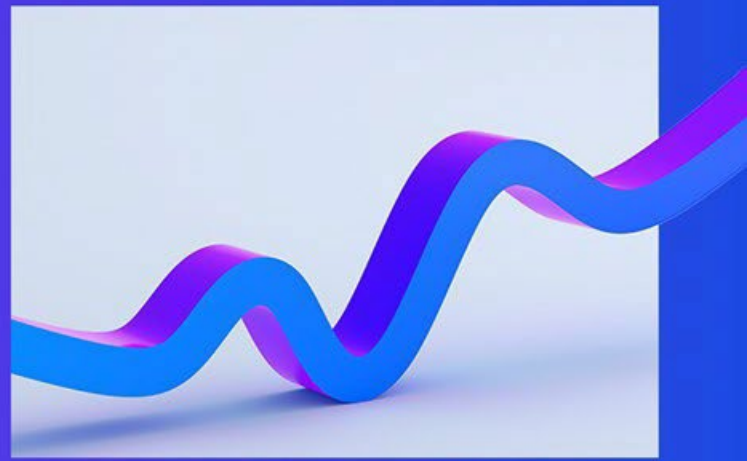




# U.S. Tax Treaties & Agreements

January 2024



## Current Status of U.S. Tax Treaties and International Tax Agreements

May 6, 2024 | This summary is current as of *May 1, 2024*. Recent updates are highlighted in bold italics.

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## I. Income Tax Treaties

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### A. Income Tax Treaties in Force

<b>Country</b>	<b>General Effective Date <sup>1</sup></b>
Armenia <sup>6</sup>	01-01-1976
*Australia <sup>9</sup>	12-01-1983
*Austria <sup>9</sup>	01-01-1999
Azerbaijan <sup>6</sup>	01-01-1976
Bangladesh <sup>1, 9</sup>	01-01-2007
*Barbados <sup>5, 9</sup>	01-01-1984
Belarus <sup>6</sup>	01-01-1976
*Belgium <sup>9, 10</sup>	01-01-2008
Bermuda <sup>2</sup>	01-01-1986
Bulgaria <sup>9, 14</sup>	01-01-2009
*Canada <sup>9, 15</sup>	01-01-1985
Chile <sup>9, 25</sup>	01-01-2024
China, People's Republic of <sup>7, 9</sup>	01-01-1987
Cyprus <sup>9</sup>	01-01-1986
Czech Republic <sup>9</sup>	01-01-1993
*Denmark <sup>9, 11</sup>	01-01-2001
Egypt <sup>9</sup>	01-01-1982
Estonia <sup>9</sup>	01-01-2000
*Finland <sup>9, 12</sup>	01-01-1991
*France <sup>9, 17</sup>	01-01-1996
Georgia <sup>6</sup>	01-01-1976
*Germany <sup>4, 9, 13</sup>	01-01-1991
Greece <sup>9</sup>	01-01-1953
*Iceland <sup>9, 16</sup>	01-01-2009
India <sup>9</sup>	01-01-1991
Indonesia <sup>9</sup>	01-01-1990
*Ireland <sup>9</sup>	01-01-1998
Israel <sup>9</sup>	01-01-1995
*Italy <sup>9, 18</sup>	01-01-2010
*Jamaica <sup>5, 9</sup>	01-01-1982
*Japan <sup>9, 21</sup>	01-01-2005
*Kazakhstan <sup>9</sup>	01-01-1996
Korea <sup>9</sup>	01-01-1980
Kyrgyzstan <sup>6</sup>	01-01-1976
Latvia <sup>9</sup>	01-01-2000
Lithuania <sup>9</sup>	01-01-2000
*Luxembourg <sup>9, 23</sup>	01-01-2001
Malta <sup>9, 20</sup>	01-01-2011
Mexico <sup>9</sup>	01-01-1994
Moldova <sup>6</sup>	01-01-1976
Morocco <sup>9</sup>	01-01-1981
*Netherlands <sup>9</sup>	01-01-1994
Netherlands Antilles <sup>3</sup>	01-01-1955
*New Zealand <sup>9, 19</sup>	01-01-1984
*Norway <sup>9</sup>	01-01-1971
Pakistan <sup>9</sup>	01-01-1959

