

**Hong Kong and Italy**  
**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 Italian residents or companies shall be allowed as a deduction against any tax payable in respect of the same incomes in Italy;
- the withholding tax rate on royalties derived by Hong Kong residents in Italy will be reduced from the current rate of 22.5% to 15%;
- the withholding tax rate on interest derived by Hong Kong residents in Italy will be reduced from the current rate of 20% to 12.5%. The withholding tax rate on the interest will be exempted if the interest is paid by the Government of Italy or a local authority thereof, or the interest is paid to the Government of the HKSAR or any agency or instrumentality (including a financial institution) wholly owned or appointed by the Government of the HKSAR and which carries out activities of a governmental nature;
- the withholding tax rate on dividends derived by Hong Kong residents in Italy will be reduced from the current rate of 20% to 10%;
- profits from international shipping transport earned by Hong Kong residents that arise in Italy will enjoy full tax exemption; and
- Hong Kong airlines operating flights to Italy will only be taxed in Hong Kong at Hong Kong's corporation tax rate.

**Hong Kong and Guernsey**  
**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 Guernsey residents or companies shall be allowed as a credit against any tax payable in respect of the same incomes in Guernsey;

- profits from international shipping transport earned by Hong Kong residents that arise in Guernsey will enjoy full tax exemption; and
- Hong Kong airlines operating flights to Guernsey will only be taxed in Hong Kong.

**Hong Kong and Qatar**  
**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 Qatari residents or companies shall be allowed as a credit against any tax payable in respect of the same incomes in Qatar; and
- profits from international shipping transport earned by Hong Kong residents that arise in Qatar will enjoy full tax exemption.