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CYPRUS DOUBLE TAX TREATIES

Cyprus currently concluded double taxation treaties with 33 countries.

The list below shows the double taxation treaties Cyprus has concluded with these 33 countries.

All rates are in percentages.

Country	Dividends %		Rights %		Interests %	
	Income in Cyprus	Payments from Cyprus	Income in Cyprus	Payments from Cyprus	Income in Cyprus	Payments from Cyprus
Austria	10	10	0	0	0	0
Belgium	10	10	10	10	0	0
Bulgaria	0	0	0	0	0	0
Canada	5	15	10	10 (8)	15	15 (11)
China	10	10	10	10	10	10
CIS	0	0	0	0	0	0
Czech Republic	10	10	5	5 (9)	10	10 (12)
Denmark	10	10 (1)	0	0	10	10 (13)
Egypt	15	15	10	10	15	15
France	10	10 (2)	0	0 (10)	10	10 (13)
Germany	15	15 (3)	0	0 (10)	10	10 (12)
Greece	25	25	0	0	10	10
Hungary	5 (1)	nil	0	0	10	10 (12)
India	15	15 (2)	15	15	10	10 (12)
Ireland	0	0	0	0 (10)	0	0
Italy	15	0	0	0	10	10
Kuwait	10	10	5	5 (9)	10	10 (12)
Malta	(4)	15	10	10	10	10
Mauritius	0	0	0	0	0	0



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Country	Dividends %		Rights %		Interests %	
	Income in Cyprus	Payments from Cyprus	Income in Cyprus	Payments from Cyprus	Income in Cyprus	Payments from Cyprus
Norway	0	0 (5)	0	0	0	0
Poland	10	10	5	5	10	10
Romania	10	10	5	5 (9)	10	10 (12)
Russia	5/10	5/10	0	0	0	0
Slovakia	10	10	5	5 (9)	10	10 (12)
Sweden	15	10 (1)	0	0	10	10 (12)
Syria	0	0 (1)	15	15 (16)	10	10
Thailand	10	10	10	10	5/10/15	5/10/15
United Kingdom	15	0(6)	0	0 (10)	10	10
U.S.A	5	0 (7)	0	0	10	10 (14)
Yugoslavia	10	10	10	10	10	10

Notes

- 1.15% if paid to a company holding a percentage of 25% or less of the share capital.
- 2.15% if paid to a company holding a percentage of 10% or less of the share capital.
- 3.10% if paid to a company holding less than 25% of the share capital of the company paying it. However, in the case when the German Corporate Tax provides for the taxation for distributed profits is lower than that in the non-distributed profits and the difference between the rates is 15% or more, the tax withheld increases from 10% to 27%. In all other cases the rate is 15%.
- 4.Withholding of tax shall not exceed the tax imposed on profits on which dividends were paid.
- 5.5% if paid to a company controlling fewer than 50% of the voting rights.
- 6.If paid to company controlling under 10% of the voting rights, is entitled to the return of the additional deducted ACT in the UK (if it controls more than 10% of the voting rights then it is not entitled to any return).
- 7.15% if paid to a company controlling under 10% of the voting rights.
- 8.Zero for the production of literary, theatrical, musical or artistic work.
- 9.Zero for the production of literary, theatrical or scientific work the film and the



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television rights.

10. 5% for films and television rights.
11. Zero if paid to the government or for export guaranty.
12. Zero if paid to the government of another country.
13. Zero if paid to the government of another country in respect to bank loans related to the sale on credit of any industrial, commercial or scientific equipment or any goods.
14. Zero if paid to a government, bank or financial institution.
15. Zero if the rights are related to literary, artistic or scientific work, including films, television or radio productions.
16. 10% for rights on the use of literary, artistic or scientific work including film productions for the cinema or for television or a radio station.

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