Philippines <sup>9</sup>	01-01-1983
Poland <sup>9</sup>	01-01-1974
Portugal <sup>9</sup>	01-01-1996
Romania <sup>9</sup>	01-01-1974
*Russia <sup>9</sup>	01-01-1994
Slovak Republic <sup>9</sup>	01-01-1993
Slovenia <sup>9</sup>	01-01-2002
South Africa <sup>9</sup>	01-01-1998
Spain <sup>9</sup> , <sup>22</sup>	01-01-1991
Sri Lanka <sup>9</sup>	01-01-2004
*Sweden <sup>9</sup>	01-01-1996
*Switzerland <sup>9</sup> , <sup>24</sup>	01-01-1998
Tajikistan <sup>6</sup>	01-01-1976
Thailand <sup>8</sup> , <sup>9</sup>	01-01-1998
*Trinidad & Tobago <sup>5</sup> , <sup>9</sup>	01-01-1970
Tunisia <sup>9</sup>	01-01-1990
Turkey <sup>9</sup>	01-01-1998
Turkmenistan <sup>6</sup>	01-01-1976
*Ukraine <sup>9</sup>	01-01-2001
*United Kingdom <sup>9</sup>	01-01-2004
Uzbekistan <sup>6</sup>	01-01-1976
Venezuela <sup>9</sup>	01-01-2000

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\* A prior income tax treaty was in force before the general effective date noted above.

<sup>1</sup> The general effective date indicates when the latest income tax treaty with the United States became effective. This general effective date does not necessarily apply to any protocol to the treaty. Some income tax treaties provide for different effective dates for different provisions of the treaty (e.g., taxation at source). The specific treaty and all related protocols should be examined carefully to determine the applicable effective date.

<sup>2</sup> The tax treaty between the United States and Bermuda (dealing with income of insurance companies) entered into force with certain reservations on December 2, 1988, and is effective as follows: (1) for excise taxes on insurance premiums paid to foreign insurers, for premiums paid or credited on or after January 1, 1986; (2) for income taxes on business profits derived by an insurance enterprise, for assistance. A reservation to the treaty provides that the treaty exemption from U.S. insurance excise taxes will *not* apply to premiums allocable to insurance coverage for periods after December 31, 1989.

<sup>3</sup> In a note dated June 29, 1987, the Netherlands Antilles and Aruba governments were notified that the U.S. government was terminating the U.S.-Netherlands Antilles and the U.S.-Aruba income tax treaties. The termination of both treaties was effective as of January 1, 1988. On July 10, 1987, the U.S. government modified the June 29 notice of termination to provide that Article VIII of both treaties (which exempts interest paid by U.S. persons to corporations and residents of the Netherlands Antilles and Aruba from U.S. tax) will continue in force after December 31, 1987. A protocol to the U.S.-Netherlands Antilles Income Tax Treaty entered into force and became effective on December 30, 1996. The protocol to the limited income tax treaty terminates the current U.S. tax exemption on interest paid to: (1) Antilles companies that are not U.S.-owned (i.e., not controlled foreign corporations); (2) U.S.-owned Antilles companies on non-Eurobond debt; and (3) U.S.-owned Antilles companies on Eurobond debt issued after October 15, 1984.

<sup>4</sup> The U.S.-Germany Income Tax Treaty is effective for the eastern states of Germany (the former East Germany) from January 1, 1991.

<sup>5</sup> The U.S.-U.K. Income Tax Treaty previously applied.

<sup>6</sup> The U.S.-U.S.S.R. Income Tax Treaty, signed June 20, 1973, applies to the countries of Armenia, Azerbaijan, Belarus, Georgia, Kyrgyzstan, Moldova, Tajikistan, Turkmenistan, and Uzbekistan.

<sup>7</sup> The IRS announced in Notice 97-40 that the United States will continue to treat Hong Kong and China as separate countries for tax treaty purposes and that this U.S.-China Income Tax Treaty will not apply to Hong Kong.

