

CBSS

Cross Border Securities Services

Tax Guide: UNITED STATES - Appendix A
Version : January 2012



Double taxation Treaties concluded by the USA and currently in force

The rate as prescribed in the DTT assumes that the beneficial owner does not hold a substantial percentage of the share capital of the company paying the dividend. Different rates may apply for substantial holdings. Please refer to the actual DTT or your tax advisor for further information.

Country	Rate prescribed by the DTT - Dividends (%)	Tax Refund available (%)	Tax Refund available (%)
Australia	15	15	N/A
Austria	15	15	N/A
Barbados	15	15	N/A
Belgium	15	15	N/A
Canada	15	15	N/A
China	10	20	N/A
Cyprus	15	15	N/A
Czech republic	15	15	N/A
Denmark	15	15	N/A
Egypt	15	15	N/A
Estonia	15	15	N/A
Finland	15	15	N/A
France	15	15	N/A
Germany	15	15	N/A
Greece	30	0	N/A
Hungary	15	15	N/A
Iceland	15	15	N/A
India	25	5	N/A
Indonesia	15	15	N/A
Ireland	15	15	N/A
Israel	25	5	N/A

Country	Rate prescribed by the DTT - Dividends (%)	Tax Refund available (%)	Tax Refund available (%)
Italy	15	15	N/A
Jamaica	15	15	N/A
Japan	15	15	N/A
Kazakhstan	15	15	N/A
Korea, Republic of	15	15	N/A
Latvia	15	15	N/A
Lithuania	15	15	N/A
Luxembourg	15	15	N/A
Mexico	10	20	N/A
Morocco	15	15	N/A
Netherlands	15	15	N/A
New Zealand	15	15	N/A
Norway	15	15	N/A
Pakistan	30	0	N/A
Philippines	25	5	N/A
Poland	15	15	N/A
Portugal	15	15	N/A
Romania	10	20	N/A
Russia	10	20	N/A
Slovak Republic	15	15	N/A
Slovenia	15	15	N/A
Spain	15	15	N/A
Sri Lanka	15	15	N/A
Sweden	15	15	N/A
Switzerland	15	15	N/A
Thailand	15	15	N/A
Trinidad and Tobago	30	0	N/A
Tunisia	20	10	N/A
Turkey	20	10	N/A
Ukraine	15	15	N/A
United Kingdom	15	15	N/A
USSR *	30	0	N/A
Venezuela	15	15	N/A

Footnotes

* The treaty with the former USSR still applies to Armenia, Azerbaijan, Belarus, Georgia, Kyrgyzstan, Moldova, Tajikistan, Turkmenistan, and Uzbekistan.