



Doing Business in Croatia

2021

Audit / Tax / Advisory

Smart decisions. Lasting value.

Welcome

to Doing Business in Croatia

Doing Business in Croatia has been prepared by the Crowe Global member firm in Croatia in order to provide general information for persons planning to do business with or in the country concerned and/or individuals intending to live and work in Croatia temporarily or permanently.

This Guide includes relevant information about business operations and taxation matters. It is intended to assist organizations that are considering establishing a business in Croatia either as a separate entity or as a subsidiary of an existing foreign company. It will also be helpful to anyone planning to come to Croatia to work and live here either on secondment or as a permanent life choice.

Unless noted otherwise, the information contained in this Guide is believed to be accurate as of 1 January 2021. However, general publications of this nature cannot be used and are not intended to be used as a substitute for professional guidance specific to the reader's particular circumstances.

All lasting business is built on friendship.

Alfred A. Montapert



About Crowe Global

Crowe Global is ranked among the top 10 global accounting networks, with over 200 independent accounting and advisory firms in more than 145 countries. Crowe Global's member firms are committed to impeccable quality service, highly integrated service delivery processes and a common set of core values that guide decisions daily.

Each firm is well-established as a leader in its national business community and is staffed by nationals, thereby providing the knowledge of local laws and customs which is important to clients undertaking new ventures or expanding into other countries. Crowe Global member firms are known for their personal service to privately and publicly held businesses in all sectors and have built an international reputation in the areas of audit, tax and advisory services.

General information

Local currency, average exchange rate to EUR HRK 7.5

Types of organization

LLC

Name in local language	Društvo s ograničenom odgovornošću (d.o.o.)
Registrable in commercial register / legal entity	Yes / yes
Minimum capital	HRK 20,000 (EUR 2,667) / HRK 10 (EUR 1.3) for simple limited liability company
Minimal number of shareholders / Maximum number of shareholders	Sole shareholder company / no limit on number of shareholders except for simple limited liability company where the max. number is 5
Capital tax / Registration fees	No / registration in commercial register
Written form / notarization	Yes / yes
Registration with tax authorities	Yes
Statutory audit	If classified as public interest entity, or medium or large company, or if exceeding at least two of the following conditions: <ul style="list-style-type: none">• Revenue: HRK 30m (app. EUR 4m)• Total assets: HRK 15m (app. EUR 2m)• Average number of employees: 25

Public company (joint-stock company)

Name in local language	Dioničko društvo (d.d.)
Registrable in commercial register / legal entity	Yes / yes
Minimum capital	HRK 200,000 (EUR 26,667)
Minimal number of shareholders / Maximum number of shareholders	Sole shareholder company / n/a
Capital tax / Registration fees	No / registration in commercial register

Written form / notarization	Yes / yes
Registration with tax authorities	Yes
Statutory audit	<p>If listed on the stock exchange or if classified as public interest company, or as medium or large company, or if exceeding at least two of the following conditions:</p> <ul style="list-style-type: none"> • Revenue: HRK 30m (app. EUR 4m) • Total assets: HRK 15m (app. EUR 2m) • Average number of employees: 25

Branch (permanent establishment)

Name in local language	Podružnica
Registrable in commercial register / legal entity	Yes / no
Minimum capital	n/a
Minimal number of shareholders / Maximum number of shareholders	n/a
Capital tax / Registration fees	No / registration in commercial register
Written form / notarization	Yes / yes
Registration with tax authorities	Yes
Statutory audit	If classified as medium or large company

Value added tax (VAT)

