

# Foreign Tax & Trade Briefs

SECOND EDITION

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LexisNexis

# UKRAINE

## Tax Information<sup>1</sup>

- (Tax Year Begins January 1) •

### Individual Income Taxes

#### Standard rate

Individuals in Ukraine are subject to Personal Income Tax (PIT). As of 2010 The PIT Law<sup>2</sup> provides the standard tax rate of PIT for tax residents of Ukraine is 15% which applies on income originating either from Ukraine or abroad. Non-residents pay 30% standard rate of PIT for income originating from Ukraine. Income received by non-residents as interest, royalties and dividends is taxed at 15% rate.

Individuals pay PIT from gross income reduced by withheld payments such as Pension Fund duty and statutory payments to social funds (these withholdings are applied to salary), and only individuals registered as Private Entrepreneurs are entitled to pay PIT from net income, deducting from gross income certain kind of expenses which are related to their business activity<sup>3</sup>.

#### Definition of Residence

If otherwise is not provided by DTT,<sup>4</sup> a person is considered to be tax resident in Ukraine if he or she has a place of abode in Ukraine. However, if the person also has a place of abode in another country, several tie-breaker rules apply to determine whether that person should be treated as a Ukraine tax resident. These rules are as follows:

1. The individual is deemed to be resident of Ukraine if he has a permanent place of abode (domicile) in Ukraine but not in another country.
2. If the individual has a permanent place of abode (domicile) in Ukraine and another country, the person is deemed to be resident in Ukraine if his centre of vital interests is in Ukraine. A sufficient but not exclusive ground for determining the country of an individual's centre of vital interest is the place

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<sup>2</sup> Law of Ukraine "On Personal Income Tax" #N 889-IV dated 22 of May, 2003, amended as of May 2010.

<sup>3</sup> The private entrepreneurs may also choose the unified tax—fixed monthly paid sum of tax, rate of which is determined depending on the type of activity, but maximum rate, provided by law is 200 UAH for the last 11 years, with the maximum possible income 500 000 UAH.

<sup>4</sup> Ratified Double Taxation Treaty with certain country.

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- of permanent abode of the individual's family members.
3. If an individual's centre of vital interests cannot be determined or the individual has no domicile in any country, the individual will be deemed to be a resident of Ukraine if he stays in Ukraine at least 183 days during the tax year (calendar year).
  4. If residence status cannot be determined based on the previous rules, an individual will be deemed to be resident of Ukraine if he is a citizen of Ukraine.

Any individual may also choose to be Ukrainian resident voluntarily applying for it voluntarily to local tax authorities for a given calendar year. The individual should take a written confirmation of the individual's tax residence status.

### **Gross Income Inclusions**

The PIT Law provides categories that are included in gross income and excluded from it. Most individual income is included in taxed gross income, but there are some special categories excluded from it. Such excluded from taxable income categories are as follows:

- state aids, compensations, insurance premiums, rewards received from state budget;
- state aid to military and other state departments provided in CPT Law;
- state awards and scholarship;
- aid to Nazi victims; repressed people;
- pensions;
- travel allowance;
- interest from certain state securities;
- state lottery prize;
- indemnification of damage caused by Chernobyl disaster;
- payments and beneficent aid of non-profitable organizations;
- tax and duties accrued on compensations, made by employer;
- income and property received as a consequence of partition of married or divorced couple property.
- alimony in determined by legislation amount, except for received from non-resident;
- cost of goods provided as warranty replacement;
- cost of certain types of goods (coal, cleaning means) for certain categories of individuals;
- taxes returned as extra paid;
- income from transfer of shares, other corporate rights or farming land, which were received while privatization;

