



Global withholding taxes

**Summary of worldwide taxation of income and gains
derived from listed securities**

2018 update – Year-end 2017

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The attached chart summarizes taxation of income and gains derived from listed securities in a number of markets around the world as of December 31, 2017. This information, which is from the KPMG International member firm in each respective country in the chart, provides a general outline and should not be relied upon for purposes of structuring transactions or making investments. Please note that while every effort has been made to provide up-to-date information, tax laws around the world are constantly changing. Accordingly, the material contained in this publication should be viewed as a general guide only and should not be relied upon without consulting your KPMG International member firm tax adviser. Further, the assumptions noted below should be considered in context of the summary information provided for each market.

Assumptions and additional notes:

1. Except where otherwise noted, this chart does not apply to (i) privately held (unlisted) securities, (ii) portfolio companies whose assets consist largely of real estate, or (iii) portfolio companies in which the fund is a substantial shareholder (e.g., an owner of 10% or more of the share capital).
2. Except where otherwise noted, this chart reflects the gains tax rules related to equities. The gains tax rules related to debt instruments are complex. In some countries, gains from the sale of debt instruments may be treated as interest and taxed accordingly.
3. The chart assumes that the investing entity provides all required documentation to the portfolio company and the local tax authorities to certify its tax residency status.
4. Reduced dividend withholding rates for "substantial shareholdings" (typically ownership of 10% or more of the portfolio company's share capital) are assumed not to apply.
5. For purposes of performing an analysis of financial statement exposure, it may be necessary to determine the foreign tax rates that applied in prior years. This chart reflects only current rates.
6. This chart does not account for the possibility that all or a portion of any cash distribution may be considered a nontaxable return of capital under local laws.
7. This chart does not address other applicable transaction taxes applied to the gross value of the transfer that are not considered withholding taxes.
8. Some European countries have enacted a financial transaction tax. These taxes are imposed on all financial transactions and are not addressed in this publication.
9. It is assumed that the investing entity does not carry on a trade or business through a permanent establishment in the country where the portfolio company is organized.
10. For withholding tax purposes, some countries may not apply "look-through" treatment to a Cayman Islands "master" fund that is treated as a partnership for U.S. tax purposes.
11. Local laws in some countries that impose gains tax on nonresidents may not address the treatment of short positions.
12. Swaps and other derivative transactions may need to be examined on a case-by-case basis in each jurisdiction, considering local anti-abuse provisions and case law.

Global income taxes

Argentina

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	15% or Exempt	No	N/A	Effective September 23, 2013, gains from disposition of securities may be taxed at 15% rate (alternatively 13.5%, i.e., 15% tax rate x 90% gross proceeds). However, beginning January 1, 2018, gains likely exempt.
Dividends	35% or Exempt		N/A	As a general rule, dividends paid to nonresident investors should not be subject to any withholding tax as long as the profits distributed were already taxed under Argentine law. However, a 7% withholding tax rate should apply for distributions on profits accrued from January 1, 2018 through December 31, 2019, and a 13% withholding tax rate from January 1, 2020 onward. If the distribution is made from earnings that have not been previously subject to Argentine corporate income tax, a 35% "equalization" tax should be applied.
Interest	Exempt, 15.05%, or 35%		N/A	Interest on government bonds and corporate bonds issued through a public placement may be exempt; issuance documentation should be reviewed. Otherwise, interest arising may be subject to 35% withholding tax, including private placement, although this rate may be reduced to 15.05% in certain circumstances (e.g., if the borrower is a qualifying financial institution).

Australia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	30% or Exempt	Yes	30% or Exempt	Gains likely to be subject to a 30% tax to the extent trading activities are considered as under "revenue account," however, if the investment fund meets certain requirements an exemption may be available. If not revenue account, gain may be exempt. Under the tax treaty, no tax should apply unless it is a real property company or the nonresident has a permanent establishment.
Dividends	Exempt or 30%		Exempt or 15%	Dividends paid by an Australian corporation to a nonresident out of earnings that were previously subject to Australian corporate tax ("franked" dividends) should be exempt, whereas dividends paid to a nonresident out of earnings that were not previously subject to Australian tax (i.e., "unfranked" dividends) should be subject to withholding tax at 30% or, if applicable, tax treaty rate. Certain unfranked dividends paid to nonresidents may be exempt from dividend withholding tax under the conduit foreign income rules.
Interest	10% or Exempt		Same as Nontreaty Rate	Interest should generally be subject to a 10% withholding tax. "Interest" is defined to generally include gains from the sale or redemption of discounted, deferred-interest and similar securities. Interest on government bonds and publicly offered debt instruments should generally be exempt.

