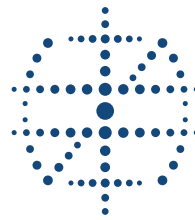
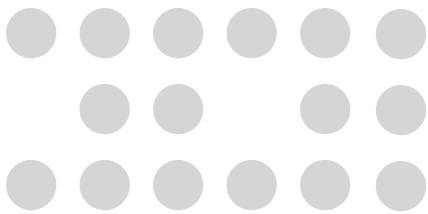
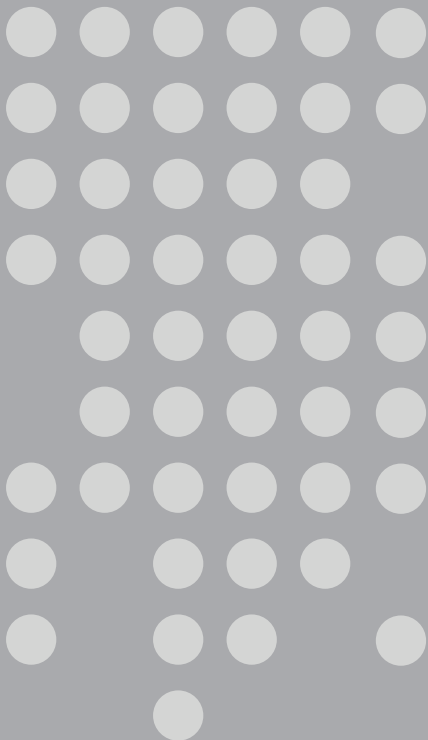