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- study fee paid by employer by such an employer profile or its operating needs, not more than 1,4 of living wage stipulated by law in a month;
- allowance on death;
- treatment allowance paid from profit documented;
- deposit or the principal sum of credit paid back and USSR Oschadbank repayments;
- treatment or recreation trip voucher paid fully or partially by trade union or state social insurance fund;
- income of Private Entrepreneurs who are unified tax payers, received from business activity on which they are paying unified tax;
- state scholarship, but not more than 1,4 of living wage stipulated by law;
- help to orphans and displaced children in order and limits stipulated by Cabinet of Ministers of Ukraine;
- aid to conscripted militaries;
- payments to blood and human milk donors, paid from budget;
- cost of residence provided from state or municipal estate to state officers;
- fee for recoverable materials (except for colored and ferrous metals) or municipal waste;
- insurance premium under certain provided by law conditions;
- long-term life insurance premium; pension payment from non-State pension fund;
- income of farmers received agricultural production sale.

### PIT rates in Ukraine

<b>Resident Income</b>		
<b>Kind of income</b>	<b>Rate of PIT</b>	<b>Comments</b>
<b>Standard rate</b> (all income)	15%	Shall apply to salary, scholarship, extra payments for business trips, rental fee, other income.
	10%	Shall apply to income of mine workers.
Sale of vehicles	1%	Income received from sale of vehicles, provided not more than once a year. Otherwise standard rate 15% shall apply.
Winnings and prizes	30%	Except for state lottery.
Investment income from state securities	5% (0%)	Income, gained from some operations involving state investment securities. There will be no PIT if investment income amounts less than tax social privilege, stated in Law of State Budget for the respective year.
Interest	15%	Interest received from other sources than those stated below.

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	0% (5%)	Interest on deposit bank account, contribution to other than bank financial institution, interest (discount income) gained on safe-deposit inscription certificate. The rate 0% is valid till January 1, 2013. Starting from this date the rate is 5%.
	0%	Interest accrued in form of shares without changing of shares ratio.
	0% (5%)	Interest on deposit bank account, contribution to other than bank financial institution, interest (discount income) gained on safe-deposit inscription certificate. The rate 0% is valid till January 1, 2013. Starting from this date the rate is 5%. The rate 0% is valid till January 1, 2013. Starting from this date the rate is 5%.
Dividends	15%	
Real Estate Sale	0%	Income received from sale of real estate, provided if the object's square area doesn't exceed 100 square meters.
	1%	Income received from sale of real estate square area of which exceed 100 square meters, calculated as the cost of each square meter, starting from the 101st meter of the relevant real estate object.
	5%	Income received from sale of real estate provided more than once during a tax year (equal to calendar year)
Inheritance tax	0%	Close relatives
	5%	Members of family (not closer relatives)
	15%	Not members of family
Gifts	0%	Close relatives
	5%	Members of family (not closer relatives)
	15%	Not members of family

<b>Non-resident Income</b>		
<b>Kind of income</b>	<b>Rate of PIT</b>	<b>Comments</b>
Standard rate (all income)	30%	Shall apply to all income, including salary, but excluding interest, royalty, dividends, state lottery winning.
Real Estate Sale	0%	Income received from sale of real estate if the object's square area doesn't exceed 100 square meters, provided that the corresponding real estate object is sold not more than once a year.

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	30%	Incomereceivedfromsale of realestateif the object's square area exceeds 100 square meters, providedthat thecorresponding real estate objectis soldnotmore thanoncea year. The income is calculated starting from the 101st meter cost of the relevantreal estate object.
	30%	Incomereceivedfromsale of realestate which is sold more than once a year. The taxableincomeis the cost of the real estate.
Interest	15%	Interestreceivedfromothersources than those stated below.
	0% (5%)	Interestondepositbank account, contribution to other than bank financial institution, interest (discount income) gained onsafe-deposit inscription certificate. The rate 0% isvalid till January 1, 2013. Starting from this date the rate is 5%.
	0%	Interestaccruedin formofshareswithout changing of shares ratio.
Royalty	15%	
Dividends	15%	The rateisappliedtoall dividends, except for accrued in form ofshares without changing of shares ratio whichis nottaxed.
Dividends	15%	
	5%	Paidbycompany whichmanagesa co-investment institution, by trust manager of construction financing fund, income from mortgage note, guaranteed mortgage note, from real estate property fund, income of member ofbank-managed mutual fund

### Special Categories

The following is a discussion of a few specifics of special categories that are treated as included as gross income for PIT calculation.

