ANNEXURE-A

COMPREHENSIVE AGREEMENTS - WITH RESPECT TO TAXES ON INCOME

List of Countries having Double Taxation Treaty with India

The following are the list of countries having Double Taxation Treaty with India:

1. Argentina
2. Albania
3. Armenia
4. Australia
5. Austria
6. Bangladesh
7. Belarus
8. Belgium
9. Bhutan
10. Botswana
11. Brazil
12. Bulgaria
13. Canada
14. China
15. Colombia

16. Croatia
17. Cyprus
18. Czech Republic
19. Denmark
20. Estonia
21. Ethiopia
22. Finland
23. Fiji
24. France
25. Georgia
26. Germany
27. Greece
28. Hashemite kingdom of Jordan
29. Hungary
30. Iceland
31. Indonesia
32. Ireland
33. Israel
34. Italy
35. Japan
36. Kazakastan
37. Kenya
38. Korea
39. Kuwait
40. Kyrgyz Republic
41. Latvia

42. Libya
43. Lithuania
44. Luxembourg
45. Macedonia
46. Malaysia
47. Malta
48. Mauritius
49. Mongolia
50. Montenegro
51. Morocco
52. Mozambique
53. Myanmar
54. Namibia
55. Nepal
56. Netherlands
57. New Zealand
58. Norway
59. Oman
60. Philippines
61. Poland
62. Portuguese Republic
63. Qatar
64. Romania
65. Russia
66. Saudi Arabia
67. Serbia

68. Singapore
69. Slovenia
70. Slovak Republic
71. South Africa
72. Spain
73. Sri Lanka
74. Sudan
75. Sweden
76. Swiss Confederation
77. Syrian Arab Republic
78. Tajikistan
79. Tanzania
80. Thailand
81. Trinidad and Tobago
82. Turkey
83. Turkemistan
84. UAE
85. UAR (Egypt)
86. UGANDA
87. United Kingdom
88. Ukraine
89. United Mexican States
90. United States of America
91. Uzbekistan
92. Vietnam
93. Zambia

ANNEXURE-B

LIMITED AGREEMENTS – WITH RESPECT TO INCOME OF AIRLINES/MERCHANT SHIPPING

1. Afghanistan
2. Bulgaria
3. Czechoslovakia
4. Ethiopia
5. Iran
6. Kuwait
7. Lebanon
8. Oman
9. Pakistan
10. Russian Federation
11. Suadi Arabia
12. Switzerland
13. UAE
14. Yemen Arab Republic
15. People’s Democratic Republic of Yemen

ANNEXURE-C

WITHHOLDING TAX RATES

[Tax rates applicable in India under DTA Agreement]

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Albania	Both	10%	Both	10%	Both	10%	Both	10%
Armenia	Both	10%	Both	10%	Both	10%	Both	10%
Australia	Both	15%	Both	15%	Both	[Note 2]	Both	[Note 2]
Austria	Both	10%	Both	10%	Both	10%	Both	10%
Bangladesh	Both	(a)10%(if at least 10% of the capital of the company paying the dividend is held by the recipient) (b) 15% in all other cases	Both	10% (Note 1)	Both	10%	No separate provision	No separate provision