	<p>Standard VAT rate: 25%</p> <p>Reduced VAT rate of 13% applies to: accommodation services, periodicals and newspapers, edible oils and fats, children's seats, children diapers and children's food, water supply except bottled water, tickets for concerts, electricity supply, municipal waste collection, urns and coffins, seeds, fertilizers, pesticides and other agrochemicals, animal food other than pet food, live animals, fresh or cooled meat and entrails, fresh or cooled sausages and similar products, live, fresh or cooled fish, crabs, seafood, fruits and vegetables, nuts, eggs, services and related copyright of writers, composers and artists, food preparation and serving inside and outside of the restaurants</p>
Tax rates	<p>Reduced VAT rate of 5% applies to, among others: all types of bread and milk, medicines approved by the competent authority, irrespective of whether they are issued on prescription or not and some medical equipment, certain daily newspapers, books, scientific publications, cinema tickets</p>
Supply of goods	<p>Supply of goods for compensation and withdrawals for private purposes</p> <p>Place of supply of goods: Generally, the place where the goods are located at the moment of supply (including supply of goods without transport/ static supply, or transported goods/ moved supply)</p> <p><i>In case of B2B supply of goods dispatched or transported by the supplier, buyer or a third person from one Member State to another Member State:</i> the place where the dispatch or transport ends.</p> <p>In case of supply of goods assembled by the supplier or another person on supplier's behalf: the place where the goods are assembled</p> <p><i>Export of goods to third countries:</i> exempt from VAT.</p> <p><i>Import from third countries:</i> Member State on whose territory the goods are located at the time of entry into the European Union</p> <p>As of 1 July 2021 ("e-Commerce VAT rules"):</p> <p>In case of distance sales to buyers within the EU exceeding the unified threshold of EUR 10,000: the place where the dispatch or transport of goods ends (option of use of "OSS")</p> <p>In case of distance sales of goods imported from third countries to buyers in the EU: the place where the dispatch or transport of goods ends (option of use of "IOSS")</p>

	Supply of services for compensation and private use / supply of services free-of charge (self-supply)
Supply of services	<p>Place of supply of services (general rule): B2B: Place of the service recipient B2C: Place of the service provider</p> <p>Supplies of services by intermediaries B2B - General rule B2C - Place of the underlying transaction</p> <p>Real estate related services B2B - Place of the real estate B2C - Place of the real estate</p> <p>Culture, art, sports, science, education and entertainment - admission to events B2B - Where the event takes place B2C - Where the services are physically carried out</p> <p>Culture, art, sports, science, education and entertainment - organisation and ancillary services B2B - General rule B2C - Where the services are physically carried out</p> <p>Passenger transportation services B2B - Where the transport takes place, proportionate to the distances travelled B2C - Where the transport takes place, proportionate to the distances travelled</p> <p>Transport of goods B2B - General rule B2C - Non-EU: where the transport takes place, proportionate to the distances travelled; EU: the place where transportation started</p> <p>Auxiliary transportation services B2B - General rule B2C - Where the services are physically carried out</p> <p>Evaluation and processing of movable tangible goods B2B - General rule B2C - Where the services are physically carried out</p> <p>Transfer and assignment of copyright, patents, licenses, trademarks and similar rights B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Advertising services B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Activities of consultants, lawyers, accountants, translations and other similar consulting services B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Data processing services B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Provision of information B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Bank and financial transactions, insurance and reinsurance services B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Personnel provision</p>
Special provisions (exemptions to the general rule)	

	<p>B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Renting of movable tangible assets (other than means of transport)</p> <p>B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Refrain from exercising, in whole or in part, certain economic activity or rights listed above</p> <p>B2B - General rule B2C - Place of service recipient (if established outside the EU; otherwise general rule applies)</p> <p>Telecom, radio, TV services</p> <p>B2B - General rule B2C - Place of service recipient</p> <p>Electronically supplied services</p> <p>B2B - General rule B2C - Place of service recipient</p>
Reverse charge on local supplies	<p>Applies to:</p> <ul style="list-style-type: none"> • All supplies of goods and services performed by non-established taxpayer without Croatian VAT ID number to the local taxpayer • Construction work and services performed between two local taxpayers • Sale of property (construction land and buildings with the associated land) for which VAT option is chosen • Supply of disposed material • Supply of greenhouse gas • Supply of reinforced concrete and iron
Import of services	Subject to self-charged VAT, if taxable according to the local VAT legislation
Deadline and conditions for VAT refund	<p>Input VAT refund for Croatian taxable persons within the EU</p> <p>Via Tax Authorities' electronic system for VAT refund</p> <p>Input VAT refund for taxable persons from other Member States</p> <p>Via the Member State Tax Authorities' electronic system for VAT refund. Deadline for submission of VAT refund request is 30 September of the following year for the previous year</p> <p>Input VAT refund for taxable persons from third countries</p> <p>If no supplies are performed in Croatia, VAT refund request form must be submitted to the relevant Croatian Tax Authorities by 30 June of the following year at the latest. Official forms, along with original invoices, certificate of residency must be submitted for VAT refund purposes. Minimum refundable amount: HRK 400 (EUR 53)</p>
Major Tax exemptions	<p>Zero rated (Input VAT deduction is applicable despite of VAT-free supply of goods and services)</p> <p>Applies to:</p> <ul style="list-style-type: none"> • Exports of goods • Cross-border transportation of goods • Cross-border passenger transport by boat and aircraft