#### Rental Income

Real estate of foreigncompanyor individual is possible to giveto rent only through Representative Office in Ukraine or residential legal entity authorized to represent such anon-resident by contract. If non-resident of Ukraine is individual, such Representative Office or legal entity should be a tax agent of non-resident if he or she is individual.

In case the tenantisan individualandnot Private Entrepreneur, the landlord is to be responsible for paying PIT to state budget.

#### Interest, dividends

The tax agent of PIT payer is the person paying interest, dividends.

Interest or dividends are to be taxed when are been paid.

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### **Royalty**

Residents are entitled to accrue royalty only on using intellectual property rights for which are properly registered.

### **Investment Income**

The PIT Law defines "Investment Income" as the positive difference between income gained from sale of securities, other corporate rights or banking metals and expenses on its acquisition upon the accounting year.

### **Income of non-residents**

When one non-resident pays Ukrainian-sourced income to another non-resident, such an income should be transferred to bank account in residential Ukrainian bank with special regime. This Ukrainian bank shall be a tax agent for these transactions. If this income is paid in cash, the recipient is responsible for paying PIT by himself during 20 calendar days from the date of receiving the income, but not later than staying in Ukraine.

If resident pays to non-resident, the resident should be tax agent of non-resident for payment PIT and is obliged to stipulate the rate of the tax in contract.

### **Exchange of Real Property**

Each party of exchanging real property is to pay 50% of the PIT rate, applied to sale.

### **The Standard Deduction**

A taxpayer is entitled to deduct of his gross monthly Ukrainian-sourced income received from one of the employers as the salary, on the sum of tax social privilege, stipulated by law.

### **Tax credit**

The total taxed income amount is to be deducted on all defined by law expenses except for VAT and excise tax on results of tax year. Tax credit may be accrued only for residents who have individual tax number.

### **Tax Agent**

PIT Law defines Tax Agent as a legal entity, individual or Representative Office irrespectively of their legal or tax status which are responsible by law to accrue, withhold and pay PIT to budget on behalf of a taxpayer and conduct tax accounting and report to tax authorities about the transactions.

Tax agents should remit the withheld tax to the state not later than the date of payment of income to individuals. Tax in respect of income that is accrued but not paid to the individuals should be transferred to the state within 20 calendar days following the end of reporting month.

## **Employment Taxes**

### **Payroll taxes**

An employment-related income is subject to a number of taxes and obligatory payments in Ukraine. Some of them are paid by employers at their own expense, while others are withheld from the income of employees prior to disbursement. The taxes

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and obligatory payments paid by employers on salaries include:

- Contribution to the State Pension Fund of Ukraine at the rate of 33.2%;
- Contribution to State Social Security Fund for Unemployment at the rate of 1.6%;
- Contribution to the State Social Security Fund for Occupational Accidents and Professional Diseases at the rate from 0.56 to 13.5% depending on professional risk of business, most of the business are taxed at the rates not exceeding 3%;
- Contribution to State Social Security Fund for the Temporarily Disabled at the rate of 1.4%.

The taxes and obligatory payments withheld from the employment-related income of the employees include:

- Personal Income Tax (PIT)—see above. The basic rate is 15%.
- Payment to the State Pension Fund of Ukraine at the rate of 2%.
- Contribution to the State Social Security Fund for Unemployment at the rate of 0.6%.
- Contribution to the State Social Security Fund for the Temporarily Disabled at the rate from 0.5 to 1%, depending on the amount of employment related income.

