

Withholding Tax on Interest: Summary of withholding tax rates per South African Double Taxation Agreements currently in force

Version: 2

Updated: June 2023

Note:

- A summary of the rates and the relevant provisions relating thereto, are reflected in the table below – the full text of these Double Taxation Agreements (DTAs) is available on the SARS website (www.sars.gov.za > Legal Counsel).
- Only DTAs which are currently in force are listed below.
- The South African domestic rules is applicable to all countries which are not listed in the table below or where the DTA does not deal with the allocation of taxing rights with regard to interest.
- Where South Africa is in the process of negotiating/renegotiating DTAs or Protocols with certain countries (see SARS website) either the present DTA rate (where there is a DTA in force dealing with interest) or the South African domestic rules apply (where there is no DTA in force or the DTA does not deal with interest) until such time as the new/renegotiated DTA or Protocol enters into force (or the specified effective date, whichever is applicable).
- Kindly refer to the provisions of the relevant DTA for the meaning of the term "interest".

Country	Entry into force	Rate in DTA	Summary of requirements to qualify for a particular rate	Extract from DTA Article on Interest
REST OF THE WORLD				
1 Australia (Government of)	12-Nov-08	0%	Paid to (derived by) a political / administrative subdivision or local authority of the other state; or to any body exercising governmental functions; or to a bank performing central banking functions Paid to (derived by) a "financial institution" which is unrelated to and dealing wholly independantly with the payor	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the law of that State, but the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding paragraph 2, interest arising in a Contracting State and beneficially owned by a resident of the other Contracting State may not be taxed in the firstmentioned State if: (a) the interest is derived by a Contracting State or by a political or administrative subdivision or a local authority thereof, or by any other body exercising governmental functions in a Contracting State, or by a bank performing central banking functions in a Contracting State; or (b) the interest is derived by a financial institution which is unrelated to and dealing wholly independently with the payer. For the purposes of this Article, the term "financial institution" means a bank or other enterprise substantially deriving its profits by raising debt finance in the financial markets or by taking deposits at interest and using those funds in carrying on a business of providing finance. (4) Notwithstanding paragraph 3, interest referred to in subparagraph (b) of that paragraph may be taxed in the State in which it arises at a rate not exceeding 10 per cent of the gross amount of the interest if the interest is paid as part of an arrangement involving back-to-back loans or other arrangement that is economically equivalent and intended to have a similar effect to back-to-back loans.
		10%	All other beneficial owners	
2 Austria (Republic of)	06-Feb-97	0%	No right to tax interest in source state	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State may be taxed only in that other State.
3 Belarus (Republic of)	29-Dec-03	0%	Paid to (derived by) the government, political subdivision or local authority of the other state; or to any entity wholly owned and controlled by the other government, subdivision or authority	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed: (a) 5 per cent of the gross amount of the interest, if the interest is derived by a bank or any other financial institution which is a resident of the other Contracting State; (b) 10 per cent of the gross amount of the interest in all other cases. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of these limitations. (3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if it is derived by the Government of the other Contracting State or a political subdivision or a local authority thereof, or any entity wholly owned and controlled by that Government or subdivision or authority.
		5%	Paid to (derived by) a bank or other financial institution resident in the other state	
		10%	All other beneficial owners	

