

## Introduction

On behalf of the KPMG Funds line of business, we are delighted to present to you the tenth edition of the Luxembourg Investment Funds Withholding Tax Study.

We looked at 125 countries and analysed interest taxes, dividend taxes, capital gains taxes, and withholding tax (WHT) rates that apply to Luxembourg SICAVs and FCPs (legal status as of January 2017). In particular, we focused on the tax treatment of Luxembourg Undertakings for Collective Investment in Transferable Securities (UCITS).

In the survey, we discuss the possibility for Luxembourg SICAVs and FCPs to reclaim WHT based on domestic law, EU law, and double tax treaties (DTTs) concluded by Luxembourg. The EU Commission's actions as well as its administrative and judicial decisions are reflected in the individual country classifications.

The study employs a revised analytical method supported by KPMG's fully automated WHT Healthcheck. Essentially, we identified the general WHT rates based on domestic law for each type of income, supplemented by the reduced WHT rate (i.e. the possibility of reduction *a priori*) and the reclaimable rate (i.e. the possibility of a tax reclaim *a posteriori*). Based thereon, the difficulty level is determined and further service options are illustrated using a traffic-light system.

We also outlined developments related to the exchange of information. In this context, Luxembourg financial institutions (including investment funds) are subject to annual reporting obligations with regard to financial information under the Foreign Account Tax Compliance Act and the Common Reporting Standard.

We hope you find the contents of the study useful. Should you seek further information on the report, we would be pleased to assist you with your queries.

Finally, we would like to thank all those who offered their valuable time to help complete the survey.

**Ravi Beegun**Partner

**Gérard Laures** Partner

# How can WHT be further reduced based on EU law?

In the last ten years, EU law has been increasingly affecting the European tax environment. Its consequences for Luxembourg's investment fund industry should no longer be underestimated.

The Court of Justice of the European Union (CJEU) case law ("Aberdeen Fininvest Alpha" C-303/07 and "Santander" C-338/11), the EU Commission's actions, as well as local administrative and judicial decisions provide a solid basis for Luxembourg SICAVs and FCPs to reclaim unduly levied WHT in the EU Member States (MS) in which they have made investments

As a consequence, the Withholding Tax Study has, for several years, included the amount of WHT that could be reclaimed in countries which, based on our analysis, may be in breach of EU law. In the majority of cases, this should allow the investment funds to further reduce the WHT rate to zero. However, we would like to draw your attention to the fact that the time limits and the reclaim processes may vary from country to country, as there is no common FU-wide rule

- Past reclaims should be filed with the competent tax authorities of the source state.
- In the future, it may be possible to file so-called "top-up claims" to obtain a reimbursement of WHT on a yearly basis.

Please note that progress has been made in this area in several countries. Certain countries have already amended their legislation to apply the same WHT treatment to domestic and foreign investment funds (i.e. Belgium, Estonia, France, Hungary, Norway, Poland, Spain, and Sweden). Other countries have issued administrative guidelines which, under certain conditions, provide for a WHT exemption on dividend payments to certain investment vehicles. Finally, WHT refunds have already been granted in Belgium, Finland, France, Norway, Poland, Spain, and Sweden. This clearly shows that reclaiming unduly withheld taxes is a success story.

On 10 April 2014, the CJEU rendered its decision in the case "Emerging Markets Series of DFA Investment Trust Company" (C-190/12) and confirmed that non-EU investment funds can also benefit from the free movement of capital. We believe that this decision is a very positive sign for non-EU resident investment funds willing to file WHT reclaims in EU MS.

Some countries, however, are still not carrying out WHT reimbursements. Germany, for instance, has not taken any action regarding WHT reclaims. Currently, the German tax authorities cannot determine which tax authority has the competence to process WHT reclaims. KPMG, in collaboration with the German tax authorities, is currently carrying out a test case in order to clarify (1) which tax



authority is competent to process the WHT reclaims, (2) whether the German legislation is in breach of EU law, and (3) which time limit should apply to EU law claims. Two court cases are currently pending with the Hessian Tax Court in Kassel. We expect the German courts to refer the case to the CJEU within 1–3 years' time, which would render a final decision and open the door for refunds in Germany.

The Dutch and the Danish supreme courts have referred questions to the CJEU for a preliminary ruling. The CJEU has been asked to analyse whether the tax regimes of both countries are contradictory to the free movement of capital.

If a negative decision on a refund request is received in the Netherlands, either from the Dutch tax authorities or a Dutch court, we recommend that foreign investment funds file a notice of objection or an appeal against this decision to preserve their rights.

For Denmark, it is also expected that the Ministry of Taxation will amend the Danish withholding tax scheme to comply with the Supreme Court ruling or with the directions to be extracted from the pending case against Denmark. Such amendments may be enacted retroactively, but may also be limited to cover reclaims filed on or after the date of proposal.

On 12 February 2015, the Luxembourg tax authorities (LTA) issued Circular L.G.-A.n°61, providing insight on the rules on the issuance of Certificates of Tax Residence (CoTR) and the access to DTTs for Luxembourg UCIs (i.e. funds established under the Law of 17 December 2010) and Specialised Investment Funds (i.e. funds established under the law of 13 February 2007). The circular is also of importance for EU law WHT reclaims, since many foreign tax authorities request the claimant to prove his/her tax residency in Luxembourg.

KPMG Luxembourg has developed outstanding technical know-how in EU and global tax matters and is now filing claims on behalf of several European and non-European investment funds in numerous countries, such as France, Germany, South Korea, Poland, Taiwan, and others. Through these projects, our multidisciplinary EU Tax Team has gained experience in mobilising and coordinating dedicated and skilled people within the KPMG network to be able to quickly and efficiently respond to your needs.

KPMG Luxembourg can assist you on a broad range of WHT-related subjects, including applying for a reduction at source and filing WHT reclaims in all countries that infringe EU law, DTT regulations, and domestic law by applying a discriminatory tax treatment to cross-border dividend distributions. If you are interested in a tailor-made solution for your fund, or if you simply wish to learn more about how to lodge a successful WHT reclaim, please contact:

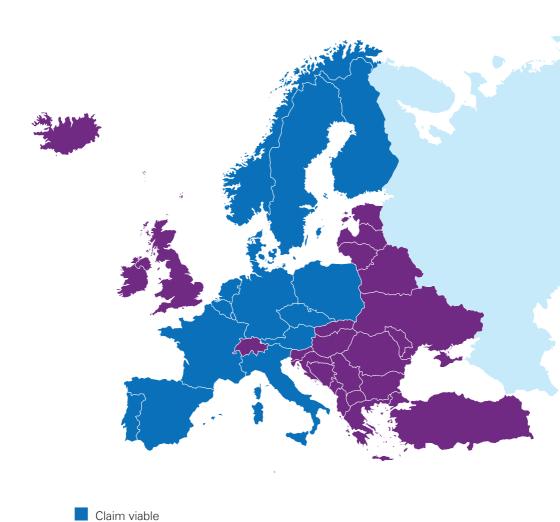
- Jean-Paul Olinger
   T +352 22 51 51 5573
   E jeanpaul.olinger@kpmg.lu
- Olivier Schneider
   T +352 22 51 51 5504
   E olivier.schneider@kpmg.lu
- Michèle Kimmel
   T +352 22 51 51 5500
   E michele.kimmel@kpmg.lu

# According to our analysis, EU-based claims may be viable in the following countries:

01-1-	WHT rates	on dividend distribution	s to	Treaty rate
State	Resident fund	Non-resident FCP	Non-resident SICAV	(Lux SICAV)
Austria	27,5% refundable	27,5%	27,5%1	15%
Belgium	30% refundable for UCITS² / 1.6695% for non UCITS	30%	30%	n/a
Czech Republic	15%	35%	35%	10%
Denmark	0% distributing funds³ 15% accumulating funds	27%	27%	15%/5%
Finland	0%	20%	20%	15%
France	0%	30%4	30%4	n/a
Germany	26,375% refundable	26,375% non-refundable	26,375% non-refundable	15%
Italy	0%5	26% <sup>6</sup>	26% <sup>6</sup>	n/a
The Netherlands	15% (with remittance reduction)	15% without remittance reduction	15% without remittance reduction	n/a
Norway	0%	25%	25%7	n/a
Poland	0%	19%	19% <sup>8</sup>	15%/0%
Portugal	0%9	25%	25%	15%
Spain	19% refundable¹º	19% non-refundable <sup>10</sup>	19% non-refundable <sup>10</sup>	15%/10%
Sweden	0%	30%11	30%11	n/a

