

Iran Double-tax treaties

No.	Country	Withholding –tax rates under Iran’s tax treaties						Company’s tax %
		Effective from date	Royalty %	Technical Assistance %	*Shareholder’s tax		Financial expenses %	
					Share %	Tax Rate		
1	Germany	20.12.1968	10	10	25 or more	15	15	25
					Less than 25	20		
2	France	07.11.1973	10	10	25 or more	15	15	25
					Less than 25	20		
3	Armenia	11.07.1997	5	5	25 or more	10	10	25
					Less than 25	15		
4	South Africa	23.11.1998	10	10		10	5	25
5	Kazakhstan	03.04.1999	10	10	20 or more	5	10	25
					Less than 20	15		
6	Turkmenistan	03.08.1999	5	5		10	10	25
7	Lebanon	21.12.2000	5	5		5	5	25
8	Georgia	15.02.2000	5	5	25 or more	5	10	25
					Less than 25	15		
9	Ukraine	26.09.2001	10	10		10	10	25
10	Belarus	15.11.2001	5	5	25 or more	10	5	25
					Less than 25	15		
11	Syria	3.12.2001	17	17		7	10	25
12	Sri Lanka	26.12.2001	8	8		10	10	25
13	Russia	05.04.2002	5	5	25 or more	5	7/5	25
					Less than 25	10		
14	China	14.08.2003	10	10		10	10	25
15	Switzerland	31.12.2003	5	5	15 or more	5	10	25
					Less than 15	15		
16	Pakistan	05.03.2003	10	10		5	10	25
17	Austria	11.07.2004	5	5	25 or more	5	5	25
					Less than 25	15		
18	Uzbekistan	15.02.2005	5	5		8	10	25
19	Turkey	23.02.2005	10	10	25 or more	15	10	25
					Less than 25	20		
20	Tunis	14.06.2005	8	8		10	10	25
21	Kyrgyzstan	15.09.2005	10	10	25 or more	5	10	25
					Less than 25	10		
22	Spain	29.01.2006	5	5	20 or more	5	7/5	25
					Less than 20	10		
23	Jordon	Non-executive	10	10	25 or more	5	5	25
					Less than 20	7/5		
24	Malaysia	//	10	10		25	15	25
25	Croatia	//	5	5	25 or more	5	5	25
					Less than 25	10		
26	Bosnia & Herzegovina	//	15	15		10	10	25
27	Qatar	//	5	5	20 or more	5	10	25
					Less than 20	7/5		

***Note:** The tax agreement in effect from 21 March 2002 abolished shareholders (dividend) tax.

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