4	Belgium (Kingdom of)	09-Oct-98	0%	<p>Paid on commercial debt-claims (represented by commercial paper) resulting from deferred payment for goods / merchandise / services supplied by an enterprise</p> <p>Paid in respect of a loan made / guaranteed / insured, or credit extended / guaranteed / insured by a public financial institution / entity under a scheme for promotion of exports</p> <p>Paid on loans of any nature (not represented by bearer instruments) granted by a banking enterprise</p> <p>Paid on deposits (not represented by bearer instruments) with a banking enterprise</p> <p>Paid to the other state</p>	<p>11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State the tax so charged shall not exceed 10 per cent of the gross amount of the interest.</p> <p>(3) Notwithstanding the provisions of paragraph 2, interest shall be exempted from tax in the Contracting State in which it arises if it is:</p> <p>a) interest on commercial debt-claims - including debt-claims represented by commercial paper - resulting from deferred payments for goods, merchandise or services supplied by an enterprise;</p> <p>b) interest paid in respect of a loan made, guaranteed or insured, or a credit extended, guaranteed or insured by a public financial institution or a public entity under a scheme for the promotion of exports;</p> <p>c) interest on loans of any nature - not represented by bearer instruments - granted by a banking enterprise;</p> <p>d) interest on deposits - not represented by bearer instruments - with a banking enterprise;</p> <p>e) interest paid to the other Contracting State.</p>
			10%	All other beneficial owners	
5	Brazil (Federative Republic of)	24-Jul-06	0%	Paid to (derived and beneficially owned by) the government or political subdivision of the other state; or to the central bank; or any agency (including a financial institution) wholly owned by the other government or subdivision	<p>11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 15 per cent of the gross amount of the interest.</p> <p>(4) Notwithstanding the provisions of paragraphs 1 and 2:</p> <p>(a) interest arising in a Contracting State and derived and beneficially owned by the Government of the other Contracting State, a political subdivision thereof, the Central Bank or any agency (including a financial institution) wholly owned by that Government or a political subdivision thereof shall be exempt from tax in the first-mentioned State;</p> <p>(b) subject to the provisions of subparagraph (a), interest from securities, bonds or debentures issued by the Government of a Contracting State, a political subdivision thereof or any agency (including a financial institution) wholly owned by that Government or a political subdivision thereof shall be taxable only in that State.</p>
			0%	Paid (in respect of securities, bonds or debentures) by the government or political subdivision of the source state; or by any agency (including a financial institution) wholly owned by the government or subdivision of the source state	
			15%	All other beneficial owners	
6	Bulgaria (Republic of)	27-Oct-04	0%	Paid to (derived and beneficially owned by) the government, political subdivision or local authority of the other state; or to the Central Bank of Bulgaria; or to any wholly owned institution of the other government, subdivision or authority	<p>11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 5 per cent of the gross amount of the interest.</p> <p>(3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if it is derived and beneficially owned by the Government of the other Contracting State or a political subdivision or a local authority thereof, the Central Bank of Bulgaria, the South African Reserve Bank or any wholly owned institution of that Government or subdivision or authority.</p>
			5%	All other beneficial owners	

7	Canada	30-Apr-97	0%	<p>Paid by (in respect of indebtedness) the government, a political subdivision or a local authority of the source state</p> <p>Paid to the Bank of Canada</p> <p>Paid in respect of a loan made / guaranteed / insured, or credit extended / guaranteed / insured by the Canadian Export Development Corporation</p> <p>Paid to an entity which was constituted and is operated exclusively to administer or provide benefits under a pension, retirement or other employee benefit plan (if such entity is generally exempt in the other state; and the interest is not derived from carrying on a trade / business or from a related person)</p> <p>Paid in respect of indebtedness resulting from the sale or furnishing on credit by a resident of the other state of any equipment / merchandise / services (except where made between "associated persons")</p>	<p>2. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if a resident of the other Contracting State is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest.</p> <p>3. Notwithstanding the provisions of paragraph 2:</p> <p>(a) ...</p> <p>(b) interest arising in South Africa and beneficially owned by a resident of Canada shall be taxable only in Canada if it is paid:</p> <p>(i) in respect of indebtedness of the government of South Africa or of a political subdivision or local authority thereof;</p> <p>(ii) to the Bank of Canada;</p> <p>(iii) in respect of a loan made, guaranteed or insured, or a credit extended, guaranteed or insured by the Canadian Export Development Corporation.</p> <p>(c) interest arising in a Contracting State and paid to a resident of the other Contracting State which was constituted and is operated exclusively to administer or provide benefits under one or more pension, retirement or other employee benefits plans shall not be taxable in the first-mentioned State provided that:</p> <p>(i) the resident is the beneficial owner of the interest and is generally exempt from tax in the other State; and</p> <p>(ii) the interest is not derived from carrying on a trade or a business or from a related person; and</p> <p>(d) interest arising in a Contracting State and paid to a resident of the other Contracting State who is the beneficial owner thereof shall be taxable only in that other State to the extent that such interest is paid with respect to indebtedness resulting from the sale or furnishing on credit by a resident of that other State of any equipment, merchandise or services, except where the sale or furnishing is made between associated persons within the meaning of subparagraphs (a) or (b) of paragraph 1 of Article 9 or where the payer and the recipient of the interest are associated persons within the meaning of the same subparagraphs.</p>
			10%	All other beneficial owners	
8	China (People's Republic of)	07-Jan-01	0%	<p>Paid to (derived by) the government, political subdivision or local authority of the other state; or to the central bank of the other state; or to a financial institution wholly owned by the government of the other state</p> <p>Paid to (derived by) a resident of the other state in respect to debt-claims indirectly financed by the government, political subdivision or local authority or central bank the other state, or a financial institution wholly owned by the government of the other state</p>	<p>2. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.</p> <p>3. Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State and derived by the Government of the other Contracting State, a political subdivision, a local authority and the Central Bank thereof or any financial institution wholly owned by the Government of that other State, or by any other resident of that other State with respect to debt-claims indirectly financed by the Government of that other State, a political subdivision, a local authority and the Central Bank thereof or any financial institution wholly owned by the Government of that other State, shall be exempt from tax in the first-mentioned State.</p>
			10%	All other beneficial owners	
9	Croatia (Republic of)	07-Nov-97	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, provided such resident is the beneficial owner of the interest.
10	Cyprus (Republic of)	08-Dec-98	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, provided such resident is the beneficial owner of the interest.
11	Czech Republic	03-Dec-97	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State if such resident is the beneficial owner of the interest.
12	Denmark (Kingdom of)	21-Dec-95	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, provided such resident is the beneficial owner of the interest.
13	Finland (Republic of)	12-Dec-95	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State if such resident is the beneficial owner of the interest.
14	France (French Republic)	01-Nov-95	0%	No right to tax interest in source state if paid to the beneficial owner and is taxed in other state	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State if such resident is the beneficial owner of the interest and if such interest is subject to tax in that other State.