- 1) Corporate funds could apply for a refund of withholding tax levied on dividends based on the Austrian Corporate Income Tax Act, if the Austrian withholding tax cannot be credited or refunded in its state of residence. However, tax authorities have been denying said requests and, after an amendment of the Investmentfondgesetz, we understand that the chances of obtaining a refund based on EU Law are low for investment funds, and high for investors. For DTT claims, however, chances of obtaining a refund remain high for investment funds.
- 2) As of 01.01.2013, the WHT borne by Belgian investment companies on dividends received is no longer creditable or refundable. In addition to that, there are arguments to sustain that non-UCITS investment funds are comparable to a Belgian "investment company" which is defined as "any corporation having as its purpose the collection of capital". As investment companies can benefit from a 95% exemption on their dividend income, which means that they are taxed at an effective WHT rate of 1.6695%, Foreign non-UCITS funds should therefore be entitled to benefit from a comparable effective tax rate on their Belgian source dividend income.
- 3) This is only applicable to corporate fund, as contractual funds are regarded as tax transparent in Denmark.
- 4) Further to the vote by the French Parliament of the second Amended Finance Act 2012 on 31.07.2012, which entered into force on 18 August 2012, the 30% WHT on dividend payments to foreign investment funds (i.e. UCITS, property funds, investment company with French tised capital) has been aboilshed. An administrative Circular determining the eligible investment whiches and the practicalities of application has been issued by the French tax authorities in July 2013.
- 5) Until 31.12.2011, a substitute tax amounting to 12.5% was applied on the increase of the net asset value (NAV) at the level of the Italian fund.
- 6) From 01.07.2014, Italy increased the rate of WHT and substitute tax with respect to income from various financial instruments (including dividends) from 20% to 26%.
- 7) In Norway, a WHT exemption at source is available, to the extent that the investment fund already filed a WHT reclaim procedure based on EU law for the past and the claim has been accepted by the tax authorities. In such case, the latter will issue a decision confirming that the entity is covered by the exemption method for the relevant year.
- 8) As from 01.01.2011, EU resident investment funds may benefit from a WHT exemption based on Polish law, to the extent that certain legal and formal conditions are met (i.e. statement confirming fulfillment of exemption conditions, certificate of residence). One of the conditions foreseen is notably the tax residency of the fund. Therefore, Luxembourg SICAVs may under certain conditions benefit from a WHT exemption.
- 9) As from 1 July 2015, a new taxation regime for investment funds was introduced in Portugal. The regime established for UCITS and FIIs was subject to a reform, which gave rise to a change on the tax scheme, from "entrance" taxation (t taxation of the funds and, generally, no taxation for the unit holders) to "exit" taxation for the unit holders.
- 10) As from 0.10.2010, Luxembourg UCITS may benefit from a WHT refund based on DTT, domestic law and EU law, so that the final tax burden for funds amounts to 1%. The WHT rete has evolved as follows: 2010-2011: 19%, 2012-2014: 21%. 2015: 20% and from 12.072015 19.5%. From 1 January 2016 onwards, the tax rate decreased to 19%. Nevertheless, UCITS funds should still be taxed at the final rate of 1% so that a WHT refund based on Spanish law may still be requested (i.e., for SICAVs 4% according to DTT and 14% based on local legislation). For non UCITS funds, a discriminatory treatment may further be evidenced and claims for refund of unduly levied WHT will have to be filed based on EU law.
- 11) As from 01.01.2012, dividends distributed by Swedish corporations to Swedish investment funds and comparable foreign investment funds are no longer subject to the 30% WHT. It is now unit-holders who are resident or otherwise fully taxable in Sweden that are, with some exceptions, taxed on a notional income of 0.4% of the value of the units held as at 1st January each year, regardless of the fund's state of residence. On 29 June 2016, the Swedish Tax Authorities published their comment on a Court ruling concluding that the same interpretation of "equivalent to a Swedish special fund" should also be applied to the WHT exemption for foreign investment funds, meaning that the WHT exemption should not be applicable to all UCITS funds that are legal entities. It will, however, still be applicable to all UCITS funds. As a result of this ruling, the STA will now mend it a statement of 23 May 2012 ("What is meant by foreign instement funds with regard to the applicable to the Income Tax Act, the Investment Savings Account Act and the Coupon Tax Act?") in which the STA has considered that the legal form of the fund is of no significance. The WHT exemption for foreign special funds would, in the STA's view, no longer be applicable to foreign funds that are legal entities. As a consequence, repayments to non-UCITS funds that are legal entities. As a consequence, repayments to non-UCITS funds that are legal entities.





No Claim viable

## KPMG Withholding Tax Healthcheck

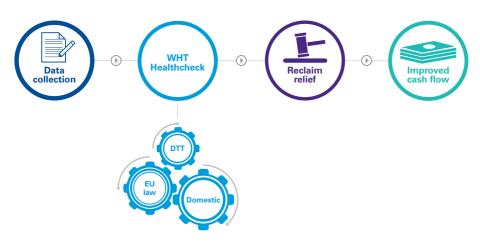
# The KPMG WHT Healthcheck: a key tool for asset managers and custody banks

The WHT Healthcheck is a fully automated tool that verifies on a worldwide basis (currently in more than 125 countries) whether Luxembourg, French, and Belgian investment funds (investing in both equity and bonds) have benefited from the most favourable WHT rates; if necessary, it also recommends the actions needed to reach the most favourable taxation.

The WHT Healthcheck can help service individual investment funds, as well as groups of funds, management companies, and custodian banks, irrespective of the amount of data to be analysed.

The WHT Healthcheck report can also help you take the necessary actions to boost fund performance and identify whether tax services are easy, medium, or difficult.

### Our expertise supported by a fully automated tool





### **Exchange of information**

Tax transparency and exchange of information have been extensively discussed at both EU and international levels in recent years.

An impressive number of initiatives have been taken in this domain, some of which overlap with others in a way that can quickly become confusing. The following reporting regimes may be of interest to the investment fund industry.

## Foreign Account Tax Compliance Act (FATCA)

On 28 March 2015, the Luxembourg government signed a FATCA Model 1 Intergovernmental Agreement (IGA) with the US for the exchange of tax information.

Luxembourg investment funds have to comply with FATCA rules, irrespective of whether they have US investors or investments.

The IGA contains a broad range of due diligence, registration, withholding, and reporting obligations. As a first step, each investment fund has the obligation to determine its FATCA status

With at least seven FATCA statuses to choose from, identifying the best possible status for each investment fund is key to the successful implementation of the regulation. It may not

be a straightforward exercise, and will often require strategic thinking.

The most obvious option would be to choose a "reporting FI status", where investment funds have to register themselves with the US authorities and fully comply with the entirety of the FATCA rules, including the obligation to register with the IRS and file an annual report in Luxembourg.

An alternative option would be to choose one of the so-called "non-reporting statuses" for investment funds, i.e. one of the following:

- Collective Investment Vehicle for an investment fund that is distributed solely through a FATCA-compliant financial institution
- **Restricted Fund** for an investment fund that formally excludes US investors
- Sponsored Investment Entity that has delegated its FATCA obligations to another entity

These non-reporting statuses may provide for restrictions and may be more burdensome during the implementation phase, but have numerous advantages in the mid-term: the investment fund would not have to register with the IRS, nor to report to the Luxembourg tax authorities in the context of the FATCA framework in subsequent years.

### Common Reporting Standard (CRS)

The OECD CRS is a significant step toward having a globally coordinated approach to disclosure of income earned by individuals and entities. As a measure to counter tax evasion, it builds upon other information-sharing legislation, such as FATCA.

Mandated by the G20 countries, the OECD published its global standard for automatic exchange of financial account information (the Global Standard) in February 2014.

The Global Standard consists of two components: the CRS, which contains the reporting and due diligence rules to be imposed on financial institutions, and the Model Competent Authority Agreement (CAA), pursuant to which governments would agree to exchange the information reported.

The Global Standard, which is frequently referred to as simply the CRS, can be viewed as a conceptual extension to FATCA and, in particular, the Model 1 IGA. However, the multi-jurisdictional approach of the CRS and the existence of differences with FATCA and between jurisdictions is expected to dramatically increase the volume of reporting obligations and add significantly to the complexity of the situation.

The CRS imposes an additional operational burden on financial institutions compared to FATCA. While FATCA requires a financial institution to identify and report only its US customers, the CRS requires financial institutions to report customers of all countries participating in the agreement (based on tax residency).

The EU has not stayed idle in this process. On 14 October 2014, the Council agreed to amend Directive 2011/16/EU on administrative cooperation in the field of direct taxation. extending its scope to match the requirements of the CRS (Revised DAC). Subsequently, the revised DAC was formally adopted by the Council on 9 December 2014 and. in Luxembourg, the law passed on 18 December 2015 transposed the Revised DAC into national law. EU financial institutions (including Luxembourg investment funds) were directed to comply with the CRS rules from 1 January 2016. The first report was due in July 2017 and it will be necessary to comply with the reporting duties annually.

For more information regarding exchange of information, please contact:

### Gérard Laures

**T** +352 22 51 51 - 5549 **E** gerard.laures@kpmg.lu

### Jean-Paul Olinger

**T** +352 22 51 51 - 5573 **E** jeanpaul.olinger@kpmg.lu

### Jean Kizito

**T** +352 22 51 51 - 5492 **E** jean.kizito@kpmg.lu



# Luxembourg Investment Funds -WHT Study 2017

Welcome to the 2017 version of KPMG Luxembourg's Investment Funds WHT Study.

KPMG Luxembourg provides you—reader, investor, promoter, or KPMG client—with the WHT Study 2017, which analyses the WHT rates of different jurisdictions with respect to Luxembourg investment funds, and provides a snapshot of each jurisdiction.

Only a certain number of DTTs signed by Luxembourg are applicable to Luxembourg funds. Based on the Circular of 12 February 2015 (L.G.-A. n°61) issued by the LTA, treaties with the following 49 countries should be applicable to a Luxembourg SICAV: Armenia, Austria, Azerbaijan, Bahrain, Barbados, Czech Republic, China, Denmark, Finland, Germany, Georgia, Guernsey, Hong Kong, Indonesia, Ireland, Isle of Man, Israel, Jersey, Laos, Kazakhstan, Liechtenstein, Macedonia, Malaysia, Malta, Moldova, Monaco, Morocco, Panama, Poland, Portugal, Qatar, Romania, San Marino, Saudi Arabia, Seychelles, Singapore, Slovakia, Slovenia, Spain, Sri Lanka, Taiwan, Taiikistan,

Thailand, Trinidad and Tobago, Tunisia, Turkey, the United Arab Emirates, Uzbekistan and Vietnam. Additionally, we understand that Luxembourg Funds should be able to benefit from the treaties with Andorra, Croatia, and Serbia. Please also consult the Luxembourg Tax Authority's website for the latest updates:

http://www.impotsdirects.public.lu/legislation/legi15/Circulaire-LG-A-n\_-61-du-12-fevrier-2015.pdf (in French).

