	Income derived on or after 01.01.2017	3	5	3	3	NA

Russia	Year of Assessment 2017/2018	0/5	10	-	3	NA
Rwanda	Pending	7.5		8	9	10
Saudi Arabia	Year of Assessment 2019/2020	5		-	5/8	NA
Serbia	Year of Assessment 2021/2022	5	10	10	5/10	NA
Slovenia	Pending	5	10	5	5	NA
South Africa	Year of Assessment 2016/2017	5	10	10	5	NA
Spain	Year of Assessment 2013/2014	0	10	5	5	NA
Switzerland	Year of Assessment 2013/2014	0	10	-	3	NA
Thailand	Year of Assessment 2006/2007	10		10/15	5/10/15	NA
Türkiye	Year of Assessment 2027/2028	5	10	7.5/10	7.5/10	NA
United Arab Emirates	Year of Assessment 2016/2017	5		5	5	NA
United Kingdom	Year of Assessment 2011/2012	0/15		Domestic rate	3	NA
Vietnam	Year of Assessment 2010/2011	10		10	7/10	NA

Notes to Tax Rates for Dividends, Interest, Royalties and Technical Fees

1. **Qualifying Companies**
   Refer to Article 10 of the relevant Comprehensive Double Taxation Agreement / Arrangement to see whether the company is qualified for the special rate.
2. **Interest**
   Exemption is granted to the interest paid to specified bodies and institutions. Such exemptions are not considered in this column.
3. The symbol "-" represents that the country / region does not have any taxing right on the dividends and / or interest.
4. The abbreviation "**NA**" means no technical fees article.

5. **Notes for country / region having more than one rate**

Armenia Mauritius	**Dividends (Qualifying Companies)** 0% applies if the beneficial owner of the dividends is a company which holds directly at least 10% of the payer's capital throughout a 365 day period that includes the day of the payment of the dividends. Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Austria Canada Finland Hungary Japan Luxembourg Malaysia Netherlands Portugal South Africa Switzerland	**Dividends (Qualifying Companies)** Generally, this rate applies if the beneficial owner of the dividends is a company that holds / controls directly or indirectly at least 10% of the payer's capital or voting power.
Bangladesh	**Dividends (Qualifying Companies)** 10% applies if the beneficial owner of the dividends is a company which holds directly at least 10% of the payer's capital. **Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly owned by the Government of the Hong Kong Special Administrative Region as agreed.

Barbados	**Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Royalties** 3% applies to payments for the use of, or the right to use, eligible intellectual property as defined under the Inland Revenue Ordinance, Chapter 112 of the Laws of Hong Kong. 5% applies in all other cases.
Belarus	**Dividends** Dividends are exempt from tax if the beneficial owner of the dividends is: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** Interest is exempt from tax if the beneficial owner of the interest is: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Royalties** 3% applies to payments for the use of, or the right to use aircraft. 5% applies in all other cases.
Belgium	**Dividends (Qualifying Companies)** Dividends shall not be taxed if the beneficial owner of the dividends is a company that holds directly at least 25% of the payer's capital for an uninterrupted period of at least 12 months. 5% applies if the beneficial owner of the dividends is a company which holds directly at least 10% of the payer's capital.
Brunei	**Interest** 5% applies if the interest is received by any bank or financial institution. 10% applies in all other cases.
Cambodia	**Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) a financial establishment appointed by the Government of the Hong Kong Special Administrative Region as agreed.

Chinese Mainland	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company that holds directly at least 25% of the payer's capital. **Royalties** With effect from 29.12.2015, 5% applies for royalties paid to an aircraft and ship leasing business. 7% applies in all other cases.
Croatia Georgia Jordan	**Dividends** Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Estonia	**Dividends (Qualifying Companies)** 0% applies if the beneficial owner of the dividends is a company. Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** 0% applies if the beneficial owner of the interest is a company. 10% applies in all other cases. Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Indonesia Korea Spain	**Dividends (Qualifying Companies)** This rate applies if the beneficial owner of the dividends is a company that holds directly at least 25% of the payer's capital.

Kuwait United Arab Emirates	**Dividends** 0% applies if the beneficial owner of the dividends is the Government of the Hong Kong Special Administrative Region or any of its institutions or other entity wholly-owned directly by the Government of the Hong Kong Special Administrative Region.
Kyrgyzstan	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company which holds directly at least 20% of the payer's capital throughout a 365 day period that includes the day of the payment of the dividends. Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Latvia	**Dividends (Qualifying Companies)** 0% applies if the beneficial owner of the dividends is a company (other than a partnership). Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** 0% applies if the beneficial owner of the interest is a company (other than a partnership). 10% applies in all other cases. Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Royalties** 0% of the gross amount of the royalties for the use of, or the right to use, industrial, commercial or scientific equipment or for information concerning industrial, commercial or scientific experience applies if the beneficial owner of the royalties is a company (other than a partnership). 3% applies in all other cases.