15	Germany (Federal Republic of)	28-Feb-75	10%	All beneficial owners if such interest is subject to tax in the other Contracting State.	8(2) However, such interest may be taxed in the Contracting State in which it arises, and according to the law of that State; but the tax so charged shall not exceed 10 per cent of the amount of the interest if such interest is subject to tax in the other Contracting State.
16	Greece (Hellenic Republic)	14-Feb-03	0%	<p>Paid by the government, a political subdivision or a local authority of the source state</p> <p>Paid to the government, a political subdivision or a local authority of the other state</p> <p>Paid to the Central Bank of Greece</p> <p>Paid to an agency / instrumentality which is wholly owned by the government, a political subdivision or a local authority of the other state</p>	<p>11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 8 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.</p> <p>3. Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if:</p> <p>a) the payer of the interest is that Contracting State or a political subdivision or a local authority thereof;</p> <p>b) the interest is paid to the other Contracting State or a political subdivision or a local authority thereof;</p> <p>c) the interest is paid to the Central Bank of Greece or the South African Reserve Bank;</p> <p>d) the interest is paid to any agency or instrumentality which is wholly owned by a Contracting State or a political subdivision or a local authority thereof.</p>
			8%	All other beneficial owners	
17	Hong Kong	20-Otc-15	0%	Interest arising in a Contracting Party is exempt from tax in that Party, if it is paid in the case of the Hong Kong Special Administrative Region to either the Government of the Hong Kong Special Administrative Region; or to the Hong Kong Monetary Authority; or to any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as may be agreed from time to time between the competent authorities of the Contracting Parties.	<p>11(2) However, such interest may also be taxed in the Contracting Party in which it arises and according to the laws of that Party, but if the beneficial owner of the interest is a resident of the other Contracting Party, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.</p> <p>(3) Notwithstanding the provisions of paragraph 2 of this Article, interest arising in a Contracting Party is exempt from tax in that Party, if it is paid:</p> <p>(a) in the case of the Hong Kong Special Administrative Region,</p> <p>(i) to the Government of the Hong Kong Special Administrative Region;</p> <p>(ii) to the Hong Kong Monetary Authority;</p> <p>(iii) to any institution wholly or mainly owned by the Government of the Hong Kong Special Administrative Region as may be agreed from time to time between the competent authorities of the Contracting Parties;</p> <p>(b) in the case of South Africa,</p> <p>(i) to the Government of South Africa and any political subdivision or local authority thereof;</p> <p>(ii) to the Reserve Bank of South Africa;</p> <p>(iii) to any institution wholly or mainly owned by the Government of South Africa as may be agreed from time to time between the competent authorities of the Contracting Parties.</p>
			0%	In the case of South Africa, to the Government of South Africa and any political subdivision or local authority thereof; or to the Reserve Bank of South Africa; or to any institution wholly or mainly owned by the Government of South Africa as may be agreed from time to time between the competent authorities of the Contracting Parties.	
			10%	All other beneficial owners	
18	Hungary (Republic of)	05-May-96	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, if such resident is the beneficial owner of the interest.
19	India (Republic of)	28-Nov-97	0%	<p>Paid to (derived and beneficially owned by) the government, a political subdivision or a local authority of the other state</p> <p>Paid to (derived and beneficially owned by) the Reserve Bank of India</p> <p>Paid to (derived and beneficially owned by) an agency / instrumentality which is wholly owned by the government of the other state, and has been approved in writing by the competent authorities</p>	<p>11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest.</p> <p>(3) Notwithstanding the provisions of paragraphs 1 and 2, interest arising in a Contracting State shall be exempt from tax in that State if it is derived and beneficially owned by:</p> <p>(a) the Government, a political subdivision or a local authority of the other Contracting State;</p> <p>(b) the Reserve Bank of India or the South African Reserve Bank; or</p> <p>(c) any agency or instrumentality which is wholly owned by the Government of a Contracting State and which has been approved in writing by the competent authorities of the Contracting States for the purposes of this paragraph.</p>
			10%	All other beneficial owners	