Under Luxembourg tax law, FCPs are considered transparent entities. Based thereon, it is challenging or impractical to apply the DTT rules and apply for a certificate of residence. The new circular provides an opportunity for FCPs to obtain such certificates of residence in the context of some DTTs that consider them as individuals or residents. This includes the Isle of Man, Saudi Arabia, Seychelles, Jersey, Guernsey, and Tajikistan. In Germany, the DTT applies to FCPs up to the percentage of the unit holders who are tax residents in Luxembourg.

### **Disclaimer**

Our analysis is a simplified summary, focusing on the taxation of UCITS investment funds—prepared in July 2017 (legal status as of 1 January 2017).

This analysis is based on several assumptions:

- The investments analysed are plain vanilla portfolio investments in shares or bonds: this does not cover securities lending, hybrids, derivatives, direct or indirect investments in real estate property, mining or petroleum, investments in SPVs or investment funds, etc.
- The securities invested in are transferable securities listed on a stock exchange.

Within the timeframe mentioned above, our analysis only outlines the situation that is most likely to apply and is subject to exceptions and continuous changes.

The taxation of each separate investment performed by an investment fund should therefore be analysed on a case-by-case basis, and it is essential that you contact us for complete and up-to-date information before making investment decisions.



### **Glossary**

Please find the following guidance pertinent to the WHT Study:

- The "General WHT rate" indicates the domestic tax rate most likely to be applied on interest, dividends, and capital gains in the source country of the investment.
- The "Reduced WHT rate" is related to the possibility of obtaining a reduction at source (i.e. a priori) and should be considered favourable, taking into account the applications of (1) domestic law, (2) DTT, and (3) EU law.
- 3. The "Reclaimable rate" refers to the percentage of WHT that may be reclaimed (i.e. *a posteriori*) based on (1) domestic law, (2) DTT, and (3) EU law.

Where a "Reduced WHT rate" and/or a tax reclaim is possible, the complexity of a reduction and/or reclaim process is categorised by a traffic light system:

### **GREEN**

Tax services are easy and uncomplicated.

### **YELLOW**

Tax services are moderately difficult; an external tax advisor may be needed to ensure an efficient filing process.

### **RED**

Tax services are difficult and complex; an external tax advisor is absolutely necessary to take actions in order to ensure advantageous taxation of the fund.

OOLINITOV .		ORPORATE BON	INTERES		OVERNMENT BOI	NDS
COUNTRY	GENERAL	REDUCED	RECLAIMABLE	GENERAL	REDUCED	RECLAIMABLE
JOUNTRI	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE
LBANIA	15%	N/A	N/A	15%	N/A	N/A
LIGERIA	10%	N/A	N/A	10%	N/A	N/A
RGENTINA	35%	N/A	N/A	0%	N/A	N/A
RMENIA	10%	N/A	N/A	10%	0%	10%
RUBA	0%	N/A	N/A	0%	N/A	N/A
USTRALIA	10%	N/A	N/A	10%	N/A	N/A
USTRIA	0%	N/A	N/A	0%	N/A	N/A
AHAMAS	0%	N/A	N/A	0%	N/A	N/A
AHRAIN	0%	N/A	N/A	0%	N/A	N/A
ANGLADESH	20%	N/A	N/A	0%	N/A	N/A
ELARUS	10%	N/A	N/A	0%	N/A	N/A
ELGIUM	30%	0%	30%	30%	0%	30%
ERMUDA	0%	N/A	N/A	0%	N/A	N/A
OTSWANA	15%	N/A	N/A	0%	N/A	N/A
BAZIL	15%	N/A	N/A	0%	N/A	N/A
RITISH VIRGIN ISLANDS	0%	N/A N/A	N/A N/A	0%	N/A	N/A
ULGARIA	0%	N/A N/A	N/A N/A	0%	N/A	N/A
AMBODIA	14%			14%	N/A N/A	
ANADA		N/A	N/A			N/A
	0%	N/A	N/A	0%	N/A	N/A
AYMAN ISLANDS	0%	N/A	N/A	0%	N/A	N/A
	4%	N/A	N/A	4%	N/A	N/A
HINA	10%	N/A	N/A	0%	N/A	N/A
COLOMBIA	14%	N/A	N/A	0%	N/A	N/A
OSTA RICA	15%	N/A	N/A	15%	N/A	N/A
ROATIA	0%	N/A	N/A	0%	N/A	N/A
URACAO	0%	N/A	N/A	0%	N/A	N/A
YPRUS	0%	N/A	N/A	0%	N/A	N/A
ZECH REPUBLIC	35%	N/A	30%	35%	N/A	30%
PENMARK	0%	N/A	N/A	0%	N/A	N/A
OMINICAN REPUBLIC	10%	N/A	N/A	0%	N/A	N/A
GYPT	20%	N/A	N/A	32%	N/A	N/A
L SALVADOR	20%	N/A	N/A	20%	N/A	N/A
STONIA	0%	N/A	N/A	0%	N/A	N/A
THIOPIA	10%	N/A	N/A	10%	N/A	N/A
INLAND	0%	N/A	N/A	0%	N/A	N/A
RANCE	0%	N/A	N/A	0%	N/A	N/A
ABON	10%	N/A	N/A	10%	N/A	N/A
EORGIA	5%	N/A	N/A	0%	N/A	N/A
BERMANY	0%	N/A	N/A	0%	N/A	N/A
HANA	8%	N/A	N/A	0%	N/A	N/A
BIBRALTAR	0%	N/A	N/A	0%	N/A	N/A
REECE	15%	0%	15%	15%	0%	15%
REENLAND	0%	N/A	N/A	0%	N/A	N/A
GUATEMALA	10%	N/A	N/A	0%	N/A	N/A
GUERNSEY	0%	N/A	N/A	0%	N/A	N/A
IONDURAS	10%	N/A	N/A	10%	N/A	N/A
IONG KONG	0%	N/A	N/A	0%	N/A	N/A
IUNGARY	0%	N/A	N/A	0%	N/A	N/A
CELAND	10%	N/A	N/A	0%	N/A	N/A
NDIA	20%	5%	15%	20%	5%	15%
NDONESIA	20%	N/A	N/A	20%	N/A	N/A
RELAND	20%	0%	20%	20%	0%	20%
SLE OF MAN	0%	N/A	20 % N/A	0%	N/A	20% N/A
SRAEL	0%	N/A N/A	N/A N/A	0%	N/A	N/A N/A
FALY	26%	N/A 0%	N/A 26%		N/A 0%	
				12,5%		12,5%
VORY COAST	0%	N/A	N/A	10%	N/A	N/A
AMAICA	33,3%	N/A	N/A	33,3%	N/A	N/A
APAN	32%	0%	N/A	32%	0%	N/A
ERSEY	0%	N/A	N/A	0%	N/A	N/A
ORDAN	10%	N/A	N/A	10%	N/A	N/A
AZAKHSTAN	15%	N/A	N/A	0%	N/A	N/A
ENYA	15%	N/A	N/A	15%	N/A	N/A
OREA	15,4%	N/A	N/A	15,4%	N/A	N/A

		INTERE	INTEREST TAX				
	DIVIDEND TAX			CAPITAL GAINS			
GENERAL	REDUCED	RECLAIMABLE	GENERAL	REDUCED	RECLAIMABL		
WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE		
15%	N/A	N/A	0%	N/A	N/A		
15%	N/A	N/A	20%	N/A	N/A		
10%	N/A	N/A	13,5%	N/A	N/A		
10%	N/A	N/A	10%	N/A	N/A		
10%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
27,5%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
20%	N/A	N/A	0%	N/A	N/A		
12%	N/A	N/A	15%	N/A	N/A		
30%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
7,5%	N/A	N/A	30%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
5%	N/A	N/A	10%	0%	10%		
14%	N/A	N/A	20%	N/A	N/A		
25%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
35%	N/A	N/A	35%	N/A	N/A		
10%	N/A	N/A	10%	N/A	N/A		
0%	N/A	N/A	10%	N/A	N/A		
5%	N/A	N/A	30%	N/A	N/A		
12%	N/A	N/A	12%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
35%	N/A	20%	1%	N/A	N/A		
27%	N/A	N/A	0%	N/A	N/A		
10%	N/A	N/A	27%	N/A	N/A		
10%	N/A	N/A	0%	N/A	N/A		
3%	N/A	N/A	3%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
10%	N/A	N/A	30%	N/A	N/A		
20%	N/A	20%	0%	N/A	N/A		
30%	0%	30%	0%	N/A	N/A		
10%	N/A	N/A	30%	N/A	N/A		
5%	N/A	N/A	15%	0%	N/A		
26,375%	N/A	26,375%	0%	N/A	N/A		
8%	N/A	N/A	15%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
15%	0%	15%	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
5%	N/A	N/A	10%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
10%	N/A	N/A	10%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
18%	N/A	N/A	18%	N/A	N/A		
0%	N/A	N/A	30%	N/A	N/A		
20%	N/A	N/A	0%	N/A	N/A		
20%	0%	20%	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
25%	N/A	N/A	0%	N/A	N/A		
26%	N/A	26%	0%	N/A	N/A		
10%	N/A	N/A	0%	N/A	N/A		
33,3%	N/A	N/A	0%	N/A	N/A		
32%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
15%	N/A	N/A	15%	N/A	N/A		
10%	N/A	N/A	0%	N/A	N/A		
22%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		

