DENMARK

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0-SYNOPTIC TABLE: TAXATION OF RESIDENTS AND NON-RESIDENTS

	RESIDENTS NON-RESIDENTS
CORPORATE INCOME TAX	22% Cooperatives: 14.3%
TAX ON CAPITAL GAINS	22%
WITHHOLDING TAXES Dividends Interests Royalties	 22% 22% 22%
PERSONAL INCOME TAX	Minimum national rate: 12.09% Maximum national rate: 15% on income exceeding DKK568,900 + local taxes for a total 52.07%
OTHER TAXES Hydrocarbons tax Tax on real estate Payroll tax Tax on motorvehicles	 25% 1.6% - 3.4% 3.54% - 15.3% 85% - 150% of the vehicle value
VAT	25%: standard rate 0%: newspapers and journals (published more than once a month), intra-community and international transport
LOSSES Carried forward Carried back	 Unlimited Not applied
DEPRECIATION Fixed assets Intangible assets	 Machinary and other company assets, included motorvehicles: maximum 25% Ships, trains and airplanes: maximum 15% 7 years

1- AN OUTLINE OF COMPANY LAW

BUSINESS ENTITY	MAIN TRAITS	FORMATION	GOVERNANCE
Companies	For legal and tax purposes, a company is a separate legal person that can also be 100% owned by foreign individuals and company. For legal purposes, all Danish corporations are limited liability companies. Companies are subject to corporate tax on their income and profits, while shareholders are subject to tax on the profits they receive in the form of dividends. The most common forms are public limited liability companies and private limited liability companies. Both can be listed on the stock exchange.		New companies must be registered with the Company Register within two weeks of incorporation. Management is entrusted to a BoD composed of at least three people and one or more directors or by one or more directors under the supervision of an independent supervisory committee. The shareholders elect the Board of Directors during the annual general meeting. If the company has had at least 35 employees in the last three years, they have the right to be represented on the Board of Directors.
Branches of foreign limited companies	Foreign limited companies within the EU, EEA, Georgia, South Korea, Switzerland and the US may perform activities in Denmark through a branch. Other foreign companies may only perform activities through a branch if allowed under an international agreement or if they present a declaration of reciprocity with respect to their home country.		The branch is managed by one or more managers. The foreign company must submit the audited annual financial statements to the Danish tax authorities which are disclosed to the public.
Administration or liaison offices	Foreign entities may also perform activities in Denmark through an administration or liaison office if the activities are limited to those of an auxiliary and preparatory character. Such activities cannot include any kind of sales activities, and an administration or liaison office must not have the power to enter into binding contracts on sales on behalf of a non-resident company.		
General partnerships	The general partnership is not subject to taxation in Denmark. It is a transparent entity and the participants pay taxes on their share of net corporate income, applying the relative rates and using the losses to balance the taxable income.	There are no specific initial contributions.	The company needs to be registered only if the members are legal entities. In this case, the general partnership must prepare and submit to the Danish tax authorities the audited annual financial statements which are disclosed to the public. There are no legal requirements relating to the management of the general partnership, which may represent a possibility for a foreign company to operate in Denmark without having to submit its financial statements to the Danish tax authorities.
Limited partnerships	It is a separate legal person that must have at least two members, which can be individuals or companies.		The limited partnership is tax free and its members are subject to tax on their share of net corporate income. If it is to be registered for legal purposes, the audited annual financial statements are disclosed to the public.
Joint venture	A joint venture is not a separate legal entity. The participants may be individuals or legal entities. Each participant has unlimited liability for the debt of the joint venture.		The company needs to be registered only if the members are legal entities. In such case, the joint venture must prepare and submit the audited annual financial statements to the Danish tax authorities who make them public.

BUSINESS ENTITY	MAIN TRAITS	FORMATION	GOVERNANCE
Sole proprietorships	An individual who owns and operates a business conducts business activity through a sole proprietorship. The sole proprietorship does not constitute a separate legal entity because the operator effectively is the business. The sole proprietor has unlimited liability for the debts and liabilities of the sole proprietorship.	An EU resident can set up a sole proprietorship without special authorizations if he has obtained a residence permit. Residents of Denmark and Nordic countries do not have to comply with this rule.	New companies must be registered with the Company Register within two weeks of incorporation. Registration of sole proprietorships is free. The owner of the sole proprietorship must prepare the financial statements, without these needing to be revised or published.

