

Restrictive Tax Rates by Country at a glance

(main countries)

(No updates since Dec. 2018)

Find the summary of the provisions of tax treaties that South Korea has entered into with various countries regarding restrictive tax rates below.

Counterpart Country	Effective Date	Tax subject to treaty		Restrictive Tax Rates (withholding)			Applicable Period		Note
		Korea	Counterparty	Interest Income	Dividend Income	Usage Fee Income	Withholding	Others (Real Estate Income/Business Income)	
Netherlands (Amended on Apr 2, 1999)	Apr 17, 1981	Income Tax	• Income Tax	• Officials serving for more than 7 years: 10% • Others : 15%	• Corporates with a 25% or higher ownership: 10% • Others : 15%	• Others : 10% • Copyright : 15%	Payments made after Jan 1, 1981	Business year commencing after Jan 1, 1982	Protocol
		Corporate Tax	• Wage Tax						
		Local Income Tax	• Corporate Tax						
			• Dividend Tax						
		Agricultural Special Tax							
New Zealand (Amended on Oct 10, 1997)	Apr 22, 1983	Income Tax	• Income Tax	10%	15%	10%	• Korea: Payments made after Jan 1, 1981 • New Zealand : Income in taxable years after Apr 1, 1981	• Korea: taxable year commencing after Jan 1, 1981 • New Zealand : Income year commencing after Apr 1, 1981	Protocol
		Corporate Tax	• Surplus Reserve Tax						
		Local Income Tax							
Germany (Amended on Oct 31, 2002)	May 4, 1978	Income Tax	• Income Tax	10%	• Corporates with a 25% or higher ownership (excluding associations): 5% • Others : 15%	• Equipment Use : 2% • Others : 10%	Payments made after Jan 1, 2003	Taxable year commencing after Jan 1, 2003	Protocol
		Corporate Tax	• Corporate Tax						
		Capital Tax	Capital Tax						
		Agricultural Special Tax	• Business Tax (Including Surcharge)						
Russia	Aug 24, 1995	Income Tax	• Tax on Corporate and Similar Organizational Profits	None	• 30% or more and \$100,000 or more: 5% • Others : 10%	5%	Payments made after Jan 1, 1996	Taxable year commencing after Jan 1, 1996	
		Corporate Tax	• Tax on Bank Income						
		Local Income Tax	• Tax on Income from Insurance Activities						
			• Tax on Individual Income						
Malaysia	Jan 2, 1983	Income Tax	• Income Tax	15%	• Corporates with a 25% or higher ownership: 10% • Others : 15%	• Others : 10% • Copyright: 15% (Academic Copyright: 10%)	Payments made after Jan 1, 1982	Taxable year (income year) commencing after Jan 1, 1982	Protocol
		Corporate Tax	• Windfall Profit Tax						
		Local Income Tax	• Additional Income Tax such as Surcharge on Profits, Development Tax, and Forest Profits Tax • Petroleum Income Tax						
Mexico	Feb 11, 1995	Income Tax	• Income Tax	• Bank: 5% (For the first 5 years from the effective date, it is 10%) • Others : 15%	• Corporates with a 10% or higher ownership: 0% • Others : 15%	10%	Payments made after Jan 1, 1996	Taxable year commencing after Jan 1, 1996	Protocol
		Corporate Tax	• Business Flat Rate Tax						
		Local Income Tax							
USA	Oct 20, 1979	Income Tax	• Federal Income Tax	12%	• Corporates with a 10% or higher ownership, and interest or dividend income from paying corporations that is 25% or less of total income: 10% • Others : 15%	• Copyrights and Films: 10% • Others : 15%	Payments made after Dec 1, 1979	Taxable year commencing after Jan 1, 1980	
		Corporate Tax							
Vietnam	Sep 9, 1994	Income Tax	• Individual Income Tax	10%	10%	• Industrial Investment in Patents, etc.: 5% • Others : 15%	Payments made after Jan 1, 1995	Business year commencing after Jan 1, 1995	Protocol
		Corporate Tax	• Profit Tax and Profit Transfer Tax						
		Local Income Tax							
Belgium	Sep 19, 1979	Income Tax	• Individual Income Tax	10%	15%	10%	Payments made after Jan 1, 1997	Business year commencing after Jan 1, 1997	
	Dec 31, 1996 (Amended)	Corporate Tax	• Corporate Tax						
		Resident Tax	• Non-profit Organization Tax • Non-residents Income Tax						
			• Special Surcharge Imposed on Individual Income Tax						