Austria

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 27.5%	Yes	Exempt	Generally exempt but may be subject to 27.5%.
Dividends	27.5%		15%	
Interest	Exempt or 27.5%		0%	Effective January 1, 2017, the rules cover interest from cash deposits in Austrian banks and Austrian bonds in case there is a withholding tax deduction. The nonresident interest taxation does not apply to corporate investors and investment funds.

Belgium

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	
Dividends	30%, 15%, or 5%		15%	Effective January 1, 2017, the statutory withholding rate should be 30%. 15% reduced rate may apply for dividends distributed by Belgian small and middle-sized entities (SMEs) provided conditions are met. 5% may apply to dividends distributed by SMEs on certain reserves provided certain conditions are met.
Interest	30%, 15%, or Exempt		15% or Exempt	Effective January 1, 2017, the statutory withholding rate on interest should be 30%. A 15% rate should apply on government bonds issued and subscribed between November 24, 2011 and December 2, 2011.

Bermuda

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	
Dividends	Exempt		N/A	
Interest	Exempt		N/A	

Brazil

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	15% or Exempt	No	N/A	Gains should be taxable unless specific exemption applies.
Dividends	15% or Exempt		N/A	Dividends generally exempt but may be subject to 15% tax in limited circumstances.
Interest	15% to 22.5% or Exempt		N/A	For fixed-income securities, the tax rate should range from 15% to 22.5% depending on the holding period. Nontax-haven investors should be subject to a 15% withholding tax.

Bulgaria

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 10%	Yes	Exempt	Gains from qualifying investment funds and certain financial instruments should be exempt. Otherwise a 10% tax should apply. The capital gain may be exempt under the Double Tax Treaty (DTT) with the United States in some cases.
Dividends	5%		5%	Generally 5%. However, a 0% withholding tax rate may apply on dividends distributed to entities that are resident in an European Economic Area (EEA)/EU Member States. Tax treaty with the United States provides for a 5% withholding tax rate unless qualifying pension plans (0%).
Interest	0% or 10%		0% or 5%	Generally 10%. However, since 2015, a 0% WHT rate may apply to interest paid to EU-related parties. An exemption may also apply on interest derived from corporate and government bonds, and debt instruments, listed on a regulated stock exchange in the EU/EEA. U.S. tax treaty should provide for a 5% WHT rate; 0% for? qualifying financial institutions and pension plans.

Canada

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 25%	Yes	Exempt or 25%	Gains generally exempt but may be taxed at a 25% rate if "taxable Canadian property." Most of Canada's treaties do not exempt gains arising from the disposition of "taxable Canadian property."
Dividends	25%		15% or 5%	
Interest	Exempt or 25%		Exempt or 15%	Generally subject to a 25% withholding tax unless exemption applies. Treaty exemption does not apply to certain participating debt interests.

Chile

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 35%	Pending (Treaty signed February 4, 2010, but not yet in force)	N/A	Exemption may apply if publicly traded and certain conditions are met. Otherwise, the applicable rate should be 35%.
Dividends	35%		N/A	
Interest	35% or 4%		N/A	Generally 35% withholding tax rate. A rate of 4% may apply to interest paid on loans granted by foreign financial institutions, banks, or insurance companies and pension funds (if certain requirements are met).

China

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	10% or Exempt (Uncertain)	Yes	No	10% withholding tax should generally apply. Circular 79 should provide a temporary exemption since November 17, 2014 for gains on A shares. It clarified that gains realized by Qualified Foreign Institutional Investors and RMB Qualified Institutional Investors prior to November 17, 2014 were taxable and should be reported in accordance with the Corporate Income Tax Law. The tax situation in China is fluid and should continue to be monitored closely for developments.
Dividends	10% or Exempt (Uncertain)		10%	Dividends paid out of pre-2008 profits relating to B and H shares should be exempt from? withholding tax. For withholding tax implication of pre-2008 A share dividends, there is regulatory ambiguity and inconsistency in practice.
Interest	10%		10%	Interest on certain government debt should be exempt.

