Australia

Corporate - Withholding taxes

Last reviewed - 19 December 2025

WHT rates are shown in the following table.

Recipient	WHT (%)		
	Dividends (1)	Interest (2)	Royalties (3)
Resident corporations or individuals (36)	0	0	0
Non-resident corporations or individuals:			
Non-treaty	30	10	30
Treaty:			
Argentina	10/15 (4)	12	10/15 (4)
Austria (5)	15	10	10
Belgium	15	10	10
Canada	5/15 (6)	10	10
Chile	5/15 (7)	5/10/15 (7)	5/10 (7)
China, People's Republic of (8)	15	10	10
Croatia (38)	0/5/10 (38)	0/10 (38)	10
Czech Republic	5/15 (9)	10	10
Denmark	15	10	10
Fiji	20	10	15
Finland	0/5/15 (11)	0/10 (11)	5 (11)
France	0/5/15 (12)	0/10 (12)	5 (12)

Recipient	WHT (%)		
	Dividends (1)	Interest (2)	Royalties (3)
Hungary	15	10	10
Iceland (10)	0/5/15 (10)	0/10 (10)	10
India	15	15	10/15 (13)
Indonesia	15	10	10/15 (14)
Ireland, Republic of	15	10	10
Israel (35)	0/5/15 (35)	0/5/10 (35)	5
Italy	15	10	10
Japan	0/5/10/15 (15)	0/10 (15)	5 (15)
Kiribati	20	10	15
Korea, Republic of	15	15	15
Malaysia	0/15 (16)	15	15
Malta	15 (17)	15	10
Mexico	0/15 (18)	10/15 (18)	10
Netherlands	15	10	10
New Zealand	0/5/15 (19)	0/10 (19)	5
Norway	0/5/15 (20)	0/10 (20)	5
Papua New Guinea	15/20 (21)	10	10
Philippines	15/25 (22)	10/15 (22)	15/25 (22)
Poland	15	10	10
Portugal (30)	5/10	0/5/10	10
Romania	5/15 (23)	10	10
Russian Federation	5/15 (24)	10	10
Singapore	0/15	10	10

Recipient	WHT (%)		
	Dividends (1)	**Interest (2)**	**Royalties (3)**
Slovenia (37)	0/5/15 (37)	0/5/10 (37)	10
South Africa	5/15 (25)	0/10 (25)	5
Spain	15	10	10
Sri Lanka	15	10	10
Sweden	15	10	10
Switzerland	0/5/15 (26)	0/10 (26)	5 (26)
Taipei/Taiwan	10/15 (27)	10	12.5
Thailand	15/20 (28)	10/25 (28)	15
Turkey	5/15 (29)	0/10 (29)	10
Ukraine (39)	0/5/15 (39)	0/5/10 (39)	10
United Kingdom	0/5/15 (31)	0/10 (31)	5
United States	0/5/15/30 (32)	0/10/15 (32)	5 (32)
Vietnam	10/15 (33)	10	10

Notes

1. Dividends paid to non-residents are exempt from dividend WHT except when paid out of profits of a company that have not borne Australian tax (i.e. unfranked dividends). Dividends include those stock dividends that are taxable. The rates shown apply to dividends on both portfolio investments and substantial holdings other than dividends paid in connection with an Australian PE of the non-resident. Unfranked dividends paid to non-residents are exempt from dividend WHT to the extent that the dividends are declared by the company to be conduit foreign income. There is also a deduction in certain cases to compensate for the company tax on inter-entity distributions where these are on-paid by holding companies to a 100% parent that is a non-resident (*see Dividend income in the Income determination section*). Dividends paid to a non-resident in connection with an Australian PE are taxable to the non-resident on a net assessment basis (i.e. the dividend and associated deductions will need to be included in the determination of the non-resident's taxable income, the dividend is not subject to dividend WHT), and a franking tax offset is allowable to the non-resident company for franked dividends received.
2. Australia's interest WHT rate is limited to 10% of gross interest, although the treaty may allow

discounts and other pecuniary benefits derived by non-residents on various forms of financings are subject to interest WHT. Interest paid to non-residents by offshore banking units is exempt from interest WHT where offshore borrowings are used in offshore banking activities (including lending to non-residents). An offshore borrowing is defined as a borrowing from (i) an unrelated non-resident in any currency or (ii) a resident or a related person in a currency other than Australian currency. The interest WHT rates listed above for residents in a treaty country are those that generally apply. It is common for Australia’s tax treaties to include a reduced limit for interest derived by certain government entities and/or financial institutions. One should refer to the relevant treaty for these limits.