	<ul style="list-style-type: none"> • Mediation in respect of the above transactions <p>VAT exemption (Input VAT deduction is not applicable)</p> <ul style="list-style-type: none"> • Granting and administration of loans, insurance activities, postal services, services of hospitals, nursing and dental institutions, certain supplies by dental technicians and doctors, education, etc. • Small businesses (total net sales not exceeding HRK 300,000 (approx. EUR 40,000) per annum
Real Estate	<p>Rent Renting of immovable property is subject to VAT. Exception: Renting for residential purposes is VAT exempt</p> <p>Sale The sale of new property is subject to 25% VAT. The sale of new property is considered to be the sale of buildings, associated land and construction site, if 2 years have not expired from the first use</p> <p>Financial leasing Supply of goods</p> <p>Operating Leasing Supply of services</p>
Foreign taxable persons (VAT registration)	VAT registration is required if supply is affected in Croatia to individuals or to non-established taxpayers without Croatian VAT ID number

Corporate tax

Accounting rules	Double entry bookkeeping Application of Croatian accounting standards (i.e., Croatian Financial Reporting Standards (HSFI)) is mandatory for all entities. So called large entities, public interest entities and entities whose shares or bonds are listed on the stock exchange, or where stock exchange listing is being prepared, must apply International Financial Reporting Standards (IFRS)
Tax rate	10% for taxpayers with annual revenue up to HRK 7.5 m (EUR 1 m) and 18% for all other taxpayers
Tax base	Accounting profit / loss determined in accordance with the applicable accounting standards (International Financial Reporting Standards or Croatian Financial Reporting Standards)
Tax assessment period	Calendar year, change possible if authorised by the Tax Authorities

Loss set-offs / carry forwards	5 years, no tax losses carry back
Tax / accounting depreciation	Straight-line depreciation. Depreciation for tax and accounting purposes must be the same. Possible doubling of depreciation rates for tax purposes if the same are used for accounting purposes
Tax deductibility of interest, Excessive interest rate rule, Thin capitalization rule	<p>Interest limitation rule Interest and other borrowing costs related to borrowings received from abroad are tax deductible up to EUR 3,000,000 or 30% of EBITDA, whichever is higher. This rule is not applicable for financial undertakings and standalone taxpayers (i.e. those that are not part of a consolidated group, are not obliged to prepare consolidated financial statements, have no associated enterprise or permanent establishment and do not approve or receive loans from their shareholders)</p> <p>Excessive interest rate rule Interest on loans granted by related parties is deductible up to the rate of 3.00% p.a. Higher interest rate possible if proven by transfer pricing study that such interest rate is market rate</p> <p>Thin capitalisation rule (debt / equity) Maximum debt / equity threshold for loans provided by foreign related parties and loans guaranteed by the direct shareholder holding more than 25% of shares: 4:1. This rule does not apply to loans provided by financial undertakings</p>
Reserves for bad debts, leaves, etc.	<p>Receivables value adjustment and bad debts write offs are tax deductible only if the prescribed criteria are fulfilled. Generally, provisions are not tax deductible. Exceptionally, the following provisions are tax deductible:</p> <ul style="list-style-type: none"> • Provisions for potential risks and expenditures based on law or contractual obligations (severance payments, renewing of natural resources, costs in guarantee periods, court proceedings and unused annual leave) • Provisions made with the banks against the risks of potential losses, up to the amounts prescribed by the Central Bank • Provisions made by the insurance companies based on the relevant laws, up to the prescribed amounts
Other Major tax adjustments a) increasing and b) decreasing taxable profit	<p>a) Increasing tax base Value adjustment of shares (unrealised losses), depreciation above prescribed rates, amortisation / impairment of goodwill, 50% of entertainment expenses, 50% of personal car related expenses, shortages exceeding the amounts prescribed by the Croatian Chamber of Commerce / the Croatian Chamber of Crafts and Trades, general allowance for inventory and financial assets, costs related to forced collection of tax and other levies, fines imposed by the competent bodies, penalty interest charged by related parties, donations exceeding prescribed amounts, expenditures determined during tax audit procedure (including the applicable value added tax, personal income tax and mandatory</p>