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Belarus	Both	10% if paid to a company holding 25% shares; otherwise 15%	Both	10% (Note 1)	Both	15%	Both	15%
Belgium	Both	15%	Both	15% (10% if loan is granted by a bank)	Both	10%	Both	10%
Botswana		(a) 7.5%, if shareholder is a company and holds atleast 25% shares in the investee company (b) 10% in all other cases		10% (Note 1)		10%		10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Brazil	Both	15%	Both	15% (Note 1)	Both	25% for use of trademark; 15% for others	Both	No separate provision
Bulgaria	Both	15%	Both	15% (Note 1)	Both	15% of royalty relating to literary, artistic, scientific works other than films or tapes used for radio or television broadcasting 20% in other cases.	Both	20%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Canada	Both	(a) 15%, if atleast 10% of the voting powers in the company, paying the dividends, is controlled by the recipient company (b)25% in other cases	Both	15% (Note 1)	Both	10%-20%	Both	10%-15%
China	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Cyprus	Both	(a) 10%, if atleast 10% of the capital of the company, paying the dividend, is held by the recipient company (b)15% in other cases	Both	10% (Note 1)	Both	15%	Both	15%/ 10%
Czech Republic	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Denmark	Both	(a) 15%, if atleast 25% of the shares of the company, paying the dividend is held by the recipient company (b)25% in other cases	Both	10% if loan is granted by bank, otherwise 15%	Both	20%	Both	20%
Estonia	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Ethiopia	Both	7.5%	Both	10% (Note 1)	Both	10%	Both	10%
Finland	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Fiji	Both	5%	Both	10% (Note 1)	Both	10%	Both	10%
France	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Greece	Source	20%	Source	20%	Source	30%	No separate provision	
Georgia	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Germany	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Hungary	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Indonesia	Both	(a) 10%, if atleast 25% of the shares of the company, paying the dividend is held by the recipient company (b)15% in other cases	Both	10% (Note 1)	Both	15%	No separate provision	
Iceland	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Ireland	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Israel	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Italy	Both	15%, if atleast 10% of the shares of the company paying the dividend is beneficially owned by the recipient company; 25% in other cases	Both	15% (Note 1)	Both	20%	Both	20%
Japan	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Jordan	Both	10%	Both	10% (Note 1)	Both	20%	Both	20%
Kazakhstan	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Kenya	Both	15%	Both	15% (Note 1)	Both	20%	Both	17.5%
Korea	Both	(a) 15%, if atleast 25% of the capital of the company paying the dividend is held by the recipient company (b)20% in other cases	Both	(a) 10%, if interest is paid to a bank; (b) 15% for others [Note1]	Both	15%	Both	15%
Kuwait	Both	10% (Note 1)	Both	10%	Both	10%	Both	10%
Kyrgyz Re-public	Both	10%	Both	10% (Note 1)	Both	15%	Both	15%
Libyan Arab Jamahiriya	Source	20%	Source	20%	Source	30%	No separate provision	
Latvia	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Lithuania	Both	5%, 15%	Both	10% (Note 1)	Both	10%	Both	10%
Luxembourg	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Malaysia	Both	5%	Both	10% (Note 1)	Both	10%	Both	10%
Malta	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Mongolia	Both	15%	Both	15% (Note 1)	Both	15%	Both	15%
Mauritius	Both	(a) 5%, if atleast 10% of the capital of the company paying the dividend is held by the recipient company (b)15% in other cases	Both	No rates specified	Both	15%	No separate provision	

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Montenegro	Both	5% (in some cases 15%)	Both	10% (Note 1)	Both	10%	Both	10%
Myanmar	Both	5%	Both	10% (Note 1)	Both	10%	No separate provision	
Morocco	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Mozambique	Both	7.5%	Both	10% (Note 1)	Both	10%	No separate provision	
Namibia	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Nepal	Both	5%., 10%	Both	10% (Note 1)	Both	15%		
Netherlands	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
New Zealand	Both	15%	Both	10% (Note 1)	Both	10%	Both	10%
Norway	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Oman	Both	(a) 10%, if atleast 10% of the Shares of the company paying the dividend is held by the recipient company (b)12.5% in other cases	Both	10% (Note 1)	Both	15%	Both	15%
Philippines	Both	(a) 15%, if atleast 10% of the shares of the company paying the dividend is held by the recipient company (b)20% in other cases	Both	(a) 10% , if interest is received by a financial institution or insurance company (b) 15% in other cases	Both	15% if it is payable in pursuance of any collaboration agreement approved by the Govt. of India	--	--

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Poland	Both	15%	Both	15% (Note 1)	Both	22.5%	Both	22.5%
Portuguese Republic	Both	10%/15%	Both	10% (Note 1)	Both	10%	Both	10%
Qatar	Both	(a) 5%, if atleast 10% of the shares of the company paying the dividend is held by the recipient company (b)10% in other cases	Both	10% (Note 1)	Both	10%	Both	10%
Romania	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Russian Federation	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Saudi Arabia	Both	5%	Both	10% (Note 1)	Both	10%	No separate provision	