The base for payroll-related charges in Ukraine is capped at UAH 13,260 (starting from April 1, 2010); UAH 13,320 (starting from July 1, 2010), UAH 13,605 (starting from October 1, 2010) and UAH 13,830 (starting from December 1, 2010). It means that if the monthly income of an employee amount to more than 13,260 UAH, the tax base shall amount not more than UAH 13,260.

In addition, an employer pays municipal tax at the rate of 1.7 UAH for each employee monthly.

### Private entrepreneurs

If individuals registered as Private Entrepreneurs (including non-residents of Ukraine), they are subject to PIT as individuals, the only difference is possibility to deduct taxable income on allowable expenses. But also they may choose to be subject to the *simplified taxation* regime<sup>5</sup> and pay *unified tax*, complying with the corresponding qualification criteria.

In order to be able to select the unified tax regime, a private entrepreneur must meet the following criteria:

- Operate in the fields stipulated by the law
- Employ not more than ten employees

<sup>5</sup> Decree of President "On simplified taxation, accounting and reporting regime for small enterprises" 727/98 dated 3 of July, 1998, amended as of May 2010.

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- Have the annual revenue from the sale of goods and/or rendering services that does not exceed UAH500,000 (approximately USD 62,000).

The monthly tax fee is regulated by the local authorities, and ranges from UAH 20 to UAH 200 (the commonly used monthly rate is 200 UAH), depending on the type of activities. A private entrepreneur, paying the unified tax is relieved of any other taxes, including the personal income tax, VAT, social security taxes, in respect of their income from the chosen entrepreneurial activities.

A private entrepreneur, paying the unified tax, must report on the amount of income received and tax paid during the reporting period to the local tax authorities within five calendar days after the end of a reporting quarter. A report to the Pension Fund must also be submitted on a yearly basis, before 1 April of the year following the reporting one.

### Estate Taxes

Ukraine does not have an Estate Tax.

The tax for property gained in inheritance is the following:

0%	Resident family members-First degree
5%	Resident family members-Not first degree
15%	Resident-Received from a non-resident
30%	Non resident-Received from a non-resident

Inheritances or gifts of property between spouses are exempted from inheritance tax as long as the property is jointly owned.

### Property Tax

#### Property Transfer Tax

The following duties and levies are applicable on the direct disposal of real estate:

- State duty at 1% of the contract price. The law does not specify which party is liable for the payment of state duty.
- Pension fund levy at 1% of the contract price, for which the buyer is liable. This levy is not applicable on the sale of land.

In order for sale and purchase agreements between related parties to be authorized by the Ukraine authorities, transactions must be carried out at "arm's length", i.e. Property must be transferred at market value.

The transfer of shares in a real estate owning company is not subject to any transfer tax in Ukraine.

#### Land tax

Land tax is charged annually on land (not buildings) located in Ukraine. Tax rates depend on the category and location of land. If the land has an estimated value then the land tax is calculated as 1% of that estimate. If there is no estimated value, the rate for 2010 is 3.2%.

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### Corporate Profit Tax

Ukrainian entities, foreign entities doing business in Ukraine through a permanent establishment and foreign entities getting passive income originating from Ukraine pay *corporate profit tax* (CPT) at rates stated below.

#### CPT payers

The Corporate Tax Law (CPT Law) <sup>6</sup> provides for the taxation of the following persons:

- B) Legal entities organized under the laws of Ukraine and which carry out business in Ukraine;
- C) Foreign entities which get a profit from sources in Ukraine (the profit arises from activities performed or property located in Ukraine, in case of dividends, interest, royalties and other passive income, the income is paid by a resident of Ukraine)
- D) Non-resident legal entities which carry out business activities on the territory of Ukraine through a permanent establishment;

CPT Law establishes a basic corporate tax rate of 25%. This is a standard rate from the profit for the entities. However, small legal enterprises may choose *the simplified taxation*. Thus VAT—registered entities pay 6% of their sales proceeds under the simplified tax system, while non-VAT—registered entities pay 10%.