Colombia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 40%, (37% in FY 2018 and 33% in FY 2019 and onwards)	No	N/A	Gains realized on the disposition of publicly traded shares should be taxed at 40% rate (37% in FY 2018 and 33% in FY 2019 and onwards) if the nonresident sells 10% or more of the outstanding shares in the same year. Otherwise it may be exempt.
Dividends	5% or 28.75% (For distributions after January 1, 2017)		N/A	Dividend distributions out of pre-CIT profits should be subject to a 28.75% withholding tax. Otherwise, a 5% withholding tax should apply.
Interest	0%, 14%, 15% or 25%		N/A	

Croatia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	
Dividends	12%		N/A	As of March 1, 2012, dividends paid to nonresident companies should be subject to a withholding tax of 12%. The tax should not apply to distributions of profits earned before March 1, 2012.
Interest	15% or Exempt		N/A	15% should be the standard withholding tax rate imposed on interest payments. No tax should apply to interest on government or corporate bonds.

Cyprus

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	None		N/A	
Interest	None		N/A	

Czech Republic

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	1% and 19%	Yes	Exempt	A 1% of the sales proceeds withholding tax should apply to payments to foreign investors domiciled in a non-EU/EEA country when the payment abroad is made by a Czech payer, which would likely be credited against the 19% tax liability.
Dividends	15% or 35%		15%	Since January 1, 2013, 35% withholding tax should apply on payments to non-EU/EEA residents where no tax treaty or exchange of information agreement is in place, or to undisclosed recipients. Since 2014, the Czech Republic-Cayman Islands Exchange of Information Agreement became effective. Thus, the applicable withholding tax should be 15% (provided that beneficial ownership and tax residency are substantiated).
Interest	15% or 35%		Exempt	Same note as dividends (above) should apply.

Denmark

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	None	Yes	N/A	
Dividends	27% or 15%		15%	Outbound dividend payments should be subject to the withholding tax rate of 27%. 15% should apply if the recipient owns less than 10% of the distributing company and is a resident in a jurisdiction that exchanges tax information with Denmark (including Cayman Islands).
Interest	Exempt or 22%		0%	The interest withholding tax should be subject to a number of exceptions, including when the recipient/beneficial owner is domiciled in a treaty jurisdiction. In general, interest on "controlled debt" should be subject to the withholding tax rate of 22%.

Egypt

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	10% (suspension is currently in force)	Yes	Exempt	Effective July 1, 2014, a 10% tax should apply on gains realized by nonresident investors upon the disposal of listed Egyptian shares and bonds. However, the implementation of this provision was suspended until May 16, 2020. . No tax should be withheld during this period. U.S.-Egypt treaty: gains should generally be exempt under the treaty except in the case of real estate entities.
Dividends	5% or 10%		N/A	A 10% withholding tax generally should apply on dividends. A 5% may apply where ownership in the distributing entity exceeds 25% of the share capital or voting rights, provided the participation is held for a minimum 2-year period.
Interest	32%, 20%, or Exempt		15%	32% rate should apply to interest paid on government bonds issued by the Ministry of Finance on behalf of the Central Bank. An exemption from withholding tax may apply to certain types of interest, including interest on bonds listed in the official schedules at the Egyptian stock exchange and interest received by corporate entities on securities and deposits certificates issued by the Central Bank of Egypt. A 20% rate should apply to interest on treasury bills issued on May 5, 2008 onwards. Interest on treasury bonds issued on July 1, 2008, onwards should also be subject to tax at 20% tax rate.

Estonia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 20%	Yes	Exempt	Gains realized on the disposition of shares should be generally exempt unless a real estate company, which may be taxed at 20% rate.
Dividends	Exempt or 20%		15%	Dividends should be generally exempt. However, the distributor should be subject to distribution tax at the rate of 20%.
Interest	Exempt or 20%		N/A	The 20% withholding tax rate applies only to the portion of interest paid that exceeds the market interest rate. Otherwise, interest payments should be exempt from withholding tax.

Finland

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	
Dividends	20%		15%	Effective January 1, 2014, the withholding tax on nonresident corporations is 20%.
Interest	Exempt		N/A	

France

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 33%	Yes	Exempt	Gains derived by nonresidents from the disposal of French shares may be taxable in the following situations: — Real estate companies — Substantial ownership
Dividends	30%		15%	
Interest	Exempt		15%	

Germany

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	
Dividends	26.375% or 15.825%		0%, 5%, or 15%	In some special cases, nontreaty residents may be able to claim a refund equal to 40% of the tax withheld, in which case the effective rate should be reduced to 15.825%. A treaty-eligible U.S. tax resident investor generally qualifies for a reduced tax rate of 15% or 5% (if the participation is at least 10%) or 0% (if the participation is at least 80% for >12 months and other requirements, e.g., limitation of benefits (LOB) clause, are met).
Interest	Exempt or 26.375%		German-sourced interest may be taxable at 26.375% if it would be interest paid on: (i) convertible bonds, profit-sharing bonds and participating loans; (ii) debt secured by real estate; or (iii) OTC.	