		INTEREST TAX							
OOLINTDV	0	ORPORATE BON	DS	G	OVERNMENT BOI	NDS			
COUNTRY	GENERAL	REDUCED	RECLAIMABLE	GENERAL	REDUCED	RECLAIMABLE			
000111111	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE			
LAOS	0%	N/A	N/A	0%	N/A	N/A			
LATVIA	0%	N/A	N/A	0%	N/A	N/A			
LEBANON	5%	N/A	N/A	5%	N/A	N/A			
LIBERIA	15%	N/A	N/A	0%	N/A	N/A			
LIECHTENSTEIN	0%	N/A	N/A	0%	N/A	N/A			
LITHUANIA	10%	N/A	N/A	0%	N/A	N/A			
LUXEMBOURG	0%	N/A	N/A	0%	N/A	N/A			
MACEDONIA	10%	N/A	N/A	10%	N/A	N/A			
MALAYSIA	15%	N/A	N/A	0%	N/A	N/A			
MALTA	0%	N/A	N/A	0%	N/A	N/A			
MAURITIUS	15%	N/A	N/A	15%	N/A	N/A			
MEXICO	4,9%	N/A	N/A	0%	N/A	N/A			
MOLDOVA	12%	N/A	N/A	12%	N/A	N/A			
MONACO	0%	N/A	N/A	0%	N/A	N/A			
MONGOLIA	20%	N/A	N/A	0%	N/A	N/A			
MONTENEGRO	9%	N/A	N/A	9%	N/A	N/A			
MOROCCO	10%	N/A	N/A	10%	0%	10%			
NAMIBIA	10%	N/A	N/A	0%	N/A	N/A			
NETHERLANDS	0%	N/A	N/A	0%	N/A	N/A			
NEW ZEALAND	15%	2%	N/A	0%	N/A	N/A			
NICARAGUA	15%	N/A	N/A	15%	N/A	N/A			
NIGERIA	0%	N/A	N/A	0%	N/A	N/A			
NORWAY	0%	N/A	N/A	0%	N/A	N/A			
OMAN	0%	N/A	N/A	0%	N/A	N/A			
PAKISTAN	10%	N/A	N/A	10%	N/A	N/A			
PANAMA	0%	N/A	N/A	0%	N/A	N/A			
PAPUA NEW GUINEA	15%	N/A	N/A	15%	N/A	N/A			
PARAGUAY	15%	N/A	N/A	15%	N/A	N/A			
PERU	4,99%	N/A	N/A	0%	N/A	N/A			
PHILIPPINES	25%	N/A	N/A	25%	N/A	N/A			
POLAND	20%	N/A	20%	20%	N/A	20%			
PORTUGAL	25%	0%	25%	25%	0%	25%			
PUERTO RICO	0%	N/A	N/A	0%	N/A	N/A			
QATAR	7%	N/A	N/A	0%	N/A	N/A			
ROMANIA	0%	N/A	N/A	0%	N/A	N/A			
RUSSIA FEDERATION	20%	20%	10%	0%	N/A	N/A			
SAN MARINO	0%	N/A	N/A	0%	N/A	N/A			
SAUDI ARABIA	5%	0%	5%	5%	0%	5%			
SENEGAL	16%	N/A	N/A	13%	N/A	N/A			
SERBIA	0%	N/A	N/A	0%	N/A	N/A			
SINGAPORE	0%	N/A	N/A	0%	N/A	N/A			
SLOVAKIA	0%	N/A	N/A	0%	N/A	N/A			
SLOVENIA	15%	0%	15%	0%	N/A	N/A			
SOUTH AFRICA	0%	N/A	N/A	0%	N/A	N/A			
SPAIN	19%	N/A	N/A	0%	N/A	N/A			
SRI LANKA	0%	N/A	N/A	0%	N/A	N/A			
SWEDEN	0%	N/A	N/A	0%	N/A	N/A			
SWITZERLAND	35%	N/A	N/A	35%	N/A	N/A			
TAIWAN ROC	15%	N/A	N/A	15%	N/A	N/A			
TANZANIA	10%	N/A	N/A	10%	N/A	N/A			
THAILAND	15%	N/A	N/A	0%	N/A	N/A			
TUNISIA	20%	N/A	N/A	20%	N/A	N/A			
TURKEY	0%	N/A	N/A	0%	N/A	N/A			
UKRAINE	15%	N/A	N/A	0%	N/A	N/A			
UNITED ARAB EMIRATES	0%	N/A	N/A	0%	N/A	N/A			
UNITED KINGDOM	20%	0%	20%	0%	N/A	N/A			
UNITED STATES OF AMERICA	0%	N/A	N/A	0%	N/A	N/A			
URUGUAY	12%	N/A	N/A	0%	N/A	N/A			
VENEZULA	34%	N/A	N/A	0%	N/A	N/A			
VIETNAM	5%	N/A	N/A	5%	N/A	5%			

	DIVIDEND TAX	INTERE		CAPITAL GAINS		
GENERAL	REDUCED	RECLAIMABLE	GENERAL	REDUCED	RECLAIMABL	
WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	
10%	N/A	N/A	10%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
5%	N/A	N/A	10%	N/A	N/A	
15%	N/A	N/A	0%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
0%	N/A	0%	0%	N/A	N/A	
15%	N/A	N/A	0%	N/A	N/A	
10%	N/A	N/A	0%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
0%	N/A	N/A	N/A	N/A	N/A	
10%	N/A	N/A	10%	N/A	N/A	
6%	N/A	N/A	12%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
20%	N/A	N/A	20%	N/A	N/A	
9%	N/A	N/A	9%	N/A	N/A	
15%	N/A	N/A	0%	N/A	N/A	
20%	N/A	N/A	0%	N/A	N/A	
15%	N/A	N/A	0%	N/A	N/A	
30%	N/A	N/A	0%	N/A	N/A	
15%	N/A	N/A	10%	N/A	N/A	
0%	N/A	N/A	10%	0%	N/A	
25%	0%	25%	0%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
12,5%	N/A	N/A	15%	N/A	N/A	
10%	N/A	N/A	10%	N/A	N/A	
15%	N/A	N/A	0%	N/A	N/A	
15%	N/A	N/A	15%	N/A	N/A	
5%	N/A	N/A	5%	N/A	N/A	
25%	N/A	N/A	25%	N/A	N/A	
19%	N/A	19%	19%	N/A	N/A	
25%	N/A	25%	0%	N/A	N/A	
10%	N/A	N/A	20%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
5%	N/A	N/A	0%	N/A	N/A	
15%	N/A	N/A	20%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
5%	N/A	N/A	0%	N/A	N/A	
10%	N/A	N/A	30%	0%	N/A	
0%	N/A	N/A	0%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
15%	0%	15%	0%	N/A	N/A	
15%	N/A	N/A	0%	N/A	N/A	
19%	N/A	18%	19%	N/A	N/A	
10%	N/A	N/A	20%	N/A	N/A	
30%	0%	30%	0%	N/A	N/A	
35%	N/A	N/A	0%	N/A	N/A	
20%	N/A	N/A	0%	N/A	N/A	
5%	N/A	N/A	0%	N/A	N/A	
10%	N/A	N/A	15%	N/A	N/A	
5%	N/A	N/A	0%	N/A	N/A	
15%	N/A	N/A	0%	N/A	N/A	
15%	N/A	N/A	15%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
0%	N/A	N/A	0%	N/A	N/A	
30%	N/A	N/A	0%	N/A	N/A	
7%	N/A	N/A	12%	N/A	N/A	
0%	N/A	N/A	1%	N/A	N/A	
0%	N/A	N/A	0.1%	N/A	N/A	

		ORPORATE BON	INTERES		OVERNMENT BOI	IDS
COUNTRY	GENERAL	REDUCED	RECLAIMABLE	GENERAL	REDUCED	RECLAIMABLE
JOUNTAL	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE
LBANIA	15%	N/A	N/A	15%	N/A	N/A
LGERIA	10%	N/A	N/A	10%	N/A	N/A
ARGENTINA	35%	N/A	N/A	0%	N/A	N/A
ARMENIA	10%	N/A	N/A	10%	0%	10%
ARUBA	0%	N/A	N/A	0%	N/A	N/A
AUSTRALIA	10%	N/A	N/A	10%	N/A	N/A
AUSTRIA	0%	N/A	N/A	0%	N/A	N/A
BAHAMAS	0%	N/A	N/A	0%	N/A	N/A
BAHRAIN	0%	N/A	N/A	0%	N/A	N/A
BANGLADESH	20%	N/A	N/A	0%	N/A	N/A
BELARUS	10%	N/A	N/A	0%	N/A	N/A
BELGIUM	30%	0%	30%	30%	0%	30%
BERMUDA	0%	N/A	N/A	0%	N/A	N/A
BOTSWANA	15%	N/A	N/A	0%	N/A	N/A
BRAZIL	15%	N/A	N/A	0%	N/A	N/A
BRITISH VIRGIN ISLANDS	0%	N/A	N/A	0%	N/A	N/A
BULGARIA	0%	N/A	N/A	0%	N/A	N/A
CAMBODIA	14%	N/A	N/A	14%	N/A	N/A
CANADA	0%	N/A	N/A	0%	N/A	N/A
CAYMAN ISLANDS	0%	N/A	N/A	0%	N/A	N/A
CHILE	4%	N/A	N/A	4%	N/A	N/A
CHINA	10%	N/A	N/A	0%	N/A	N/A
COLOMBIA	14%	N/A	N/A	0%	N/A	N/A
COSTA RICA	15%	N/A	N/A	15%	N/A	N/A
CROATIA	0%	N/A	N/A	0%	N/A	N/A
CURAÇÃO	0%	N/A	N/A	0%	N/A	N/A
CYPRUS	0%	N/A	N/A	0%	N/A	N/A
CZECH REPUBLIC	35%	N/A	35%	35%	N/A	35%
DENMARK	0%	N/A	N/A	0%	N/A	N/A
DOMINICAN REPUBLIC	10%	N/A	N/A	0%	N/A	N/A
EGYPT	20%	N/A	N/A	32%	N/A	N/A
EL SALVADOR	20%			20%		
		N/A	N/A		N/A	N/A
ESTONIA ETHIOPIA	0%	N/A	N/A	0%	N/A	N/A
INLAND	10%	N/A	N/A	10%	N/A	N/A
FRANCE	0%	N/A N/A	N/A N/A	0%	N/A N/A	N/A N/A
GABON	10%	N/A	N/A	10%	N/A	
GEORGIA	5%	0%	5%	0%	N/A N/A	N/A N/A
GERMANY						
	0%	N/A	N/A	0%	N/A	N/A
GHANA	8%	N/A	N/A	0%	N/A	N/A
GIBRALTAR	0%	N/A	N/A	0%	N/A	N/A
GREECE	15%	0%	15%	15%	0%	15%
GREENLAND	0%	N/A	N/A	0%	N/A	N/A
GUATEMALA	10%	N/A	N/A	0%	N/A	N/A
GUERNSEY	0%	N/A	N/A	0%	N/A	N/A
HONDURAS	10%	N/A	N/A	10%	N/A	N/A
HONG KONG	0%	N/A	N/A	0%	N/A	N/A
HUNGARY	0%	N/A	N/A	0%	N/A	N/A
CELAND	10%	N/A	N/A	0%	N/A	N/A
NDIA	20%	5%	15%	20%	5%	15%
NDONESIA	20%	10%	10%	20%	10%	10%
RELAND	20%	0%	20%	20%	0%	20%
SLE OF MAN	0%	N/A	N/A	0%	N/A	N/A
SRAEL	0%	N/A	N/A	0%	N/A	N/A
TALY	26%	0%	26%	12,50%	0%	12,50%
VORY COAST	0%	N/A	N/A	10%	N/A	N/A
IAMAICA	33,30%	N/A	N/A	33,30%	N/A	N/A
IAPAN	32%	0%	N/A	32%	0%	N/A
JERSEY	0%	N/A	N/A	0%	N/A	N/A
JORDAN	10%	N/A	N/A	10%	N/A	N/A
KAZAKHSTAN	15%	10%	5%	0%	N/A	N/A
KENYA	15%	N/A	N/A	15%	N/A	N/A
KOREA	15,40%	10%	5,40%	15,40%	10%	5,40%
KUWEIT	0%	N/A	N/A	0%	N/A	N/A