2- WHEN DANISH COMPANIES CAN BE CONSIDERED RESIDENT OR NON-RESIDENT?

A corporation is deemed to be resident in Denmark for tax purposes if it is a Danish registered limited company (A/S) or private limited company (ApS), or its management is effectively situated in Denmark, regardless of where it is registered.

Partnerships, joint ventures, limited partnerships and limited business partnerships are Danish residents upon registration. Because they are transparent entities for tax purposes, their residence is irrelevant for Danish participants but may be relevant for foreign investors.

3- BUSINESS AND NON-BUSINESS ACTIVITIES (ADMINISTRATIVE OFFICES, LIAISON OFFICES, PURCHASING OFFICES, ETC.)

Foreign companies can carry out their business in Denmark through an administrative or liaison office whose activities, however, cannot include sales or sales contracts on behalf of non-resident companies. When the office carries out only auxiliary and preparatory activities, the foreign company is not obliged to submit its annual financial statements either to the State Agency for Enterprises, or to the Danish Tax Authorities, as the activities of the office are tax free.

4- WHICH FOREIGN LOCAL UNITS CAN BE OPENED IN DENMARK: SECONDARY ESTABLISHMENTS, BRANCHES, SUBSIDIARIES OR PERMANENT ESTABLISHMENTS?

A non-resident is not subject to Danish taxes on operating or business profits. In the event that he carries out activities in Denmark, however, he must pay the income tax from Danish sources.

A foreign company is subject to Danish income tax, while the Danish branch does not have any withholding tax on remittances and, furthermore, payments of royalties or interest are considered internal money transfers.

5- CALCULATING TAXABLE INCOME

Trading profits are calculated for Danish tax purposes in accordance with the financial annual report, but they are adjusted for certain expenditures to comply with the tax provisions. Adjustment must be made for depreciation resulting from book to tax differences. Some of the most common adjustments include the following:

1. Reserves and provisions contained in the financial statements that relate to anticipated but unquantified losses are not deductible in determining income for tax purposes.
2. Costs of increasing the company's capital are generally not deductible.
3. Penalty interest payable to the Danish Tax Administration in respect of income and value added tax (VAT) is not tax deductible. Fines and bribes are generally non-deductible.
4. Gains on the disposal of certain assets are exempt from tax or reduced

5. Dividends paid by a resident or non-resident company to another resident company or a Danish permanent establishment of a company resident in an EU or EEA country, or in any case in a country with which Denmark has signed an AFB: tax free, to certain conditions.
6. For accounting purposes, contractors usually record income as a percentage of completion and may recognise profit using the completed contract method. Where contractors adopt this method, no deduction is permitted for anticipated losses.
7. Interest is taxable or tax deductible on an accrual basis. Limitations may apply to the tax deductibility, due to the Danish thin capitalisation rules or due to Danish anti-avoidance rules with respect to capital trusts investing in Danish companies.
8. Only 25% of entertainment expenses relating to the taxpayer’s business activities (including gifts to customers) are tax deductible.
9. Foreign exchange gains on debt are generally subject to tax, and foreign exchange losses are generally deductible when realised. Companies may choose to include unrealised foreign exchange gains and losses on unquoted debt in their taxable income.
10. In certain circumstances, a creditor’s extinguishment of commercial debts will affect the Danish taxable income of the debtor. In certain instances, a debtor’s deductible tax loss may for example be reduced by the part of the debt that has been repealed by a voluntary overall settlement of the debtor’s debt liabilities.

6- TREATMENT OF LOSSES

Trading losses of an active business may offset all business income and gains received in the same accounting period. Such losses may not offset financial income. Trading losses cannot be carried back. An active business may carry forward any remaining loss indefinitely.

The taxable profits for any year up to a given threshold may be fully relieved by unused losses from previous years. However, the amount of profits in excess of the threshold for that year which may be relieved is limited to 60%. In 2023, the threshold is DKK 9,135,000.