Greece

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	No Relief	Nonresident entities without a permanent establishment in Greece may argue they are not subject to tax on the disposal of Greek securities.
Dividends	15%		No Relief	
Interest	Exempt or 15%		Exempt or 15%	No withholding tax should be levied on interest derived from government bonds and treasury bills. Any other interest payments should be subject to 15% withholding tax. The U.S.-Greece treaty provides that Greek-source interest may be exempt if the interest rate charged is not in excess of 9% per annum (on the condition that specific requirements are fulfilled).

Hong Kong

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	
Dividends	Exempt		N/A	
Interest	Exempt		N/A	

Hungary

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 9%	Yes. Once ratified by the Senate, the Treaty signed on 4 February 2010 should replace the 1979 treaty that is currently in force.	Exempt	Nonresident companies should be subject to tax at 9% on gains derived from the sale of real property holding companies (underlying Hungarian properties) that are not listed on a regulated stock exchange.
Dividends	Exempt		N/A	
Interest	Exempt		N/A	

Iceland

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	18%	Yes	Exempt	
Dividends	18%		15%	
Interest	10%		Exempt	Interest generally should include gain on sale of bonds. Interest paid by the Central Bank of Iceland, in its own name or on behalf of the government of Iceland, generally should be exempt. Bonds issued by financial institutions and energy companies should also be exempt if the bonds are registered on a bond market in one of the OECD countries within the EEA, European Free Trade Association, or the Faroe Islands.

India

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0% or 15% or 30%	Yes	No Relief	Gains derived by portfolio investor nonresident companies on the sale of shares may be taxed. The tax rate for short-term gains should be 15% provided the Securities Transaction Tax (STT) has been levied. Long-term gains should be exempt provided the STT has been levied. Note that the applicable tax rate should be increased by a surcharge of 0%, 2%, 5%, 10%, or 12% depending on income and type of foreign investor. The applicable tax rate should also be increased by a 3% Education Cess. General anti-avoidance rule provisions are applicable from April 1, 2017.
Dividends	Exempt or 20.358%		25% or 15%	There should be no withholding tax on dividends payable to a nonresident. However, the Indian payer of such dividends must pay a Dividends Distribution Tax (DDT). DDT should be payable at the rate of 20.358%.
Interest	5% or 20%		10% or 15%	Interest paid to nonresident portfolio investors should generally be subject to withholding tax at a rate of 20%. However, interest payable to certain specified Foreign Portfolio Investors on investments in a rupee-denominated bond of an Indian Company or government securities from June 1, 2013 to June 30, 2020 should be taxed at a reduced rate of 5%, subject to fulfillment of certain conditions. Note that the applicable tax rate should be increased by a surcharge of 0%, 2%, 5%, 10%, or 12% depending on income and type of foreign investor. The applicable tax rate should also be increased by a 3% Education Cess.

Indonesia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0.1%	Yes	Exempt	A 0.1% final income tax should be imposed on the proceeds from disposal of publicly listed shares.
Dividends	20%		15%	
Interest	20%		10%	"Interest" should generally include gain on sale of government and corporate bonds.

Ireland

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	20% or 0%		15% or 5%	0% rate may apply if the beneficial owner is a resident of EU or a country with a tax treaty with Ireland; some conditions apply.
Interest	20% or 0%		0%	Some domestic exemptions from interest withholding tax include interest paid on government securities and quoted Eurobonds.

Israel

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	
Dividends	25%, 20%, or 15%		12.5% under certain conditions	Dividends deriving from "Industrial Enterprise" (also known as an Approved/Beneficial/Preferred Enterprise) incomes are eligible for a reduced withholding tax rate of 20% (non-U.S. resident) or 15% (U.S. resident).
Interest	Exempt, or 25%, or 15%		Up to 17.5%	Interest deriving from exchange-traded securities (except for government bonds that mature within 13 months) or bank deposits should be exempt.

Italy

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 13.95%	Yes	Exempt	Tax may apply if "substantial participation" in an Italian-listed company (i.e., shares representing more than 2% of the Italian company's voting rights or 5% of its capital) and subject to an effective tax rate of 13.95%.
Dividends	26%		15%	Effective July 1, 2014, a 26% withholding tax rate should apply.
Interest	12.5%, 20%, or. 26%		10%	Effective July 1, 2014, a 26% withholding tax rate should apply. Government bonds should be subject to a 12.5% rate.

