

KEY FACTS

DOUBLE TAX TREATIES

AS PART OF THE DRIVE TO PROMOTE MALTA AS A FINANCIAL SERVICES CENTRE, SUCCESSIVE MALTESE GOVERNMENTS HAVE ENCOURAGED THE CONTINUED NEGOTIATION OF VARIOUS DOUBLE TAX TREATIES (MOST OF WHICH ARE BASED ON THE OECD MODEL) WITH IMPORTANT TRADING PARTNERS AND EMERGING MARKETS TO FOSTER FURTHER DEVELOPMENT OF INTERNATIONAL TRADE.

This policy is expected to continue in the future. Once a double tax treaty has been concluded, it is transcribed into law by virtue of a ministerial decree and published via a legal notice. Thereafter the provisions of the tax treaty supersede any domestic tax provisions allowing for double tax relief to be provided.

The following table lists the countries with whom Malta has a double tax treaty in place and shows the withholding tax rates on dividends, interest and royalties when these are paid to Malta by a treaty country. In general, Malta does not apply withholding tax under domestic law to outbound dividends, interest or royalties even where a treaty allows for such tax.

| COUNTRY | DIVIDENDS | | | INTEREST | ROYALTIES |
|---------------|---------------------------------|---------------------------------|---|-----------|-----------|
| | Minority Shareholding Rates (%) | Majority Shareholding Rates (%) | Requirement to Qualify for Major Shareholding (%) | Rates (%) | Rates (%) |
| ALBANIA*** | 15 | 5 | 25 | 5 | 5 |
| ANDORRA*** | 0 | 0 | 0 | 0 | 0 |
| ARMENIA | 10 | 5 | 10 | 5 | 5 |
| AUSTRALIA*** | 15 | 15 | N/A | 15 | 10 |
| AUSTRIA*** | 15 | 15 | N/A | 5 | 0/10 |
| AZERBAIJAN | 8 | 8 | N/A | 8 | 8 |
| BAHRAIN*** | 0 | 0 | N/A | 0 | 0 |
| BARBADOS*,*** | 15 | 5 | 5 | 5 | 0/5 |
| BELGIUM*** | 15 | 15 | N/A | 0/10 | 0/10 |
| BOTSWANA | 6 | 5 | 25 | 8.5 | 5/7.5 |
| BULGARIA | 0 | 0 | N/A | - | - |
| CANADA*** | 15 | 15 | N/A | 15 | 0/10 |
| CHINA | 10 | 5 | 25 | 10 | 10 |
| CROATIA*** | 5 | 5 | N/A | 0 | 0 |

TRIDENT FUND SERVICES (MALTA) LIMITED IS REGULATED BY THE MALTA FINANCIAL SERVICES AUTHORITY TO PROVIDE FUND ADMINISTRATION SERVICES IN TERMS OF THE INVESTMENT SERVICES ACT, 1994.

| COUNTRY | DIVIDENDS | | | INTEREST | ROYALTIES |
|------------------------|---------------------------------|---------------------------------|---|-----------|-----------|
| | Minority Shareholding Rates (%) | Majority Shareholding Rates (%) | Requirement to Qualify for Major Shareholding (%) | Rates (%) | Rates (%) |
| CURACAO** | - | - | - | - | - |
| CYPRUS*** | 15 | 15 | N/A | 10 | 10 |
| CZECH REPUBLIC*** | 5 | 5 | N/A | 0 | 0 |
| DENMARK*** | 15 | 0 | 25 | 0 | 0 |
| EGYPT*** | 10 | 10 | N/A | 10 | 12 |
| ESTONIA*** | 15 | 5 | 25 | 10 | 10 |
| ETHIOPIA** | - | - | - | - | - |
| FINLAND*** | 15 | 5 | 10 | 0 | 0 |
| FRANCE*,*** | 15 | 0 | 10 | 5 | 0/10 |
| GEORGIA | - | - | - | 0 | 0 |
| GERMANY* | 15 | 5 | 10 | 0 | 0 |
| GHANA** | - | - | - | - | - |
| GREECE*** | 10 | 5 | 25 | 8 | 8 |
| GUERNSEY*** | 0 | 0 | N/A | 0 | 0 |
| HONG KONG | 0 | 0 | 0 | 0 | 0 |
| HUNGARY*** | 15 | 5 | 25 | 10 | 10 |
| ICELAND*** | 15 | 5 | 10 | 0 | 5 |
| INDIA*** | 10 | 10 | N/A | 10 | 10 |
| IRELAND*** | 15 | 5 | 10 | 0 | 5 |
| ISLE OF MAN*** | 0 | 0 | 0 | 0 | 0 |
| ISRAEL *** | 15 | 0 | 10 | 0/5 | 0 |
| ITALY* | 15 | 15 | N/A | 10 | 0/10 |
| JERSEY*** | 0 | 0 | 0 | 0 | 0 |
| JORDAN*** | 10 | 10 | N/A | 10 | 10 |
| KOREA (REPUBLIC OF)*** | 15 | 5 | 25 | 0/10 | 0 |