Loss carry-forward may be reduced if there is a substantial change of ownership (more than 50% of the number of votes or number of shares) in the period from the beginning of the accounting year in which the loss has been produced until the end of the accounting year in which the deduction of loss is desired.

7- IS INTEREST DEDUCTIBLE?

For Danish tax purposes, a taxpayer generally may deduct interest expenses on an accrual basis. Interest expenses are deemed to be incurred once the interest becomes due and payable, and not necessarily when paid. Where interest is paid to related persons, its deductibility is restricted to arm's length rates.

When interest is paid by a resident company to a non-resident company, or from a Danish PE of a foreign company to another non-resident company, the paying company may have to withhold Danish tax from the payment. The Danish withholding tax rate is 22%. The withholding tax may be reduced or eliminated by the EU Interest and Royalties Directive or a tax treaty.

Thin capitalisation rules limit the tax deductibility of interest expenses and apply to all Danish resident companies and to all foreign companies with a permanent establishment in Denmark paying interest to certain Danish or foreign companies.

An anti-avoidance tax rule limits the tax deductibility of net financial expenses exceeding DKK 21.3 million.

8- IS DEPRECIATION DEDUCTIBILITY ACKNOWLEDGED?
Danish tax law allows taxpayers to take depreciation deductions for equipment and other business assets over their useful lives. A business may depreciate machinery and equipment, including motor vehicles, on a pooled declining balance basis – up to a maximum rate of 25%.
No depreciation is available in the year of acquisition of assets used or intended for use in leasing. However, a maximum depreciation rate of 50% is available in the year following acquisition.
For some types of ships, airplanes and trains, for oil rigs and the like in the hydrocarbon sector and for some power generation plants, a maximum depreciation of 15% is allowed.
Taxpayers may depreciate utility distribution plant, railroad tracks and radio, television and telecommunication distribution plant at a maximum of only 7%.
Taxpayers may claim depreciation on industrial buildings, shops, storage facilities, cinemas, central heating, elevators and other component parts of industrial buildings.at the maximum rate of 4%.
Capital expenditure incurred in scientific research may be fully depreciated in the year incurred or, alternatively, on a straight-line basis over five years.
Goodwill may be amortised over seven years at 1/7 per annum on a straight-line basis.
Patent rights and industrial know-how may be fully amortised in the year acquired or alternatively over seven years at 1/7 per annum on a straight-line basis.

9- WHAT TAX TREATMENT IS APPLIED TO RESIDENT COMPANIES?
Limited companies, private limited companies, branches of foreign companies and trusts covered by the Danish Trust Tax Law pay Danish income tax at a flat tax rate. The rate for both resident and non-resident businesses is 22% for the 2023 tax year.
Tax must be paid on account in 2 instalments. The first payment is due on or before 20 March, and the second payment is due on or before 20 November.
The on account tax is computed on the basis of 50% of the company's average income tax over the previous 3 years. If the company has not existed for 3 years, the company may voluntarily choose to pay on account based upon its estimate of tax due for the current year.
Investment associations are taxable only on undistributed profits at the normal corporate income tax rates. Production and marketing cooperatives are subject to tax at a rate of 14.3% of income. Their income is determined as a percentage of their capital (usually in the range of 4% to 6%).
Partnerships, limited partnerships and limited business partnerships do not pay tax at the entity level. Instead the participants are taxed on their part of the net income at their respective separate income tax rates.

10- ARE GROUP COMPANIES CONSIDERED SINGLE COMPANIES FOR FISCAL PURPOSES?
Although Denmark does not allow consolidated returns, it has tax rules on Danish forced joint taxation and on voluntary global joint taxation of company groups.
Joint taxation implies that each company included in the joint taxation group should calculate its taxable income or loss on a stand-alone basis. Thus, the taxable income/losses of each company are then added to determine the joint taxable income of the group, allowing losses of some companies to offset profits of other companies but only if the companies were all subject to joint taxation at the time the losses were incurred.
Denmark introduced the principle of forced joint taxation for group companies subject to Danish taxation and for Danish permanent establishments and real properties of foreign group companies. A group is not defined according to shareholding percentage but rather according to votes or decisive influence. For example, a group exists where a company holds the majority of voting rights in another company.