20	Indonesia (Republic of)	23-Nov-98	0%	Paid by the government, a political subdivision or a local authority of the source state	11(2) The rate of tax imposed by one of the Contracting States on interest derived from sources within that Contracting State and beneficially owned by a resident of the other Contracting State shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if: (a) the payer of the interest is the Government of that Contracting State or a political subdivision or a local authority thereof; or (b) the interest is paid to the Government of the other Contracting State or a political subdivision or a local authority thereof; or (c) the interest is paid to the Bank of Indonesia or the South African Reserve Bank.
				Paid to the government, a political subdivision or a local authority of the other state	
		10%	All other beneficial owners		
21	Iran (Islamic Republic of)	23-Nov-98	0%	Paid to (derived by) the government, ministries, a political subdivision, local authority or municipality of the other state; or to institutions wholly owned by the government of the other state; or to the Central Bank of Iran	11(2) However, such interest may also be taxed in the Contracting State in which it arises, and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 5 per cent of the gross amount of the interest. (4) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State and derived by the Government of the other Contracting State or ministries, political subdivisions, local authorities or municipalities thereof, other institutions wholly owned by that Government, the Central Bank of Iran and the South African Reserve Bank, shall be exempt from tax in the first-mentioned State.
			5%	All other beneficial owners	
22	Ireland (Government of)	05-Dec-97	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, provided such resident is the beneficial owner of the interest.
23	Israel (State of)	27-May-80	25%	All beneficial owners	11(2) However, such interest may be taxed in the Contracting State in which it arises, and according to the laws of that Contracting State, but the tax so charged shall not exceed 25 per cent of the gross amount of the interest.
24	Italy (Republic of)	02-Mar-99	0%	Paid by the government, a political / administrative subdivision or a local authority of the source state	11(2) However, such interest may also be taxed in the Contracting State in which it arises, and according to the laws of that State, but if the recipient is the beneficial owner of the interest, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation. 3. Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if: (a) the payer of the interest is the Government of that Contracting State or a political or administrative subdivision or a local authority thereof; or (b) the interest is paid to the Government of the other Contracting State or a political or administrative subdivision or a local authority thereof or any agency or instrumentality (including a financial institution) wholly owned by that other State or subdivision or authority; or (c) the interest is paid to any other agency or instrumentality (including a financial institution) in relation to loans made in application of an agreement concluded between the Governments of the Contracting States.
				Paid to the government, a political / administrative subdivision, or a local authority of the other state; or to an agency / instrumentality (including a financial institution) wholly owned by the government, subdivision or authority of the other state	
				Paid to an agency / instrumentality (including a financial institution) in relation to loans made in application of an agreement between the states	
		10%	All other beneficial owners		
25	Japan (Government of)	05-Nov-97	0%	Paid to (derived by) the government, a political subdivision or local authority of the other state; or to the central bank or any financial institution wholly owned by the other state (including the Bank of Japan, the Export-Import Bank of Japan, the Overseas Economic Cooperation Fund, the Japan Bank for International Cooperation, the Japan International Cooperation Agency, and certain financial institutions agreed to by the states - see definition in DTA)	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that Contracting State, but if the recipient is the beneficial owner of the interest, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State and derived by the Government of the other Contracting State, a political subdivision or local authority thereof, the Central Bank of that other Contracting State or any financial institution wholly owned by that Government, or by any resident of the other Contracting State with respect to debt-claims guaranteed, insured or indirectly financed by the Government of that other Contracting State, a political subdivision or local authority thereof, the Central Bank of that other Contracting State or any financial institution