Japan

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 24.43%	Yes	Exempt or 24.43%	Gains arising from the disposition of shares may be subject to a 24.43% tax under the land-rich company principle (5% shareholding threshold for listed companies or 2% for nonlisted) or the substantial ownership principle (25% shareholding or 5% disposal thresholds). The rate should decrease to 24.22% for the fiscal year beginning from April 1, 2018 to March 31, 2019.
Dividends	20.42% or 15.315%		0%, or 5%, or 10% (depending on investor's status)	The general withholding tax rate on dividends should be 20%; however, the 15% rate generally applies on dividends paid by listed companies. A special reconstruction surtax of 2.1% should be imposed from January 1, 2013 through December 31, 2037. Reduced treaty rates should not be affected by the special reconstruction surtax.
Interest	20.42%, or 15.315%, or Exempt		Lower of Nontreaty Rate or 0% or 10% (depending on investor's status)	The 15% rate should apply to interest paid on government, municipal, corporate bonds, or bank deposits. The 20% rate should apply to interest paid on loans to an operating business. Exemptions may apply to registered government bonds and certain Eurobonds. Interest on Japanese corporate bonds should also be exempt if such bonds are managed under the "Book-Entry System" provided certain conditions are met. A special reconstruction surtax of 2.1% may be imposed from January 1, 2013 through 31 December 2037. Reduced treaty rates should not be affected by the special reconstruction surtax.

Jordan

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	
Dividends	Exempt		N/A	
Interest	10%		N/A	Withholding tax rate for nonresident service providers should be 10%.

Korea (Republic of)

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt, or the lesser of 11% of the sales proceeds, or 22% of the net gain	Yes	Exempt	Gains realized should be taxable if the nonresident owned at least 25% of the listed shares of the Korean company at any time during the year of the transfer and in the preceding 5 years. U.S. tax treaty exemption may apply unless real estate company.
Dividends	22%		16.5% or 11%	11% rate under the tax treaty should apply when the recipient is a corporation and owns at least 10% of the outstanding voting stock, provided that not more than 25% of the gross income of the paying corporation for the prior taxable year consists of interest or dividends and that certain requirements are met. Otherwise, 16.5% should apply.
Interest	22%, 15.4%, or Exempt		13.2%	Bonds issued by the Korean government, local government, and domestic corporations should be subject to 15.4%. Interest paid on foreign currency denominated bonds issued overseas by the Korean government, local governments, or domestic corporations should be exempt from Korean tax. All other interest should be subject to the 22% rate.

Luxembourg

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0% or 20.33% (19.26% from 2018 onwards)	Yes	N/A	In general, gains from the sale of shares in a listed company should be exempt unless (i) the nonresident owned a "substantial participation" (more than 10% of share capital) in the Luxembourg-listed company and (ii) the period between acquisition and disposition is less than 6 months.
Dividends	15%		15%	
Interest	Exempt		Exempt	

Malaysia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	Interest on certain government and corporate fixed-income securities may be tax exempt, including fixed-income securities issued by the Malaysian government and fixed-income securities approved or authorized by the Securities Commission
Dividends	Exempt		N/A	
Interest	15%		N/A	

Mexico

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	10% or 40%	Yes	Exempt	In general, nonresidents that realize gains on the transfer of listed shares through the stock exchange should be subject to a 10% tax. However, there may be an exemption available under the applicable tax treaty. Tax havens may be subject to a 40% tax.
Dividends	10%		Exempt or 5% or 10%	A 10% withholding tax should apply to dividends that arise from earnings obtained starting 2014. U.S.-Mexico tax treaty: 10% general rate, but may be reduced to 5% if the beneficial owner is a company owning directly at least 10% of the voting stock of the company paying the dividends. It should be exempt if the beneficial owner is a company that owns 80% of voting shares during the previous 12 months and complies with the LOB clause.
Interest	Exempt, 4.9%, or 40%		Lower of Nontreaty Rate or 15%	A 4.9% withholding rate should apply on interest from bonds or securities that are regularly and substantially traded on a recognized securities market. Interest on government bonds should be generally exempt. Tax havens may be subject to a 40% tax.

Morocco

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	15%		No Further Reduction	The withholding rate increased to 15% in 2013.
Interest	10%		No Further Reduction	Interest on government bonds may be exempt from withholding.