<sup>8</sup> The U.S. Treasury announced on December 18, 2001, that the U.S.-Thailand Income Tax Treaty will not terminate because Thailand and the United States have exchanged diplomatic notes providing for the implementation of the treaty's exchange of information provisions. The treaty would have automatically terminated from January 1, 2004, if the exchange of information issue had not been resolved. Thailand and the United States had until June 30, 2003, to exchange the diplomatic notes.

<sup>9</sup> Designated as a "comprehensive income tax treaty ... which includes an exchange of information program" for purposes of Code §1(h)(11)(C)(i)(II), thereby allowing certain dividends paid by qualified corporations of that country to U.S. citizens and U.S. resident individuals to be taxed for U.S. tax purposes at rates limited to 5%, 15%, and 20%, as the case may be. (See IRS Notice 2011-64.) Notice 2024-11 updates the list of treaties that meet the requirements of Code §1(h)(11)(C)(i)(II) by adding Chile with respect to dividends paid on or after December 19, 2023, and removing Russia in respect of dividends paid on or after January 1, 2023, and removing Hungary with respect of dividends paid on or after January 8, 2023.

<sup>10</sup> A new income tax treaty with Belgium was signed on November 27, 2006, and entered into force on December 28, 2007. The provisions of the tax treaty relating to taxes withheld at source are generally effective for amounts paid or credited on or after February 1, 2008. All other provisions of the tax treaty are generally effective for taxable periods beginning on or after January 1, 2008. However, subparagraph (f) of paragraph 5 of Article 21 (Limitation on Benefits), dealing with the requirement that a "headquarters company" must be subject to the same income tax rules in its country of residence as a company actively engaged in a trade or business in that country, will not have effect until January 1, 2011. A person that would have been entitled to greater benefits under the old U.S.-Belgium Income Tax Treaty may elect to apply the old treaty in its entirety for an additional 12-month period from the date the new treaty would otherwise have been effective under the withholding and general effective dates.

<sup>11</sup> A new protocol to the U.S.-Denmark Income Tax Treaty was signed on May 2, 2006, and entered into force on December 28, 2007. The provisions of the protocol relating to taxes withheld at source are effective for amounts derived on or after February 1, 2008. All other provisions of the protocol are effective for taxable periods beginning on or after January 1, 2008.

<sup>12</sup> A new protocol to the U.S.-Finland Income Tax Treaty as signed on May 31, 2006, and entered into force on December 28, 2007. The provisions of the protocol relating to taxes withheld at source are generally effective for amounts paid or credited on or after February 1, 2008. However, the provision providing for a tax exemption for certain corporate dividends is effective retroactively for income derived on or after January 1, 2007. All other provisions of the protocol are effective for taxable periods beginning on or after January 1, 2008.

<sup>13</sup> A new protocol to the U.S.-Germany Income Tax Treaty was signed on June 1, 2006, and entered into force on December 28, 2007. The provisions of the protocol relating to taxes withheld at source are effective retroactively for amounts paid or credited on or after January 1, 2007. All other provisions of the protocol are generally effective for taxable years beginning on or after January 1, 2008.

<sup>14</sup> An income tax treaty with Bulgaria signed on February 23, 2007, and a related protocol signed on February 26, 2008, entered into force on December 15, 2008. The provisions of the tax treaty and protocol relating to taxes withheld at source are effective for income paid or credited on or after January 1, 2009. All other provisions of the tax treaty and protocol are effective for taxable periods beginning on or after January 1, 2009.

<sup>15</sup> A 5th protocol to the U.S.-Canada Income Tax Treaty was signed on September 21, 2007, and entered into force on December 15, 2008. The provisions of the protocol become effective on various dates in accordance with Article 27 of the protocol. The provisions of the protocol relating to taxes withheld at source are generally effective for amounts paid or credited on or after February 1, 2009. However, the provision providing for the reduction of the tax rate on related party interest from 10% to 7% is effective retroactively for interest derived on or after January 1, 2008. Article 27 should be reviewed to determine other applicable effective dates.