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Double Taxation Treaties

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DOUBLE TAXATION TREATIES RATIFIED BY PORTUGAL

Europe

COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION/ENTRY INTO FORCE	MAXIMUM RATE%					
			DIVIDENDS		INTEREST		ROYALTIES	
			Art.	Rate	Art.	Rate	Art.	Rate
AUSTRIA	DL no. 70/71 of the 8 th of March	Notice published on 08-02-1972 In force since 28-02-1972	10 ^o	15%	11 ^o	10%	12 ^o	5% 2) 10% 3)
BELGIUM	DL no. 619/70, of the 15th of December Additional Convention (Res. Port. Assembly. no. 82/2000 of the 14th of December)	Notice published on 17-02-1971 In force since 19-02-1971. Additional Convention in force since 05-04-2001	10 ^o	15%	11 ^o	15%	12 ^o	10%
BULGARIA	Resolution of the Portuguese Assembly no. 14/96 of the 11th of April	Notice no. 258/96 published on 26-08-1986 In force since 18-07-1996	10 ^o	10% 5) 15% 2)	11 ^o	10%	12 ^o	10%
CYPRUS	Resolution of the Portuguese Assembly no. 89/2013 of the 1st of July	Notice no. 87/2013 published on 1-08-2013 In force since 16-08-2013	10 ^o	10%	11 ^o	10%	12 ^o	10%
CZECH REPUBLIC	Resolution of the Portuguese Assembly no. 26/97 of the 9th of May	Notice no. 288/97 published on 08-11-1997 In force since 01-10-1997	10 ^o	10% 5) 15% 2)	11 ^o	10%	12 ^o	10%
DENMARK	Resolution of the Portuguese Assembly no. 6/2002 of the 23rd of February	Notice no. 53/2002 published on 15-06-2002 In force since 24-05-2002 with effects after 01-01-2003	10 ^o	10%	11 ^o	10%	12 ^o	10%
ESTONIA	Resolution of the Portuguese Assembly no. 47/2004 of the 8th of July	Notice no. 175/2004 published on 27-11-2004 In force since 23-07-2004 with effects after 01-01-2005	10 ^o	10%	11 ^o	10%	12 ^o	10%
FINLAND	DL no. 494/70 of the 23 rd of October	Notice published on 22-08-1980 In force since 14-07-1971	10 ^o	10% 6) 15% 2)	11 ^o	15%	12 ^o	10%
FRANCE	DL no. 105/71 of the 26 th of March	Notice published on 13-11-1972 In force since 18-11-1972	11 ^o	15%	12 ^o	10% 8) 12% 2)	13 ^o	5%
GERMANY	Law no. 12/82 of the 3 rd of June	Notice published on 14-10-1982 In force since 08-10-1982	10 ^o	15%	11 ^o	10% 1) 15% 2)	12 ^o	10%
GREECE	Resolution of the Portuguese Assembly no. 25/2002 of the 4th of April	Notice no. 85/2002 published on 24-09-2002 In force since 13-08-2002 with effects after 01-01-2003	10 ^o	15%	11 ^o	15%	12 ^o	10%
HUNGARY	Resolution of the Portuguese Assembly no. 4/99 of the 28th of January	Notice no. 126/2000 published on 30-06-2000 In force since 08-05-2000	10 ^o	10% 5) 15% 2)	11 ^o	10%	12 ^o	10%
IRELAND	Resolution of the Portuguese Assembly no. 29/94 of the 24th of June (Res. Port. Assembly. no. 64/2006 of the 6th of December)	Notice no. 218/94 published on 24-08-1994 In force since 11-07-1994 Additional Convention in force since 18-12-2006	10 ^o	15%	11 ^o	15%	12 ^o	10%
ICELAND	Resolution of the Portuguese Assembly no. 16/2002 of the 8th of March	Notice no. 48/2002 published on 08-06-2002 In force since 11-04-2002 with effects after 01-01-2003	10 ^o	10% 13) 15% 2)	11 ^o	10%	12 ^o	10%
ITALY	Law no. 10/82 of the 1 st of June	Notice published on 07-01-1983 In force since 15-01-1983	10 ^o	15%	11 ^o	15%	12 ^o	12%
LATVIA	Resolution of the Portuguese Assembly no. 12/2003 of the 28th of February	Notice no. 138/2003 published on 26-04-2003 In force since 07-03-2003	10 ^o	10%	11 ^o	10%	12 ^o	10%
LITHUANIA	Resolution of the Portuguese Assembly no. 10/2003 of the 25th of February	Notice no. 123/2003 published on 22-03-2003 In force since 26-02-2003	10 ^o	10%	11 ^o	10%	12 ^o	10%
LUXEMBOURG	Resolution of the Portuguese Assembly no. 56/2000 of the 30th of June Additional Convention (Res. Port. Assembly. no. 45/2012 of the 12th of April)	Notice no. 256/2000 published on 30-12-2000 In force since 30-12-2000. Additional Convention in force since 18-05-2012	10 ^o	15%	11 ^o	10% 14) 15% 2)	12 ^o	10%



COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION/ENTRY INTO FORCE	MAXIMUM RATE%					
			DIVIDENDS		INTEREST		ROYALTIES	
			Art.	Rate	Art.	Rate	Art.	Rate
MALTA	Resolution of the Portuguese Assembly no. 11/2002 of the 25th of February	Notice no. 33/2002 published on 06-04-2002 and ratified on 30-04-2002. In force since 05-04-2002 with effects after 01-01-2003	10º	10% 13 15% 2)	11º	10%	12º	10%
MOLDOVA REP.	Resolution of the Portuguese Assembly no. 106/2010 of the 2nd of September	Notice no. 300/2010 published on 08-11-2010 In force since 18-10-2010	10º	5% 24) 10% 2)	11º	10%	12º	8%
NETHERLANDS	Resolution of the Portuguese Assembly no. 62/2000 of the 12th of July	Notice no. 167/2000 published on 24-08-2000 In force since 11-08-2000	10º	10%	11º	10%	12º	10%
NORWAY	DL no. 504/70 of the 27 th of October	Notice published on 15-10-1971 In force since 01-10-1971	10º	10% 6) 15% 2)	11º	15%	12º	10%
POLAND	Resolution of the Portuguese Assembly no. 57/97 of the 9th of September	Notice no. 52/98 published on 25-03-1998 In force since 04-02-1998	10º	10% 5) 15% 2)	11º	10%	12º	10%
ROMANIA	Resolution of the Portuguese Assembly no. 56/99 of the 10th of July	Notice no. 96/99 published on 18-08-1999 In force since 14-07-1999	10º	10% 13) 15% 2)	11º	10%	12º	10%
RUSSIA	Resolution of the Portuguese Assembly no. 10/2002 of the 25th of February	Notice no. 32/2003 published on 30-01-2003 In force since 11-12-2002 with effects after 01-01-2003	10º	10% 13) 15% 2)	11º	10%	12º	10%
SLOVAKIA	Resolution of the Portuguese Assembly no. 49/2004 of the 13th of July	Notice no. 191/2004 published on 04-12-2004 In force since 02-11-2004 with effects after 01-01-2005	10º	15% 2) 10% 13)	11º	10%	12º	10%
SLOVENIA	Resolution of the Portuguese Assembly no. 48/2004 of the 10th of July	Notice no. 155/2004 published on 31-08-2004 In force since 13-08-2004 with effects after 01-01-2005	10º	5% 6) 15% 2)	11º	10%	12º	5%
SPAIN	Resolution of the Portuguese Assembly no. 6/95 of the 28th of January	Notice no. 164/95 published on 18-07-1995 In force since 28-06-1995	10º	10% 6) 15% 2)	11º	15%	12º	5%
SWEDEN	Resolution of the Portuguese Assembly no. 20/2003 of the 11th of March	Notice no. 3/2004 published on 02-01-2004 and Notice no. 32/2004, of 10-04-2004. In force since 19-12-2003 with effects after 01-01-2000	10º	10%	11º	10% 17)	12º	10%
SWITZERLAND	DL no. 716/74 of the 12 th of December	Notice published on 26-02-1976 In force since 17-12-1975	10º	10% 6) 15% 2)	11º	10%	12º	5%
TURKEY	Resolution of the Portuguese Assembly no. 13/2006 of the 21st of February	Notice no. 2/2007 published on 10-01-2007 In force since 18-12-2006	10º	5% 21) 15% 2)	11º	10% 22) 15% 2)	12º	10%
UKRAINE	Resolution of the Portuguese Assembly no. 15/2002 of the 8th of March	Notice no. 34/2002 published on 11-04-2002 and ratified on 30-04-2002. In force since 11-03-2002 with effects after 01-01-2003	10º	10% 13) 15% 2)	11º	10%	12º	10%
UNITED KINGDOM	DL no. 48497 of the 24 th of July, 1968	Notice published on 03-03-1969 In force since 20-01-1969	10º	10% 6) 15% 2)	11º	10%	12º	5%