3. Royalties paid to non-residents (except in respect of a PE in Australia of a resident of a treaty country) are subject to 30% WHT (on the gross amount of the royalty), unless a DTA provides for a lesser rate. Tax is generally limited to the indicated percentage of the gross royalty.
4. For Australian-sourced dividends that are franked under Australia's dividend imputation provisions and paid to a person who directly holds at least 10% of the voting power of the company, the limit is 10% (although note that Australia does not impose WHT on franked dividends). For Argentinean-sourced dividends paid to a person who holds at least 25% of the capital in the company, the limit is 10%. A 15% limit applies to other dividends. Source-country tax is limited to 10% of the gross amount of royalties in relation to copyright of literary, dramatic, musical, or other artistic work; the use of industrial or scientific equipment; the supply of scientific, technical, or industrial knowledge; assistance ancillary to the above; or certain forbearances in respect of the above. Source-country tax is limited to 10% of the net amount of royalties for certain technical assistance. In all other cases, it is limited to 15% of the gross amount of royalties.
5. The government announced on 4 February 2010 that negotiations to update Australia's tax treaty with Austria would take place in March 2010. No further announcements have been made in relation to the progress of treaty negotiations.
6. A 5% dividend WHT rate applies to franked dividends paid by an Australian resident company and, in the case of dividends paid by a Canadian resident company (other than a non-resident owned investment corporation), to a company that directly holds at least 10% of the voting power in the dividend company (although note that Australia does not impose WHT on franked dividends). Otherwise, the maximum WHT rate on dividends is 15%.
7. A 5% dividend WHT rate applies to dividends paid to a company that directly holds at least 10% of the voting power in the company paying the dividends. Otherwise, the maximum WHT rate on dividends is 15%. In respect of interest, a 5% WHT rate applies to interest derived by a financial institution that is unrelated to and dealing wholly independently with the payer. Where the 5% rate does not apply, a 15% WHT rate applies to interest arising in Chile, and a 10% WHT rate applies to interest in all other cases. A 5% royalty WHT rate applies to royalties for the use of, or right to use, any industrial, commercial, or scientific equipment, and a 10% royalty WHT rate applies in all other cases.
8. Except Hong Kong and Macau.
9. The treaty between Australia and the Czech Republic allows Australia to impose a 5% WHT

20% of the capital of the company paying the dividend. 15% of the gross amount of dividend applies in other cases.