<sup>16</sup> A new income tax treaty and protocol with Iceland were signed on October 23, 2007, and entered into force on December 15, 2008. The provisions of the tax treaty and protocol relating to taxes withheld at source are generally effective for amounts derived on or after January 1, 2009. All other provisions of the tax treaty and protocol are generally effective for any taxable year beginning on or after January 1, 2009.

A person that would have been entitled to greater benefits under the old U.S.-Iceland Income Tax Treaty may elect to apply the old treaty in its entirety for an additional 12-month period from the date the new treaty would otherwise have been effective under the withholding and general effective dates. In addition, an individual who was entitled to benefits under Article 21 (Teachers) of the old treaty at the time of the entry into force of the new treaty shall continue to be entitled to benefits under Article 21 of the old treaty until such time as the individual would cease to be entitled to benefits had the old treaty remained in force.

<sup>17</sup> A new protocol to the U.S.-France Income Tax Treaty was signed on January 13, 2009, and entered into force on December 24, 2009. The provisions of the protocol relating to taxes withheld at source are effective retroactively for amounts paid or credited on or after January 1, 2009. All other provisions of the protocol are generally effective for taxable years beginning on or after January 1, 2010.

<sup>18</sup> A new income tax treaty with Italy was signed on August 25, 1999, and entered into force on December 16, 2009. The provisions of the new tax treaty relating to taxes withheld at source are effective for amounts paid or credited on or after February 1, 2010. All other provisions of the new tax treaty are effective for taxable years beginning on or after January 1, 2010. A person that would have been entitled to greater benefits under the old U.S.-Italy Income Tax Treaty may elect to apply the old treaty in its entirety for an additional 12-month period from the date the new treaty would otherwise have been effective under the withholding and general effective dates.

<sup>19</sup> A new protocol to the U.S.-New Zealand Income Tax Treaty was signed on December 1, 2008, and entered into force on November 12, 2010. The provisions of the protocol relating to taxes withheld at source are effective for amounts paid or credited on or after January 1, 2011. All other provisions of the protocol are generally effective in the United States for taxable years beginning on or after January 1, 2011, and in New Zealand for taxable years beginning on or after April 1, 2011.

<sup>20</sup> A new income tax treaty with Malta was signed on August 8, 2008, and entered into force on November 23, 2010. The provisions of the new tax treaty relating to taxes withheld at source are effective for amounts paid or credited on or after January 1, 2011. All other provisions of the new tax treaty are effective for taxable years beginning on or after January 1, 2011.

<sup>21</sup> A new protocol to the U.S.-Japan Income Tax Treaty was signed on January 24, 2013, and entered into force on August 30, 2019. The provisions of the protocol relating to taxes withheld at source are effective for amounts paid or credited on or after November 1, 2019. All other provisions of the protocol generally are effective for taxable periods beginning on or after January 1, 2020.

<sup>22</sup> A new protocol to the U.S.-Spain Income Tax Treaty was signed on January 14, 2013, and entered into force on November 27, 2019. The provisions of the protocol relating to taxes withheld at source are effective for amounts paid or credited on or after November 27, 2019. Other provisions of the protocol are effective for taxable periods beginning on or after November 27, 2019.

<sup>23</sup> A new protocol to the U.S.-Luxembourg Income Tax Treaty was signed on May 20, 2009, and entered into force on September 20, 2019. The protocol is effective for information requests made on or after September 20, 2019, with regard to tax years beginning on or after January 1, 2009.

<sup>24</sup> A new protocol to the U.S.-Switzerland Income Tax Treaty was signed on September 23, 2009, and entered into force on September 20, 2019. The provisions of the protocol relating to taxes withheld at source are effective for amounts paid or credited on or after January 1, 2020. The provisions of the protocol relating to information requests are effective with respect to requests for bank information made on or after September 20, 2019, to information that relates to any date beginning on or after September 23, 2009, and with respect to all other cases, with respect to requests for information that relate to taxable periods beginning on or after January 1, 2010. The provisions of the protocol relating to mandatory arbitration are effective with respect to both cases that are under consideration by the competent authorities as of September 20, 2019, and to cases that come under consideration after September 20, 2019.