Netherlands

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0%, 20% or 25%	Yes	N/A	0% applies if less than 5% ownership. Otherwise, 20% or 25% tax may apply.
Dividends	15%		0% or 5% or 15%	If the provisions of the U.S.-Netherlands tax treaty are met, no tax should apply. Otherwise, 5% or 15% tax.
Interest	N/A		N/A	No withholding tax on interest except for payments on certain profit participating loans in which case dividend withholding tax may apply.

New Zealand

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	28%	Yes	Exempt	Gains likely to be taxable.
Dividends	30% or 15%		15%	The 15% nontreaty rate should apply if the dividend is fully imputed. Note: assumes a shareholding of less than 10%.
Interest	15% or 0%		Lower of Nontreaty Rate or 10%	The 0% nontreaty rate should apply where the issuer has been granted "Approved Issuer" status.

Nigeria

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 10%	No	N/A	Gains from the disposal of long-term corporate bonds should be subject to 10%
Dividends	10%		N/A	
Interest	Exempt		N/A	

Norway

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	25%		15%	
Interest	Exempt		N/A	

Oman

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	Gains from the sale of shares registered on the Muscat Securities Market should be exempt. If not registered, likely taxable only if the foreign company has taxable presence (permanent establishment). Oman has a Free Trade Agreement with the United States.
Dividends	10% (effective, February 27, 2017)		N/A	
Interest	10% (effective, February 27, 2017)		N/A	

Pakistan

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	30%, 20%, 18%, 16%, 15%, 12.5%, 11%, or 7.5%, or Exempt	Yes	Treaty Does Not Alter Domestic Rules	For shares acquired after July 1, 2016, a 15% tax rate should apply to tax return “filers” and a 20% tax rate should apply to tax return “non-filers.” For shares acquired prior to July 1, 2016, the applicable tax rate varies depending on holding period and whether “filer” or “non-filer.” Bonds should be taxed at a 30% rate.
Dividends	20% or 12.5%		Treaty Does Not Alter Domestic Rules	“Non-filers” should be subject to a 20% tax rate, and “filers” should be subject to a 12.5% tax rate.
Interest	17.5%, 10% or Exempt		Treaty Does Not Alter Domestic Rules	“Non-filers” should be subject to a 17.5% tax rate, and “filers” should be subject to a 10% tax rate. Some exemptions may apply.

Peru

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt, 5% or 30%	No	N/A	Generally, if listed and traded on the Peruvian stock exchange, gain should be subject to a 5% tax. If not, the applicable rate should be 30%. From January 1, 2017, a temporary exemption was introduced for sales on the Peruvian stock exchange when certain requirements are met.
Dividends	5%		N/A	
Interest	Exempt, 4.99%, or 30%		N/A	Various rates may apply depending on the type of interest. Government bond interest should be tax exempt. The payment of interest to an overseas entity may be subject to the following rates of withholding tax: — 4.99% on certain loans — 30% otherwise.

Philippines

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0.5%, 5%, or 10%	Yes	Exempt	0.5% transfer tax should apply on the gross proceeds from sale of listed shares in the Philippine Stock Exchange. Unlisted shares should be subject to a 5% final tax on the first PHP 100,000 net gain, and 10% thereafter. Under Republic of the Philippines-U.S. Tax Treaty, nonresidents should not be subject to Capital Gains Tax on unlisted shares, unless the shares are those of a corporation at least 50% of whose assets consist of real property in the Philippines.
Dividends	30% or 15%		25% or 20%	The 30% rate should be reduced to 15% if the recipient's country of residence provides a tax credit of at least 15% or does not impose tax on dividend income. Tax treaty preferential rates of 25% or 20% may apply.
Interest	30% or 20%		15% or 10%	The 20% rate would apply on interest from any currency bank deposit, deposit substitute, trust funds and similar arrangements and royalties, otherwise the 30% rate should apply. Tax treaty preferential rates of 15% or 10% may apply.

Poland

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	19%	Yes	Exempt	
Dividends	19%		15% or 5%	5% withholding tax on dividends should be applicable if the recipient holds at least 10% of shares of the company paying the dividends, in other cases 15% rate may apply under the tax treaty.
Interest	Exempt or 20%		0%	Interest on Polish government bonds issued on foreign markets should be exempt.

Portugal

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	25%	Yes	Exempt	25% tax rate should apply to tax-haven residents.
Dividends	35%		15%	35% rate should apply if paid to a tax-haven resident or an unidentified recipient.
Interest	0% or 35%		10%	Interest on certain debt may be exempt for residents in a country that did sign an exchange of information agreement with Portugal. Cayman has an exchange of information agreement in force with Portugal. The 35% rate should apply to a tax-haven resident or an unidentified recipient.

