

## Withholding Taxes

Withholding taxes are deducted from amounts paid to both residents and to non-residents. Some are deducted as advance taxes, including pay-as-you-earn (PAYE) while others are a final tax. Currently there are three rates of withholding taxes (including PAYE) these being 3%, 10%, 7.5% and 15%. These rates may be varied by a DTAA or by specific provisions in the Income Tax Act. The table below indicates the current rates of withholding taxes for various items.

### Withholding Tax Rates (Domestic Rates)

Payment	Rate applicable to		Final or advance tax
	Residents	Non-residents	
Interest	10	15	Final tax for non residents Advance tax for residents
Dividends	7.5	7.5	Final tax
Commercial royalties	-	15	Final tax
Management and consultancy fees	-	15	Final tax
Entertainment fees	-	10	Final tax
Construction	3	3	Advanced tax
Mine Rehabilitation	10	10	Final tax

<b>Payment of Rent</b>	<b>5</b>	<b>5</b>	<b>Advanced tax</b>
<b>Brokerage or Commission</b>	<b>10</b>	<b>10</b>	<b>Advanced tax</b>

## Withholding Tax rates of payments to residents of DTAA countries

Payment to residents of	Dividend	Interest	Royalties	Management, Consultancy / Technical fees
<b>France</b>	5% if beneficial owner is a Company and holds 25% or more of shares.  12% in all other cases	10%	10%	7.5%
<b>Mauritius</b>	5% if beneficial owner is a Company and holds 25% or more of shares.  10% in all other cases.	12%	12.5%	15%
<b>Namibia</b>	10%	10%	10%	15%
<b>South Africa</b>	10% if beneficial owner is a Company and holds 25% or more of shares.  15% in all other cases.	10%	10%	10%
<b>Sweden</b>	15%	15%	15%	15%
<b>United Kingdom</b>	5% if beneficial owner is a Company and holds 25% or more of shares.  12% in all other cases.	10%	10%	7.5%
<b>Seychelles</b>	5% if beneficial owner is a Company and holds 25% or more of shares.  10% in all other cases.	7.5%	10%	10%
<b>Barbados</b>	5% if beneficial owner is a Company and holds 25% or more of shares.  12% in all other cases.	10%	10%	10%
<b>Zimbabwe</b>	5% if beneficial owner is a Company and holds 25% or more of shares.  10% in all other cases.	10%	10%	10%

<b>INDIA</b>	7.5% if beneficial owner is a Company and holds 25% or more of shares  10% in all other cases	10%	10%	10%
--------------	---	-----	-----	-----