<sup>25</sup> A new income tax treaty with Chile was signed on February 4, 2010, and entered into force on December 19, 2023. The provisions of the new U.S.-Chile Income Tax Treaty relating to taxes withheld at source are effective for amounts paid or credited on or after February 1, 2024. All other provisions of the new U.S.-Chile Income Tax Treaty are effective for taxable years beginning on or after January 1, 2024.

## B. Income Tax Treaties Approved by U.S. Senate, Awaiting Exchange of Instruments of Ratification or Formal Notice To Be Given

Country	Date Signed	Status
<i>None</i>		

## C. Income Tax Treaties Signed, Awaiting U.S. Senate Approval

Country	Date Signed	Status
Croatia (Treaty)	12-07-2022	Treaty signed at Washington, D.C., on December 7, 2022.
Hungary (Treaty)	02-04-2010	Treaty signed at Budapest, Hungary, on February 4, 2010. Sent to the U.S. Senate on November 15, 2010, for advice and consent to ratification. Considered by the Senate Foreign Relations Committee at a hearing held on June 7, 2011. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on July 26, 2011, and again on April 1, 2014,

		November 10, 2015, and February 8, 2016.
Poland (Treaty)	02-13-2013	Treaty signed in Poland on February 13, 2013. Sent to the U.S. Senate on May 20, 2014, for advice and consent to ratification. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on July 16, 2014, and again on November 10, 2015, and February 8, 2016. On September 7, 2022, a U.S. Treasury official stated that targeted reservations must be drafted due to the passage of the Tax Cuts and Jobs Act after the proposed Treaty was signed.
Vietnam (Treaty and Protocol)	07-07-2015	Treaty and accompanying protocol signed in Washington, D.C. on July 7, 2015. On September 7, 2022, a U.S. Treasury official stated the United States is negotiating with Vietnam on targeted reservations due to passage of the Tax Cuts and Jobs Act after the proposed Treaty and Protocol were signed.

#### D. Income Tax Treaties Under Negotiation

Algeria	First round of negotiations was held the week of September 21, 1992. No recent activities.
Argentina	Argentina has expressed interest in beginning income tax treaty negotiations. Preliminary talks held on August 10, 1992. The preliminary round of talks planned for the week of August 15, 1994, was postponed. Correspondence sent to Argentina in January 1996. On September 26, 2016, Treasury announced it invited Argentina's representatives to consult with it on the negotiation of an income tax treaty. On December 15, 2016, a U.S. Treasury official indicated that the first round of negotiations on an income tax treaty had taken place.
Armenia	Armenia expressed an interest in beginning income tax treaty negotiations. Correspondence was exchanged. On December 3, 2015, Treasury issued a letter indicating it has no plans to initiate negotiations with Armenia at this time. On February 6, 2018, Treasury announced it will commit resources to negotiating an income tax treaty with Armenia.
Azerbaijan	Azerbaijan has expressed an interest in beginning income tax treaty negotiations. Correspondence has been exchanged. No recent activities.
Belarus	Belarus has expressed an interest in beginning income tax treaty negotiations. Correspondence has been exchanged. No recent activities.
Brazil	Discussions held the weeks of November 13, 1990, and May 18, 1992. Brazil has expressed the need for a tax sparing provision. It is the U.S. Treasury's position that the United States will not enter into a tax treaty with a tax sparing provision, nor will the United States continue negotiations with a country that insists on including such a provision in a tax treaty. On March 17, 2011, Senator Richard Lugar (R-Ind.) introduced a resolution (S. Res. 108) that encourages President Obama to negotiate an income tax treaty with Brazil.
Colombia	Initial meetings were held the week of December 8, 2008. The round of negotiations that had been scheduled for the week of December 14, 2009, did not occur. On May 9, 2014, a U.S. Treasury official confirmed a second round of negotiations is underway. On December 15, 2016, a U.S. Treasury official indicated that the U.S. and Colombia were close to initialing a treaty.
Croatia	On September 7, 2022, a U.S. Treasury official confirmed that a draft Treaty was sent in May to the State Department for review and that after the Croatian translation is certified, it would be ready for signature.
Ireland	The Irish Department of Finance announced in a press release dated August 25, 2016, that negotiations to amend the existing treaty are underway. On December 15, 2016, a U.S. Treasury official stated that two rounds of negotiations had been completed.
Israel	October 2022, a U.S. Treasury official stated treaty update negotiations are underway.
Korea	Negotiations to discuss a new income tax treaty were held the weeks of March 15, 1999 and March 20, 2000. Rounds were also held the weeks of March 19, 2001 and on June 28 and 29, 2001. Negotiations were held in Washington, D.C., the week of June 1, 2009. The round of negotiations that had been planned for October 2009 did not occur. Negotiations seemed to have "stalled."
Kuwait	First round of negotiations held the week of November 27, 1989. No recent activities.
Kyrgyzstan	Former Soviet Republic has expressed interest in beginning income tax treaty negotiations. Correspondence has been exchanged. No recent activities.
Luxembourg	Two rounds of negotiations were held in 2015, with a third round held in early 2016. On June