America

COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION / ENTRY INTO FORCE	MAXIMUM RATE%					
			DIVIDENDS		INTEREST		ROYALTIES	
			Art.	Rate	Art.	Rate	Art.	Rate
BRAZIL (4)	Resolution of the Portuguese Assembly no. 33/2001 of the 27th of April	Notice no. 131/2001 published on 14-12-2001 In force since 05-10-2001 with effects from 01-01-2000	10º	10% 13) 15% 2)	11º	15%	12º	15%
CANADA	Resolution of the Portuguese Assembly no. 81/2000 of the 6th of December	Notice no. 111/2001 published on 17-10-2001 In force since 24-10-2001	10º	10% 13) 15% 2)	11º	10%	12º	10%
CHILE	Resolution of the Portuguese Assembly no. 28/2006 of the 6th of April	Notice no. 243/2008 published on 29-12-2008 In force since 25-08-2008	10º	10% 6) 15% 2)	11º	5% 18) 10% 19) 15% 2)	12º	5% 20) 10% 2)
COLOMBIA	Resolution of the Portuguese Assembly no. 46/2012 of the 13th of April	Notice no. 2/2015 published on 23-01-2015 In force since 30-01-2015	10º	10%	11º	10%	12º	10%
CUBA	Resolution of the Portuguese Assembly no. 49/2001 of the 13th of July	Notice no. 187/2006 published on 23-01-2006 In force since 28-12-2005	10º	5% 6) 10% 2)	11º	10%	12º	5%
MEXICO	Resolution of the Portuguese Assembly no. 84/2000 of the 15th of December	Notice no. 49/2001 published on 21-05-2001 In force since 09-01-2001	10º	10%	11º	10%	12º	10%
PANAMA	Resolution of the Portuguese Assembly no. 48/2012, of the 16th of April	Notice no. 69/2012 published on 09-08-2012 In force since 10-06-2012	10º	10/15%	11º	10%	12º	10%
PERU	Resolution of the Portuguese Assembly no. 88/2013, of the 27th of June	Notice no. 48/2014 published on 03-04-2014 In force since 12-04-2014	10º	10% 27) 15% 2)	11º	10% 1) 15% 2)	12º	10% 11) 15% 2)
URUGUAY	Resolution of the Portuguese Assembly no. 77/2011, of the 5th of April	Notice no. 30/2013 published on 18-02-2013 In force since 13-09-2012	10º	5% 6) 10%	11º	10%	12º	10%
USA	Resolution of the Portuguese Assembly no. 39/95 of the 12th of October	Notice no. 35/96 published on 09-01-1996 In force since 01-01-1996	10º	5% 7) 10% 7) 15% 2)	11º	10%	13º	10%
VENEZUELA	Resolution of the Portuguese Assembly no. 68/97 of the 5th of December	Notice no. 15/98 published on 16-01-1998 In force since 08-01-1998	10º	10% 9) 15% 10)	11º	10%	12º	10% 11) 12% 12)



Africa

COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION / ENTRY INTO FORCE	MAXIMUM RATE%					
			DIVIDENDS		INTEREST		ROYALTIES	
			Art.	Rate	Art.	Rate	Art.	Rate
ARGELIA	Resolution of the Portuguese Assembly no. 22/2006 of the 23rd March	Notice no. 579/2006 published on 05-05-2006 In force since 01-05-2006	10º	10% 13) 15% 2)	11º	15%	12º	10%
CAPE VERDE	Resolution of the Portuguese Assembly no. 63/2000 of the 12th of July	Notice no. 4/2001 published on 18-01-2001 In force since 15-12-2000	10º	10%	11º	10%	12º	10%
MAROCCO	Resolution of the Portuguese Assembly no. 69-A/98 of the 23rd of December	Notice no. 201/2000 published 16-10-2000 In force since 27-06-2000	10º	10% 5) 15% 2)	11º	12%	12º	10%
MOZAMBIQUE	Resolution of the Portuguese Assembly no. 36/92 of the 30th of December (Res. Port. Assembly, no. 36/2009 of the 8th of May)	Notice no. 55/95 published on 03-03-1995. In force since 01-01-1994. (Convention in force since 07-06-2009. Notice no. 45/2009 published on 21-08-2009)	10º	10% 26)	11º	10%	12º	10%
REPUBLIC OF SOUTH AFRICA	Resolution of the Portuguese Assembly no. 53/2008 of the 22nd September	Notice no. 222/2008 published on 20-11-2008 In force since 22-10-2008	10º	10% 13) 15% 2)	11º	10%	12º	10%
TUNISIA	Resolution of the Portuguese Assembly no. 33/2000 of the 31st of March	Notice no. 203/2000 published on 16-10-2000 In force since 21-08-2000	10º	15%	11º	15%	12º	10%