		INTERE	EREST TAX				
	DIVIDEND TAX			CAPITAL GAINS			
GENERAL	REDUCED	RECLAIMABLE	GENERAL	REDUCED	RECLAIMABLE		
WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE		
15%	N/A	N/A	15%	N/A	N/A		
15%	N/A	N/A	20%	N/A	N/A		
10%	N/A	N/A	13,50%	N/A	N/A		
10%	N/A	N/A	10%	0%	10%		
10%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
27,50%	N/A	12.5%	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
20%	N/A	N/A	0%	N/A	N/A		
12%	N/A	N/A	15%	N/A	N/A		
30%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
7,50%	N/A	N/A	30%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	10%	N/A	N/A		
14%	N/A	N/A	20%	N/A	N/A		
25%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
35%	N/A	N/A	35%	N/A	N/A		
10%	N/A	N/A	10%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
5%	N/A	N/A	30%	N/A	N/A		
12%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
35%	10%	25%	1%	0%	N/A		
27%	N/A	27%	0%	N/A	N/A		
10%	N/A	N/A	27%	N/A	N/A		
10%	N/A	N/A	10%	N/A	N/A		
3%	N/A	N/A	3%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
10%	N/A	N/A	30%	N/A	N/A		
20% 30%	0%	20% 30%	0%	N/A	N/A		
				N/A	N/A		
10%	N/A	N/A	30%	N/A	N/A		
5%	N/A	N/A	15%	0%	N/A		
26.375%	N/A	26.375%	0%	N/A	N/A		
8%	N/A	N/A	25%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
15%	0%	15%	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
5%	N/A	N/A	10%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
10%	N/A	N/A	10%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
18%	N/A	N/A	18%	N/A	N/A		
20%	N/A 15%	N/A 5%	30%	N/A	N/A		
20%	15%	5% 20%	0% 0%	N/A	N/A		
	0%			N/A	N/A		
0%	N/A	N/A 100/	0%	N/A	N/A		
25%	15%	10%	0%	N/A	N/A		
26%	N/A	26%	0%	N/A	N/A		
10%	N/A	N/A	0%	N/A	N/A		
33,30%	N/A	N/A	0%	N/A	N/A		
32%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
0%	N/A	N/A	0%	N/A	N/A		
15%	N/A	N/A	0%	N/A	N/A		
	N/A	N/A	0%	N/A	N/A		
10% 22%	15%	7%	0%	N/A	N/A		

	C	ORPORATE BON	DS	GC	OVERNMENT BOI	NDS
COUNTRY	GENERAL	REDUCED	RECLAIMABLE	GENERAL	REDUCED	RECLAIMABLE
	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE	WHT RATE
AOS	0%	N/A	N/A	0%	N/A	N/A
ATVIA	0%	N/A	N/A	0%	N/A	N/A
EBANON	5%	N/A	N/A	5%	N/A	N/A
LIBERIA	15%	N/A	N/A	0%	N/A	N/A
LIECHTENSTEIN	0%	N/A	N/A	0%	N/A	N/A
LITHUANIA	10%	0%	10%	0%	N/A	N/A
LUXEMBOURG	0%	N/A	N/A	0%	N/A	N/A
MACEDONIA	10%	0%	10%	10%	0%	10%
MALAYSIA	15%	10%	5%	0%	N/A	N/A
WALTA	0%	N/A	N/A	0%	N/A	N/A
MAURITIUS	15%	N/A	N/A	15%	N/A	N/A
MEXICO	4,90%	N/A	N/A	0%	N/A	N/A
MOLDOVA	12%	5%	7%	12%	5%	7%
MONACO	0%	N/A	N/A	0%	N/A	N/A
MONGOLIA	20%	N/A	N/A	0%	N/A	N/A
MONTENEGRO	9%	N/A	N/A	9%	N/A	N/A
MOROCCO	10%	N/A	N/A	10%	0%	10%
NAMIBIA	10%	N/A	N/A	0%	N/A	N/A
NETHERLANDS	0%	N/A	N/A	0%	N/A	N/A
NEW ZEALAND	15%	2%	N/A	0%	N/A	N/A
NICARAGUA	15%	N/A	N/A	15%	N/A	N/A
NIGERIA	0%	N/A	N/A	0%	N/A	N/A
NORWAY	0%	N/A	N/A	0%	N/A	N/A
OMAN	0%	N/A	N/A	0%	N/A	N/A
PAKISTAN	10%	N/A	N/A	10%	N/A	N/A
PANAMA	0%	N/A	N/A	0%	N/A	N/A
PAPUA NEW GUINEA	15%	N/A	N/A	15%	N/A	N/A
PARAGUAY	15%	N/A	N/A	15%	N/A	N/A
PERU	4,99%	N/A	N/A	0%	N/A	N/A
PHILIPPINES	20%	N/A	N/A	20%	N/A	N/A
POLAND	20%	0%	20%	20%	0%	20%
PORTUGAL	25%	0%	25%	25%	0%	25%
PUERTO RICO	0%	N/A	N/A	0%	N/A	N/A
DATAR	7%	N/A	7%	0%	N/A	N/A
ROMANIA	0%	N/A	N/A	0%	N/A	N/A
RUSSIAN FEDERATION	20%	N/A	N/A	0%	N/A	N/A
SAN MARINO	0%	N/A	N/A	0%	N/A	N/A
SAUDI ARABIA	5%	0%	5%	5%	0%	5%
SENEGAL	16%	N/A	N/A	13%	N/A	N/A
SERBIA	20%	10%	10%	0%	N/A	N/A
SINGAPORE	0%	N/A	N/A	0%	N/A	N/A
SLOVAKIA	0%	N/A	N/A	0%	N/A	N/A
SLOVENIA	15%	0%	15%	0%	N/A	N/A
SOUTH AFRICA	0%	N/A	N/A	0%	N/A	N/A
SPAIN	19%	0%	19%	0%	N/A	N/A
SRI LANKA	0%	N/A	N/A	0%	N/A	N/A
SWEDEN	0%	N/A	N/A	0%	N/A	N/A
SWITZERLAND	35%	N/A	N/A	35%	N/A	N/A
TAIWAN ROC	15%	N/A	N/A	15%	N/A	N/A
TANZANIA	10%	N/A	N/A	10%	N/A	N/A
THAILAND	15%	N/A	N/A	0%	N/A	N/A
TUNISIA	20%	10%	10%	20%	10%	10%
TURKEY	0%	N/A	N/A	0%	N/A	N/A
JKRAINE	15%	N/A	N/A	0%	N/A	N/A
JNITED ARAB EMIRATES	0%	N/A	N/A	0%	N/A	N/A
JNITED KINGDOM	20%	0%	20%	0%	N/A	N/A
JNITED STATES OF AMERICA	0%	N/A	N/A	0%	N/A	N/A
JRUGUAY	12%	N/A	N/A	0%	N/A	N/A
/ENEZULA	34%	N/A	N/A	0%	N/A	N/A
VIETNAM	5%	N/A	N/A	5%	N/A	5%
VENEZULA	34%	N/A	N/A	0%	N/A	N/A
VIETNAM	5%	N/A	N/A	5%	N/A	5%