	22, 2016, the U.S. Treasury Department released a statement confirming the two States are in the process of negotiating a protocol that would amend a number of the current treaty's provisions and add the expanded triangular/exempt permanent establishment provision introduced in the 2016 U.S. Model Income Tax Treaty.
Malaysia	Negotiations were held the week of March 30, 1992. Another round was held during the week of February 28, 1994. Open issues remain on bank secrecy and the offshore sector. No recent activities.
Moldova	Moldova has expressed an interest in beginning income tax treaty negotiations. No recent activities.
Netherlands	On December 15, 2016, a U.S. Treasury official stated that negotiations on a new treaty were scheduled to begin in 2017.
Norway	U.S. government officials stated on April 5, 2006, that negotiations “have been completed.” On May 11, 2012, a U.S. Treasury official stated that a new income tax treaty with Norway had been initialed and is awaiting signature. On January 24, 2014, a U.S. Treasury official stated that a new income tax treaty with Norway is being prepared for signature. On September 7, 2022, a U.S. Treasury official noted that a new Treaty has not yet been signed because targeted reservations for certain terms previously negotiated are needed due to passage of the Tax Cuts and Jobs Act.
Pakistan	The United States has sent correspondence to Pakistan to resume negotiations. Negotiations were held the week of March 11, 1991. Correspondence has been exchanged. However, no recent movement on these discussions.
Romania	On January 24, 2014, a U.S. Treasury official stated that a new income tax treaty with Romania is being prepared for signature. On September 7, 2022, a U.S. Treasury official noted that a new Treaty has not yet been signed because targeted reservations for certain terms previously negotiated are needed due to passage of the Tax Cuts and Jobs Act.
Singapore	A first round of negotiations was held the week of December 14, 1987. No recent activities.
Switzerland	In October 2022, a U.S. Treasury official stated treaty update negotiations are underway.
Taiwan	On July 13, 2023, the U.S. Senate Foreign Relations Committee approved a bill that authorizes the U.S. President to negotiate a bilateral tax agreement with Taiwan.
Trinidad and Tobago	There has been correspondence on open issues. No recent activities.
United Kingdom	A second round of negotiations was held at the end of May 2011. On January 15, 2013, a U.S. Treasury official stated that an agreement had been reached on the text of a protocol.
Uzbekistan	Has expressed an interest in beginning income tax treaty negotiations. No recent activities.

#### E. Income Tax Treaties Terminated

<b>Country</b>	<b>Date Terminated</b>	<b>Effective Date</b>
Anguilla	06-30-1983	01-01-1984
Antigua and Barbuda	02-26-1983	08-26-1983
Aruba <sup>1</sup>	06-29-1987	01-01-1988
Barbados <sup>2</sup>	06-30-1983	01-01-1984
Belize	06-30-1983	01-01-1984
British Virgin Islands	06-30-1982	01-01-1983
Burundi	06-30-1983	01-01-1984
Dominica	06-30-1983	01-01-1984
Falkland Islands	06-30-1983	01-01-1984
The Gambia	06-30-1983	01-01-1984
Grenada	06-30-1983	01-01-1984
Hungary <sup>4</sup>	07-08-2022	01-08-2023
Malawi	06-30-1983	01-01-1984
Malta	11-16-1995	01-01-1997
Montserrat	06-30-1983	01-01-1984
Netherlands Antilles <sup>1</sup>	06-29-1987	01-01-1988
Rwanda	06-30-1983	01-01-1984