10. Australia's treaty with Iceland entered into force in relation to WHT from 1 January 2024. Source-country tax on dividends will be generally limited to 15%, subject to an exemption for dividends paid to certain pension funds or government investment funds beneficially holding no more than 10% of the voting power in the company paying the dividend or for dividends paid to a beneficially entitled company that satisfies certain public listing requirements and holds 80% or more of the voting power in the company paying the dividend, and a 5% limit that will apply to dividends paid to companies with voting power of 10% or greater in the dividend paying company. Source-country tax on interest is generally limited to 10%. However, zero interest WHT will be payable where interest is paid to an unrelated financial institution, a government body, central bank, or certain pension funds.
11. A zero WHT rate applies to inter-corporate dividends where the recipient directly holds 80% or more of the voting power of the company paying the dividend. A 5% rate limit applies on all other inter-corporate dividends where the recipient directly holds 10% or more of the voting power of the company paying the dividend. A 15% rate applies to all other dividends. A rate limit of 10% applies to interest, except no tax is chargeable in the source country on interest derived by a financial institution resident in the other country or a government or political or administrative subdivision or local authority or central bank of the other country. Amounts derived from equipment leasing (including certain container leasing) are excluded from the royalty definition and treated either as international transport operations or business profits.
12. The source country exempts inter-corporate non-portfolio (i.e. minimum 10% shareholding) dividends paid out of profits that have borne the normal rate of company tax. There is a 5% rate limit for all other non-portfolio dividends. A rate limit of 15% applies for all other dividends. A rate limit of 10% applies to interest, except no tax is chargeable in the source country on interest derived by a financial institution resident in the other country or a government or political or administrative subdivision or local authority or central bank of the other country. Amounts derived from equipment leasing (including certain container leasing) are excluded from the royalty definition and treated either as international transport operations or business profits.
13. The source-country limit under the Indian agreement is 10% for royalties paid in respect of the use of or rights to use industrial, commercial, or scientific equipment or for the provision of consulting services related to such equipment. In other cases, the limit is 15%.
14. The source-country limit under the Indonesian agreement is 10% for royalties paid in respect of the use of or the right to use any industrial, commercial, or scientific equipment or for the supply of scientific, technical, industrial, or commercial knowledge or information, and it is 15% in other cases.
15. The source country exempts inter-corporate dividends where the recipient directly holds 80% or more of the voting power of the company paying the dividend and certain limitation of benefit thresholds are met. A 5% rate limit applies on all other inter-corporate dividends where the recipient directly holds 10% or more of the voting power of the company paying the dividend. A rate limit of 10% otherwise applies for dividends. However, where the dividends

company consist, directly or indirectly, of real property situated in Japan and 10% in all other cases. Special rules apply to distributions to Japanese residents by real estate investment trusts (REITs). A rate limit of 10% applies to interest, except no tax is chargeable in the source country on interest derived by a financial institution resident in the other country or a government or political subdivision or local authority or central bank or other specified entity of the other country. Amounts derived from equipment leasing (including certain container leasing) are excluded from the royalty definition and treated either as international transport operations or business profits.

16. A zero dividend WHT rate applies to franked dividends paid by an Australian resident company to an entity that directly holds at least 10% of the voting power in the dividend paying company'; otherwise, a 15% WHT rate applies. In relation to dividends paid by a company resident of Malaysia, no WHT applies.
17. Source-country tax in Malta is limited to the tax chargeable on the profits out of which the dividends are paid.
18. A zero dividend WHT rate applies to franked dividends paid (in Mexico, those dividends that have been paid from the net profit account) to a company that directly holds at least 10% of the voting power in the dividend paying company. In all other cases, a 15% WHT rate will apply to dividends. Source-country tax is limited to 10% when interest is paid to a bank or an insurance company, derived from bonds and securities that are regularly and substantially traded on a recognised securities market, paid by banks (except where the prior two criteria apply), or paid by the purchaser to the seller of machinery and equipment in connection with a sale on credit. It is 15% in all other cases.
19. A zero WHT rate applies in certain cases to inter-corporate dividends where the recipient directly holds at least 80% of the voting power in the dividend paying company. A rate of 5% applies on all other inter-corporate dividends where the recipient directly holds 10% or more of the voting power of the company paying the dividend. A general limit of 15% applies for all other dividends. Source-country tax on interest is limited to 10%. However, no tax is chargeable in the source country on interest derived by a government or a political subdivision or local authority of the other country (including a government investment fund or a bank performing central banking functions) or on interest derived by a financial institution that is unrelated to and dealing wholly independently of the payer (excluding interest paid as part of a back-to-back loan arrangement and, for New Zealand payers, where that person has not paid approved issuer levy).
20. A zero WHT rate applies in certain cases to inter-corporate dividends where the recipient directly holds at least 80% of the voting power in the dividend paying company for the 12-month period prior to payment. A rate of 5% applies to all other inter-corporate dividends where the recipient directly holds 10% or more of the voting power of the company paying the dividend. A general limit of 15% applies to all other dividends. A general rate limit of 10% applies to interest. However, no tax is chargeable in the source country on interest derived by a government of the other country (including its money institutions or a bank performing central banking functions) from the investment of official reserve assets and on interest derived by a financial institution resident in the other country (excluding interest paid as part

Guinea, the limit is 20%.