Romania

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	16%	Yes	Exempt	
Dividends	5%		10%	
Interest	50%, 16% or 0%		10%	In general, the withholding rate should be 16%; however, interest on government bonds and debt instruments issued by the Romanian National Bank may be exempt. An increased withholding tax rate of 50% applies for income (interest, royalties, commissions, and services) paid to a country with which Romania has not concluded an exchange of information treaty and as long as the transactions qualify as an artificial transaction (those which do not have an economic purpose, are not carried out in the normal course of business and their only purpose is to avoid taxation or obtain undue fiscal advantages).

Russia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	20% or Exempt	Yes	Exempt	Gains from the sale of real estate companies likely to be taxable at 20% rate.
Dividends	15%		10% or 5%	<p>A reduced tax rate of 10% should apply to U.S. tax resident investors after a tax residence certificate is submitted to the tax agent prior to the date of payment.</p> <p>A further reduction to 5% tax rate may be available if the U.S. tax resident investor (beneficial owner) is a company that owns at least 10% of the voting stock (or if there is no voting stock, at least 10% of the statutory capital) of the company paying the dividends</p>
Interest	0%, 20%, or 30%		Exempt	<p>Interest paid through a foreign nominee to a nonresident should be subject to withholding tax at 30%. A 20% withholding tax may apply if the tax agent has been provided with information regarding the holder of the interest, the number of securities, and the country of residence of the holder.</p> <p>There should be no obligation on tax agents to withhold tax on government bonds held by nonresidents.</p> <p>According to the Russia-U.S. DTT, 0% withholding tax rate should be applied to interests earned by U.S. tax resident investors.</p>

Serbia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	20%	No	N/A	
Dividends	20%		N/A	
Interest	25% or Exempt		N/A	Tax should be withheld at source. For residents of low-tax jurisdictions with preferential tax systems (e.g., Cayman Islands), the rate should be 25%, effective December 26, 2012. Effective January 7, 2012, interest on bonds or debentures issued by the government or the National Bank should be exempt.

Singapore

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	
Dividends	Exempt		N/A	
Interest	15% or Exempt		N/A	Certain exemptions for nonresidents without a permanent establishment in Singapore may apply, including a possible exemption from withholding tax on interest derived from qualifying debt securities issued between February 27, 1999 and December 31, 2018, and from qualifying project debt securities issued between November 1, 2006 and December 31, 2022.

Slovakia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	21%	Yes	Exempt	Gains generally are taxed at a 21% rate.
Dividends	35%		Exempt (entities) or 7% (individuals)	Dividends generally are taxed at a 35% rate.
Interest	Exempt or 19%		0%	Interest on government bonds and treasury bills paid to a nonresident is likely to be tax exempt. Interest derived from securities (other than government bonds and treasury bills) paid to a nonresident is likely to be subject to a 19% withholding tax.

Slovenia

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	15%		15%	
Interest	15%		5%	Interest on government debt should be exempt from tax for foreign institutional investors.

South Africa

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 22.4%	Yes	Exempt	Gains generally exempt from tax to the extent that the non-resident does not have a permanent establishment in South Africa. Otherwise, a 22.4% tax may apply. Under the tax treaty, no tax should apply unless it is a real property company or the nonresident has a permanent establishment
Dividends	20% (15% prior to February 22, 2017)		5% or 15%	Under the tax treaty, the 5% reduced rate may apply if substantial ownership.
Interest	15%		0% unless anti-avoidance provisions apply	A 15% withholding tax should apply to interest. Certain portfolio interest, including that arising from government bonds and listed debt instruments, should be exempt.

Spain

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	19%	Yes	Exempt	Gain generally should be taxable at 19% rate. Under the U.S.-Spain tax treaty, gain should be exempt unless is substantial ownership or land-rich shares.
Dividends	19%		15% or 10%	Under the U.S.-Spain tax treaty, a tax rate of 10% should apply if the beneficial owner is a company owning at least 25% interest of the company paying the dividends. A tax rate of 15% should apply to all other cases.
Interest	19% or Exempt		10% or Exempt	Interest may include gains on the sale of debt instruments in certain cases. Current applicable tax rate should be 19%. Certain specialties may apply in the case that the source of the income is the region of Basque Country or Navarra (in any case the tax rate should be about 19%–21%). Government bonds and interest paid to EU residents should be exempt. A reduced rate of 10% should apply under the U.S.-Spain tax treaty. Exemption may apply in certain cases.