	<p>social security contributions) incurred in relation to the hidden profit distribution, non-business related expenses, etc.</p> <p>b) Decreasing tax base</p> <p>Dividends and shares in profits, unrealised losses upon realisation, certain expenses not tax recognised in previous period (e.g. inventory and receivables value adjustment), prescribed incentives</p>
Transfer pricing, Transfer pricing documentation, Related parties	<p>Related parties</p> <p>A company participates directly or indirectly in the management, control or capital of another company (subsidiary), or the same persons participate directly or indirectly in the management, control or capital of both companies (sister company).</p> <p>Companies with mutual shares, having more than 25% of shares in another company and companies connected by entrepreneurial agreements (company's business management, contracts on profit transfer and other entrepreneurial agreements entered into the court registry)</p> <p>Transfer prices and transfer pricing documentation</p> <p>Transfer pricing documentation is prepared in line with the OECD Guidelines and should be readily available on the Tax Authorities' request.</p> <p>Large taxpayers must submit transfer pricing documentation along with the annual CPT return.</p> <p>Advance Pricing Agreements with the Tax Authorities are possible</p>
Withholding tax	
Interest	<p>15% (a lower rate / elimination may be provided in accordance with the applicable DTT)</p> <p>Based on EU Interest-Royalty Directive, interest paid to the EU parent company or to a company in which the parent company holds at least 25% of shares is not subject to withholding tax if: minimum holding of 25% for at least 2 years</p>
Royalties	<p>15% (a lower rate / elimination may be provided in accordance with the applicable DTT)</p> <p>Based on EU Interest-Royalty Directive, royalties paid to the EU parent company or to a company in which the parent company holds at least 25% of shares are not subject to withholding tax if: minimum holding of 25% for at least 2 years</p>
Dividends	<p>10% (a lower rate / elimination may be provided in accordance with the applicable DTT)</p> <p>Based on EU Parent-Subsidiary Directive, dividends paid to the EU company holding at least 10% of shares are not subject to withholding tax if: minimum holding of 10% for at least 2 years</p>
Services	15% on market research services, tax and business consulting services and audit services paid to non-residents legal entities (0% based on the applicable DTT)
Group taxation	No group taxation

Personal income tax

Taxable income	Resident taxpayers: world-wide income Non-resident taxpayers: income realised in Croatia (depending on provisions of DTT)
Income from employment / self-employment	Type of income: income from so called small businesses (crafts) and similar activities, income from independent professions and income from agriculture and forestry. Tax rate: 20% on a tax base up to HRK 360,000 (EUR 48,000) per annum and 30% on a tax base above HRK 360,000 (EUR 48,000) per annum
Income from property and property rights	Type of income: leases, rentals, renting of flats, rooms and beds to travellers and tourists and organising camps, temporally limited cession of copyright, industrial property rights and other property rights, alienation of property and property rights Tax rate and tax base: <ul style="list-style-type: none">• Leases and rentals: 10%• Income from leasing / renting decreased for 30% deemed expenses• Renting to travellers / tourists: fixed amount / bed, or 10% (flat rate) or, as self-employment activity (in case HRK 300 thousand limit exceeded)• Property rights: 20% out of the market / sales value• Sale of property and property rights: 20% out of the difference between market / sales value and purchase / acquisition cost
Income from capital	Type of income: interest, withdrawals, capital gains, share based payments and stock options, dividends / shares in profit Tax rate and tax base: <ul style="list-style-type: none">• Interest and dividends / shares in profit: 10% out of the gross amount• Capital gains: 10% out of the difference between market / sales value and purchase / acquisition cost• Share based payments and stock options: 20% out of the market value• Withdrawals: 30% out of the market value
Other income	20%
Withholding tax	
Interest	10%
Royalties	20%
Dividends	10%
Capital gain	10%, if sold within 2 years from acquisition, 0% if sold after 2 years