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Serbia	Both	(a) 5%, if recipient is company and holds 25% shares (b)15% in other cases	Both	10% (Note 1)	Both	10%	Both	10%
Singapore	Both	(a) 10%, if atleast 25% of the shares of the company paying the dividend is held by the recipient company (b)15% in other cases	Both	(a)10%, if loan is granted by a bank or similar institute including an insurance company (b) 15% in all other cases	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Slovenia	Both	(a) 5%, if atleast 10% of the shares of the company paying the dividend is held by the recipient company (b)15% in other cases	Both	10% (Note 1)	Both	10%	Both	10%
South Africa	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Spain	Both	15%	Both	15% (Note 1)	Both	10%/20% [Note 3]	Both	20% [Note 3]
Sri lanka	Both	7.5%	Both	10% (Note 1)	Both	10%	Both	10%
Sudan	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Sweden	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Swiss Con-federation	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Syrian Arab Republic	Both	(a) 5%, if atleast 10% of the shares of the company paying the dividend is held by the recipient company (b)10% in other cases	Both	10% (Note 1)	Both	10%	Both	No separate provision

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Tajikistan	Both	(a) 5%, if atleast 25% of the shares of the company paying the dividend is held by the recipient company (b)10% in other cases	Both	10% (Note 1)	Both	10%	Both	No separate provision
Tanzania	Both	5% ,10%	Both	10% (Note 1)	Both	10%	Both	No separate provision

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Thailand	Both	(a) 15%, if dividend is paid by an industrial company and atleast 10% of the capital of such company is held by the recipient company (b)20% in other cases	Both	(a)10% if it is received by a financial institution or insurance company (b)25% for others	Both	15%	Both	No separate provision
Trinidad and Tobago	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Turkey	Both	15%	Both	(a)10% if loan is granted by a bank etc. (b)15% in other cases	Both	15%	Both	15%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Turkmeni-stan	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Uganda	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Ukraine	Both	(a) 10%, if atleast 25% of the shares of the company paying the dividend is held by the recipient company (b)15% in other cases	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
United Arab Emirates	Both	10%	Both	(a)5% if loan is granted by a bank/ similar financial institution including insurance company (b) 12.5% in other cases	Both	10%	No separate provision	
United Arab Republic	Source	20%	Source	20%	Source	30%	No separate provision	
United Mexican States	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
United Kingdom	Both	15%/10% [Note 4]	Both	(a)10% if interest is paid to a bank. (b)15% in other cases	Both	10%/15% [Note 2]	Both	10%/ 15%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
United States	Both	(a) 15%, if atleast 10% of the voting stock of the company paying the dividend is held by the recipient company (b)25% in other cases	Both	(a)10% if loan is granted by a bank/ similar institute including insurance company. (b)15% in other cases	Source	10%/15% [Note2]	Source	10%/ 15%
Uruguay	Both	5%	Both	10% (Note 1)	Both	10%	Both	10%
Uzbekistan	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%
Vietnam	Both	10%	Both	10% (Note 1)	Both	10%	Both	10%

Country	Dividend [not being covered by Section 115-O]		Interest		Royalty		Fee for technical services	
	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate	Right of State to tax	Tax rate
Zambia	Both	(a) 5%, if atleast 25% of the shares of the company paying the dividend is held by the recipient company for a period of atleast 6 months prior to the date of payment of the dividend. (b)15% in other cases	Both	10% (Note 1)	Both	10%	No separate provision	

Note:

1. Dividend/interest earned by the Government and certain specified institutions, inter alia, Reserve Bank of India is exempt from taxation in the country of source.

2. Royalties and fees for technical services would be taxable in the country of source at the rates prescribed for different categories of royalties and fees for technical services. These rates shall be subject to various conditions and nature of services/royalty for which payment is made. For detailed conditions refer to relevant Double Taxation Avoidance Agreements.

3. Royalties and fees for technical services would be taxable in the country of source at the following rates:

   (a) 10% in case of royalties relating to the payments for the use of, of or the right to use, industrial, commercial or scientific equipment;

   (b) 20% in case of fees for technical services and other royalties.

4. (a) 15% of the gross amount of the dividends where those dividends are paid out of income (including gains) derived directly or indirectly from immovable property within the meaning of Article 6 by an investment vehicle which distributes most of this income annually and whose income from such immovable property is exempted from tax;

   (b) 10% of the gross amount of the dividends, in all other cases.