	Dec 1, 2015	"	"	"	"	"	Payments made after Jan 1, 2016	Business year commencing after Jan 1, 2016	Article 25 of the Protocol Treaty amended
Brazil (Amended on Jan 10, 2018)	Nov 21, 1991	Income Tax	• Federal Income Tax	• Officials serving for more than 7 years: 10%	10%	• Trademarks: 25%	Payments made after Jan 1, 1992	Business year commencing after Jan 1, 1992	Protocol
		Corporate Tax		• Others : 15%		• Copyrights : 10% (Payments made after Jan 1, 1998)			
		Local Income Tax				• Others : 10% (06.1.1. Payments made after Jan 1, 2006)			
Saudi Arabia	Dec 1, 2008	Income Tax	• Religion Tax	5%	• Coporates with 25% or more ownership (excluding partnerships): 5%	• Industrial, commercial, and academic awards information: 5%	Withholding after Jan 1, 2009	Taxable year commencing after Jan 1, 2009	Protocol
		Corporate Tax	• Income Tax including Natural Gas Investment Tax		• Others : 10%	• Others : 10%			
		Agricultural Special Tax							
		Local Income Tax							

Sweden	Sep 9, 1982	Income Tax	• Central Government Income Tax (Including Seafarers' Tax and Lottery Tax)	• Officials serving for more than 7 years: 10%	• Coporates with 25% or more ownership : 10%	• Others : 10%	Payments made after Jan 1, 1981	Business year commencing after Jan 1, 1981	Protocol
		Corporate Tax	• Tax on Corporate Retained Earnings and Distributions Resulting from Amalgamation or Liquidation	• Others : 15%	• Others : 15%	• Copyright : 15%			
		Local Income Tax	• 1 other than Local Income Tax						
Switzerland (Amended on Jul 25, 2012)	Apr 22, 1981	Income Tax	• Federal Tax for income	• Bank receipt : 5%	• Coporates with 10% or more ownership(excluding partnerships): 5%	5%	Payments made after Jan 1, 2013	Business year commencing after Jan 1, 2013	Protocol
		Corporate Tax	• Alcohol Tax	• Others : 10%	• Others : 15%				
		Local Income Tax	• Local Government Tax						
		Agricultural Special Tax							
Spain	Nov 21, 1994	Income Tax	• Individual Income Tax • Corporate Tax	10% (excluding credit sales interest)	• Coporates with 25% or more ownership : 10%	10%	Payments made after Jan 1, 1995	Taxable year commencing after Jan 1, 1995	Protocol
		Corporate Tax	• Local Tax related to Urban Land Value Increase		• Others : 15%				
		Local Income Tax							
Singapore (Amended on Jun 28, 2013)	Feb 11, 1981	Income Tax	• Income Tax	10%	• Coporates with 25% or more ownership : 10%	15%	Payments made after Jan 1, 1979	Business year commencing after Jan 1, 1979	Protocol
		Corporate Tax			• Others : 15%				
		Local Income Tax							
U.A.E	Mar 9, 2005	Income Tax	• Income Tax	10%	• Coporates with 10% or more ownership : 5%	0%	Payments made after Jan 1, 2003	Taxable year commencing after Jan 1, 2003	Protocol
		Corporate Tax	• Corporate Tax		• Others : 10%				
		Local Income Tax							
		Agricultural Special Tax							
Ireland	Dec 27, 1991	Income Tax	• Income Tax	0%	• Coporates with a 10% or higher ownership: 10%	0%	Payments made after Jan 1, 1992	Business year commencing after Jan 1, 1992	Protocol
		Corporate Tax	• Corporate Tax		• Others : 15%				
		Local Income Tax	• Transfer Income Tax						
UK (Amended on Dec 30,1996)	May 13, 1978	Income Tax	• Income Tax	10%	• Shareholders with a 25% or higher ownership (excluding associations): 5%	• Equipment Use : 2%	Payments made after Jan 1, 1997	Taxable year commencing after Jan 1, 1997	LOE
		Corporate Tax	• Corporate Tax		• Others : 15%	• Others : 10%			
		Local Income Tax	• Transfer Income Tax						
		Agricultural Special Tax							
Italy (Amended on Jan 23, 2015)	Jul 14, 1992	Income Tax	• Individual Income Tax	10%	• Companies with a 25% or higher ownership: 10%	10%	Payments made after Jan 1, 1993	Business year commencing after Jan 1, 1993	Protocol
		Corporate Tax	• Corporate Income Tax		• Others : 15%				
		Local Income Tax	• Local Tax on Productive Activities						