Mandatory social contributions

Contribution rates	Pension insurance contribution: 20%; Health insurance contribution: 16.5%
Minimum and maximum contribution	Depend on the nature of employment and nature of payment
Self-employed individuals	<p>Minimum base for mandatory social contributions for 2021 depends on self-employment activity which is carried out. Generally, HRK 5,968 (EUR 796) per month (if CPT payer: HRK 10,099 (EUR 1,347) per month)</p> <p>Pension insurance: First pillar: 15% Second pillar: 5% Maximum base for pension insurance contribution for first pillar for 2021: generally, HRK 661,032 (EUR 88,138) per annum (HRK 55,086 (EUR 7,345) per month)</p> <p>Health insurance: 16.5%</p>
Employed individuals	<p>Minimum base for mandatory social contributions for 2021: HRK 3,489 (EUR 465) per month</p> <p>Pension insurance: First pillar: 15% Second pillar: 5% Maximum base for pension insurance contribution for first pillar for 2021: generally, HRK 661,032 (EUR 88,138) per annum (HRK 55,086 (EUR 7,345) per month)</p> <p>Health insurance: 16.5%</p>

BEPS implementation

CFC	If a foreign company is considered to be a controlled foreign company of a Croatian company and is not subject to tax or is exempt from tax in foreign jurisdiction, the Croatian company must include in its tax base profits of the controlled foreign company arising from the following categories of income: interest or financial assets income, royalties or intellectual property fees, dividends, financial leasing, insurance, banking, etc.
DAC 6	DAC 6 Directive has been fully implemented in Croatian legislation and has been in force since 1 January 2020. Reportable arrangements need to be reported to the Tax Authorities within 30 days.
CbCr	Applies to multinational companies (MNCs) with a combined revenue of EUR 750 million or more.
Profit shifting rule	Interest and other borrowing costs related to borrowings received from abroad are tax deductible up to EUR 3,000,000 or 30% of EBITDA, whichever is higher. This rule is not applicable for financial undertakings and standalone taxpayers (i.e., those that are not part of a consolidated group, are not obliged to prepare consolidated financial statements, have no associated enterprise or permanent establishment and do not approve or receive loans from their shareholders).
GAAR / other anti-abuse rules (PPT, etc.)	General Anti-Avoidance rules (GAAR) apply.

Global employment issues

Work and Residence permit	Work and residence permit required for longer stays in Croatia (longer than 90 days), easier conditions for key personnel and EU citizens
Minimum salary	Minimum gross salary for 2021 amounts to HRK 4,250 (EUR 567)

Taxation of immovable property

Tax depreciation	Straight-line depreciation over the expected useful life of the asset. Depreciation must be the same for tax and accounting purposes
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Depreciation categories	
Land	No depreciation
Building	Tax deductible depreciation period: up to 20 years (depreciation rate: 5% per annum)
Tax base	Acquisition cost
Special depreciation	Double depreciation rates can be used for tax purposes if used for accounting purposes as well
Real estate transfer tax	Subject to RETT is the transfer of ownership over land, rights to use the land and ownership of property if not subject to VAT. Tax base is the market / purchase value, which under certain circumstances may be assessed by the Tax Authorities. In general, tax rate is 3%. Exceptionally, sale of buildings and associated land and construction sites is subject to 25% VAT, if used for less than 2 years
Property tax (rate and base)	Tax base: m ² Tax rate: Fixed amount per m ² prescribed by the local self-government unites
Real estate funds	
Owner of the fund assets	Generally, the fund, so that for the investor there is no entry in the Land Register and no real estate transfer tax.
Valuation	In principle, by the certified expert or the fund management company
Investment	In principle, 70% of net fund assets to be invested in property in Croatia and other EU Member States.
Risk diversification	Value of any individual property not to exceed 20% of total fund assets

