

DOUBLE TAX TREATY BETWEEN CYPRUS AND LUXEMBOURG

dba Alert #6
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The Double Tax Treaty (“DTT”) between Cyprus and Luxemburg, which was signed on 8 May 2017, has come into force from 23rd April 2018.

The provisions of the Treaty shall apply:

- (i) to taxes withheld at source, to amounts paid or credited after 1st January 2019 and,
- (ii) In respect of other taxes, that relate to any tax year commencing on or after 1st January 2019

The DTT provides for a 0% withholding tax rate on interest and royalties. For dividends, a 0% withholding tax rate applies for corporate investors holding directly at least 10% of the capital of the paying company; a 5% withholding tax rate applies in all other cases of dividends.

The text of the Treaty and the protocol can be found on the website of the Tax Department [Click here](#).

How can dba assist you

Contact us for a detail discussion of how the above treaty might affect your group of Companies.

Contact us

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