CPT Law defines *taxable profit* as gross income minus allowable gross expenses and minus charges of depreciation. Gross income includes income gained from all types of activity over the reporting period in the form of cash, tangible or intangible assets, except for certain items specifically exempted.

#### Rates of CPT

The CPT law fixes the following rates of profit taxation for resident entities:

25%	Basic rate from taxable profits
3%	on gross profit from insurance activities (except life insurance) of resident insurance companies
0%	on gross profit from long-termed life and pension insurance
	for gross profits of non-profitable entities received free of charge in the form of money or property as financial aid or charitable donations
	for profits received from sale of energy conservation equipment manufactured by the taxpayer to the extent of directing the profit to output of the equipment;
	on 50% of profits from special enterprises providing energy-conservative operations or projects;

### Simplified Taxation

Small enterprises may choose a special regime of calculation of CPT using “simpli-

<sup>6</sup> Law of Ukraine “On Corporate Profit Tax” # 334/94- CQ dated 28 of December, 1998 amended as of May 2010.

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“fied” taxation, accounting and reporting system. In this case they pay:

- 6% of their sales proceeds (VAT-registered entities)
- 10% (non-VAT-registered entities).

### **Taxation of Non-Residents**

#### **Withholding Tax**

Withholding tax in Ukraine is kind of CPT. If otherwise is not provided by Double Taxation Treaties, resident (or Representative office of non-resident in Ukraine) shall pay CPT on behalf of non-residents in the following rates:

15% standard rate	Interest (including interest paid under promissory notes issued by resident and excluding interest from state securities sold to non-residents or non-resident's interest from loan given to State of Ukraine)
	Dividends paid or accrued
	Royalties
	Engineering services
	Profits from sales of real estate situated in Ukraine (a Representative Office should be set up)
	Lease payments
	Profits from securities and corporate right transactions
	Profits from joint-cooperation in Ukraine
	Fees from cultural, educational, religious, sporting and entertainment activities in Ukraine
	Brokerage, commission or agents' fees received for services rendered in Ukraine
	Charitable contributions
	Contributions and premiums for insurance or reinsurance of risks in Ukraine (including insurance of life risks) or insurance of resident companies risks outside Ukraine
	Other profits from business activities in Ukraine, excluding compensation for goods, works or services rendered to resident companies, including services for international communications or international information
6%	payments for freight on vehicles
20%	charged on fee paid by resident to non-resident for advertisement services at the expense of the resident
0%	on reinsurance premium

### **Taxation of Permanent Establishment (Representative Offices)**

Income of non-residents doing their business in Ukraine through Permanent Establishment shall be taxed in general order as if it is independent from the non-resident unit.

If the Ukraine is not the only place of doing business of the non-resident and the resident doesn't define the profit gained as a result of his business in Ukraine for taxation purposes, the non-resident should make a separate balance sheet of his business in Ukraine and submit it to local tax authorities by the Permanent Establishment site of registration.

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If the Ukrainian-sourced profit of non-resident is impossible to calculate, a taxable profit shall be calculated by tax authorities by applying of coefficient 0.7% to gross expenses.

Residents providing agent, trust, commission and other similar services in a sale or acquisition of commodities (works, services) at expense and from behalf of non-resident, should withhold and pay PIT from behalf of such a non-resident in the same order as Permanent Establishment of non-resident in Ukraine is taxed.

### Special rules applied to transactions with Off-Shores

Special rules apply to payments for goods or services to foreign entities established in listed by Ukrainian government off-shore jurisdictions. Only 85% of payments to an entity in one of these jurisdictions will be deductible, unless evidence is held that the entity is subject to the ordinary tax rules of that jurisdiction (i.e., it does not benefit from the offshore tax regime). The list includes 36 off-shore jurisdictions and has not been changed from 2006.