Denmark introduced the concept of voluntary international joint taxation, which includes all foreign entities “above” and “below” the Danish company in the organisational scheme, as well as all foreign group companies, branches, foreign PEs and immovable property.
In some cases, tax treaties with foreign countries may not allow Denmark to tax the foreign income.

11- WHAT TAX TREATMENT IS APPLIED TO FOREIGN LOCAL UNITS AND NON-RESIDENT COMPANIES?

A foreign company is subject to Danish tax at the rate of 22% only on the profits recorded in Denmark and on the capital gains accrued on the activities of the branch in Denmark, while there is no withholding tax on remittances of the profits of the branch and on the payments of royalties and interest to the foreign location, which may appear as an internal money transfer.
A non-resident's net income from real estate in Denmark is also subject to 22% corporate tax.

12- ARE CAPITAL GAINS TAXED?

Resident and non-resident companies are subject to Danish capital gains tax only, unless they choose voluntary global tax consolidation or make use of Danish rules on foreign subsidiaries.
Resident individuals are taxed on global capital gains, while non-resident individuals are taxed on Danish-sourced capital gains only.
Capital gains accrued on equity investments in qualified companies are not taxed and the expenses are non-deductible.
Capital gains on portfolio shares are subject to the corporate rate of 22% and expenses are deductible.
Capital gains on shares of non-resident companies and individuals are not taxed, except in the case where the shares - in relation to legal persons - concern a Danish permanent establishment.
Capital gains from the sale of real estate are taxable.

13- WHAT TAX TREATMENT IS APPLIED IN CASE OF COMPANY LIQUIDATION?

Under Danish tax law, a liquidating company recognises a taxable capital gain or loss on all of its assets and liabilities.
A liquidation distribution made in the final calendar year of liquidation will generally be considered a gain on the disposal of shares. If the shares in the liquidating company are portfolio shares, the gain will be taxable irrespective of the ownership period. Liquidation distributions to the shareholders in the years before the final year of liquidation are taxed as dividends and, thus, may be exempt from Danish withholding tax

14- TRANSFER OR REPURCHASE OF SHARES: HOW ARE THEY TAXED?

In general, Denmark treats a reduction of capital as a partial disposal of shares in a company. Accordingly, Denmark taxes the full amount, without deduction of original costs or contributions, as a dividend distribution. As such, if the amount is distributed to a Danish or a foreign corporate shareholder fulfilling the requirements to receive tax exempt dividends, that amount can be received exempt from Danish tax. In the case of a foreign parent company, where the shareholding or further requirements cannot be met, Danish withholding tax may apply.
On the sale of shares to the issuing company, the sales amount is treated as a dividend in the hands of the shareholder.

15- WHAT OTHER TAXES ARE APPLIED IN DENMARK?
VAT
The standard rate of VAT is 25%. The 0% rate applies to newspapers and journals (published more than once a month), intra-community and international transport
Hydrocarbons tax
The corporate income tax rate for oil and gas companies is 25%.
Stamp duty
It is paid on mortgages on real estate (1.5%) and on the sale of real estate (0.6%).
Land tax on real estate
The municipalities levy land tax on real estate each year based on the annual assessed value of land. This tax varies between 1.6% and 3.4% of the public stated value.
Payroll duty
It is paid by companies carrying out activities not subject to Danish VAT, if the total annual salary and profits exceeds 80,000 DKK:

Business actvity/type	***Tax base***	***Rate (%)***
Banks, insurance companies and other financial services	Total payroll	15.3
Foundations, associations, companies with exempt gambling activities and public companies without a taxable profit Foundations, associations, companies with exempt gambling activities and public companies without a taxable profit	Total payroll	6.37
Newspaper importers and publishers	Total revenue from newspaper sales	3.54
All other business activities	Total payroll plus the company's annual profit or Total payroll minus the company's annual losses	4.12

