



# ASC 740 *Income Taxes*

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

2017 update – Year end 2016

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The attached chart provides a summary of taxation of income and gains derived from listed securities in a number of worldwide markets as of December 31, 2016. The selected markets included in the attached chart represent those that are generally the most relevant to global investors. This information provides a general outline and should not be relied upon for purposes of structuring transactions or making investments. Further the assumptions noted below should be considered in regards to the summary information provided for each market.

#### **Assumptions and additional notes:**

1. Except where otherwise noted, this chart does not apply with respect 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/or 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 ASC 740 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 income taxes for ASC 740 purposes.
8. Some European countries have enacted a financial transaction tax (FTT). These taxes are imposed on all financial transactions. Such taxes are not ASC 740 income tax.
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/or case law.

# ASC 740 *Income Taxes*

## Argentina

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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).
Dividends	35% or Exempt		N/A	As a general rule, dividends paid to non-resident investors should not be subject to any withholding tax as long as the profits distributed were already taxed under Argentine law. 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 or 35% or 15.05%		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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	30% or Exempt	Yes	30% or Exempt	<p>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.</p> <p>Under the tax treaty, no tax should apply unless it is a real property company or the non-resident has a permanent establishment.</p>
Dividends	Exempt, 15% or 30%		Exempt or 15%	<p>Dividends paid by an Australian corporation to a non-resident 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 non-residents may be exempt from dividend withholding tax under the conduit foreign income rules.</p> <p>Distributions of capital gains relating to Australian real property should typically be subject to a final tax rate of 15% where the distributions are made to residents of information exchange (EOI) countries and the Australian fund qualifies as a Managed Investment Trust. For residents of non-EOI countries, a final rate of 30% should apply on distributions of capital gains.</p>
Interest	10% or Exempt		Same as Non-Treaty Rate	<p>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.</p>

## Austria

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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	0% or 27.5%		0%	Effective 1 January 2015, the rules cover interest from cash deposits in Austrian banks and Austrian bonds in case that there is a withholding tax deduction. EU-resident private investors are, however, out of scope as their interest amounts fall within the scope of the EU Savings Directive and are thus effectively taxed in their resident jurisdictions. The new non-resident interest taxation does not apply to corporate investors and investment funds.

## Belgium

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	
Dividends	30% or 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 SME's ("small and middle-sized entities") provided conditions are met. 5% may apply to dividends distributed by SME's on certain reserves provided certain conditions are met.
Interest	30% or 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	15% or Exempt	No	N/A	Gain should be taxable unless specific exemption applies.
Dividends	15% or Exempt		N/A	Dividends generally exempt but may be subject to 15% 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. Non-tax haven investors should be subject to a 15% withholding tax.

## Bulgaria

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 DTT with the U.S. in some cases.
Dividends	5%		5%	Generally 5%. However, a 0% WHT rate may apply on dividends distributed to entities that are resident in an EEA/EU Member States.  Tax treaty with the U.S. provides for a 5% WHT 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% IF qualifying financial institutions and pension plans.

## Canada

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 25%	Yes	Exempt or 25%	Gain 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 25% or 35%	Pending (Treaty Signed February 4, 2010, but it has not yet entered into force)	N/A	Exemption may apply if publicly traded and certain conditions are met. A 25% tax should apply on the sale of non-listed shares for the 2017 commercial year, or non-qualifying listed shares, if the securities have been held for more than one year, the securities are not sold to a related party and the seller is not habitually engaged in the sale and purchase of shares. 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 17 November 2014 for gains on A shares. It clarified that gains realized by QFIs and RQFIs prior to 17 November 2014 were taxable and should be reported in accordance with the CIT Law.  The tax situation in China is fluid and should continue to be monitored closely for subsequent developments.
Dividends	10% or Exempt (uncertain)		10%	Dividends paid out of pre-2008 relating to B and H shares should be exempt for WHT. For WHT 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 39% (40% in FY 2017 and 37% in FY 2018)	No	N/A	Gains realized on the disposition of publicly traded shares should be taxed at 39% rate (40% in FY 2017 and 37% in FY 2018) if the non-resident sells 10% or more of the outstanding shares in the same year. Otherwise it may be exempt.
Dividends	Exempt or 33% (For distributions after January 1, 2017, 5% or 38.5%)		N/A	Dividend distributions out of pre-CIT profits should be subject to a 33% (38.5% in 2017) withholding tax. Otherwise exempt (5% in 2007).
Interest	14% or 33% (Effective January 1, 2017, 15%)		N/A	Effective January 1, 2017, the withholding tax on interest should be 15%.

