



**Ceskoslovenska
obchodni banka, a.s.**

The Czech Republic

CSOB Custody Bulletin

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DTT between Czech Republic and Sri Lanka

Please be informed that, based on the information received by the Ministry of Finance of the Czech Republic from the Czech Republic Embassy in Delhi on 15 October 2024, the Double Taxation Treaty (DTT) between the Czech Republic and the Democratic Socialist Republic of Sri Lanka (signed on 3 February 2023) entered into force on 27 August 2024.

The provisions of the Treaty will apply to income paid on or after 1 January 2025.

The Treaty between the Czechoslovak Socialist Republic and the Republic of Sri Lanka for the avoidance of double taxation, signed on 26 July 1978, will cease to be in force on 1 January 2025.

The following tax rates will apply under the Treaty:

Dividends

- 10%
- 7,5% if the beneficial owner is a company which holds directly at least 10% of the capital of the company paying the dividends

Interest

- Interest arising in a Contracting State and paid to a resident of the other Contracting State may be taxed in that other state.
- Interest may also be taxed in the Contracting State in which it arises and according to the law of that State. However, if the beneficial owner of the interest is a resident of the other contracting state, the tax charged shall not exceed 5% of the gross amount of the interest.
- Interest paid to certain institutions, such as governments, central banks, or organizations promoting export or investment, is only taxable in the recipient's state of residence.

Impact on foreign investors:

Please take note of the above details and rates applicable to investors from Democratic Socialist Republic of Sri Lanka from 1 January 2025.

Source: Ministry of Finance of the Czech Republic



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