			<p>Paid to (derived by) any resident of the other state with respect to debt-claims guaranteed / insured / indirectly financed by the government, a political subdivision or local authority of that other state; or by the central bank or any financial institution wholly owned by the government (see definition in DTA) of the other state</p>	<p>wholly owned by that Government shall be exempt from tax in the first-mentioned Contracting State. (4) For the purposes of the provisions of paragraph 3, the terms "the Central Bank" and "financial institution wholly owned by that Government" mean: (a) in the case of Japan: (i) the Bank of Japan; (ii) the Export-Import Bank of Japan; (iii) the Overseas Economic Cooperation Fund; (iv) the Japan International Cooperation Agency; and (v) such other financial institution the capital of which is wholly owned by the Government of Japan as may be agreed upon from time to time between the Governments of the two Contracting States;</p>
		10%	All other beneficial owners	

26	Korea (Republic of Korea)	07-Jan-96	0%	Paid to the government of the other state (including the Bank of Korea, the Korea Export-Import Bank, the Korea Development Bank, political subdivision, local authority and certain institutions agreed to by the competent authorities of the states - see definition in DTA)	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. 3. Notwithstanding the provisions of paragraph 2: (a) interest arising in a Contracting State and paid to the Government of the other Contracting State shall be exempt from tax in the first-mentioned State; (b) interest paid in connection with the sale on credit of any industrial, commercial or scientific equipment, or paid in connection with the sale on credit of any merchandise by one enterprise to another enterprise shall be taxable only in the Contracting State of which the beneficiary is a resident. 4. For the purposes of paragraph 3(a), the term "Government" includes: (a) the Bank of Korea, the Korea Export-Import Bank, the Korea Development Bank and the South African Reserve Bank; (b) the political subdivisions and local authorities of the Contracting States; and (c) such institutions, at least 80 per cent of whose capital is owned by the Government of either Contracting State or a political subdivision or local authority thereof, as may be agreed from time to time by the competent authorities of the Contracting States.
			10%	All other beneficial owners	
27	Kuwait (State of)	25-Apr-06	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State who is the beneficial owner of such interest shall be taxable only in that other Contracting State.
28	Luxembourg (Grand Duchy of)	08-Sep-00	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State if such resident is the beneficial owner of the interest.
29	Malaysia (Government of)	17-Mar-06	0%	Paid to (derived by) the government of the other state (including governments of the states of Malaysia, local authorities, statutory bodies engaged in governmental functions, Bank Negara Malaysia and the Export-Import Bank of Malaysia Berhad (EXIM Bank) - see definition in DTA)	11(2) However, such interest may also be taxed in the Contracting State in which it arises, and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2, the Government of a Contracting State shall be exempt from tax in the other Contracting State in respect of interest derived by the Government from that other State. (4) For the purposes of paragraph 3, the term "Government": (a) in the case of Malaysia means the Government of Malaysia and shall include: (i) the governments of the States; (ii) the local authorities; (iii) the statutory bodies engaged in governmental functions; (iv) the Bank Negara Malaysia; and (v) the Export-Import Bank of Malaysia Berhad (EXIM Bank);
			10%	All other beneficial owners	
30	Malta (Government of)	12-Nov-97 and 17-Dec-13	0%	Paid by the government, a political subdivision or a local authority of the source state Paid to the government, a political subdivision or a local authority of the other state Paid by or to the central bank of any of the states Paid to any institution / body wholly owned (directly or indirectly) by the government, political subdivision or local authority of the other state Paid in respect of a debt instrument listed on a recognised stock exchange (currently JSE)	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if: (a) the payer of the interest is the Government of that Contracting State or a political subdivision or a local authority thereof; or (b) the interest is paid to the Government of the other Contracting State or a political subdivision or a local authority thereof; or (c) the interest is paid by the Central Bank of that Contracting State or to the Central Bank of the other Contracting State; or (d) the interest is paid to any institution or body which is wholly owned, directly or indirectly, by the other Contracting State or a political subdivision or a local authority thereof; or (e) the interest arises in respect of any debt instrument listed on a recognised stock exchange." (4) For the purposes of paragraph 3(e), the term "recognised stock exchange" means: (a) in Malta, the Malta Stock Exchange; (b) in South Africa, the Johannesburg Stock Exchange; (c) any other stock exchange agreed upon by the competent authorities of the Contracting States.
			10%	All other beneficial owners	