Tax on gambling
The gambling market was partially liberalized from January 1, 2012. Online gaming operators are taxed at 28%, casinos at 45% and slot machines at 41% of gross income.
Excise tax on consumer goods
Denmark imposes an excise tax on a variety of consumer goods including fuels, alcoholic beverages, tobacco products, chocolate, radios and televisions.
Motor vehicles tax
Denmark imposes a motor vehicle registration tax, usually on the vehicle's initial registration in Denmark. The tax is generally 85% of the vehicle's value under DKK 210,600 and 150% on the remaining value. Lower rates are available for certain types of cars used for business purposes. Denmark also imposes a number plate tax of DKK 1,180, and a tax based on fuel consumption.
Tax on insurance premiums
A special duty is levied monthly on non-life insurance documents and premiums at a rate of 1.1% of non-life insurance premiums.
Excess profits tax
No specific excess profits tax applies.

Environmental taxes
There are several Danish taxes based on environmental issues, including levies on packaging, pesticides, tap water, fossil fuels, electricity and sewerage. Energy tax relief is generally available for VAT-registered businesses engaging in energy production.
Taxes are also imposed on carbon and sulphur oxide emissions, while the use of less environmentally hazardous vehicle fuels is tax-privileged.

16- DIVIDENDS, INTERESTS AND ROYALTIES: HOW ARE THEY CONSIDERED AND TAXED?

Dividends paid are subject to Danish withholding tax at a rate of 22%. The rate is reduced to 15% if the foreign company receiving the dividend owns less than 10% of the shares in the Danish distributing company.
However, if the shareholder is a foreign company, a Danish company may distribute dividends without withholding tax if the foreign company qualifies as a company under Danish rules, directly owns at least 10% of the shares in the Danish company, and the distribution of the dividend to the foreign company is protected by either the EU Parent Subsidiary Directive or by one of Denmark's tax treaties.
Royalties received from Danish sources are subject to 22% withholding tax. An applicable double tax treaty or the EU Interest and Royalties Directive may reduce or eliminate this withholding tax.
Interest paid by a controlled Danish company to foreign controlling companies is subject to 22% withholding tax. A relevant tax treaty or the EU Interest and Royalties Directive may reduce or eliminate the withholding tax.

17- HOW ARE CALCULATED STOCKS OR INVENTORIES?

A business may value inventory at the current price at the end of the financial year, at the gross purchase price, or at the cost of production. A business may apply different valuation methods to different categories of products. The last-in, first-out (LIFO) method of valuing inventory is not acceptable for income tax purposes.

18- HOW ARE RESIDENT INDIVIDUALS TAXED?

Tax liability criteria
"Resident of Denmark" means a person domiciled in Denmark or a person who, without being domiciled in Denmark, stays in Denmark for a period of at least 6 months, including short stays abroad for holidays or similar.
Tax rates

Local tax (average)	25%
National bottom tax	12.09%
National top tax	14.98%
Maximum marginal tax rate	52.07%

Bottom tax of 12.09% in 2023 is levied on the total of personal income and positive net capital income after deduction of the LMC. A basic allowance of DKK 48,000 is available. Any unused part of the allowance may be transferred to a spouse.
Top tax of 15% is levied on personal income and positive net capital income over DKK48,800 for single individuals and DKK97,600 for married couples, after deduction of the LMC. There is a basic allowance of DKK568,900. This allowance cannot be transferred between spouses.
Total national and local income tax (this excludes ecclesiastical tax to Lutheran Church of Denmark, which is approximately 1% and applies only to members of the Church) may not exceed 52.07% (no change from 2022).

Main deductions and reliefs

Each spouse must file a tax return and the tax so assessed is collected individually.

A tax exempt payment is made to families with children, regardless of the income of the child or parents. In 2023, the payment constitutes the following annual amounts:

Age of the child	*DKK*
0 – 2 years	18,984
3 – 6 years	15,084
7 – 17 years	11,820

Inheritance and gift tax

If the deceased was domiciled in Denmark, inheritance tax must be paid on all assets, irrespective of whether they are situated in Denmark or abroad.

The inheritance transmitted to the spouse is exempt from tax, while, when the heirs are persons other than children, grandchildren or parents of the deceased, an additional 25% is applied, bringing the property tax to 36.25%.