22. Source-country tax is limited to 15% where relief by way of rebate or credit is given to the beneficial owner of the dividend. In any other case, source-country tax is limited to 25%. Source-country tax generally is limited to 15% of gross royalties if paid by an approved Philippines enterprise. In all other cases, the rate is limited to 25% of the gross royalties.
23. Source-country tax (Australia) is limited to 5% where a dividend is paid to a Romanian resident company that directly holds at least 10% of the capital of the Australian company paying the dividend to the extent that the dividend is fully franked. Source-country tax (Romania) is limited to 5% where a dividend is paid to an Australian resident company that directly holds at least 10% of the capital of the Romanian company paying the dividend if the dividend is paid out of profits that have been subject to Romanian profits tax. In other cases, it is limited to 15%.
24. Source-country tax generally is limited to 15%. However, a rate of 5% applies where the dividends have been fully taxed at the corporate level, the recipient is a company that has a minimum direct holding in the paying company, and the recipient has invested a minimum of AUD 700,000 or the Russian ruble equivalent in the paying company. Where the dividends are paid by a company that is a resident in Russia, the dividends are exempt from Australian tax.
25. A 5% rate limit applies on all inter-corporate dividends where the recipient directly holds 10% or more of the voting power of the company paying the dividend. A rate limit of 15% otherwise applies for dividends. A general rate limit of 10% applies to interest. However, no tax is chargeable in the source country on interest derived by a government of the other country (including a bank performing central banking functions) and on interest derived by a financial institution resident in the other country (excluding interest paid as part of a back-to-back loan arrangement).
26. The DTA applies a 5% WHT rate to dividends paid to companies that hold directly 10% or more of the voting power of the paying company. Dividends paid to publicly listed companies, or subsidiaries thereof, or to unlisted companies in certain circumstances, that hold 80% or more of the voting power of the paying company will be exempt from dividend WHT. Dividends paid to government or a political subdivision or local authority (including a government investment fund), a central bank, complying Australian superannuation funds, and tax exempt Swiss pension schemes will also be exempt from dividend WHT. In all other cases, a 15% WHT rate will apply. A general rate limit of 10% applies to interest. However, interest paid to bodies exercising governmental functions, banks performing central banking functions, banks that are unrelated to and dealing independently with the payer, complying Australian superannuation funds, and tax exempt Swiss pension schemes are exempt from interest WHT. The DTA applies a 5% WHT on royalties.
27. Source-country tax (Taiwan) is limited to 10% of the gross amount of the dividends paid to a company that holds at least 25% of the capital of the company paying the dividends. A rate of 15% applies in all other cases. To the extent that dividends are franked because they are paid out of profits that have borne Australian tax, they are exempt from dividend WHT (*See Note 1 above*). The treaty allows Australia to impose a 10% WHT on the franked part of a dividend.

financial institution.

29. A 5% WHT rate applies to inter-corporate dividends where the recipient directly owns 10% of the voting power of an Australian resident company or directly owns 25% of the capital of a Turkish resident company where the profits out of which the dividend is paid has been subject to the full rate of corporation tax in Turkey. In all other cases, a 15% WHT rate will apply. The DTA applies a general limit of 10% WHT on interest. However, interest derived from the investment of official reserve assets by either the Australian or Turkish government, the Australian or Turkish central bank, or a bank performing central banking functions in either Australia or Turkey shall be exempt from interest WHT.

30. Australia signed a new treaty with Portugal on 30 November 2023 (that is yet to enter into force). Source-country tax on dividends will be generally limited to 15%, subject to a 5% rate for dividends paid to certain pension funds or government investment funds beneficially holding no more than 10% of the voting power in the company paying the dividend, and to dividends paid to companies with voting power of 10% or greater in the dividend paying company. Source-country tax on interest is generally limited to 10%. However, zero interest WHT will be payable where interest is paid to government and central banks and a 5% rate for tax-exempt Portuguese pension funds, Australian superannuation funds, and independent financial institutions.