Other significant business-related taxes

Forestry tax / contribution	Payable by the taxpayers whose total annual income exceeds HRK 7,500,000 (approx. EUR 1,000,000) at the rate of 0.024% on total annual income
Tourist tax / contribution	Payable by the taxpayers who perform certain business activities at the rate ranging from 0.01705% to 0.14212% on total annual income
Monument tax / contribution	Monument tax based on total income: payable by the taxpayer who performs certain business activities at the rate of 0.05%, on total income realized from those activities. Monument tax based on the square metres of protected property: payable by the taxpayers who perform business activity in monument protected property at HRK 1-4 / square metre

Incentives

Investment incentives	CPT rate: 0% to 5% / 9% for up to 10 years
R&D incentives	Double dip for qualifying R&D expenses for CPT purposes
Young employees, elderly employees	Special employment incentives (the State is financing certain percentage of employee's salary for a year) and reduced social security contributions (for employees under 30 employed for an indefinite time-period)
Educational incentives	Double dip for qualifying education expenses for CPT purposes
Other special incentives / tax regimes and opportunities for business models	City of Vukovar: CPT rate: 0% Special state care areas: CPT rate: 5% / 9%

Tax liabilities

	For taxpayers	For directors (chief officers)	For shareholders
Binding opinion / Advanced tax rulings	Yes, for future transactions	n/a	n/a
Penalties for late payment of tax	Penalty interest on late payments (defined on a 6-month basis): 5.75% per annum (for the period from 1 January 2021 to 30 June 2021) and 5.61% per annum (for the period from 1 July 2021 to 31 December 2021)	Penalty interest on late payments (defined on a 6-month basis): 5.75% per annum (for the period from 1 January 2021 to 30 June 2021) and 5.61% per annum (for the period from 1 July 2021 to 31 December 2021)	n/a
Tax misdemeanour provisions	Fines up to HRK 500,000 (EUR 66,667), i.e., for repeated offenses up to HRK 700,000 (EUR 93,333)	Fines up to HRK 40,000 (EUR 5,333), i.e., for repeated offences up to HRK 50,000 (6,667)	n/a
Criminal provisions	Criminal penalties for tax fraud	Criminal penalties for tax fraud	n/a
Piercing the corporate veil	n/a	Personal liability of company's directors for misuse of their powers	Personal liability of company's owners and related parties for misuse of their powers
Advanced pricing agreements	Possible	n/a	n/a

Deadlines for reporting and payment of taxes and social contributions

Type of tax	Reporting deadline	Payment deadline
CPT	4 months after the business year end (e.g., if business year is equal to calendar year, reporting deadline is 30 April for the previous year)	Monthly CPT advance payments: by the end of the current month for the previous month Annual CPT liability: day of the CPT return submission (e.g., 30 April)
PIT	15th of the month for the previous month Taxpayers who are required to file an Annual PIT return - 28 February of the following year for the preceding year	15th of the month for the previous month Annual PIT return - 15 days upon receipt of the Tax Resolution
VAT	20th of the month following the end of the assessment period	By the end of the month following the end of the assessment period
Social contributions	15th of the month for the previous month	15th of the month for the previous month

Double taxation treaties

Country	Dividends	Royalties	Interest	Affected by MLI
Americas				
Canada	5/15	10	10	Yes
Chile	5 ⁷ /15	5/10	5/15	Yes
Asia/Pacific				
China	5	10	10	Yes
India	5 ³ /15	10	10	Yes
Indonesia	10	10	10	Yes
Japan	5/10 ¹³	5	5	No
Korea	5 ¹ /10	0	5	Yes
Malaysia	5 ³ /10	10	10	Yes
Vietnam	10	10	10	Yes
Europe				
Albania	10	10	10	Yes
Austria	0 ³ /15	0	5	Yes
Azerbaijan	5 ¹⁰ /10	10	10	Yes
Belarus	5 ¹ /15	10	10	Yes
Belgium	5 ³ /15	0	10	Yes
Bosnia and Herzegovina	5 ¹ /10	10	10	Yes
Bulgaria	5	0	5	Yes
Czech Republic	5	10	0	Yes
Denmark	5 ² /10	10	5	Yes
Estonia	5 ³ /15	10	10	Yes
Finland	5 ² /15	10	0	Yes
France	0 ³ /15	0	0	Yes