## Croatia

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-resident 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 that should be imposed on interest payments.  No tax should apply to interest on government or corporate bonds.

## Cyprus

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 should apply on payments to foreign investors domiciled in a non EU/EEA country when the payment abroad is made by a Czech payer.
Dividends	15% or 35%		15%	Since January 1, 2013, 35% withholding tax should apply on payments to non-EA 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. As such, the applicable withholding tax should be 15% (provided that their beneficial ownership and tax residency are substantiated).
Interest	15% or 35%		Exempt	Same as dividends should apply.

## Denmark

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 WHT 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 WHT rate of 22%.

## Egypt

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	10% (two-year suspension is currently in force) or 22.5%	Yes	Exempt	Effective July 1, 2014, a 10% tax should apply on gains realized by nonresident investors upon the disposal of listed and unlisted Egyptian shares and bonds. However, the implementation of this provision was suspended for two years starting May 17, 2015. 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% or 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 5th, 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 20%	Yes	Exempt	Gain 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	Effective January 1, 2014, the withholding tax on nonresident corporations is 20%.
Dividends	20%		15%	
Interest	Exempt		N/A	

## France

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 33% or 75%	Yes	Exempt	Gains derived by nonresidents from the disposal of French shares may be taxable in the following situations: — Real estate companies; — Substantial ownership; and — In the case of a resident of a NCST, which may be taxed at 75%.
Dividends	30% or 75%		15%	NCST should be subject to 75% withholding tax (55% prior to January 1, 2013).
Interest	Exempt or 75%		15%	NCST should be subject to 75% withholding tax (50% before 2013).

## Germany

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0.79% or exempt	Yes	Exempt	0.79% effective tax may apply to non-resident corporate investors (as defined by German tax law) if it owns 1% or more at any time during the 5 years prior to the sale ("material shareholding").
Dividends	26.375% or 15.825%		0%, 5%, or 15%	In some special cases, non-treaty 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. LOB clause, are met).
Interest	Exempt or 26.375%			German sourced interest may be taxable at 26.375% if: i) interest on convertible bonds, profit-sharing bonds and participating loans and ii) interest on debt secured by real estate.

## Greece

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 to be subject to tax on the disposal of Greek securities.
Dividends	15%		No Relief	Effective January 1, 2017, the withholding tax for dividends should be 15%.
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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 9%	Yes. Note that, once ratified by the Senate, the Treaty signed on February 4, 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 are 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, EFTA or the Faroe Islands.



## India

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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% or 12% depending on income and type of foreign investor. The applicable tax rate should also be increased by a 3% Education Cess.  GAAR provisions may be 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 portfolio investor nonresidents should generally be subject to withholding tax at a rate of 20%. However, interest payable to certain specified FPI/ FII or Qualified Foreign Investors on investments in a rupee denominated bond of an Indian Company or government securities from June 1, 2013 to June 30, 2017 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% 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 beneficial owner is EU resident or country with a tax treaty; some conditions apply.
Interest	20%		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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	Exempt	
Dividends	25%		12.5% under certain conditions	Dividends deriving from an "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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 13.67% (effective January 1, 2017, the rate is 11.93%)	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 13.67% (effective January 1, 2017, the rate is 11.93%).
Dividends	26%		15%	Effective July 1, 2014, a 26% withholding tax rate should apply.
Interest	12.5% or 20% or 26%		10%	Effective July 1, 2014, a 26% withholding tax rate should apply. Government bonds should be subject to 12.5% rate.