Asia

COUNTRY	REGULATION	EXCHANGE OF INSTRUMENTS OF RATIFICATION / ENTRY INTO FORCE	MAXIMUM RATE%					
			DIVIDENDS		INTEREST		ROYALTIES	
			Art.	Rate	Art.	Rate	Art.	Rate
CHINA	Resolution of the Portuguese Assembly no. 28/2000 of the 30th of March	Notice no. 109/2000 published on 02-06-2000 In force since 08-06-2000	10º	10%	11º	10%	12º	10%
HONG KONG	Resolution of the Portuguese Assembly no. 49/2012, of the 16th of April	Notice no. 53/2012 published on 01-06-2012 In force since 03-06-2012	10º	5/10%	11º	10%	12º	5%
INDIA	Resolution of the Portuguese Assembly no. 20/2000 of the 6th of March	Notice no. 123/2000 published on 15-06-2000 In force since 05-04-2000	10º	10% 13) 15% 2)	11º	10%	12º	10%
INDONESIA	Resolution of the Portuguese Assembly no. 64/2006 of the 6th of December	Notice no. 42/2008 published on 04-04-2008 In force since 11-05-2007	10º	10%	11º	10%	12º	10%
ISRAEL	Resolution of the Portuguese Assembly nº 2/2008 of the 15th of January	Notice no. 94/2008 published on 13-06-2008 In force since 18-02-2008	10º	5% 24) 10% 25) 15% 2)	11º	10%	12º	10%
JAPAN	Resolution of the Portuguese Assembly no. 50/2012, of the 17th of April	Notice no. 88/2013 published on 16-08-2013 In force since 28-07-2013	10º	5/10%	11º	5%	12º	5%
QATAR	Resolution of the Portuguese Assembly no. 51/2012 Signed on 12-12-2011	Notice no. 51/2014 published on 02-05-2014 In force since 04-04-2014	10º	5% 28) / 10%	11º	10%	12º	10%
KUWAIT	Resolution of the Portuguese Assembly no. 44/2011, of the 18th of March	Notice no. 11/2014 published on 15-01-2014 In force since 05-12-2013	10º	5/10%	11º	10%	12º	10%
MACAO	Resolution of the Portuguese Assembly no. 80-A/99 of the 16th of December	Notice no. 72/2001 published on 16-07-2001 In force 01-01-1999	10º	10%	11º	10%	12º	10%
PAKISTAN	Resolution of the Portuguese Assembly no. 66/2003 of the 2nd of August	Notice nº 6/2008 published on 21-01-2008 In force since 04-06-2007	10º	10% 13) 15% 2)	11º	10% 15)	12º	10% 16)
SINGAPORE	Resolution of the Portuguese Assembly no. 85/2000 of the 15th of December (Resolution of the Portuguese Assembly no. 96/2013 of the 15th of February)	Notice no. 45/2001 published on 11-05-2001 In force since 16-03-2001 Notice no. 9/2014 published on 15.01.2014	10º	10%	11º	10%	12º	10%
SOUTH KOREA	Resolution of the Portuguese Assembly no. 25/97 of the 8th of May	Notice no. 315/97 published on 27-12-1997 In force since 21-12-1997	10º	10% 5) 15% 2)	11º	15%	12º	10%
UNITED ARAB EMIRATES	Resolution of the Portuguese Assembly no. 47/2012 of the 15th of April	Notice no. 59/2012 published on 11-06-2012 In force since 22-05-2012	10º	5% 23) 15%	11º	10%	12º	5%

Notes:

