



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

**The Czech Republic**

# CSOB Custody Bulletin

**No: 11  
November, 2024**



Although the items of information in this Bulletin are from sources that CSOB regards as reliable, CSOB does not vouch for their accuracy; some terms may be incomplete or simplified. The view and conclusions presented in this publication are our opinions and are liable to change without notification. The data published in the Bulletin constitutes no legal obligation for CSOB.

## Custody Contacts

### The Czech Republic

Michal Stuchlik	Tel.: +420 605 236 562, Email: <a href="mailto:MSTUCHLIK@CSOB.CZ">MSTUCHLIK@CSOB.CZ</a>
Tomas Vacha	Tel.: +420 725 759 106, Email: <a href="mailto:TVACHA@CSOB.CZ">TVACHA@CSOB.CZ</a>
Pavel Pata	Tel.: +420 725 295 400, Email: <a href="mailto:PPATA@CSOB.CZ">PPATA@CSOB.CZ</a>
Jana Cutychova	Tel.: +420 603 800 006, Email: <a href="mailto:JCUTYCHOVA@CSOB.CZ">JCUTYCHOVA@CSOB.CZ</a>

### The Slovak Republic

Rastislav Capkovic	Tel.: +421-2-5966 8415, Email: <a href="mailto:RCAPKOVIC@CSOB.SK">RCAPKOVIC@CSOB.SK</a>
Tatiana Scepanova	Tel.: +421-2-5966 8418, Email: <a href="mailto:TSCEPANOVA@CSOB.SK">TSCEPANOVA@CSOB.SK</a>

## Contents

DTT between Czech Republic and Rwanda .....	3
---	---



Although the items of information in this Bulletin are from sources that CSOB regards as reliable, CSOB does not vouch for their accuracy; some terms may be incomplete or simplified. The view and conclusions presented in this publication are our opinions and are liable to change without notification. The data published in the Bulletin constitutes no legal obligation for CSOB.

## DTT between Czech Republic and Rwanda

Please be informed that, based on the information received by the Ministry of Finance of the Czech Republic from the Czech Republic Embassy in Nairobi, the Double Taxation Treaty (DTT) between the Czech Republic and the Republic of Rwanda (signed on 2 May 2023) entered into force on 30 October 2024.

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

The following tax rates will apply under the Treaty:

### Dividends

- Dividends paid by a company which is a resident of a Contracting State to a resident of the other Contracting State may be taxed in that other State.
- However, dividends paid by a company which is a resident of a Contracting State may also be taxed in that State according to the laws of that State, but if the beneficial owner of the dividends is a resident of the other Contracting State, the tax shall not exceed 10% of the gross amount of the dividends. This does not affect the taxation of the company in respect of the profits out of which the dividends are paid.

### 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 10% of the gross amount of the interest.
- Interest paid to certain institutions, such as governments, central banks, or organizations promoting export or investment, or to a resident of the other State in connection with any loan or credit guaranteed by such institutions, 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 Republic of Rwanda from 1 January 2025.

Source: Ministry of Finance of the Czech Republic



Although the items of information in this Bulletin are from sources that CSOB regards as reliable, CSOB does not vouch for their accuracy; some terms may be incomplete or simplified. The view and conclusions presented in this publication are our opinions and are liable to change without notification. The data published in the Bulletin constitutes no legal obligation for CSOB.