St. Christopher-Nevis	06-30-1983	01-01-1984
St. Lucia	06-30-1983	01-01-1984
St. Vincent and the Grenadines	06-30-1983	01-01-1984
Seychelles	06-30-1983	01-01-1984
Sierra Leone	06-30-1983	01-01-1984
South Africa <sup>3</sup>	10-15-1986	07-01-1987
Zaire	06-30-1983	01-01-1984
Zambia	06-30-1983	01-01-1984

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<sup>1</sup> Under a modification of the termination notice, Article VIII will remain in force after December 31, 1987. Treasury announced on September 15, 1995, that Article VIII of the treaty with the Antilles would be limited, applying only to interest paid to U.S.-owned Antilles companies on Eurobond debt issued on or before October 15, 1984. The limitation is contained in a protocol that became effective on December 30, 1996. Treasury also announced the complete termination, as of January 1, 1997, of the remaining provision of the income tax treaty with Aruba.

<sup>2</sup> A new Barbados Income Tax Treaty entered into force on March 28, 1986.

<sup>3</sup> A new income tax treaty between the United States and South Africa was entered into and became generally effective as of January 1, 1998.

<sup>4</sup> The U.S.-Hungary Income Tax Treaty ceases to have effect with respect to taxes withheld at source on January 1, 2024. In respect of other taxes, the U.S.-Hungary Income Tax Treaty ceases to have effect with respect to taxable periods beginning on or after January 1, 2024. See Announcement 2024-5.

## II. Estate/Gift Tax Treaties

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### A. Estate/Gift Tax Treaties in Force

The United States has estate, gift, or combined estate and gift, tax treaties in force with the following countries:

Country	General Effective Date
Australia (estate)	01-07-1954
Australia (gift)	12-14-1953
Austria (combined estate and gift)	07-01-1983
Canada (estate) — Terminated	This treaty ceased to have effect with respect to estates of persons dying on or after January 1, 1985; however, see the U.S.-Canada Income Tax Treaty regarding the application of estate and gift taxes.
Denmark (combined estate and gift)	11-07-1984
Finland (estate)	12-18-1952
France (combined estate and gift) <sup>1</sup>	10-01-1980
Germany (combined estate and gift)	01-01-1979
Greece (estate)	12-30-1953
Ireland (estate)	12-20-1951 (or, upon election, estates of persons dying in 1951 prior to December 20)
Italy (estate)	10-26-1956
Japan (combined estate and gift)	04-01-1955
Netherlands (estate)	02-03-1971
Norway (estate) <sup>3</sup>	12-11-1951
South Africa (estate)	07-15-1952 (or upon election, 06-30-1944)
Sweden (combined estate and gift) — Notice of Termination given <sup>2</sup>	09-05-1984; ceased to have effect as of January 1, 2008 <sup>2</sup>
Switzerland (estate)	09-17-1952
United Kingdom (combined estate and gift)	11-11-1979

<sup>1</sup> A protocol to the U.S.-France Estate and Gift Tax Treaty was signed on December 8, 2004, and entered into force on December 21, 2006. It is generally effective with respect to gifts made and deaths occurring after entry into force; however, relief provided with respect to surviving non-citizen spouses and the pro rata unified credit is effective with respect to gifts made and deaths occurring after November 10, 1988.

<sup>2</sup> The U.S. Treasury announced that on June 7, 2007, the United States delivered to the Government of Sweden a Notice of Termination of the Estates, Inheritances, and Gifts Tax Treaty between the two countries. In accordance with Article 15 (Termination) of the treaty, the treaty ceased to have effect as of January 1, 2008. The U.S. Treasury announcement states that since Sweden has abolished its tax on inheritances and gifts, the treaty is no longer needed to prevent double taxation with respect to taxes on estates, inheritances, and gifts.

