



Tax Newsflash

Hong Kong Tax News: HK-Belarus Tax Treaty Signed

Hong Kong (HK) signed a comprehensive agreement for the avoidance of double taxation (CDTA) with Belarus on 16 January 2017. Belarus is located in Eastern Europe and is one of the countries along the Belt and Road. This is the 36th CDTA concluded by HK.

Below is a comparison of the withholding tax (WHT) rates of dividends, interest and royalties, under the respective domestic tax law and the HK-Belarus CDTA:

	Dividends	Interest	Royalties
HK non-CDTA rate	0%	0%	4.95%/16.5% (NB1)
Belarus non-CDTA rate	12% /13% (NB2)	10% / 13% (NB3)	13% / 15% (NB4)
HK-Belarus CDTA rate	0% / 5% (NB5)	0% / 5% (NB5)	3% / 5% (NB6)

NB1: The 4.95% rate applies (i) if the royalty is not paid to a related party; or (ii) if the royalty is paid to a related party, the licensed intellectual property has never been owned in whole or in part by a person carrying on business in Hong Kong. Otherwise, the rate is 16.5%.

NB2: 12% for companies; 13% for individuals.

NB3: 10% for companies; 13% for individuals.

NB4: 13% for individuals; 15% for companies.

NB5: 0% for beneficial owner being the government or institutions authorized by the government; 5% in all other cases.

NB6: 3% for the right to use aircraft; 5% in all other cases.

The HK-Belarus CDTA will come into force after the completion of ratification procedures on both sides. The CDTA can be downloaded from this [link](#).

Tax Newsflash is published for the clients and professionals of Deloitte Touche Tohmatsu. The contents are of a general nature only. Readers are advised to consult their tax advisors before acting on any information contained in this newsletter.

If you have any questions please contact:

Davy Yun

Tax Partner

Tel: +852 2852 6538

Email: dyun@deloitte.com.hk

Doris Chik

Tax Senior Manager

Tel: +852 2852 6608

Email: dchik@deloitte.com.hk



Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients. Please see [About Deloitte](#) for a more detailed description of DTTL and its member firms.

Privacy

Thank you for your interest in Deloitte China services. Deloitte China would like to continue to use your personal information (in particular name and contact details) for the purpose of sending you marketing and regulatory updates, invitations to seminars and other events organized, sponsored or promoted by Deloitte China. If you do not wish to receive further communications from Deloitte China, please send a return email to the sender with the word "Unsubscribe" in the subject line.

If you would like to update your personal information, please click [here](#).

Deloitte China refers to Deloitte Touche Tohmatsu in Hong Kong, Deloitte Touche Tohmatsu in Macau, Deloitte Touche Tohmatsu Certified Public Accountants LLP in the Chinese Mainland and their respective affiliates practising in Hong Kong, Macau and the Chinese Mainland.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited, its member firms, or their related entities (collectively the "Deloitte Network") is by means of this communication, rendering professional advice or services. None of the Deloitte Network shall be responsible for any loss whatsoever sustained by any person who relies on this communication.

© 2016 Deloitte Touche Tohmatsu in Hong Kong, Deloitte Touche Tohmatsu in Macau, and Deloitte Touche Tohmatsu Certified Public Accountants LLP in the Chinese Mainland. All rights reserved.

To no longer receive emails about this topic please send a return email to the sender with the word "Unsubscribe" in the subject line.