Sri Lanka

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	10% (14%, effective April 1, 2018)		N/A	
Interest	10% (5%, effective April 1, 2018) or Exempt		10%	Generally, 10% (5%, effective April 1, 2018) should apply. Exemption may apply on certain publicly traded bonds and cross-border debt instruments.

Sweden

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	30%		15%	The definition of dividends under Swedish Withholding Tax Act also covers certain dividend-like payments, such as share redemption payments, etc.
Interest	Exempt		N/A	

Switzerland

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	35%		15%	Tax treaty-reduced rates require filing for a refund.
Interest	35% or Exempt		0%	Interest payments on certain qualifying write-down bonds and contingent convertible bonds (CoCos) are generally exempt from withholding tax, if issued between 2013 and 2016. Tax treaty-reduced rates require filing for a refund.

Taiwan

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	Nonresident corporate shareholders with no permanent establishment in Taiwan should be exempt from income tax or alternative minimum tax on the gains arising from the sale of listed shares, futures, or options.
Dividends	20%		N/A	
Interest	15% or 20%		N/A	Interest income derived from certain corporate bonds, government bonds, short-term commercial paper, and securitized loan should be subject to a 15% tax rate. All other interest is likely to be subject to a 20% rate.

Thailand

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	15%	Yes	N/A	Tax should be withheld at source if the purchaser or broker is a resident of Thailand. If neither the purchaser nor the seller are Thai residents, and the transaction is executed and the payment is made outside of Thailand, then the withholding tax provisions should not apply and such transaction should be considered outside the Thai tax regime.
Dividends	10%		No Further Reduction	
Interest	15%		15% or 10%	Interest income on all government bonds was exempt from tax before October 13, 2010. Effective October 13, 2010, government bonds issued by certain state owned enterprises became taxable.

Turkey

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	Gains derived by nonresident companies from the disposal of shares listed on the Istanbul Stock Exchange should generally be exempt from Turkish tax. Foreign investors must submit a certificate of tax residency in order to be eligible for the current exemption from gains tax.
Dividends	15%		No Further Reduction	
Interest	Exempt		No Further Reduction	Interest on government bonds, Treasury bills, Eurobonds, and traded corporate bonds issued after January 1, 2006 should be generally exempt. However, please refer to the prospectus of the particular debt offering.

United Arab Emirates

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	
Dividends	Exempt		N/A	
Interest	Exempt		N/A	

United Kingdom

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	
Dividends	Exempt		N/A	No withholding tax on dividends should be paid by a U.K. company.
Interest	20% or 0%		0%	Interest on quoted Eurobonds should be exempt from withholding tax.

United States

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	N/A	N/A	Gains realized by nonresident investors are generally exempt from U.S. tax. However, tax may apply if shares are treated as U.S. real property interests. It is also important to note that offshore funds may suffer material adverse U.S. income tax consequences unless the fund (i) timely and properly registers with the Internal Revenue Service under the Foreign Account Tax Compliance Act (FATCA), and (ii) complies with all related investor due diligence, withholding and reporting obligations imposed under the FATCA regulations and any applicable intergovernmental agreement (IGA).
Dividends	30%		N/A	See note on FATCA, above.
Interest	Exempt or 30%		N/A	Nonresidents should generally be exempt from U.S. tax on "portfolio interest." If non-qualifying interest, the applicable rate should be 30%. See note on FATCA, above.

Venezuela

Type of income	Tax rate applicable to nontreaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the United States?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt, 1%, 15% or 34%	Yes	Exempt	Gains from the alienation of publicly traded shares on the Venezuelan stock exchange should be subject a 1% transaction tax on the gross proceeds. OTC transactions should be subject to tax at rates ranging from 15% to 34%. Bonds generally taxable at rate ranging from 15% to 34%, but exemptions may apply.
Dividends	34%		15% or 5%	Only dividend distributions in excess of taxable profits of the distributing company are subject to withholding tax. The withholding tax rate should be increased to 50% for hydrocarbon companies and 60% for mining companies.
Interest	34%		10% or 4.95%	The 34% rate should be applied to 95% of the gross payment resulting in an effective rate of 32.3%.

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Carles Farre is a Tax principal in KPMG's International Tax practice and focuses on helping clients in the asset management industry. His clients consist of asset managers that include pension plans, hedge funds, private equity funds, venture capital funds, mutual funds, broker-dealers, and investment advisers. He has extensive experience addressing complex U.S. and foreign country tax issues affecting his clients.

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