

Withholding Tax on Interest: Summary of withholding tax rates per South African Double Taxation Agreements currently in force

	Country	Entry into force	Rate in DTA	Summary of requirements to qualify for a particular rate	Extract from DTA Article on Interest
14	France (French Republic)	01-Nov-95	0%	No right to tax interest in source state if paid to the beneficial owner and is taxed in other state	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State if such resident is the beneficial owner of the interest and if such interest is subject to tax in that other State.
15	Germany (Federal Republic of)	28-Feb-75	10%	All beneficial owners if such interest is subject to tax in the other Contracting State.	8(2) However, such interest may be taxed in the Contracting State in which it arises, and according to the law of that State; but the tax so charged shall not exceed 10 per cent of the amount of the interest if such interest is subject to tax in the other Contracting State.
50	United Kingdom of Great Britain & Northern Ireland	17-Dec-02	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other State, if such resident is the beneficial owner of the interest.
51	United States of America	28-Dec-97	0%	No right to tax interest in source state if paid to the beneficial owner	11(1) Interest derived and beneficially owned by a resident of a Contracting State shall be taxable only in that State.
			15%	Contingent interest of a type not qualifying as portfolio interest under US law	(5) Notwithstanding the provisions of paragraph 1: a) interest that is contingent interest of a type that does not qualify as portfolio interest under United States law may be taxed at a rate not exceeding the rate prescribed in subparagraph b) of paragraph 2 of Article 10 (Dividends); and b) ...