## Japan

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 or the substantial ownership principle (25% threshold in a land rich company). The rate should increase to 25.81% for the fiscal year beginning from April 1, 2017 to March 31, 2018, and later decrease to 25.59% from April 1, 2018 onwards.
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 Non-Treaty 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 December 31, 2037. Reduced treaty rates should not be affected by the special reconstruction surtax.

## Jordan

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-resident service providers should be 10%.

## Korea (Republic of)

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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	Gain realized should be taxable if the non-resident owned at least 25% of the listed shares of the Korean company at any time during the year of the transfer or in the preceding 5 years.  US tax treaty exempt 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 corporation 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0% or 22.47% (20.33% in 2017, and 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 non-resident 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 six months.  The effective rate should decrease to 20.33% in 2017, and to 19.26% from 2018 onwards.
Dividends	15%		15%	
Interest	Exempt		Exempt	

## Malaysia

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	No	N/A	
Dividends	Exempt		N/A	
Interest	15%		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.

## Mexico

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 10% or 40%	Yes	Exempt	Effective 2015, in general, non-residents 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%	Effective 2014, a 10% withholding tax should apply to dividends.  US-Mexico tax treaty: 10% general rate, but may be reduced to 5% if the beneficial owner is a company which owns 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 or 4.9% or 40%		Lower of Non-Treaty 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0% or 25%	Yes	N/A	0% applies if less than 5% ownership. Otherwise, 25% tax may apply.
Dividends	15%		15%	
Interest	0%		0%	

## New Zealand

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

## NIGERIA

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



## Norway

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 U.S.
Dividends	None		N/A	
Interest	None		N/A	

## Pakistan

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	32% or 15% or 12.5% or 7.5% or Exempt	Yes	Treaty Does Not Alter Domestic Rules	Applicable rate varies depending on holding period and when security was acquired.  Bonds should be taxed at a 32% rate (seller corporation).
Dividends	12.5%		Treaty Does Not Alter Domestic Rules	Non-filers should be subject to a 20% tax rate.
Interest	10% or Exempt		Treaty Does Not Alter Domestic Rules	Non-filers should be subject to a 17.5% tax rate. Some exemptions may apply.

## Peru

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 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%. Since 2105 a temporary exemption was introduced for sales on the Peruvian stock exchange when certain requirements are met, e.g., less than 10% of the outstanding shares of company being transferred during the prior 12 months, etc.
Dividends	6.8% (8% in 2017-2018 and 9.3% from 2019 onwards)		N/A	Since January 1, 2015 – December 30, 2016 tax rate should be 6.8%. During 2017 – 2018 tax rate should be 8.0%. For year 2019 and following years tax rate should be 9.3%.
Interest	Exempt or 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	0.5% or 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 RP-US Tax Treaty, non-residents should not be subject to CGT on unlisted shares, unless the shares are those of a corporation at least whose 50% of assets consist of real property in the Philippines.
Dividends	30% or 15%		20% or 25%	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 20 or 25% may apply.
Interest	30% or 20%		15% or 10%	The 30% rate should apply if the debt is denominated in pesos; otherwise the 20% rate would apply. Tax treaty preferential rates of 10 or 15% may apply.

## Poland

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	19%	Yes	Exempt	
Dividends	19%		15% or 5%	5% WHT on interests 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.
Interest	Exempt or 20%		0%	Interest on Polish government bonds issued on foreign markets may be exempt from tax until December 31, 2021.