31	Mexico (United Mexican States)	22-Jul-10	0%	Paid to (beneficially owned by) the government, a political subdivision or a local authority of the other state; or the central bank of the other state	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2, interest referred to in paragraph 1 shall be exempt from tax in the Contracting State in which it arises, where: (a) the beneficial owner is a Contracting State, political subdivision, local authority or a Central Bank; (b) the interest is paid by any of the persons referred to in subparagraph (a); (c) the interest is paid in respect of a loan or credit for a period of no less than three years granted by, guaranteed or insured by a financial or a credit institution wholly owned by a Contracting State.
				Paid by the government, a political subdivision or a local authority of the source state; or by the central bank of the source state	
			10%	All other beneficial owners	
32	Netherlands (Kingdom of the)	28-Dec-08	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and beneficially owned by a resident of the other Contracting State shall be taxable only in that other State. (2) The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of paragraph 1.
33	New Zealand (Government of)	23-Jul-04	0%	Paid to (derived by) the government of the other state	11(2) However, such interest may also be taxed in the Contracting State in which it arises, and according to the laws of that State, but the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2, interest derived by the Government of a Contracting State, or by a bank performing central banking functions in a Contracting State, shall be exempt from tax in the other Contracting State.
				Paid by a bank performing central banking functions in a state	
			10%	All other beneficial owners	
34	Noway (Kingdom of)	12-Sep-96	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State provided such resident is the beneficial owner of the interest.
35	Oman (Sultanate of)	29-Dec-03	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other Contracting State, provided such resident is the beneficial owner of the interest.
36	Pakistan (Islamic Republic of)	09-Mar-99	0%	Paid to (derived and beneficially owned by) the government, a political subdivision or a local authority of the other state; or (subject to agreement by the competent authorities) any agency / instrumentality of the government, subdivision or authority of the other state	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation. (3) Notwithstanding the provisions of paragraph 2: (a) interest arising in a Contracting State shall be exempt from tax in that State if it is derived and beneficially owned by: (i) the Government of the other Contracting State, or a political subdivision or a local authority thereof, or subject to the agreement of the competent authorities, any agency or instrumentality of that State or political subdivision or local authority; (ii) the Central Bank of the other Contracting State; (b) interest arising in a Contracting State shall be exempt from tax in that State if it is beneficially owned by a resident of the other Contracting State and is derived in connection with a loan or credit extended, endorsed or guaranteed by the Government of the first-mentioned State.
				Paid to (derived and beneficially owned by) the central bank of the other state	
				Paid in connection with a loan / credit extended / endorsed / guaranteed by the government of the source state	
			10%	All other beneficial owners	
37	Poland (Republic of)	05-Dec-95	0%	Paid to (derived by) the government, or a local authority of the other state; or the central bank of the other state; or any financial institution controlled by the government of the other state	11(2) However, interest referred to in paragraph 1 of this Article may also be taxed in the Contracting State in which it arises, and according to the laws of that State, but the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2 interest arising in a Contracting State and derived by the Government of the other Contracting State including local authorities thereof, the Central Bank or any financial institution controlled by that Government, or interest derived on loans guaranteed by that Government, shall be exempt from tax in the first-mentioned State.
				Paid on loans guaranteed by the government of the source state	
			10%	All other beneficial owners	
38	Portugal (Portuguese Republic)	22-Oct-08	0%	Paid to (derived and beneficially owned by) the government, a political / administrative subdivision or a local authority of the other state; or to any entity wholly owned and controlled by the government, subdivision or authority of the other state	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.

