

Hong Kong and Jersey
Comprehensive Agreement for the Avoidance of Double Taxation

Highlights

Under the agreement:

- double taxation is avoided in that any Hong Kong income tax paid by Jersey residents or companies shall be allowed as a credit against any tax payable in respect of the same incomes in Jersey;
- profits from international shipping transport earned by Hong Kong residents that arise in Jersey will enjoy full tax exemption; and
- Hong Kong airlines operating flights to Jersey will only be taxed in Hong Kong at Hong Kong's corporation tax rate.

Hong Kong and Canada
Comprehensive Agreement for the Avoidance of Double Taxation

Highlights

Under the agreement:

- double taxation is avoided in that any Hong Kong income tax paid by Canadian residents or companies shall be allowed as a credit against any tax payable in respect of the same incomes in Canada;
- the withholding tax rate on royalties derived by Hong Kong residents in Canada will be reduced from the current rate of 25% to 10%;
- the withholding tax rate on interest derived by Hong Kong residents in Canada will be reduced from the current rate of 25% to 10%;
- the withholding tax rate on dividends derived by Hong Kong residents in Canada will be reduced from the current rate of 25% to 15%. The withholding tax rate on dividends will be further reduced to 5% if the beneficial owner is a company controlling at least 10% voting power in the dividend-paying company;
- profits from international shipping transport earned by Hong Kong residents that arise in Canada will enjoy full tax exemption; and
- Hong Kong airlines operating flights to Canada will only be taxed in Hong Kong at Hong Kong's corporation tax rate.

Hong Kong and Austria
Second Protocol to the Comprehensive Agreement for the Avoidance
of Double Taxation

Highlights

Under the second protocol:

- in relation to the information to be provided by the applicant party to the requested party when making a request for exchange of information, the applicant party is required to provide, to the extent known, the name and address of any person believed to be in possession of the requested information. The variance between the standard of information required under subparagraph 1(e) of paragraph III of the original protocol and paragraph 5(e) of Article 5 of the Tax Information Exchange Agreement Model of the Organisation for Economic Cooperation and Development is removed.