

BARBADOS' TAX TREATIES

Rates BEPS Action 6 minimum standard



BARBADOS
REVENUE AUTHORITY

| Recipient | Treaty Status | Withholding Tax (WHT) (%) | Withholding Tax (WHT) (%) | Withholding Tax (WHT) (%) | Withholding Tax (WHT) (%) | Notes | Compliance with the OECD/G20 BEPS Action 6 Minimum Standards | | | |
|-----------------------------|--|---------------------------|---------------------------|---------------------------|---------------------------|--|--|----------|-----------|-----------------|
| | | | | | | | Dividends | Interest | Royalties | Management Fees |
| Residents | | 0/15 (1) | 15 (2) | - | - | 1. The rate is 0% for companies and 15% for individuals. 2. The rate is 0% for pensioners aged 60 years and over. | - | - | - | - |
| Non-residents: | | | | | | | | | | |
| Non-treaty | | 0/5 (3) | 0 | 0 | 0 | 3. The rate is 0% if dividends are paid out of income earned from sources outside of Barbados. | - | - | - | - |
| Treaty: | | | | | | | | | | |
| Austria | In Force | 5/15 (4) | 0 (5) | 0 (5) | - | 4. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 10%. 5. Taxable only in the state in which the beneficial owner is resident. | No | No | Yes MLI | PPT |
| Bahrain | In Force | 0 | 0 | 0 | - | | No | Yes MLI | - | PPT |
| Botswana * | * Treaty not yet in force; protocol or treaty awaiting ratification. | 5/12 (6) | 10 | 10 | - | 6. The rate is 12% for portfolio dividends; 5% if the beneficial owner is a company holding at least 25%. | No | No | Yes MLI | PPT |
| Canada | In Force | 15 | 15 (7) | 10 (8) | 5 | 7. The rate applies provided that the interest is subject to tax in the other territory. 8. The rate applies provided that the royalties are subject to tax in the other territory. | No | Yes MLI | - | PPT |
| CARICOM | In Force | 0 | 15 | 15 | 15 | | No | No | - | |
| China, People's Republic of | In Force | 5/10 (9) | 10 | 10 | - | 9. The rate is 10% for portfolio dividends; 5% if the beneficial owner is a company holding at least 25%. | No | Yes MLI | - | PPT |

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| | | | | | | | Compliance with the standard | Subject to a complying instrument (Subject to complying instrument means the MLI (BEPS Action 15) or a new amending protocol whether it has been entered into force or not) | Steps have been taken to implement the minimum standard | Minimum standard provision used (PPT- Principle Purpose Test) |
| | | Dividends | Interest | Royalties | Management Fees | | | | | |
| Cuba | In Force | 5/15 (10) | 10 | 5 | - | 10. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 25%. | No | No | - | |
| Cyprus | In Force | 0 (5) | 0 (5) | 0 (5) | | 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |
| Czech Republic | In Force | 5/15 (10) | 5 | 5/10 (11) | - | 10. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 25%. 11. 5% on any literary, artistic, or scientific work, including films or television broadcasting, and 10% on any patent, trademark, commercial, or scientific equipment, among others. | No | Yes MLI | - | PPT |
| Finland | In Force | 5/15 (4) | 5 | 5 | 5 | 4. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 10%. | No | Yes MLI | - | PPT |
| Ghana * | * Treaty not yet in force; protocol or treaty awaiting ratification. | 5/7.5 (12) | 5/7.5 (13) | 7.5 | - | 12. The rate is 7.5% for portfolio dividends; 5% if the beneficial owner is a company holding at least 10%. 13. The rate is 7.5% of the gross amount; 5% if the beneficial owner is a bank. | | | - | |
| Iceland | In Force | 5/15 (4) | 10 | 5 | - | 13. The rate is 7.5% of the gross amount; 5% if the beneficial owner is a bank. | No | Yes MLI | - | PPT |
| Italy | In Force | 5/15 (4) | 5 | 5 | - | 4. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 10%. | No | Yes MLI | - | PPT |

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| Luxembourg | In Force | 0/15 (14) | 0 (5) | 0 (5) | - | 14. The rate is 15% for portfolio dividends; 0% if the beneficial owner is a company holding at least 10% for an uninterrupted period of at least 12 months prior to the decision to distribute the dividend. 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |
| Malta | In Force | 5/15 (15) | 5 | 5 | - | 15. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 5%. | No | Yes MLI | - | PPT |
| Mauritius | In Force | 5 | 5 | 5 | - | | No | Yes MLI | - | PPT |
| Mexico | In Force | 5/10 (16) | 10 | 10 | - | 16. The rate is 10% for portfolio dividends; 5% if the beneficial owner is a company holding at least 10%. | No | Yes MLI | - | PPT |
| Netherlands | In Force | 0/15 (17) | 5 | 0/5 (18) | - | 17. The rate is 15% for portfolio dividends; 0% if the beneficial owner is a company (subject to certain restrictions) holding at least 10%, a regulated bank or insurance company, a pension fund that is regulated and whose income is generally tax exempt. 18. The rate is 0% for royalties in respect of literary, artistic, scientific work, cinematographic films, and films, discs, or tapes for radio or television broadcasting. | No | Yes MLI | - | PPT |
| Norway | In Force | 5/15 (4) | 5 | 5 | 5 | 4. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 10%. | No | No | Yes MLI | PPT |

