

2025 Tax Treaty Survey

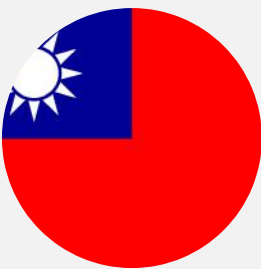


Top Priority Treaty Countries

Ranked as #1 priority by members



1. Switzerland



2. Taiwan



T-3. Brazil



T-3. Israel



T-3. Italy



T-3. Saudi Arabia



T-3. Singapore

Top Treaty Negotiation Elements

Voted most significant by members

SWITZERLAND

1 Reducing withholding rates on dividends, Limitation of Benefits ("LoB"), Mutual Agreement Process ("MAP"), reducing withholding rates on interests and royalties

TAIWAN

Permanent Establishment ("PE"), reducing withholding rates on interests and dividends

2

BRAZIL

Transfer Pricing, reducing withholding rates on interests and dividends

3

ISRAEL

Reducing withholding rates on dividends, transfer pricing, MAP

3

ITALY

Reducing withholding rates on royalties, MAP, PE

3

SAUDI ARABIA

MAP, PE, Business profits

3

SINGAPORE

Reducing withholding rates on royalties, PE, MAP

3

Overall Priority Treaty Countries

Total number of votes



1. Brazil



2. Singapore



3. India



4. Switzerland

Other Priority Countries: Israel, Saudi Arabia, Republic of Korea, Argentina, Taiwan, Italy

Read the full survey results at www.nftc.org