31. Source-country tax on dividends is generally limited to 15%. However, an exemption applies for dividends paid to a listed company that satisfies certain public listing requirements and controls 80% or more of the voting power in the company paying the dividend, and a 5% limit applies to dividends paid to other companies with voting power of 10% or greater in the dividend paying company. Source-country tax on interest is generally limited to 10%. However, generally zero interest WHT is payable where interest is paid to a financial institution or a government body exercising governmental functions.

32. Source-country tax on dividends is generally limited to 15%. No source country tax is chargeable on dividends to a beneficially entitled company that satisfies certain public listing requirements and holds 80% or more of the voting power in the company paying the dividend. A 5% limit applies to dividends paid to other companies with voting power of 10% or greater in the dividend paying company. No limit applies to US tax on dividends paid on certain substantial holdings of Australian residents in US REITs. In practical terms, US tax on these dividends is increased from 15% to the current US domestic law rate of 30%. The 15% rate applies to REIT investments made by certain listed Australian property trusts subject to the underlying ownership requirements not exceeding certain levels. Investments in REITs by listed Australian property trusts acquired before 26 March 2001 are protected from the increased rate. Source-country tax on interest generally is limited to 10%. However, generally zero interest WHT is payable where interest is paid to a financial institution or a government body exercising governmental functions. Rules consistent with US tax treaty policy and practice will allow interest to be taxed at a higher 15% rate (the rate that generally applies to dividends) and for tax to be charged on intra-entity interest payments between a branch and its head office. Amounts derived from equipment leasing (including container leasing) are excluded from the royalty definition.

dividends paid to a beneficially entitled company that satisfies certain public listing requirements and holds 80% or more of the voting power in the company paying the dividend and a 5% limit that will apply to dividends paid to companies with voting power of 10% or greater in the dividend paying company. Source-country tax on interest is generally limited to 10%. However, zero interest WHT will be payable where interest is paid to a financial institution or a government body exercising governmental functions.

35. Source-country tax on dividends will be generally limited to 15%, subject to an exemption for dividends paid to certain pension funds or government investment funds beneficially holding less than 10% of the voting power in the company paying the dividend and a 5% limit that will apply to dividends paid to companies with voting power of 10% or greater in the dividend paying company. Source-country tax on interest is generally limited to 10%. However, a 5% rate applies to interest payable to an unrelated financial institution or certain pension funds, and there is no interest WHT payable where interest is paid to a government body or central bank.

36. Where the recipient does not quote a Tax File Number (or Australian Business Number), the payer is obligated to withhold tax at the rate of 47% under the Pay-As-You-Go (PAYG) withholding regime. No withholding is required in relation to franked dividends.

37. Australia signed a new treaty with Slovenia on 9 September 2024 (that is yet to enter into force). A WHT rate of 10% on dividends applies generally, with a reduced 5% rate available for intercorporate dividends on non-portfolio holdings of at least 10%. An exemption is available for dividends derived by tax-exempt Slovenian recognised pension funds or Australian superannuation funds that have holdings of less than 10% of the paying company. A 5% WHT rate applies to interest derived by an unrelated and independent financial institution, provided that the interest is not paid as part of an arrangement involving back-to-back loans or other equivalent arrangements. No WHT applies to interest derived by governments, central banks, tax-exempt Slovenian pension funds, Australian recognised pension funds, and specified government investment funds. A general 10% interest WHT rate applies in other cases.