## Transaction Taxes

### Excise

Excise tax is payable on cars, alcoholic beverages, tobacco products, beer, petrol and diesel fuel, whether imported or produced domestically. Rates of excise duty are specific.

### VAT

VAT in Ukraine is payable by buyer if it is registered as VAT payer or importer of goods irrespective of its registration as VAT payer.

VAT Law provides the standard rate of VAT on domestic sales of goods and services is 20% added to agreed price. Agreed price, which should not exceed a "usual" price, includes excise tax, customs duty, other taxes and duties, except for VAT and duty to Pension Fund paid by for cellular mobile services. VAT Law provides a rule that if the usual price is higher than agreed by parties price on 20%, the usual price should be taken to be taxable.

Not taxable operations are issue of securities, insurance services, financial operations and other stipulated by VAT Law. The VAT Law provides also sales exempt from VAT such as sale of infant food, produced in Ukraine, periodical publications, goods for disabled persons, some medical products, some transportation, educational services, transfer of land.

### Import VAT

Import of goods is rated at 20%.

### Export VAT

Exported goods and related services are zero-rated. Other services are taxable at standard rate, but VAT law provides some exemptions. The following export services

<sup>7</sup> Law of Ukraine "On Value Added Tax" # 168/97 dated 3 of April, 1997 amended as of May 2010.

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are exempt from VAT: services of consultants, engineers, attorneys, accountants, auditors, actuaries, data base proceeding and providing information, transfer of copyright.

### VAT in Real Estate operations

The sale and leasing of real estate (including land) is subject to VAT in Ukraine at the standard rate of 20%. The transfer of shares in a real estate owning company is exempt from VAT.

The sale of real estate, except for the sale of land alone, is subject to VAT at the rate of 20% charged on the contract price. If the value of the land on which a building is constructed is included in the sale value of the building then the whole transaction will be VAT taxable at the rate of 20%.

### Registration of VAT payer

VAT is paid by a taxpayer who has been registered for VAT purposes with the Ukrainian tax authorities and by import operations. Registration is required if profits within the last 12 months exceed the threshold of UAH 300,000 (approximately USD 37 500).

### VAT refund

The difference between VAT obligation and VAT credit is refundable from state budget. The Ukraine has difficulty with reimbursements of VAT and in 2010 a decision was made by the Government to issue bonds. The bonds will be circulating on the secondary market and will be accepted for refinancing by the central bank of Ukraine.

### Dividends

Companies paying dividends are generally required to pay advance corporate income tax at the standard rate 25% charged on the amount of dividends. The advance payment is used to meet their subsequent corporate income tax liabilities (other than for insurance companies). If the advance tax is not able to be used in the year the dividend is paid, it is carried over to future income years, but it cannot be refunded.

Companies must also deduct withholding tax from dividends paid to individuals and foreign entities. For dividends paid to resident or non-resident individuals, or to foreign entities (including those with a permanent establishment in Ukraine), the standard rate is 15%. A lower rate may apply under a relevant tax treaty.

17 of May, 2010 the new Law have entered into force. By the Law the parent company which holds 20% and more of shares in the Ukrainian company, should account the dividends separately and do not include them in gross income. The advance payment is not applicable anymore to payment of dividends in form of shares, which do not change proportions of shareholders in company charter capital, by joint-investment institutes and got by parent companies which hold 20% and more of shares in the Ukrainian company.

### Royalty

Royalty are VAT exempt. The rate of withholding tax is 15%.

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But the definition of Royalty in Ukraine is a little bit different from definition provided in Model Double Taxation Treaties. It is important to determine whether payment is to be considered as royalty, defined in CPT Law, to be exempt from VAT and deducted from taxable income.

Royalty is defined in Ukrainian CPT Law as payment received as consideration for use or for granting the right to use any copyright on literary work, work of art or science, including computer programs, other recording mediums, video or audiotapes, movies, or tapes for radio and TV broadcasting; for purchasing any patent, registered trademark, designs, patterns, formulas, process, right for information on industrial, commercial or scientific experience (know-how).

