



# International tax treaty rates<sup>1</sup> (%)

(updated to August 1, 2015)

| Country            | Interest <sup>2</sup> | Dividends, including patronage dividends <sup>3</sup> | Royalties and rents – Personal property <sup>2</sup> | Rents - Real property in Canada | Pensions and annuities <sup>2</sup> | Estate or trust |
|--------------------|-----------------------|---|--|---------------------------------|-------------------------------------|-----------------|
| Australia          | 0/10                  | 5/15  | 10   | 25                              | 15/25                               | 15              |
| Belgium            | 0/10                  | 5/15  | 0/10   | 25                              | 25                                  | 15              |
| China <sup>4</sup> | 0/10                  | 10/15   | 10   | 25                              | 25                                  | 25              |
| France             | 0/10                  | 5/15  | 0/10   | 25                              | 25                                  | 15              |
| Germany            | 0/10                  | 5/15  | 0/10   | 25                              | 15/25                               | 25              |
| Israel             | 0/15                  | 15  | 0/15   | 25                              | 15/25                               | 15/25           |
| Italy              | 0/10                  | 5/15  | 0/5/10   | 25                              | 15/25                               | 15              |
| Japan              | 0/10                  | 5/15  | 10   | 25                              | 25                                  | 25              |
| Mexico             | 0/10                  | 5/15  | 0/10   | 25                              | 0/15/25                             | 15              |
| Netherlands        | 0/10                  | 5/15  | 0/10   | 25                              | 15/25                               | 15              |
| Switzerland        | 0/10                  | 5/15  | 0/10   | 25                              | 15/25                               | 25              |
| United Kingdom     | 0/10                  | 5/15  | 0/10   | 25                              | 0/10/25                             | 15              |
| United States      | 0 <sup>5</sup>        | 5/15  | 0/10   | 25                              | 0/15/25                             | 15              |

<sup>1</sup> Withholding tax rates applied by Canada to certain payments to residents of selected countries with which it has signed international tax treaties. Certain exceptions modify the tax rates.

<sup>2</sup> Certain payments are exempt from withholding tax under the Canadian Income Tax Act. For example, interest (other than on participating debt) paid to arm's length parties is not subject to Canadian withholding tax effective January 1, 2008.

<sup>3</sup> Rates vary according to the percentage of ownership, and whether the payments are made to an individual or a corporation.

<sup>4</sup> The treaty with China does not apply to Hong Kong.

<sup>5</sup> Under the Canadian Income Tax Act and under the Fifth Protocol to the Canada-US treaty, (non-contingent) interest paid to both arm's length and non-arm's length parties is not subject to withholding tax.