- 1) If paid by banking entities.
- 2) In all other cases.
- 3) When the company holds 50% or more of the share capital.
- 4) Between 01-01-1972 and 31-12-1999 a DTA between Portugal and Brazil was in force approved by DL no. 244/71 of the 2nd of June and became to be denounced unilaterally by Brazil. The reduced rate to dividends, interest and royalties was of 15%, being also applicable, in the case of royalties, a rate of 10%, wherever it were literary, scientific or artistic works, which was regulated by Circular no. 17/73, of the 19th of October.
- 5) When the beneficial owner is a company that, for an uninterrupted period of two years prior to the payment of the dividend, holds 25% of the share capital of the company paying the dividends, the rate so charged shall not exceed with respect to dividends paid after December 3, 1996, 10 per cent of the gross amount of such dividends. However, under the terms of article 28^o or 29^o of the respective conventions, this reduced rate of 10% will only apply, seeing it is a tax withheld at source, the fact giving rise to them appearing on or after the first day of January in the year next following the year in which this Convention enters into force.
- 6) When the beneficial owner is a company that holds 25% or more of the share capital.
- 7) When the partner is a company that during an uninterrupted period of two years prior to the payment of the dividends, holds directly 25% or more of the share capital, the rate is of 10% between 01-01-1997 and 31-12-1999 and 5% after 31-12-1999.
- 8) In respect of debentures issued in France after 1st January 1965.
- 9) Since 01-01-1997. However, under the terms of article 29^o, no. 2, paragraph a) of the Convention with Venezuela, this reduced rate of 10% will only apply, seeing it is a tax withheld at source, the fact giving rise to them appearing on or after 01-01-1999.
- 10) Until 31-12-1996, as provided for in article 10^o, no. 2 of the Convention with Venezuela. However, seeing that this Convention has only entered into force in 08-01-1998, this reduced rate of 15% was never applied.
- 11) Rate to technical assistance.
- 12) Rate to royalties in general.
- 13) When the beneficial owner of the dividends is a company, that during an uninterrupted period of two years prior to the payment of the dividends, owns directly at least 25% of the share capital of the company that pays the dividends.
- 14) If interest were paid by a company of a Contracting State, in which titulary the interest is considered as deductible cost, of a financial establishment resident in other Contracting State.
- 15) Though, interest arising from a Contracting State is exempt in that State, under the terms and if fulfilled the foreseen conditions in paragraphs a), b) or c) of no. 3 of art. 11^o of the DTA with Paquistan.
- 16) This reduced rate of 10% is also applicable to "payments for technical services", under the terms and with the foreseen conditions in nos. 4 and 5 of art. 12^o of the DTA with Paquistan.
- 17) Though, the interest shall only be taxed in the Contracting State of which the beneficial owner is resident, if fulfilled one of the foreseen conditions in paragraphs a) and d) of no. 3 of article 11^o of the DTA with Sweden.
- 18) The gross amount of the interest derived from bonds or securities that are regularly and substantially traded on a recognized securities market.
- 19) The gross amount of the interest derived from: loans granted by banks and insurance companies; a sale on credit paid by the purchaser of machinery and equipment to a beneficial owner that is the seller of the machinery and equipment.
- 20) The gross amount of the *royalties* for the use of, or the right to use, any industrial, commercial or scientific equipment.
- 21) If the beneficial owner is a company (other than a partnership), that, for an uninterrupted period of two years prior to the payment of the dividends, or if the company paying the dividends has existed for less than two years during the lifetime of the company, holds directly at least 25 per cent of the capital (capital social) of the company paying the dividends.
- 22) If it is paid on a loan made for a period of more than two years.
- 23) If the beneficial owner is a company (other than a partnership) which holds directly at least 10 per cent of the capital of the company paying the dividends, or if the beneficial owner of the dividends is a resident of the other Contracting State.
- 24) If the beneficial owner is a company (other than a partnership) which holds directly at least 25 per cent of the capital of the company paying the dividends.
- 25) If the beneficial owner is a company which holds directly at least 25 per cent of the capital of the company paying the dividends where that latter company is a resident of Israel and the dividends are paid out of profits which are subject to tax in Israel at a rate which is lower than the normal rate of Israeli company tax.
- 26) Rate in force since 07-06-2009 (Article no. 6^o and 17^o of the Convention approved by the Resolution of the Portuguese Assembly no. 36/2009 of the 8th of May and Notice no. 45/2009 of the 21st of August).
- 27) If the beneficial owner is a company (other than a partnership) which holds directly at least 10 per cent of the capital of the company paying the dividends, where such company is a resident of Portugal; or controls directly at least 10 per cent of the voting power in the company paying the dividends where such company is a resident of Peru.
- 28) If the beneficial owner is a company which holds at least 10 per cent of the company paying the dividends.

Document updated on: **February 4, 2015**



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