Georgia	5	5	5	Yes
Germany	5 ³ /15	0	0	Yes
Greece	5 ² /10	10	10	Yes
Hungary	5 ¹ /10	0	0	Yes
Iceland	5/10	10	10	Yes
Ireland	5 ⁵ /10	10	0	Yes
Italy	15	5	10	Yes
Kosovo	5 ² /10	5	5	Yes
Latvia	5 ² /10	10	10	Yes
Lithuania	5 ¹ /15	10	10	Yes
Luxembourg	5 ³ /15	5	10	Yes
Macedonia	5 ¹ /15	10	10	Yes
Malta	5 ⁴	0	0	Yes
Moldova	5 ¹ /10	10	5	Yes
Montenegro	5 ¹ /10	10	10	Yes
Netherlands	0 ³ /15	0	0	Yes
Norway	15	10	0	Yes
Poland	5 ² /15	10	10	Yes
Portugal	5 ³ /10	10	10	Yes
Romania	5	10	10	Yes
Russia	5 ⁶ /10	10	10	Yes
San Marino	5 ¹ /10	5	10	Yes
Serbia	5 ¹ /10	10	10	Yes
Slovakia	5 ¹ /10	10	10	Yes
Slovenia	5	5	5	Yes
Spain	0 ⁸ /15	0	0	Yes
Sweden	5 ² /15	0	0	Yes
Switzerland	5 ² /15	0	5	Yes

Turkey	10	10	10	Yes
Ukraine	5 ¹ /10	10	10	Yes
United Kingdom	5 ¹¹ /15 ¹² /10	5	5	Yes
Middle East and Africa				
Armenia	0 ² /10	5	10	Yes
Iran	5 ² /10	5	5	Yes
Israel	5 ² /10 ⁹ /15	5	5/10	Yes
Jordan	5 ¹ /10	10	10	Yes
Kazakhstan	5 ² /10	10	10	Yes
Kuwait	0	10	0	Yes
Mauritius	0	0	0	Yes
Morocco	8 ¹ /10	10	10	Yes
Oman	0	10	5	Yes
Qatar	0	10	0	Yes
South Africa	5 ¹ /10	5	0	Yes
Syria	5 ³ /10	12	10	Yes
Turkmenistan	10	10	10	Yes
United Arab Emirates	5	5	5	Yes

¹ If the beneficial owner is a company which holds directly at least 25% of the capital of the company paying the dividends

² If the beneficial owner is a company (other than a partnership) which holds directly at least 25% of the capital of the company paying the dividends

³ If the beneficial owner is a company which holds directly or indirectly at least 10% of the capital of the company paying the dividends

⁴ Where the dividends are paid by a company which is a resident of Croatia to a resident of Malta who is the beneficial owner thereof, the Croatian tax so charged shall not exceed 5% of the gross amount of the dividends

⁵ If the beneficial owner is a company (other than a partnership) which holds directly at least 10% of the voting power of the company paying the dividends

⁶ If the beneficial owner is a company which holds directly at least 25% of the capital of the company paying the dividends (this share should be at least USD 100,000

⁷ If the beneficial owner is a company which holds directly at least 20% of the capital of the company paying the dividends

⁸ If the dividends are paid to a company that has the capital of which is wholly or partly divided into shares, as long as it holds directly at least 25% of the capital of the company paying the dividends

⁹ When the beneficial owner is a company which holds directly at least 10% of the capital of the company paying the dividends where that latter company is a resident of Israel and the dividends are paid out of profits which are subject to tax in Israel at a rate which is lower than the normal rate of Israeli company tax

¹⁰ When the beneficial owner is a company (other than a partnership) which holds directly at least 25% of the capital of the company paying the dividends and has invested to the capital of that company at least EUR 150,000

¹¹ If the beneficial owner is a company which is a resident of the other Contracting State and controls, directly or indirectly, at least 25% of the capital of the company paying the dividends (other than where the dividends are paid by an investment vehicle as mentioned in subparagraph (b))

¹² When those dividends are paid out of income (including gains) derived directly or indirectly from immovable property within the meaning of Article 6 by an investment vehicle which distributes most of this income annually and whose income from such immovable property is exempted from tax

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