	DIVIDEND TAY	INTERE	SI IAX	CAPITAL GAINS	
CENEDAL	DIVIDEND TAX	DECLAIMADI E	GENERAL		DECLAIRANDLE
GENERAL	REDUCED	RECLAIMABLE		REDUCED	RECLAIMABLE
WHT RATE 10%	WHT RATE	WHT RATE	WHT RATE 10%	WHT RATE	WHT RATE
	N/A	N/A N/A	0%	N/A	N/A N/A
0% 5%	N/A N/A	N/A	10%	N/A N/A	N/A
	N/A	N/A N/A	0%		N/A N/A
15% 0%	N/A	N/A N/A	0%	N/A N/A	N/A
15%	N/A	N/A	0%	N/A	N/A
15%	N/A	N/A	0%	N/A	N/A
10%	N/A	N/A	0%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
0%	N/A	N/A	N/A	N/A	N/A
10%	N/A	N/A	10%	N/A	N/A
6%	N/A	N/A	12%	0%	12%
0%	N/A	N/A	0%	N/A	N/A
20%	N/A	N/A	20%	N/A	N/A
9%	N/A	N/A	9%	N/A	N/A
15%	N/A	N/A	0%	N/A	N/A
20%	N/A	N/A	0%	N/A	N/A
15%	N/A	15%	0%	N/A	N/A
30%	N/A	N/A	0%	N/A	N/A
15%	N/A	N/A	10%	N/A	N/A
10%	N/A	N/A	10%	0%	N/A
25%	0%	25%	0%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
12,50%	N/A	N/A	15%	N/A	N/A
10%	N/A	N/A	10%	0%	10%
15%	N/A	N/A	0%	N/A	N/A
15%	N/A	N/A	15%	N/A	N/A
5%	N/A	N/A	5%	N/A	N/A
15%	N/A	N/A	30%	N/A	N/A
19%	0%	19%	19%	0%	19%
25%	15%	25%	0%	N/A	N/A
10%	N/A	N/A	20%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
5%	N/A	N/A	16%	0%	16%
15%	N/A	N/A	20%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
5%	N/A	N/A	0%	N/A	N/A
10%	N/A	N/A	30%	0%	N/A
20%	10%	10%	20%	0%	20%
0%	N/A	N/A	0%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
15%	0%	15%	0%	N/A	N/A
15%	N/A	N/A	0%	N/A	N/A
19%	N/A	18%	19%	0%	19%
10%	N/A	N/A	20%	0%	20%
30% 35%	0%	30%	0% 0%	N/A	N/A
20%	N/A 15%	N/A 5%	0%	N/A N/A	N/A N/A
5%	N/A	N/A	0%	N/A	N/A
10%	N/A	N/A	15%	N/A	N/A
5%	N/A	N/A	0%	N/A	N/A
15%	N/A	N/A	0%	N/A	N/A
15%	N/A	N/A	15%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
0%	N/A	N/A	0%	N/A	N/A
30%	N/A	N/A	0%	N/A	N/A
7%	N/A	N/A	12%	N/A	N/A
0%	N/A	N/A	1%	N/A	N/A
0%	N/A	N/A	0.1%	N/A	N/A
0%	N/A	N/A	1%	N/A	N/A
0%	N/A	N/A	0.1%	N/A	N/A
- 10	. 47.	. 47. 1		. 41.1	. 4/ .

	ALBANIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% N/A N/A	15% N/A N/A	15% N/A N/A	15% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	15% N/A N/A	15% N/A N/A	15% N/A N/A	15% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	ALGERIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 4 years	10% N/A N/A	10% N/A N/A	15% N/A N/A	20% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 4 years	10% N/A N/A	10% N/A N/A	15% N/A N/A	20% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	Difficulty level N/A				

	ARGENTINA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	35% N/A N/A	0% N/A N/A	10% N/A N/A	13.5% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	35% N/A N/A	0% N/A N/A	10% N/A N/A	13.5% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No	Difficulty level N/A				

	ARMENIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 2 months 3 years	10% N/A N/A	10% 0% 10%	10% N/A N/A	10% 0% 10%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 2 months 3 years	10% N/A N/A	10% 0% 10%	10% N/A N/A	10% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes Ö Yes C Yes  C Yes  Ø Yes  Ø Yes Ø Yes C Yes	9 No C No 9 No 9 No C No 9 No	N Ave N N Ave	ity level  /A rage /A /A /A /A /A			

	ARUBA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	AUSTRALIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	No     No	N N N N	ty level  /A  /A  /A  /A  /A			

	AUSTRIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 6 months 5 years	0% N/A N/A	0% N/A N/A	27.5% N/A 12.5%	0% N/A N/A	No	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	275% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes	O No 9 No 9 No 9 No 9 No 9 No	DIII N N N	ity level			

	BAHAMAS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No	N N N N	ity level /A //A //A //A //A			

	BAHRAIN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ty level  /A  /A  /A  /A  /A			

	BANGLADESH		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	20% N/A N/A	0% N/A N/A	20% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	20% N/A N/A	0% N/A N/A	20% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A /A /A /A			

	BELARUS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	10% N/A N/A	0% N/A N/A	12% N/A N/A	15% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	10% N/A N/A	0% N/A N/A	12% N/A N/A	15% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	BELGIUM		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	30% 0% 30%	30% 0% 30%	30% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	30% 0% 30%	30% 0% 30%	30% N/A N/A	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes Ö Yes C Yes  C Yes  Ø Yes  Ø Yes Ø Yes C Yes	® No C No ® No ® No C No ® No	N Ave N N Ave	ity level /A rage /A /A /A /A			

	BERMUDA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	BOTSWANA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	15% N/A N/A	0% N/A N/A	7.5% N/A N/A	30% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	15% N/A N/A	0% N/A N/A	7.5% N/A N/A	30% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	BRAZIL		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ty level  /A  /A  /A  /A  /A			

	BRITISH VIRGIN ISLANDS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	Difficulty level N/A				

	BULGARIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	5% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	CAMBODIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	14% N/A N/A	14% N/A N/A	14% N/A N/A	20% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	14% N/A N/A	14% N/A N/A	14% N/A N/A	20% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	CANADA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 2 years	0% N/A N/A	0% N/A N/A	25% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 2 years	0% N/A N/A	0% N/A N/A	25% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	CAYMAN ISLANE	DS .	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	CHILE		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	4% N/A N/A	4% N/A N/A	35% N/A N/A	35% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 3 years	4% N/A N/A	4% N/A N/A	35% N/A N/A	35% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	CHINA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 3 years	10% N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 3 years	10% N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	COLOMBIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A Before year-end	14% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A Before year-end	14% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	COSTA RICA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 4 years	15% N/A N/A	15% N/A N/A	5% N/A N/A	30% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 4 years	15% N/A N/A	15% N/A N/A	5% N/A N/A	30% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	CROATIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	0% N/A N/A	0% N/A N/A	12% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 3 years	0% N/A N/A	0% N/A N/A	12% N/A N/A	12% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	CURAÇAO		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ty level  /A  /A  /A  /A  /A			

	CYPRIUS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 6 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 6 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	CZECH REPUBLI	С	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 3 years	35% 0% 35%	35% 0% 35%	35% 10% 25%	1% 0% N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	35% N/A 30%	35% N/A 30%	35% N/A 20%	1% N/A N/A	No	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ĉ Yes Ø Yes Ø Yes Ĉ Yes Ĉ Yes	O No ® No O No O No ® No ® No	Diff N Diff Ea N	ity level   /A  /A   /SUII			

	DENMARK		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 3 years	0% N/A N/A	0% N/A N/A	27% N/A 27%	0% N/A N/A	No	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	0% N/A N/A	0% N/A N/A	27% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes Ø Yes C Yes Ö Yes Ö Yes Ö Yes	O No © No O No © No © No © No © No	Ec N Dill N	ity level 15y //A 16UII //A //A			

	DOMINICAN REF	PUBLIC	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	10% N/A N/A	0% N/A N/A	10% N/A N/A	27% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	10% N/A N/A	0% N/A N/A	10% N/A N/A	27% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No	N N N N	ity level /A //A //A //A //A			

	EGYPT		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	20% N/A N/A	32% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	20% N/A N/A	32% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A /A /A /A /A /A			

	EL SALVADOR		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	20% N/A N/A	20% N/A N/A	3% N/A N/A	3% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	20% N/A N/A	20% N/A N/A	3% N/A N/A	3% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ty level  //A  //A  //A  //A			

	ESTONIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 3 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No     No     No     No     No     No     No     No     No	N N N N	ity level /A //A //A //A //A			

	ETHIOPIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	10% N/A N/A	30% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	10% N/A N/A	30% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level  /A  /A  /A  /A  /A			

	FINLAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate	Yes	0% N/A	0% N/A	20% 0%	0% N/A	Yes	
	Reclaimable rate  Refund payment timeframe  Statute of limitations	Approximately 3 to 6 months	N/A	N/A	20%	N/A		Yes
	Statute of limitations	5 years						
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate	No	0% N/A N/A	0% N/A N/A	20% 0% 20%	0% N/A N/A	Yes	Yes
	Refund payment timeframe	Approximately 3 to 6 months						
	Statute of limitations	5 years						
တ္တ	WHT reclaims			Difficu	Ity level			
services	Rendered based on DTT Rendered based on domestic law Rendered based on EU law	<ul><li></li></ul>	O No ⊗ No O No		Äverage N/A			
Тах se	Reduction at source Rendered based on DTT	⊗ Yes	O No	Ea	asy			
	Rendered based on domestic law Rendered based on EU law	⊗ Yes C Yes	O No ⊗ No	N	icuit /A			

	FRANCE		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 3 to 6 months 2 years	0% N/A N/A	0% N/A N/A	30% 0% 30%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 3 to 6 months 2 years	0% N/A N/A	0% N/A N/A	30% 0% 30%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes Ø Yes O Yes C Yes Ø Yes O Yes	® No C No ® No ® No C No ® No	N Dill N N				

	GABON		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 months	10% N/A N/A	10% N/A N/A	10% N/A N/A	30% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 months	10% N/A N/A	10% N/A N/A	10% N/A N/A	30% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No     No     No     No     No     No     No     No     No	N N N N	ity level /A //A //A //A //A			

	GEORGIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes  Irrespective of the statutory terms of refund (1 month) in practice, it takes considerable time  3 years	5% 0% 5%	0% N/A N/A	5% N/A N/A	15% 0% N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	5% Ñ/A N/A	0% N/A N/A	5% N/A N/A	15% 0% N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes O Yes Ø Yes Ø Yes O Yes	C No ® No ® No C No ® No ® No	Ave N N Ave	ity level rage I/A I/A rage I/A			

	GERMANY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes  10 to 12 months for DTT reclaims  4 years	0% N/A N/A	0% N/A N/A	26,375% N/A 26,375%	0% N/A N/A	No	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 4 years	0% N/A N/A	0% N/A N/A	26,375% N/A 26,375%	0% N/A N/A	No	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ø Yes Ø Yes C Yes Ø Yes	C No © No C No © No © No © No © No	E E N N DIII	ity level 15) //A 160111 //A //A			

	GHANA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A Within a year	8% N/A N/A	0% N/A N/A	8% N/A N/A	25% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A Within a year	8% N/A N/A	0% N/A N/A	8% N/A N/A	25% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A /A /A /A			

	GIBRALTAR		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A /A /A /A /A			

	GREECE		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% 0% 15%	15% 0% 15%	15% 0% 15%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% 0% 15%	15% 0% 15%	15% 0% 15%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ö Yes Ö Yes Ö Yes Ö Yes Ö Yes Ö Yes	9 No C No 9 No 9 No C No 9 No	N Ave N N Ave	ity level //A rage //A //A rage //A			

	GREENLAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	GUATEMALA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	0% N/A N/A	5% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	0% N/A N/A	5% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	GUERNSEY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	HONDURAS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	10% N/A N/A	10% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	10% N/A N/A	10% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	HONG KONG		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes O Yes O Yes O Yes C Yes O Yes O Yes O Yes	9 No 9 No 9 No 9 No 9 No 9 No		ilty level I/A I/A I/A I/A I/A			

	HUNGARY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	ICELAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 4 years	10% N/A N/A	0% N/A N/A	18% N/A N/A	18% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 4 years	10% N/A N/A	0% N/A N/A	18% N/A N/A	18% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No	N N N N	ity level /A //A //A //A //A			

	INDIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 2 years	20% 5% 15%	20% 5% 15%	0% N/A N/A	30% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 2 years	20% 5% 15%	20% 5% 15%	0% N/A N/A	30% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes Ø Yes O Yes O Yes Ø Yes O Yes	® No O No ® No ® No O No ® No	N Diff N N	ity level //A initil //A //A //A //A //A //A			

	INDONESIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	20% 10% 10%	20% 10% 10%	20% 15% 5%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	20% N/A N/A	20% N/A N/A	20% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes O Yes Ø Yes Ø Yes O Yes	C No © No © No C No © No © No	N N N International N	ity level iest /A /A /A /A /A /A /A			

	IRELAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 3 months 4 years	20% 0% 20%	20% 0% 20%	20% 0% 20%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 3 months 4 years	20% 0% 20%	20% 0% 20%	20% 0% 20%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes Ø Yes O Yes O Yes Ø Yes O Yes	No     C No     No     No     No     O No     O No     O No     O No	N Ave N N	ity level /A rage /A /A			

	ISLE OF MAN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 4 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 4 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ty level  /A  /A  /A  /A  /A			

	ISRAEL		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 6 years	0% N/A N/A	0% N/A N/A	25% 15% 10%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 6 years	0% N/A N/A	0% N/A N/A	25% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes Ö Yes Ø Yes Ö Yes Ö Yes	O No ® No ® No O No ® No ® No	N N N Ave	ity level  /A  /A  rage  /A			

	ITALY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 48 months	26% 0% 26%	12.5% 0% 12.5%	26% N/A 26%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 48 months	26% 0% 26%	12.5% 0% 12.5%	26% N/A 26%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes Ö Yes ⊙ Yes O Yes ⊙ Yes O Yes	9 No C No C No 9 No C No 9 No	N Diff Diff N E	ity level /A iddit iddit //A issy. /A			

	IVORY COAST		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	JAMAICA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 6 years	33.3% N/A N/A	33.3% N/A N/A	33.3% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 6 years	33.3% N/A N/A	33.3% N/A N/A	33.3% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	JAPAN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	32% 0% N/A	32% 0% N/A	32% N/A N/A	0% N/A N/A	Yes	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	32 % 0% N/A	32% 0% N/A	32% N/A N/A	0% N/A N/A	Yes	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No C No 9 No	N N N N	ity level /A /A //A //A //A //A			

	JERSEY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A //A //A			

	JORDAN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No	N N N N	ity level /A /A /A //A //A	-		

	KAZAKHSTAN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	15% 10% 5%	0% N/A N/A	15% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes Ö Yes Ø Yes Ö Yes Ö Yes	C No ® No ® No © No © No ® No	N N N Ave	ity level   /A  /A  rage  /A			

	KENYA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% N/A N/A	15% N/A N/A	10% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	15% N/A N/A	15% N/A N/A	10% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	No     No	N N N N	ty level   /A   /A   /A   /A			

	REPUBLIC OF KO	DREA	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	15.4% 10% 5.4%	15.4% 10% 5.4%	22% 15% 7%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15.4% N/A N/A	15.4% N/A N/A	22% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes O Yes Ø Yes Ö Yes O Yes	C No ® No ® No © No ® No ® No	Diff N N ISH	ity level iesi /A /A /A /A /A /A /A			

	KUWAIT		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	LAOS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	LATVIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	LEBANON		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 4 years	5% N/A N/A	5% N/A N/A	5% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 4 years	5% N/A N/A	5% N/A N/A	5% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level //A //A //A //A //A			

	LIBERIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 7 years	15% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 7 years	15% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No		ilty level I/A I/A I/A I/A I/A			

	LIECHTENSTEIN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A /A /A //A //A //A //A			

	LITHUANIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	10% 0% 10%	0% N/A N/A	15% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	10% 0% 10%	0% N/A N/A	0% N/A N/A	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	○ Yes ○ Yes ○ Yes ○ Yes ○ Yes ○ Yes ○ Yes	9 No C No 9 No 9 No C No 9 No	N DIII N N Ave	tty level  /A  iouli  /A  /A  /A  /A  /A			

	LUXEMBOURG		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 1 year	0% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 1 year	0% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A		•	

	MACEDONIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	10% 0% 10%	10% 0% 10%	10% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	10% N/A N/A	10% N/A N/A	10% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes O Yes Ø Yes Ö Yes O Yes	C No ® No ® No © No © No ® No	Ave N N Ave N	ity level rage //A //A rage //A //A //A //A			

	MALAYSIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 6 years	15% 10% 5%	0% N/A N/A	0% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 6 years	15% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes O Yes Ø Yes Ö Yes O Yes	C No ® No ® No © No ® No ® No	N N N	ity level 15) /A /A /A 15V /A			

	MALTA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	MAURITIUS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	15% N/A N/A	15% N/A N/A	0% N/A N/A	N/A N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	15% N/A N/A	15% N/A N/A	0% N/A N/A	N/A N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	MEXICO		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	4.9% N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	4.9% N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	REPUBLIC OF M	OLDOVA	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes  1 to 6 months 6 years	12% 5% 7%	12% 5% 7%	6% N/A N/A	12% 0% 12%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	12% N/A N/A	12% N/A N/A	6% N/A N/A	12% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes Ö Yes Ø Yes Ö Yes Ö Yes	C No ® No ® No © No ® No ® No	Ave N N Ave N	ity level rage /A /A /A rage //A			

	MONACO		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	MONGOLIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	20% N/A N/A	0% N/A N/A	20% N/A N/A	20% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	20% N/A N/A	0% N/A N/A	20% N/A N/A	20% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	MONTENEGRO		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	9% N/A N/A	9% N/A N/A	9% N/A N/A	9% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	9% N/A N/A	9% N/A N/A	9% N/A N/A	9% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 8 No 9 No 8 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	MOROCCO		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 4 years	10% N/A N/A	10% 0% 10%	15% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 4 years	10% N/A N/A	10% 0% 10%	15% N/A N/A	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes Ø Yes O Yes  C Yes Ø Yes Ø Yes Ø Yes O Yes	9 No C No 9 No 8 No C No 9 No	N DHI N N	ity level //A icelli //A //A //A //A			

	NAMIBIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	0% N/A N/A	20% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	0% N/A N/A	20% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	NETHERLANDS		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	0% N/A N/A	0% N/A N/A	15% N/A 15%	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	0% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes		N N Dill N	ity level //A //A //A //A //A			

	NEW ZEALAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 8 years	15% 2% N/A	0% N/A N/A	30% N/A N/A	0% N/A N/A	Yes	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 8 years	15% 2% N/A	0% N/A N/A	30% N/A N/A	0% N/A N/A	Yes	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes O Yes O Yes O Yes Ø Yes O Yes	9 No 9 No 9 No 9 No C No 9 No	N N N N	ity level /A //A //A //A (CIII)			

	NICARAGUA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	15% N/A N/A	15% N/A N/A	15% N/A N/A	10% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	15% N/A N/A	15% N/A N/A	15% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes		N N N N	ity level //A //A //A //A //A			

	NIGERIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	10% 0% N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	10% 0% N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	NORWAY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	25% 0% 25%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	25% 0% 25%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes O Yes S Yes O Yes O Yes O Yes O Yes O Yes	9 No 9 No 0 No 9 No 0 No 9 No	N N Dill N Dill	ity level /A //A //A //A //A			

	OMAN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A //A //A //A //A			

	PAKISTAN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	12.5% N/A N/A	15% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	12.5% N/A N/A	15% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	PANAMA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 3 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	10% 0% 10%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 3 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	10% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes O Yes Ø Yes Ö Yes O Yes	C No ® No ® No © No ® No ® No	DIII N N IMI	ity level			

