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**REDUCED RATES OF NRWT THAT APPLY UNDER DOUBLE TAX AGREEMENTS TO
NON-RESIDENT PASSIVE INCOME**

Note: These reduced rates of NRWT do not apply if the payments are connected to a permanent establishment in NZ. In that case, the NZ domestic tax laws apply, together with any relief available under the “Business Profits” article of the relevant double tax agreement

	Dividends derived by a holding company	Dividends generally	Interest derived by a bank	Interest generally	Royalties¹
Australia	5% ² or 0% ³	15%	0% ⁴	10%	5%
Austria	N/A	15%	N/A	10%	10%
Belgium	N/A	15%	N/A	10%	10%
Canada	N/A	15%	N/A	15%	15%
Chile	N/A	15%	10%	15%	5%
China	N/A	15%	N/A	10%	10%
Czech Republic	N/A	15%	N/A	10%	10%
Denmark	N/A	15%	N/A	10%	10%
Fiji	N/A	15%	N/A	10%	15%
Finland	N/A	15%	N/A	10%	10%
France	N/A	15%	N/A	10%	10%
Germany	N/A	15%	N/A	10%	10%
Hong Kong	5% ² or 0% ³	15%	0%	10%	5%
India	N/A	15%	N/A	10%	10%
Indonesia	N/A	15%	N/A	10%	15%
Ireland	N/A	15%	N/A	10%	10%
Italy	N/A	15%	N/A	10%	10%
Japan⁵	0% ⁶	15%	0%	10%	5%
Korea	N/A	15%	N/A	10%	10%
Malaysia	N/A	15%	N/A	15%	15%
Mexico	5% ² or 0% ³	15%	N/A	10%	10%
The Netherlands	N/A	15%	N/A	10%	10%
Norway	N/A	15%	N/A	10%	10%
Papua New Guinea⁷	N/A	15%	N/A	10%	10%
The Philippines	N/A	15%	N/A	10%	15%
Poland	N/A	15%	N/A	10%	10%
Russian Federation	N/A	15%	N/A	10%	10%
Singapore	5%	15%	N/A	10%	5%
South Africa	N/A	15%	N/A	10%	10%
Spain	N/A	15%	N/A	10%	10%

	Dividends derived by a holding company	Dividends generally	Interest derived by a bank	Interest generally	Royalties¹
Sweden	N/A	15%	N/A	10%	10%
Switzerland	N/A	15%	N/A	10%	10%
Taiwan	N/A	15%	N/A	10%	10%
Thailand	N/A	15%	N/A	15% ⁸	10% ⁹
Turkey	5% ¹⁰	15%	10% ¹¹	15%	10%
United Arab Emirates	N/A	15%	N/A	10%	10%
United Kingdom	N/A	15%	N/A	10%	10%
United States	5% ¹² or 0% ¹³	15%	0% ¹⁴	10%	5%

¹ The definition of “royalties” is not the same in all double tax agreements. Refer to the Royalties PDF.

² 5% for dividends derived by a company holding at least 10% of the voting power in the company that pays the dividend.

³ 0% for dividends derived by a listed company that has held at least 80% (Australia)/ 50% (Hong Kong) of the voting power, for at least 12 months, in the company that pays the dividends.

⁴ 0% only if Approved Issuer Levy (AIL) of 2% is paid, or if the payer is ineligible to elect to pay AIL. The 0% rate does not apply if the loan it is paid on is part of a back-to back loan arrangement.

⁵ A new treaty with Japan was signed on 10 December 2012. At the time of writing (January 2013) the treaty is not yet in force. The rates set out are from the new treaty. Under the old treaty dividends were capped at 15% but there was no cap for interest or royalties.

⁶ 0% if at least 10% of the dividend-paying company is owned by a listed company or a company that is at least 50% owned by 5 or fewer listed companies and the owner has owned the shares in the dividend-paying company for at least 6 months before the date the entitlement to the dividends is determined.

⁷ The treaty with PNG was signed on 29 October 2012 and is not yet in force at the time of writing (January 2013).

⁸ 10% if derived by a financial institution or insurance company, or it is paid on loans relating to arm's length credit sales.

⁹ 15% if paid in relation to the supply of scientific, technical, industrial or commercial knowledge or information, or assistance for the same, or for patents, trademarks, designs or models, secret formulae or processes or similar.

¹⁰ The holding required to obtain the 5% rate is 25% of the capital of the company paying the dividend.

¹¹ 10% if paid to a bank.

¹² 5% for dividends derived by a company holding at least 10% of the voting power in the company that pays the dividend.

¹³ 0% for dividends derived by a listed company that has held at least 80% of the voting power, for at least 12 months, in the company that pays the dividends.

¹⁴ 0% if derived by banks and other similar financial institutions.