## Portugal

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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	25% or 35%		15%	35% rate should apply if paid to a tax haven resident or an unidentified recipient.
Interest	0% or 25% or 35%		10%	Interest and gains on certain debt may be exempt for non-tax haven residents or for residents in a country that did not sign an exchange of information agreement with Portugal. Cayman does have an exchange of information agreement in force with Portugal.  The 25% rate should apply from January 1, 2012. The 35% rate should apply to tax haven or an unidentified third party.

## Romania

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	16%	Yes	Exempt	
Dividends	5%		10%	
Interest	50% or 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.  Starting with 1 February 2013, an increased withholding rate of 50% was introduced for income (dividends, 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	20% or Exempt	Yes	Exempt	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 which 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% or 9% or 15% or 20% or 30%		Exempt	<p>Interest paid through a foreign nominee to a non-resident 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-US Double Tax Treaty 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	20%	No	N/A	
Dividends	20%		N/A	
Interest	20% or 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 March 31, 2017.

## Slovak Republic

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	Exempt		N/A	Dividends paid out of profits derived from 1 January 2004 are not likely to be subject to tax on the gain in Slovakia.
Interest	Exempt or 19% or 35%		0%	Interest on government bonds and treasury bills paid to a nonresident is likely to be tax exempt. Interest derived from securities (outside of government bonds and/or treasury bills) paid to a nonresident is likely to be subject to a 19% withholding tax. A 35% withholding tax may be applicable if the interest is paid to a country with no tax treaty or exchange on information agreement.

## Slovenia

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 18.65%	Yes	Exempt	Gains may be subject to a 18.65% tax to the extent trading activities are considered as under "revenue account." 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 non-resident has a permanent establishment
Dividends	15%		5% or 15%	A 15% withholding tax should apply.  Under the tax treaty, the 5% reduced rate may apply if substantial ownership.
Interest	15%		0% unless anti-avoidance provisions apply	Effective March 1, 2015, a 15% withholding tax should apply to certain 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	19% or Exempt	Yes	Exempt	Gain should be taxable at 19% rate. EU residents and certain DTT residents may be exempt.
Dividends	19%		15% or 10%	Under the US-Spain tax treaty, a tax rate of 10% should apply if the beneficial owner is a company which owns 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 should include gains on the sale of debt instruments. 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 in the region of 19-21%).  Government bonds and interest paid to EU residents should be exempt.



## Sri Lanka

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

## Sweden

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	Yes	N/A	
Dividends	30%		15%	Please note that the definition of dividends under Swedish WHT 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 reclaim.
Interest	35% or Exempt		0%	Interest payments on 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 reclaim.

## Taiwan

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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	Corporate bonds, government bonds, short-term commercial paper, and securitized loans was reduced to 15% effective January 1, 2010. All other interest is likely to be subject to the 20% rate.

## Thailand

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	15%	Yes	N/A	Tax should be withheld at the 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 outside of Thailand, 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%	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	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 UK 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 non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt	N/A	N/A	<p>Gains realized by nonresident investors are generally exempt from U.S. tax.</p> <p>However, tax may apply if shares are treated as U.S. real property interests.</p> <p>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").</p>
Dividends	30%		N/A	See note on FATCA, above.
Interest	Exempt or 30%		N/A	<p>Nonresidents should generally be exempt from U.S. tax on "portfolio interest". If non-qualifying interest, the applicable rate should be 30%.</p> <p>See note on FATCA, above.</p>

## Venezuela

Type of income	Tax rate applicable to non-treaty resident fund (Assumed to be a Cayman Islands Limited Company)	Has country concluded a bilateral income tax treaty with the U.S.?	Reduced tax rate applicable to eligible U.S. tax resident investor	Notes
Gains	Exempt or 1% 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%	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%	The 34% rate should be applied to 95% of the gross payment resulting in an effective rate of 32.3%.

## About the author



**Carles Farre** is a tax principal in the International Tax practice at KPMG. He has more than ten years of experience in serving asset manager clients, including pension plans, hedge funds, private equity funds, venture capital funds, mutual funds, broker dealers, and investment advisers.

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