

**Hong Kong and South Africa**  
**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 South African residents or companies shall be allowed as a credit against any tax payable in respect of the same income in South Africa;
- the withholding tax rate on royalties derived by Hong Kong residents in South Africa will be reduced from the current rate of 15% to 5%;
- the withholding tax rate on interest derived by Hong Kong residents in South Africa will be reduced from the current rate of 15% to 10%. The withholding tax rate on the interest will be exempted if the recipient is the Government of the Hong Kong Special Administrative Region (HKSAR), Hong Kong Monetary Authority or such other institutions wholly or mainly owned by the Government of the HKSAR as subsequently agreed between both Parties;
- the withholding tax rate on dividends derived by Hong Kong residents in South Africa will be reduced from the current rate of 15% to 10%. The withholding tax rate on dividends will be further reduced to 5% if the beneficial owner is a company which holds directly at least 10% of the capital of the company paying the dividends;
- profits from international shipping transport earned by Hong Kong residents that arise in South Africa will enjoy full tax exemption; and
- Hong Kong airlines operating flights to South Africa will only be taxed in Hong Kong at Hong Kong's corporation tax rate.

**Hong Kong and the UAE**  
**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 UAE residents or companies shall be allowed as a credit against any tax payable in respect of the same income in the UAE.

Hong Kong and Japan  
Exchange of Notes regarding the EOI Article of  
the Comprehensive Agreement for the Avoidance of Double Taxation

**Highlights**

Under the notes exchanged:

- in relation to the EOI arrangement, it expands the coverage of tax types under the Agreement, so as to fulfil our international obligation to meet global standards for enhancing tax transparency.