| COUNTRY | DIVIDENDS | | | INTEREST | ROYALTIES |
|------------------|---------------------------------|---------------------------------|---|-----------|-----------|
| | Minority Shareholding Rates (%) | Majority Shareholding Rates (%) | Requirement to Qualify for Major Shareholding (%) | Rates (%) | Rates (%) |
| KOSOVO | 10 | 0 | 10 | 5 | 0 |
| KUWAIT | 0 | 0 | N/A | 0 | 10 |
| LATVIA*** | 10 | 5 | 25 | 10 | 10 |
| LEBANON* | 5 | 5 | N/A | 0 | 51 |
| LIBYA | 15 | 5 | 10 | 5 | 5 |
| LIECHTENSTEIN*** | - | - | N/A | 0 | 0 |
| LITHUANIA*** | 15 | 5 | 25 | 10 | 10 |
| LUXEMBOURG*** | 15 | 5 | 25 | 0 | 10 |
| MALAYSIA*** | - | - | N/A | 0/15 | 15 |
| MAURITIUS*** | 0 | 0 | N/A | 0 | 0 |
| MEXICO | - | - | N/A | 0/5/10 | 10 |
| MOLDOVA | 5 | 5 | N/A | 5 | 5 |
| MONACO | 0 | 0 | 0 | 0 | 0 |
| MONTENEGRO | 10 | 5 | 25 | 10 | 5/10 |
| MOROCCO | 10 | 6.5 | 25 | 10 | 10 |
| NETHERLANDS*** | 15 | 5 | 25 | 10 | 0/10 |
| NORWAY*** | 15 | 0 | 10 | 0 | 0 |
| PAKISTAN*** | - | 15 | 20 | 10 | 0/10 |
| POLAND* | 10 | 0 | 10 | 5 | 5 |
| PORTUGAL *** | 15 | 10 | 25 | 10 | 10 |
| QATAR*** | - | - | N/A | 0 | 5 |
| ROMANIA*** | 5 | 5 | N/A | 5 | 5 |
| RUSSIA*,*** | 10 | 5 | N/A | 5 | 5 |
| SAN MARINO*** | 10 | 5 | 25 | 5 | 5 |
| SAUDI ARABIA*** | 5 | 5 | N/A | 0 | 5/7 |

| COUNTRY | DIVIDENDS | | | INTEREST | ROYALTIES |
|--------------------------|---------------------------------|---------------------------------|---|-----------|-----------|
| | Minority Shareholding Rates (%) | Majority Shareholding Rates (%) | Requirement to Qualify for Major Shareholding (%) | Rates (%) | Rates (%) |
| SERBIA*** | 10 | 5 | 25 | 10 | 5/10 |
| SINGAPORE*,*** | - | - | N/A | 7/10 | 10 |
| SLOVAKIA*** | 5 | 5 | N/A | 0 | 5 |
| SLOVENIA*** | 15 | 5 | 25 | 5 | 5 |
| SOUTH AFRICA* | 10 | 5 | 10 | 5 | 5 |
| SPAIN*** | 5 | 0 | 25 | 0 | 0 |
| SWEDEN* | 15 | 0 | 10 | 0 | 0 |
| SWITZERLAND* | 15 | 0 | 10 | 0/10 | 0 |
| SYRIA | - | - | N/A | 10 | 18 |
| TUNISIA | 10 | 10 | N/A | 12 | 12 |
| TURKEY | 15 | 10 | 25 | 10 | 10 |
| UKRAINE*** | 15 | 5 | 20 | 10 | 10 |
| UNITED ARAB EMIRATES*** | 0 | 0 | 0 | 0 | 0 |
| UNITED KINGDOM*** | - | - | N/A | 10 | 10 |
| UNITED STATES OF AMERICA | 15 | 5 | 10 | 10/15 | 10 |
| URUGUAY*** | 15 | 5 | 25 | 10 | 10 |
| VIETNAM | 15 | 5 | 50 | 10 | 5/10 |

* Includes amending protocol

** Tax treaties negotiated but not yet in force include those with Curacao, Ethiopia and Ghana

*** Modified by the MLI

- PEOPLE LED
- TECH ENABLED
- GLOBAL COVERAGE
- TAILORED SERVICE

- 1,100 STAFF
- 25 JURISDICTIONS
- 47,000 ENTITIES
- \$177BN AUA

- FUNDS
- PRIVATE CLIENTS
- CORPORATE CLIENTS
- MARITIME

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