(Former) India	;Aug 31, 1986	Income Tax	• Income Tax	• Bank : 10%	• Companies with a 20% or higher ownership: 15%	15%	• Korea: Payments made after Jan 1, 1986	• Korea: taxable year commencing after Jan 1, 1986	Protocol
		Corporate Tax	• Corporate (Income) Value-Added Tax	• Others : 15%	• Others : 20%		• India : Payments made after Apr 1, 1986	• India : Income year commencing after Apr 1, 1986	
		Local Income Tax							
India	Sep 12, 2016 (Whole Amendment)	Income Tax	• Income Tax (inc. VAT)	10%	Profitable Owner 15%	Profitable owner 10% (Based on the payment location)	Payments made after Jan 1, 2017	Starting from the tax year commencing on Jan 1, 2017.	Whole Amendment to Protocol
		Corporate Tax							
		Agricultural Special Tax							
Indonesia	May 3, 1989	Income Tax	• Income Tax	10%	• Corporates with a 25% or higher ownership (excluding associations): 10%	15%	Payments made after Jan 1, 1990	Business year commencing after Jan 1, 1990	Protocol
		Corporate Tax	• Corporate Tax within the scope specified in the Income Tax regulations		• Others : 15%				
		Local Income Tax	• Tax on Interest, Dividends, and Royalties						
Japan (Amended on Nov 22, 1999)	Nov 22, 1999	Income Tax	• Income Tax	10%	• Owned more than 25% in the previous 6 months: 5% (10% until the end of 2003)	10%	Pyaments made after Jan 1, 2000	Taxable year commencing after Jan 1, 2000	Protocol
		Corporate Tax	• Corporate Tax		• Others : 15%				
		Local Income Tax	• Local Income Tax						
		Agricultural Special Tax	• Local Corporate Tax (Starting from the tax year commencing on October 1, 2014)						
China (Excluding Hong Kong, Taiwan, and Macao) (Amended on Jul 4, 2006)	Sep 28, 1994	Income Tax	• Individual Income Tax	10%	• Corporates with a 25% or higher ownership (excluding associations): 5%	10%	Payments made after Jan 1, 1995	Business year commencing after Jan 1, 1995	Protocol
		Corporate Tax	• Income Tax and Local Income Tax for Foreign Investment Companies and Foreign Companies		• Others : 10%				
		Local Income Tax							
Qatar	Apr 15, 2009	Income Tax	• Income Tax	10%	10%	5%	Withholding tax from Jan 1, 2010, onwards	Starting from the tax year commencing on Jan 1, 2010	Protocol
		Corporate Tax							
		Agricultural Special Tax							
Canada (Amended on Dec 18, 2006)	Dec 19, 1980	Income Tax	• Income Tax	10%	• Corporates with a 25% or higher ownership (excluding associations): 5%	10%	Payments made after Jan 1, 2007	Starting from the tax year commencing on Jan 1, 2007	Protocol
		Corporate Tax			• Others : 15%				
		Local Income Tax							
		Agricultural Special Tax							

Thailand (Amended on Jun 29, 2007)	Jun 29, 2007 (after amendment)	Income Tax	• Income Tax	• Financial Institutions (Insurance Companies): 10%	10%	• Software, Broadcast Tapes, Scientific Works: 5%	Payments made after Jan 1, 1987.	Starting from the tax year commencing on January 1, 2008.	Protocol	
		Corporate Tax	• Petroleum Income Tax	• Credit Sales Interest: 10%		• Patents and Trademarks: 10%				
		Local Income Tax		• Government, Government Investment Financial Institutions: Exempt		• Industrial, Commercial, Scientific Equipment, and Intellectual Property: 15%				
		Agricultural Special Tax		• Others : 15%						
Turkey	Mar 27, 1986	Income Tax	• Income Tax	• More than 2 years: 10%	10%	10%	Payments made after Jan 1, 1987	Starting from the tax year commencing on Jan 1, 2008	Protocol	
		Corporate Tax	• Corporate Tax	• Others : 15%						• Corporates with a 25% or higher ownership (excluding associations): 15%
		Local Income Tax								• Others : 20%
Portugal	Dec 21, 1997	Income Tax	• Individual Income Tax	15%	10%	10%	Payments made after Jan 1, 1998	Starting from the tax year commencing on Jan 1, 1998		
		Corporate Tax	• Corporate Income Tax							• Corporates with a 25% or higher ownership for more than 2 years: 10%
		Local Income Tax	• Local Tax imposed on Corporate Income Tax							• Others : 15%
		Agricultural Special Tax								
France (Amended on Mar 1, 1992)	Mar 1, 1992	Income Tax	• Income Tax	10% (Interest Exempt for Credit Sales)	10%	10%	Payments made after Mar 1, 1992.	• Individual: Income generated after Mar 1, 1992 • Corporates: Commencing business year after Mar 1, 1992	Protocol	
		Corporate Tax	• Corporate Tax							• Corporates with a 10% or higher ownership: 10%
		Local Income Tax								• Others : 15%
Australia	Jan 1, 1984	Income Tax	• Income Tax (Including Additional Tax on Retained Earnings of Private Corporations)	15%	15%	15%	• Korea: Income generated after Jan 1, 1982 • Australia: Income generated after Jan 1, 1982	• Korea: Commencing business year after Jan 1, 1982 • Australia: Income year commencing on or after Jul 1, 1982	Protocol	
		Corporate Tax								
		Local Income Tax								
Hongkong	Sep 27, 2016	Income Tax, Corporate Tax, Agricultural Special Tax, Local Income Tax	• Profits Tax	10%	10%	Profitable owner 10%	Payments made after Apr 1, 2017.	Business year Commencing after Jan 1, 2017.		
			• Wage Tax							• Income-earning owner, excluding partnerships, who directly owns a minimum of 25% of the capital of the dividend-paying company: 10%
			• Property Tax (Regardless of whether it is imposed based on individual assessment)							• Other cases: 15%

Source : Samil Info Mine