38. Australia signed a new treaty with Croatia on 24 November 2025 (that is yet to enter into force). A WHT rate of 10% on dividends applies generally, with a reduced 5% rate available for intercorporate dividends on certain continuous non-portfolio holdings of at least 10%. An exemption applies to dividends paid to governments (including a government investment fund), central banks, recognised tax-exempt Croatian pension funds, or Australian superannuation funds that have voting power holdings of less than 10% of the paying company and are not able to determine the identity of a person(s) who makes the decisions that comprise the control and direction of the operations of the dividend paying company. No WHT applies to interest derived by governments (including a government investment fund), central banks, a recognised tax-exempt Croatian pension fund, or a recognised Australian pension or complying superannuation fund, provided that the beneficial owner is not able to determine the identity of a person(s) who makes the decisions that comprise the control and direction of the operations of the issuer of the debt-claims, and also to interest derived by an unrelated and independent authorised financial institution (excluding interest paid as part of an arrangement involving back-to-back loans or other similar arrangements).

force). A WHT rate of 15% on dividends applies generally, with a reduced 5% rate available for intercorporate dividends on certain continuous non-portfolio holdings of at least 10%. No WHT applies to dividends paid to government (including a government investment fund), a central bank, a recognised Australian pension or complying superannuation fund, or a recognised tax-exempt Ukrainian pension fund that have voting power holdings of less than 10% of the paying company and are not able to determine the identity of a person(s) who makes the decisions that comprise the control and direction of the operations of the dividend paying company. No WHT applies to interest paid to governments (including a government investment fund), central banks, a recognised Australian pension or complying superannuation fund, or a recognised tax-exempt Ukrainian pension fund, provided that the beneficial owner is not able to determine the identity of a person(s) who makes the decisions that comprise the control and direction of the operations of the issuer of the debt-claim. A 5% WHT rate applies to interest paid to an unrelated and independent authorised financial institution (excluding interest paid as part of an arrangement involving back-to-back loans or similar other arrangements).

The Australian government plans to enter into a number of new and updated tax treaties. Meanwhile negotiations with Bulgaria, Greece, India, and Luxembourg are underway, with plans to enter into new tax treaty negotiations with Colombia, Cyprus, Estonia, Latvia, and Lithuania.

Other payments

A PAYG withholding regime applies to require the deduction and remittance of taxes on behalf of foreign resident individuals and entities that are in receipt of the following types of payments:

Type of payment	Rate of withholding (%)
Payments for promoting or organising casino gaming junket arrangements	3
Payments for performing artists and sportspersons, including payments to support staff such as art directors, bodyguards, coaches, hairdressers, and personal trainers:	
if recipient is a company	30
if recipient is an individual	the applicable non-resident marginal tax rate
Payments under contracts entered into for the construction, installation, and upgrading of buildings, plant, and fixtures, and for associated activities	5

Managed investment trust (MIT) distributions

For MIT fund payments to a non-resident investor, a WHT regime applies, with divergent outcomes, depending upon whether or not the recipient of such fund payments is resident of a country identified as being one with which Australia has an effective exchange of information (EEOI) arrangement and which is regulated as such for purposes of these rules. For a resident of a residents of non-EEOI regulated countries, a final WHT at a 30% rate applies.

The MIT withholding rate on income attributable to a trading business, amounts from certain cross-staple arrangements, and rents from agricultural land and certain residential housing is set at a rate equal to the top corporate tax rate (i.e. 30%), rather than 15% (other than for certain pre-existing arrangements held immediately before 27 March 2018). An MIT WHT rate of 15% applies to payment of amounts on or after 1 July 2024 referable to rental income or a capital gain from newly constructed eligible residential build-to-rent properties.

Distributions from an MIT that holds only certified 'clean buildings' are eligible for a reduced rate of WHT of 10% where the recipient of the fund payment is a resident of a regulated EEOI country. The government has proposed to extend the clean building MIT WHT concession to data centres and warehouses that meet a relevant energy efficiency standard, where construction commences after 7:30 pm (AEST) on 9 May 2023. This extension will come into effect from the first of January, April, July, or October that occurs after the amending Act receives royal assent. A higher minimum energy efficiency rating is also proposed to apply to buildings to which the existing clean building MIT regime applies.

Australia has an attribution tax regime that certain MITs (known as attribution managed investment trusts or AMITs) can choose to adopt. The allocation of trust components to the members of an AMIT will be based on an ‘attribution’ rather than based on present entitlement to distributable income. Members of an AMIT will be taxed on the parts of the AMIT's trust components that are attributed to them as if they derived those amounts in their own right and in the same circumstances as the AMIT.