CPT Law provides what payments are not considered as royalties. These are payments for receiving the above-mentioned objects in disposition or ownership or if the terms of use of such objects empower the user to sell or otherwise dispose such objects.

### Miscellaneous taxes

In addition to taxes and duties provided above, the Ukrainian tax system includes also other state and local taxes. <sup>8</sup>

State taxes in Ukraine are as follows: customs duty; state duty; proprietors of transport vehicles and other self-propelled machines and mechanisms tax; duty for geological survey works, executed at the expense of state budget; duty for the special use of natural resources; duty for contamination of natural environment; payment for trade patent; fixed agricultural tax; tax on development of viticulture, gardening and hopgrowing; use of radio frequency resource duty; a special purpose raise to the ratified tariff on natural gas for the users etc.

The local taxes in Ukraine are as follows: advertising tax; municipal tax; charge for use of local symbols; automobile parking duty, market charge; resort collection, collection for conducting of local auction, competitive sale and lotteries; collection from the proprietors of dogs etc.

### Tax Treaties

Withholding tax rates on dividends, interest and royalties under Ukraine's tax treaty network. There are following Treaties are ratified by Ukraine and the rates for dividends, interest and royalty payments, made to non-residents (the domestic rate is 15 to all this payments) are as follows.

Countries	Dividends	Interest	Royalties
Algeria	5/15	10	10
Armenia	5/15	10	0
Austria	5/15	2/5	0/5
Azerbaijan	10/15	10	10

<sup>8</sup> Law of Ukraine "On Taxation System" # 1251-XII dated 25 of June, 1991, amended as of May 2010.

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Countries	Dividends	Interest	Royalties
Belarus	15	10	15
Belgium	5/15	2/10	0/10
Brazil	10/15	15	15
Bulgaria	5/15	10	10
Canada	5/15	10	0/10
China	5/15	10	10
Croatia	5/15	10	10
Cyprus	0	0	0
Czech Republic	5/15	5	10
Denmark	5/15	0/10	0/10
Egypt	12	12	12
Estonia	5/15	10	10
Finland	0/5/15	5/10	0/5/10
France	0/5/15	2/10	0/10
Georgia	5/10	10	10
Germany	5/10	2/5	0/5
Greece	5/10	10	10
Hungary	5/15	10	5
India	10/15	10	10
Indonesia	10/15	10	10
Iran	10	10	10
Iceland	5/15	10	10
Israel	5/15	5/10	10
Italy	5/15	10	7
Japan	15	10	0/10
Jordan	5/15	10	10
Kazakhstan	5/15	10	10
Korea	5/15	5	5
Kuwait	5	0	10
Kyrgyzstan	5/15	10	10
Latvia	5/15	10	10
Lebanon	5/15	10	10
Lithuania	5/15	10	10
Libya	5/15	10	10
Macedonia	5/15	10	10
Malaysia	15	15	10/15
Moldova	5/15	10	10
Mongolia	0	0	0
Netherlands	0/5/15	2/10	0/10
Norway	5/15	10	5/10
Poland	5/15	10	10
Portugal	10/15	10	10
Romania	10/15	10	10/15
Russia	5/15	10	10

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Countries	Dividends	Interest	Royalties
Serbia and Montenegro	5/15	10	10
Slovak Republic	10/15	10	10
Slovenia	5/15	5	5/10
South Africa	5/15	0/10	10
Spain	15	0	0/5
Sweden	0/5/10	10	0/10
Switzerland	5/15	0/10	0/10
Syria	10	10	15
Tajikistan	10	10	10
Thailand	10/15	10/15	15
Turkey	10/15	10	10
Turkmenistan	10	10	10
United Arab Emirates	5/10	3	0/10
United Kingdom	5/10	0	0
USA	5/15	0	10
Uzbekistan	10	10	10
Vietnam	10	10	10

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