			10%	All other beneficial owners	(3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if it is derived by the other Contracting State or a political or administrative subdivision or a local authority thereof or any entity wholly owned and controlled by that State or subdivision or local authority.
39	Qatar	02-Dec-15	0%	Paid to the government, political subdivision or local authority of the other state; or to the Central bank of the other state; or to institutions/bodies in respect of loans made in application of an agreement between the states or interest arises with reor interest arises with regards to any debt intrusment listed on a recognised stock exchange.	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.
			10%	All other beneficial owners	(3)Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if: (a) the payer of the interest is the Government of that Contracting State or a political subdivision or a local authority thereof; or (b) the interest is paid to the Government of the other Contracting State or a political subdivision or a local authority thereof; or (c) the interest is paid by the Central Bank of that Contracting State or the Central Bank of the other Contracting State; or (d) the interest is paid to any institution or body which is wholly owned, directly or indirectly, by the other Contracting State or a political subdivision or local authority thereof; or (e) the interest arises in respect of any debt instrument listed on a recognised stock exchange. 4. For the purpose of paragraph 3(e), the term "a recognised stock exchange" means: (a) in South Africa, the Johannesburg Stock Exchange; (b) in Qatar, the Qatar Exchange; (c) any other stock exchange agreed upon by the competent authorities of the Contracting States.
40	Romania (Government of)	21-Oct-95	0%	Paid in respect of a loan made / guaranteed (directly / indirectly) by a state, a political subdivision, a local authority or an administrative-territorial unit thereof; or by the central bank of a state	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that Contracting State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 15 per cent of the gross amount of the interest. The provisions of this paragraph shall not apply to interest paid in respect of a loan made and guaranteed, directly or indirectly, by a Contracting State, a political subdivision, a local authority or an administrative-territorial unit thereof, the National Bank of Romania or the Reserve Bank of South Africa.
			15%	All other beneficial owners	
41	Russia (Russian Federation)	26-Jun-00	0%	Paid in respect of a loan made / guaranteed by the government or a local authority of the other state; or by the central bank of a state	2. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest.
			10%	All other beneficial owners	The provisions of this paragraph shall not apply to interest paid in respect of a loan made or guaranteed by the Government of a Contracting State, a local authority thereof, the Bank of Russia or the South African Reserve Bank.
42	Saudi Arabia (Kingdom of)	01-May-08	5%	All beneficial owners	11(2) However, such income from debt-claims may also be taxed in the Contracting State in which it arises and according to the laws of that Contracting State, but if the beneficial owner of the income from debt-claims is a resident of the other Contracting State, the tax so charged shall not exceed 5 per cent of the gross amount of the income from debt-claims.
43	Singapore (Republic of)	16-Dec-16	0%	Paid by by the Government of that State; or is paid to the Government of the other State; or the interest arises in respect of any debt instrument listed on a recognised stock exchange.	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Con11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 7.5 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.

			7.5%	All other beneficial owners	(3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State shall be exempt from tax in that State if: (a) the interest is paid by the Government of that State; or (b) the interest is paid to the Government of the other State; or (c) the interest arises in respect of any debt instrument listed on a recognised stock exchange. (4) For the purposes of paragraph 3, the term "Government": (a) in Singapore, means the Government of Singapore and shall include: (i) the Monetary Authority of Singapore; (ii) GIC Private Limited; (iii) a statutory body; and (iv) any institution wholly or mainly owned by the Government of Singapore, as may be agreed from time to time between the competent authorities of the Contracting States; and (b) in South Africa, means the Government of South Africa or a political subdivision or a local authority thereof and shall include: (i) the South African Reserve Bank; (ii) a statutory body; and (iii) any institution wholly or mainly owned by the Government of South Africa, as may be agreed from time to time between the competent authorities of the Contracting States (5) For the purposes of paragraph 3(c), the term "recognised stock exchange" means: (a) in Singapore, the Singapore Exchange (SGX); (b) in South Africa, the Johannesburg Stock Exchange; (c) any other stock exchange as may be agreed from time to time between the competent authorities of the Contracting States.
44	Slovak Republic	30-Jun-99	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State if such resident is the beneficial owner of the interest.
45	Spain (Kingdom of)	28-Dec-07	0%	Paid to (beneficially owned by) the government, a political subdivision or a local authority of the other state	2. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 5 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation. 3. Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State if the recipient is the beneficial owner of the interest and a) the interest is beneficially owned by a Contracting State or a political subdivision or a local authority thereof; or b) the interest is paid in connection with the sale on credit of merchandise or equipment to an enterprise of a Contracting State; or c) the interest is paid on a long-term loan (7 or more years) granted by a bank or other credit institution, which is a resident of a Contracting State.
				Paid in connection with the sale on credit of merchandise / equipment to an enterprise	
				Paid on a long-term loan (7 or more years) granted by a bank / credit institution resident in the other state	
			5%	All other beneficial owners	
46	Sweden (Kingdom of)	25-Dec-95	0%	No right to tax interest in source state if paid to the beneficial owner and is taxed in other state	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, provided such resident is the beneficial owner of the interest and is subject to tax thereon in that other State.
47	Switzerland (Swiss Confederation)	27-Jan-09	5%	All beneficial owners	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 5 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.
48	Taiwan (Republic of China)	12-Sep-96	10%	All beneficial owners	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that Contracting State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.

