

Table 1:

## MAURITIUS DTA NETWORK - Maximum Rates of Withholding Tax

Year		Country	Dividends		Interest		Royalties	Capital Gains
<i>Signed</i>	<i>Ratified</i>		<i>Substantial interest</i>	<i>Portfolio</i>	<i>Banks</i>	<i>Others</i>		
28/09/04	28/01/05	Barbados	5%	5%	5%	5%	5%	(d)
04/07/95	28/01/99	Belgium	5%(b)	10%	Exempt	10%	Nil	(d)
26/09/95	13/03/96	Botswana	5%(a)	10%	12%	12%	12.5%	(d)
01/08/94	05/05/95	China	5% #	5% #	10%	10%	10%	(d)
06/09/02	10/08/03	Croatia	0% (e)	0% (e)	0% (e)	0% (e)	0% (e)	0%
21/01/00	12/06/00	Cyprus	0% (e)	0% (e)	0% (e)	0% (e)	0% (e)	(d)
11/12/80	17/09/82	France	5%(b)	15%	Exempt	(c)	15%	(d)
15/03/78	01/01/81	Germany	5%(a)	15%	Exempt	(c)	15%	(d)
24/08/82	11/06/85	India	5%(b) #	15% #	Exempt	(c)	15%	(d)
09/03/90	28/04/95	Italy	5%(a)	15%	(c)	(c)	15%	(d)
24/03/97	01/09/98	Kuwait	0% (e)	0% (e)	0% (e)	0% (e)	10%	(d)
29/08/97	09/09/04	Lesotho	10%	10%	10%	10%	10%	(d)
15/02/95	12/09/96	Luxembourg	5%(b)	10%	(e)	(e)	(e)	(d)
30/08/94	04/12/95	Madagascar	5%(a)	10%	10%	10%	5%	(d)
23/08/92	19/08/93	Malaysia	5%(b)	15%	15%	15%	15%	(d)
14/02/97	08/05/99	Mozambique	8%(a)	10%	Exempt	8%	5%	(d)
04/03/95	25/07/96	Namibia	5%(a)	10%	Exempt	5%	5%	(d)
03/08/99	10/11/99	Nepal	5% (h) 10% (b)	15%	10% (i)	15%	15%	(d)
30/03/98	20/07/98	Oman	0% (e)	0% (e)	0% (e)	0% (e)	0% (e)	(d)
03/09/94	19/05/95	Pakistan	10%	10%	10%	10%	12.5%	(d)*
30/07/01	14/04/03	Rwanda	0%	0%	0%	0%	0%	(d)
		Senegal	0% (e)	0% (e)	0% (e)	0% (e)	0% (e)	(d)
	21/06/05	Seychelles	0% (e)	0% (e)	0% (e)	0% (e)	0% (e)	(d)
19/08/95	07/06/96	Singapore	0% (e)	0% (e)	0% (e)	0% (e)	0% (e)	(d)
05/07/96	20/06/97	South Africa	5%(b) #	15% #	Exempt	Nil	Nil	(d)
12/03/96	02/05/97	Sri Lanka	10%(b)	15%	Exempt (g)	10%	10%	(d)
29/06/94	08/11/94	Swaziland	7.5%	7.5%	5%	5%	7.5%	(d)
23/04/92	21/12/92	Sweden	5%(b)	15%	Exempt	15%	15%	(d)
01/10/97	10/06/98	Thailand	10%	10%	10%	15%	5%-15%	(d)
12/02/08	10/05/08	Tunisia	0%(j)	0%(j)	2.5% (i)	2.5%	2.5%	(d)
19/09/03	21/07/04	Uganda	10%	10%	10%	10%	10%	(d)
11/02/81	26/10/87	U.K. (and Northern Ireland)	15%	15%	Exempt	(c)	15%	(d)
18/09/06	22/01/07	United Arab Emirates	0% (e)	0% (e)	0% (e)	0% (e)	0% (e)	(d)
06/03/92	05/11/92	Zimbabwe	10%(a)	20%	Exempt	10%	15%	(d)



## Notes

- (a) Shareholding not less than 25%.
- (b) Shareholding not less than 10%.
- (c) Interest taxed in source country according to taxation laws of that country.
- (d) Generally taxable in the alienator's country of residence, except for the alienation of immovable property and immovable property forming part of the business property of a Permanent Establishment. Gains from alienation of ships or aircraft taxable in the state in which the place of effective management of the enterprise is situated.
- (e) Dividends / Interests / Royalties are taxable only in the recipient's country of residence.
- (f) Shareholding not less than 20%.
- (g) If the loan is from state-owned bank or institution.
- (h) Shareholding not less than 15%
- (i) Exempt if Government owned/controlled financial institution, otherwise limited to the rate in the table.
- (j) Taxable in none of the contracting states.
- # These are maximum rates of withholding tax on dividends applicable according to the DTA. Presently there is no withholding tax on dividends according to the laws of that state.
- \* Arising on the sale of shares and other securities in Pakistan. Listed shares on the Stock Exchange are exempt up to the year ending 30 June 2007.

7 treaties **await ratification** with Bangladesh, Malawi, Nigeria, Russia, State of Qatar, Vietnam and Zambia.

5 treaties are **being negotiated** with : Canada, Czech Republic, Greece, Portugal, Republic of Iran, and Egypt.