	PAPUA NEW GU	INEA	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	15% N/A N/A	15% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	15% N/A N/A	15% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes		N N N N	ity level //A //A //A //A //A			

	PARAGUAY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% N/A N/A	15% N/A N/A	15% N/A N/A	15% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	15% N/A N/A	15% N/A N/A	15% N/A N/A	15% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	PERU		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 4 years	4,99% N/A N/A	0% N/A N/A	5% N/A N/A	5% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 4 years	4,99% N/A N/A	0% N/A N/A	5% N/A N/A	5% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A //A //A			

	PHILIPPINES		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 2 years	20% N/A N/A	20% N/A N/A	15% N/A N/A	30% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 2 years	25% N/A N/A	25% N/A N/A	25% N/A N/A	25% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes		N N N N	ity level //A //A //A //A //A			

	POLAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 2 to 6 months 5 years	20% 0% 20%	20% 0% 20%	19% 0% 19%	19% 0% 19%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 2 to 6 months 5 years	20% N/A 20%	20% N/A 20%	19% N/A 19%	19% N/A N/A	No	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	<ul> <li>         Ø Yes         Ø Yes        Ø Yes         Ø Yes</li></ul>	C No ® No C No ® No C No ® No	Ave N Dill N Ave	ity level rage //A //A //A rage			

	PORTUGAL		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 12 months 2 years	25% 0% 25%	25% 0% 25%	25% 15% 25%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 2 years	25% 0% 25%	25% 0% 25%	25% N/A 25%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ø Yes Ø Yes Ø Yes Ø Yes Ø Yes	C No C No C No C No C No 9 No	Diff Diff Diff Ea Ea	ity level icori ic			

	PUERTO RICO		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	20% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	0% N/A N/A	0% N/A N/A	10% N/A N/A	20% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	QATAR		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 60 days 5 years	7% N/A 7%	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	7% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes Ö Yes Ö Yes Ö Yes Ö Yes	C No © No © No © No © No © No	N N N N	ity level 			

	ROMANIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	0% N/A N/A	0% N/A N/A	5% N/A N/A	16% 0% 16%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	5% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	© Yes C Yes C Yes G Yes C Yes C Yes C Yes C Yes C Yes	C No ® No ® No © No ® No ® No	Dill N N IDIII	ity level  /A  /A  /A  /(A			

	RUSSIAN FEDER	ATION	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 1 month 3 years	20% N/A N/A	0% N/A N/A	15% N/A N/A	20% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 1 month 3 years	20% N/A N/A	0% N/A N/A	15% N/A N/A	20% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No     No     No     No     No     No     No     No     No	N N N N	ity level /A //A //A //A //A			

	SAN MARINO		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	@ No @ No @ No @ No @ No @ No	N N N N	ity level //A //A //A //A //A			

	SAUDI ARABIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	5% 0% 5%	5% 0% 5%	5% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	5% 0% 5%	5% 0% 5%	5% N/A N/A	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	© Yes C Yes C Yes G Yes C Yes C Yes C Yes C Yes C Yes	C No ® No ® No © No ® No ® No	Ave N N Ave N	ity level rage /A //A rage //A //A //A //A			

	SENEGAL		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 2 years	16% N/A N/A	13% N/A N/A	10% N/A N/A	30% 0% N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 2 years	16% N/A N/A	13% N/A N/A	10% N/A N/A	30% 0% N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	SERBIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	20% 10% 10%	0% N/A N/A	20% 10% 10%	20% 0% 20%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	© Yes C Yes C Yes © Yes C Yes C Yes C Yes	C No ® No ® No © No ® No ® No	N N N Diff	ity level iesti /A /A /A iotili /A			

	SINGAPORE		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 4 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 4 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A /A /A /A /A			

	SLOVAKIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 10 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 10 years	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	@ No @ No @ No @ No @ No @ No	N N N N	ity level //A //A //A //A //A			

	SLOVENIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 30 days 5 years	15% 0% 15%	0% N/A N/A	15% 0% 15%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 30 days 5 years	15% 0% 15%	0% N/A N/A	15% 0% 15%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	○ Yes ○ Yes ○ Yes ○ Yes ○ Yes ○ Yes ○ Yes	® No C No ® No ® No C No ® No	N Ee N N	ity level  /A ISSV //A //A ISSV			

	SOUTH AFRICA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	0% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	0% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	SPAIN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes From 6 months to 2 years 4 years	19% 0% 19%	0% N/A N/A	19% N/A 18%	19% 0% 19%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No From 6 months to 2 years 4 years	19% N/A N/A	0% N/A N/A	19% N/A 18%	19% 0% 19%	No	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	<ul> <li></li></ul>	C No C No 9 No 9 No C No 9 No	Dill Dill N N	ity level (69)1 (69)1 (69)1 (7A) (7A) (7A) (7A)			

	SRI LANKA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	10% N/A N/A	20% 0% 20%	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	10% N/A N/A	20% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	Ave N N Ave N	ity level rage /A /A /A rage /A			

	SWEDEN		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 1 year 5 years	0% N/A N/A	0% N/A N/A	30% 0% 30%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No 1 year 5 years	0% N/A N/A	0% N/A N/A	30% 0% 30%	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	○ Yes ② Yes ○ Yes ○ Yes ○ Yes ○ Yes ○ Yes	® No C No ® No ® No C No ® No	N Diji N N	ity level //A //A //A //A //A			

	SWITZERLAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	35% N/A N/A	35% N/A N/A	35% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 3 years	35% N/A N/A	35% N/A N/A	35% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	TAIWAN, PROVINCE OF C	AINA	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes 1 year 5 years	15% N/A N/A	15% N/A N/A	20% 15% 5%	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 5 years	15% N/A N/A	15% N/A N/A	20% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes Ö Yes Ø Yes Ö Yes Ö Yes	O No ® No ® No O No ® No ® No	N N N International N	ity level			

	UNITED REPUBL OF TANZANIA	IC	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	5% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	10% N/A N/A	10% N/A N/A	5% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No     No     No     No     No     No     No     No     No	N N N N	ity level //A //A //A //A //A			

	THAILAND		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 3 years and 7 days	15% N/A N/A	0% N/A N/A	10% N/A N/A	15% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years and 7 days	15% N/A N/A	0% N/A N/A	10% N/A N/A	15% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A //A //A //A //A //A			

	TUNISIA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 10 years	20% 10% 10%	20% 10% 10%	5% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 10 years	20% N/A N/A	20% N/A N/A	5% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	Ø Yes Ö Yes Ö Yes Ø Yes Ö Yes Ö Yes	O No ® No ® No O No ® No ® No	N N N	ity level  155  1/A  1/A  155  1/A			

	TURKEY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 5 years	0% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 5 years	0% N/A N/A	0% N/A N/A	15% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	® No ® No ® No ® No ® No ® No ® No	N N N N	ity level /A /A /A /A /A /A			

	UKRAINE		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 3 years	15% N/A N/A	0% N/A N/A	15% N/A N/A	15% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	15% N/A N/A	0% N/A N/A	15% N/A N/A	15% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	No     No	N N N N	ity level /A /A //A //A //A			

	UNITED ARAB EI	MIRATES	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A //A //A //A //A			

	UNITED KINGDO	M	Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 4 years	20% 0% 20%	0% N/A N/A	0% N/A N/A	0% N/A N/A	Yes	Yes
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A N/A 4 years	20% 0% 20%	0% N/A N/A	0% N/A N/A	0% N/A N/A	Yes	Yes
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes  Ø Yes  O Yes  C Yes  Ø Yes  Ø Yes  O Yes	9 No C No 9 No 9 No C No 9 No	N N	ty level  /A  35V  /A  /A			

	USA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	N/A 2 years	0% N/A N/A	0% N/A N/A	30% N/A N/A	0% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 2 years	0% N/A N/A	0% N/A N/A	30% N/A N/A	0% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A //A //A //A //A			

	URUGUAY		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 4 years	12% N/A N/A	0% N/A N/A	7% N/A N/A	12% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 4 years	12% N/A N/A	0% N/A N/A	7% N/A N/A	12% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level //A //A //A //A //A			

	VENEZUELA		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 6 years	34% N/A N/A	0% N/A N/A	0% N/A N/A	1 % N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 6 years	34% N/A N/A	0% N/A N/A	0% N/A N/A	1% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	C Yes	9 No 9 No 9 No 9 No 9 No 9 No 9 No	N N N N	ity level /A /A //A //A //A //A			

	VIETNAM		Interest tax on corporate bonds	Interest tax on government bonds	Dividend tax	Capital Gains tax	A priori	A posteriori
SICAV	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	Yes N/A 3 years	5% N/A N/A	5% N/A N/A	0% N/A N/A	0.1% N/A N/A	No	No
FCP	Benefit of DTT General WHT rate Reduced WHT rate Reclaimable rate Refund payment timeframe Statute of limitations	No N/A 3 years	5% N/A N/A	5% N/A N/A	0% N/A N/A	0.1% N/A N/A	No	No
Tax services	WHT reclaims Rendered based on DTT Rendered based on domestic law Rendered based on EU law Reduction at source Rendered based on DTT Rendered based on domestic law Rendered based on EU law	O Yes	No     No	N N N N	ty level  /A  /A  /A  /A  /A			



### Contact us



Ravi Beegun

T: +352 22 51 51 - 6248 E: ravi.beegun@kpmg.lu



Jean-Paul Olinger

T: +352 22 51 51 - 5573 E: jeanpaul.olinger@kpmg.lu



**Gerard Laures** 

T: +352 22 51 51 - 5549 E: gerard.laures@kpmg.lu



Olivier Schneider

T: +352 22 51 51 - 5504 E: olivier.schneider@kpmg.lu

KPMG Luxembourg, Société coopérative

39, Avenue John F. Kennedy L-1855 Luxembourg Tel: +352 22 51 51 1

www.kpmg.lu















The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.