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| Panama | In Force | 5 (19) | 5/7.5 (13) | 7.5 | - | 19. The rate is 75% of the statutory nominal rate at the time of distribution; 5% if the beneficial owner is a company holding at least 25%. 13. The rate is 7.5% of the gross amount; 5% if the beneficial owner is a bank. | No | Yes MLI | - | PPT |
| Portugal | In Force | 5/15 (10) | 10 | 5 | - | 10. The rate is 15% for portfolio dividends; 5% if the beneficial owner is a company holding at least 25%. | No | Yes MLI | - | PPT |
| Qatar | In Force | 0 (5) | 0 (5) | 5 | - | 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |
| Rwanda * | * Treaty not yet in force; protocol or treaty awaiting ratification. | 7.5 | 10 | 10 | 15 | | | | - | |
| San Marino | In Force | 0/5 (20) | 5 | 0 (5) | - | 20. The rate is 5% for portfolio dividends; 0% if the beneficial owner is a company holding at least 10% for an uninterrupted period of at least 12 months prior to the decision to distribute the dividend. 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |
| Seychelles | In Force | 5 | 5 | 5 | - | 21. The rate is 5% for portfolio dividends; 0% if the beneficial owner is a company holding at least 10%. | No | Yes MLI | - | PPT |
| Singapore | In Force | 0 (5) | 12 | 8 | - | 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |

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| Slovakia * | * Treaty not yet in force; protocol or treaty awaiting ratification. | 0/5 (21) | 10 | 0/5 (22) | - | 21. The rate is 5% for portfolio dividends; 0% if the beneficial owner is a company holding at least 10%. 22. 0% on any literary, artistic, or scientific work, including films or television broadcasting, and 5% on any patent, trademark, commercial, or scientific equipment, among others. | | | - | |
| Spain | In Force | 0/5 (23) | 0 (5) | 0 (5) | - | 23. The rate is 5% for portfolio dividends; 0% if the beneficial owner is a company holding at least 25%. 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |
| Sweden | In Force | 5/15 (3) | 5 | 5 | 5 | 3. The rate is 0% if dividends are paid out of income earned from sources outside of Barbados. | No | Yes MLI | - | PPT |
| Switzerland (24) | In Force | 0 | 0 | 0 | - | 24. Agreement extended to Barbados by virtue of the agreement between Switzerland and the United Kingdom, on payments to non-residents from Barbados. | No | No | Yes MLI | PPT |
| United Arab Emirates | In Force | 0 (5) | 0 (5) | 0 (5) | - | 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |

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| United Kingdom | In Force | 0/15 (25) | 0 (5) | 0 (5) | - | 25. Dividends are only taxable in the state in which the beneficial owner is resident. The rate of 15% applies to dividends paid out of income from immovable property by an investment vehicle that distributes most of this income annually and whose income is exempt from tax, other than where the beneficial owner is a pension scheme. 5. Taxable only in the state in which the beneficial owner is resident. | No | Yes MLI | - | PPT |
| United States | In Force | 5/15 (26) | 5 | 5 | - | 26. The rate is 15% for portfolio dividends; 5% for holdings of at least 10%. Dividends paid by a regulated investment company will bear WHT at a rate of 15%, regardless of the percentage of shares held by the recipient. Dividends paid by a real estate investment trust (REIT) will qualify for the 5% WHT rate only if the beneficial owner is an individual holding less than 10% of the shares in the REIT, otherwise, a 30% WHT rate will apply. 5. Taxable only in the state in which the beneficial owner is resident. | No | No. The United States has made a general statement that it intends to use the D-LOB as part of its commitment to implement the minimum standard in all of its bilateral agreements. | Yes MLI | PPT |
| Venezuela | In Force | 5/10 (27) | 5/15 (28) | 10 | - | 27. The rate is 10% for portfolio dividends; 5% if the beneficial owner is a company holding at least 5%. 28. The rate is 15% generally; 5% if the recipient is a bank. | No | No | Yes MLI | PPT |

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| IBC, ISRLs, QICs, & EICs (29) | | | | | | 29. International business companies (IBCs), international societies with restricted liability (ISRLs), exempt insurance companies (EICs), and qualifying insurance companies (QICs) that have been grandfathered are exempt from WHTs on payments to non-resident persons or international business entities. Specific legislation applies. | | | | |