49	Thailand (Kingdom of)	27-Aug-96	0%	Paid to the government of the other state (including the Bank of Thailand, the Export-Import Bank of Thailand, a political subdivision, a local authority; and certain institutions (wholly owned by the government, subdivision or authority) agreed to by the competent authorities of the states - see definition in DTA)	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest and is a company which is a resident of the other Contracting State, the tax so charged shall not exceed: (a) 10 per cent of the gross amount of the interest if it is received by a financial institution (including an insurance company); (b) 15 per cent of the gross amount of the interest in other cases. (3) Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State and paid to the Government of the other Contracting State shall be exempt from tax in the first-mentioned State. (4) For the purposes of paragraph 3, the term "Government" includes: (a) the South African Reserve Bank, the Bank of Thailand and the Export-Import Bank of Thailand; (b) the political subdivisions and local authorities of the Contracting States; and (c) such institutions, the capital of which is wholly owned by the Government of either Contracting State or a political subdivision or local authority thereof, as may be agreed from time to time by the competent authorities of the Contracting States.
			10%	Paid to (beneficially owned by) a company which is a financial institution (including an insurance company)	
			15%	All other beneficial owners	
50	Turkey (Republic of)	06-Dec-06	0%	Paid to the government of the other state; or to the Central Bank of Turkey or the Turkish Eximbank	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. (3) Notwithstanding the provisions of paragraph 2, interest arising in: a) South Africa and paid to the Government of Turkey, to the Central Bank of Turkey (Türkiye Cumhuriyet Merkez Bankasi) or to the Turkish Eximbank shall be exempt from South African tax; b) Turkey and paid to the Government of South Africa or to the South African Reserve Bank shall be exempt from Turkish tax.
			10%	All other beneficial owners	
51	Ukraine (Republic of)	29-Dec-04	0%	Paid by the government, a political subdivision or a local authority of the source state	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation. 3. Notwithstanding the provisions of paragraph 2 of this Article, interest arising in a Contracting State shall be exempt from tax in that State if: a) the payer of the interest is the Government of that Contracting State, a political subdivision or local authority thereof; or b) the interest is paid to the Government of the other Contracting State, a political subdivision, a local authority or the Central Bank thereof or any agency or instrumentality (including a financial institution) wholly owned by that other Contracting State, a political subdivision or local authority thereof; or c) the interest is paid in relation to loans made in application of an agreement concluded between the Governments of the Contracting States.
				Paid to the government, a political subdivision or a local authority of the other state; or to central bank of the other state; or to any agency / instrumentality (including a financial institution) wholly owned by the other government, subdivision or authority of the other state	
			10%	Paid in respect of loans made in application of an agreement between the states All other beneficial owners	
52	United Arab Emirates	23-Nov-16	10%	All beneficial owners	11(2) However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.
53	United Kingdom of Great Britain & Northern Ireland	17-Dec-02	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, if such resident is the beneficial owner of the interest.
54	United States of America	28-Dec-97	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest derived and beneficially owned by a resident of a Contracting State shall be taxable only in that State. (5) Notwithstanding the provisions of paragraph 1: a) interest that is contingent interest of a type that does not qualify as portfolio interest under United States law may be taxed at a rate not exceeding the rate prescribed in subparagraph b) of paragraph 2 of Article 10 (Dividends); and b) ...
			15%	Contingent interest of a type not qualifying as portfolio interest under US law	