Pension, social security and national health policy

In Denmark all wage earners aged 16–65 years of age are compulsory members of the Labour Market Supplementary Pension Fund (ATP), although the Danish Government encourages additional pension savings arrangements.

The contribution is DKK284 per month, of which the employer generally pays DKK189.35 and the wage earner pays DKK94.65.

19- HOW ARE FOREIGN INDIVIDUALS TAXED? WHEN ARE THEY CONSIDERED RESIDENT?

Tax liability criteria

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The inheritance transmitted to the spouse is exempt from tax, while, when the heirs are persons other than children, grandchildren or parents of the deceased, an additional 25% is applied, bringing the property tax to 36.25%.

Pension, social security and national health policy

Persons subject to limited tax liability may not make deductions for contributions to private pension schemes.

Foreign wage earners are exempt if employed in Denmark for under 6 months or if they are covered by a pension scheme in their home country during longer periods of employment in Denmark for companies abroad.

20- TERMS FOR TAX PAYMENTS: THE FISCAL YEAR IN DENMARK

The Danish tax year corresponds to the calendar year, although taxpayers can choose an alternative tax year. The fiscal year usually starts on the first day of the month.

To choose an alternative tax year, taxpayers must seek authorization from the Danish tax administration.

The declaration must be sent electronically.

Taxes must be paid in two installments, calculated on the average of the previous three years.

In case of late payment, a monthly interest of 0.7% is applied.

21- WHAT TAX INSPECTIONS ARE MADE?

The Danish tax administration may carry out checks on taxpayers' books and accounting records relating to one or more issues, also requesting additional information. The tax inspection must take place within three / five years; in case of fraud, there is no such limit.

In anticipation of tax audits, taxpayers must keep contracts and documents for a period of five years.

If the errors or omissions found during the inspection are accidental, the sanction imposed is of a pecuniary nature; if it is proved that it is deliberate, the penalty envisaged also includes imprisonment.

22- CAN TAXPAYERS AGREE IN ADVANCE THEIR TAX TREATMENT?

To obtain the application of a particular tax regime, the taxpayer must submit a written request. The authorities have two / three months to communicate their decision which becomes binding for five years, both for the authorities and for the taxpayer.

23- WHAT EXCHANGE CONTROLS ARE CARRIED OUT?

The currency in force in Denmark is the Danish Krone (DKK).

Since 1998, Denmark imposes no restrictions on capital movements to or from Denmark. Further, the previous system of notifying the Danish Central Bank (Nationalbanken) of all foreign investments exceeding a certain minimum amount has been abolished. The Danish Central Bank now receives information on all movements from a foreign bank account to a Danish bank account automatically for statistical purposes.

24- WHAT TAX RELIEFS AND INCENTIVES ARE GRANTED BY THE DANISH GOVERNMENT?

Regional development grants

There are no direct regional development grants in Denmark, but it may be possible to obtain loans on favourable terms.

Export credit guarantees and export financing

For a moderate premium, a guarantee is provided against political and commercial risks in a purchaser's country. Financing is available in the form of long-term loans at market rates of interest. Other terms depend on the particular purchaser and the extent of Danish export interests in the particular country.

Research and development

A special tax regime exists for research and development (R&D) costs realised in connection with a company's business activities. A company may choose to deduct 108% of such costs on an accrual basis in 2023, 2024 and 2025 or to depreciate such costs over 5 years. If a business realises such costs before the business has begun, a taxpayer may only deduct or depreciate such costs from the start of the year of business activities.

In a year in which a business makes a loss for tax purposes, it may request a cash payment from the tax authority in respect of R&D expenditure of up to DKK25 million per year at the current corporate tax rate (22% in 2023).

Tax credit carry-forwards

Tax credits to be carried forward are not limited, and tax credits can be carried forward indefinitely. Thus, if a Danish company or PE has no taxable income to offset the foreign tax, the Danish company or PE may disregard its tax loss to the extent that its taxable income corresponds to the foreign income.

Danish tonnage tax regime

Shipping companies (and some affiliated companies) may choose taxation under the Danish tonnage tax regime. In this case the taxation is calculated in a specific way, based on the total tonnage operated. Thereby the taxation is independent of earnings or losses incurred in a given taxation period. The ordinary corporate tax rate of 22% applies to the taxable income calculated. The choice is binding for 10 years. Further, seafarers may be exempted from paying income tax on their DIS (Danish International Shipping Register) salary.

