

List of countries with whom Republic of Serbia has Agreement on the Avoidance of Double Taxation

No.	Country	Interest	Dividends	
			If the recipient company holds at least 25% of the paying company	Others (less than 25% of holdings)
1	Albania	10	5	15
2	Armenia	8	8	8
3	Austria	10	5	15
4	Azerbaijan	10	10	10
5	Belgium	15	10	15
6	Belorussia	8	5	15
7	Bosnia and Herzegovina	10	5	10
8	Bulgaria	10	5	15
9	Canada	10	5	15
10	China	10	5	5
11	Croatia	10	5	10
12	Cyprus	10	10	10
13	Czech Republic	10	10	10
14	Denmark	10	5	15
15	Egypt	15	5	15
16	Estonia	10	5	10
17	Finland	0	5	15
18	France	0	5	15
19	Georgia	10	5	10
20	Germany	0	15	15
21	Greece	10	5	15
22	Hungary	10	5	15
23	India	10	5	15
24	Indonesia	10	15	15
25	Iran	10	10	10
26	Ireland	10	5	10
27	Italy	10	10	10
28	Kazakhstan	10	10	15
29	Kuwait	10	5	10

30	Latvia	10	5	10
31	Libya	10	5	10
32	Lithuania	10	5	10
33	Luxembourg	10	5	10
34	Macedonia	10	5	15
35	Malta	10	5	10
36	Moldavia	10	5	15
37	Montenegro	10	10	10
38	Netherland	0	5	15
39	North Korea	10	10	10
40	Norway	10	5	15
41	Pakistan	10	10	10
42	Poland	10	5	15
43	Qatar	10	5	10
44	Republic of Korea	10	5	10
45	Romania	10	10	10
46	Russia	10	5 ²⁾	15
47	San Marino	10	5 ⁶⁾	10
48	Slovakia	10	5	15
49	Slovenia	10	5	10
50	Spain	10	5	10
51	Sri Lanka	10	12.5	12.5
52	Sweden	0	5	15
53	Switzerland	10	5 ³⁾	15
54	Tunis	10	10	10
55	Turkey	10	5	15
56	Ukraine	10	5	10
57	United Arab Emirates	10	5 ⁴⁾⁵⁾	10 ⁵⁾
58	United Kingdom	10	5	15
59	Vietnam	10	10	15

1) or 15% in case of non-resident individuals

2) if an investor has invested at least USD 100.000,00 (RSD counter value) in the paying company

3) if the beneficial owner is a company (excluding partnerships) which indirectly holds at least 20% of the capital of the company paying the dividend

4) if the beneficial owner is a company which directly or indirectly holds at least 5% of the capital of the company paying the dividend

5) 0% rate will apply if paid to the government of the contracting state (or political subdivisions or local authorities). In the case of payment of dividends by Serbian tax residents to tax residents of the United Arab Emirates, the Protocol provides specific list of entities to which 0% rate on dividends is applicable.

6) if the recipient holds, within the period of 365 days (pay date included), at least 25% threshold of the issuer paying the income

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