Macao SAR	**Dividends** Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed between the competent authorities of both sides. **Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed between the competent authorities of both sides.
Maldives	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company which holds directly at least 25% of the payer’s capital throughout a 365 day period that includes the day of the payment of the dividend. Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Mexico	**Interest** 4.9% applies if the beneficial owner of the interest is a bank. 10% applies in all other cases.
New Zealand	**Dividends (Qualifying Companies)** Dividends shall not be taxed if the beneficial owner is a company that holds directly or indirectly at least 50% of the payer’s voting power, and meets specified requirements. Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; or (c) any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. 5% applies if the beneficial owner of the dividends is a company which holds directly at least 10% of the payer’s voting power.
Nigeria	**Interest** Interest shall be exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any financial institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.

Norway	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company (other than a partnership) which holds directly at least 10% of the payer's capital throughout a 365 day period that includes the day of the payment of the dividend.
Pakistan	**Interest** Interest shall be exempt from tax if it is beneficially owned by (a) the Hong Kong Monetary Authority; (b) the Exchange Fund; (c) the Government of the Hong Kong Special Administrative Region; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Romania	**Dividends (Qualifying Companies)** This rate applies if the beneficial owner of the dividends is a company (other than partnership) which holds directly at least 15% of the payer's capital. Dividends are exempt from tax if they are derived and beneficially owned by: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) a financial institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** 0% applies if and as long as the Hong Kong Special Administrative Region levies no withholding tax on interest. Interest is exempt from tax if it is derived and beneficially owned by (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) a financial institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Russia	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company (other than a partnership) which holds directly at least 15% of the payer's capital. Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Rwanda	**Dividends** Dividends are exempt from tax if they are paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned, directly or indirectly, by the Government of the Hong Kong Special Administrative Region as agreed. **Interest** Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned, directly or indirectly, by the Government of the Hong Kong Special Administrative Region as agreed.

Saudi Arabia	**Royalties** 5% applies to payments for the use of, or the right to use, industrial, commercial or scientific equipment. 8% applies in all other cases.
Serbia	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company which holds directly at least 25% of the payer's capital throughout a 365 day period that includes the day of the payment of the dividends. **Royalties** 5% applies to payments for the use of, or the right to use, any copyright of literary, artistic or scientific work including cinematograph films or films or tapes used for radio or television broadcasting. 10% applies to payments for the use of, or the right to use, any patent, trade mark, design or model, plan, secret formula or process, or for the use of or the right to use, industrial, commercial or scientific equipment, or for information concerning industrial, commercial or scientific experience.
Slovenia	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company which holds directly at least 10% of the payer's capital throughout a 365 day period that includes the day of the payment of the dividend. **Interest** Interest shall be exempt from tax if it is derived and beneficially owned by: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; (c) the Exchange Fund; or (d) any entity wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as agreed.
Thailand	**Interest** 10% applies if the interest is beneficially owned by (a) any financial institution or insurance company; or (b) a resident of the Hong Kong Special Administrative Region and is paid with respect to indebtedness arising as a consequence of a sale on credit by a resident of the Hong Kong Special Administrative Region of any equipment, merchandise or services, except where the sale was between persons not dealing with each other at arm's length. 15% applies in all other cases. **Royalties** 5% applies to payments for the use of, or the right to use, any copyright of literary, artistic or scientific work. 10% applies to payments for the use of, or the right to use, any patent, trademark, design or model, plan, secret formula or process. 15% applies in all other cases.

Türkiye	**Dividends (Qualifying Companies)** 5% applies if the beneficial owner of the dividends is a company (other than a partnership) which holds directly at least 25% of the payer's capital throughout a 365 day period that includes the day of the payment of the dividends. **Interest** 7.5% applies if the interest is received by a financial institution in respect of a loan or debt instrument with a maturity period exceeding 2 years. 10% applies in all other cases. Interest is exempt from tax if it is paid to: (a) the Government of the Hong Kong Special Administrative Region; (b) the Hong Kong Monetary Authority; or (c) the Exchange Fund. **Royalties** 7.5% applies to payments for the use of, or the right to use, industrial, commercial or scientific equipment. 10% applies in all other cases.
United Kingdom	**Dividends** 15% applies if, other than where the beneficial owner of the dividends is a pension scheme, dividends are paid out of income (including gains) derived directly or indirectly from immovable property within the meaning of Article 6 by an investment vehicle which distributes most of this income annually and whose income from such immovable property is exempted from tax. Dividends shall be exempt from tax in all other cases. **Interest** The domestic rate generally applies. There is no withholding tax where (a) the interest is beneficially owned by (i) the Government of the Hong Kong Special Administrative Region including the Hong Kong Monetary Authority; (ii) an individual; (iii) a listed company; (iv) a pension scheme; (v) a financial institution which is unrelated to and dealing wholly independently with the payer; or (vi) any other company which was accepted that its establishment, acquisition or maintenance does not have as its main purpose or one of its main purposes to secure the benefits of the article on interest; or (b) the interest is paid: (i) by the Government of the Hong Kong Special Administrative Region including the Hong Kong Monetary Authority; (ii) by a bank in the ordinary course of its banking business; or (iii) on a quoted Eurobond.
Vietnam	**Royalties** 7% applies to payments for the use of, or the right to use, any patent, design or model, plan, secret formula or process. 10% applies in all other cases.

https://www.ird.gov.hk/eng/tax/dta_rates.htm