25- HAS DENMARK SIGNED BILATERAL TAX AGREEMENTS WITH OTHER COUNTRIES? TABLE OF WITHHOLDING TAXES

The withholding tax applied to payments of dividends, interest on controlled debts and royalties from non-residents of non-signatory countries is 22%. "Controlled debt" means the debt to a foreign company that owns more than 50% of the share capital or voting power of the Danish company that pays the interest; no withholding taxes are applied on dividends paid by a Danish company to a company resident in an EU or EEA member state; for dividends paid to companies resident outside the EU, the tax rate is reduced to 15% on shareholdings of less than 10%.

The interest is not subject to Danish withholding tax, except if paid to a foreign company that owns more than 50% of the capital or voting rights of the paying company.

Royalties relating to copyrights, news and equipment from Danish sources are exempt from withholding tax.

The following Danish withholding rates apply to non-residents:

	Dividends %	*Interest %*	*Royalties %*

Non-treaty countries	15/22/44	0/22	0/22
Treaty countries			
Argentina	10/15	0/12	10/15
Armenia	0/5/15	0/5/15	5/10
Australia	15	10	10
Austria	0/10/15	0	0
Azerbaijan	0/15	0/8	5/10
Bangladesh	10/15	0/10	10
Belarus	0	0	0
Belgium	0/15	0/10	0
Bosnia and Herzegovina	5/15	0	10
Brazil	15/22	0/15	15/25
Bulgaria	0/5/15	0	0
Canada	5/15	0/10	0/10
Chile	5/15	15	15
China	5/10	0/10	10
Croatia	5/10	0	0/10
Cyprus	0/15	0	0
Czech Republic	0/15	0	0/10
Egypt	15/20	0	20
Estonia	0/5/15	0/10	0/10
Faroe Islands	0/15	0	0
Finland	0/15	0	0
Georgia	0/5/10	0	0
Germany	0/5/15	0	0
Ghana	5/15	0/8	8
Greece	0/18	0/8	0/5
Greenland	15/22	0	10
Hungary	0/15	0	0
Iceland	0/15	0	0
India	15/22	10/15	20
Indonesia	10/20	10	15
Irleland	0/15	0	0
Israel	0/10	0/5	0
Italy	0/15	0/10	0/5
Jamaica	10/15	0/12,5	10
Japan	0/15	0/10	0
Kenia	20/22	20	20
Korea	15	0	10/15
Kuwait	0/5/15	0	10
Kyrghyzstan	0	0	0
Latvia	0/5/15	0/10	0/10
Lithuania	0/5/15	0/10	0/10
Luxembourg	0/5/15	0	0
Macedonia	0/5/15	0	10
Malaysia	0	0	10
Malta	0/10/15	0	0
Mexico	0/15	0/5/15	10
Montenegro	5/15	0	10
Morocco	10/22	0/10	10
Netherlands	0/15	0	0
New Zealand	15	10	10
Norway	0/15	0	0
Pakistan	15	0	12/15
Philippines	10/15	0/10	15
Poland	0/5/15	0/5	0/5
Portugal	0/10	0/10	0/10

Romania	0/10/15	0/10	0/10
Russia	10	0	0
Serbia	5/15	10	10
Singapore	0/5/10	0/10	10
Slovakia	0/15	0	0/5
Slovenia	0/5/15	0/5	0/5
Southafrica	5/15	0	0
Sri Lanka	15	10	10
Sweden	0/15	0	0
Switzerland	0/15	0	0
Taiwan	10	10	10
Tanzania	15	12,5	20
Thailand	10	0/15	15
Tunisia	15	12	10
Turkey	15/20	0/15	10
Uganda	0/10/15	10	10
Ukraine	5/15	0/10	10
United Kingdom	0/15	0	0
United States	0/5/15	0	0
Venezuela	5/15	0/5	5/10
Vietnam	5/10/15	10	5/15
Zambia	15	0	15

Denmark has signed 45 TIEAs based on the OECD model convention.