<sup>3</sup> The Norwegian government terminated this agreement on June 6, 2014. This agreement will not be in effect after December 31, 2014.

### B. Estate/Gift Tax Treaties Signed, Awaiting Final Action

Country	Date Signed	Status
None	—	—

### C. Estate/Gift Tax Treaties Under Negotiation

United Kingdom	Meetings were held in April 2000 to negotiate revisions to the current estate and gift tax treaty.
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### III. Tax Information Exchange Agreements (TIEAs)

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#### A. TIEAs in Force

<b>Multilateral</b>	<b>Effective Date</b>
OECD / Council of Europe Convention on Mutual Administrative Assistance on Tax Matters	01-04-1995
<b>Country</b>	<b>Effective Date</b>
Antigua & Barbuda	02-10-2003
Argentina	01-01-2018
Aruba	09-13-2004
Bahamas	01-01-2004 - Criminal Tax 01-01-2006 - Civil Tax
Barbados	11-03-1984
Bermuda	12-02-1988
Brazil	03-19-2013
British Virgin Islands <sup>1</sup>	03-10-2006
Cayman Islands <sup>1,4</sup>	03-10-2006
Colombia	04-30-2014
Costa Rica <sup>10</sup>	01-01-2021
Dominica	05-08-1988
Dominican Republic	10-12-1989
Ecuador	10-30-2022
Gibraltar <sup>7</sup>	12-22-2009 - Criminal Tax 01-01-2010 - Civil Tax
Grenada	07-13-1987
*Guernsey <sup>6</sup>	03-30-2006
Guyana	08-27-1992
Honduras	10-11-1991
Hong Kong	06-20-2014
*Isle of Man <sup>3</sup>	06-26-2006
Jamaica	12-18-1986
*Jersey <sup>8</sup>	06-26-2006
Liechtenstein <sup>5</sup>	01-01-2010
Marshall Islands	03-14-1991
Mauritius	08-29-2014
Mexico	01-18-1990
Monaco	03-11-2010
Netherlands Antilles	03-22-2007
Panama	04-18-2011
*Peru	03-31-1993
Singapore	01-01-2021
*St. Lucia <sup>2</sup>	04-22-1991
Trinidad & Tobago	02-09-1990

\* Countries that are not included in the "North American area" for purposes of §274(h) relating to the deductibility of certain convention expenses. (See Rev. Rul. 2007-28, issued April 4, 2007.)

<sup>1</sup> Rev. Rul. 2007-28 states that the British Virgin Islands and the Cayman Islands have entered into tax information exchange agreements with the United States that are not of the type described in Code §274(h)(6)(C)(i) because of certain limitations on the scope of those agreements.

<sup>2</sup> Rev. Rul. 2007-28 states that it has come to the attention of the IRS that the tax information exchange agreement signed by the United States and Saint Lucia on January 30, 1987, is not in effect within the meaning of §274(h)(6)(A)(i) because the government of Saint Lucia has not enacted legislation to implement the agreement. The IRS will treat Saint Lucia as not included in the North American area under Code §274(h)(6) with respect to conventions that begin after April 4, 2007, except with respect to expenses for which the taxpayer demonstrates a nonrefundable contractual obligation existing as of April 4, 2007. Representatives of the State Department confirm that the TIEA with Saint Lucia is otherwise in force.

<sup>3</sup> On February 21, 2014, the Isle of Man ratified a protocol, signed on December 13, 2013, that amends this TIEA. This protocol entered into force on August 26, 2015.

<sup>4</sup> A new TIEA with the Cayman Islands entered into force on April 14, 2014.

<sup>5</sup> On May 16, 2014, the United States and Liechtenstein signed a protocol amending the current TIEA. The protocol entered into force on January 22, 2015.

<sup>6</sup> On June 25, 2014, Guernsey ratified a protocol (signed on December 13, 2013) amending the current TIEA. The protocol entered into force on August 26, 2015.

<sup>7</sup> A protocol (signed on May 8, 2014) that amends the current TIEA governing criminal tax matters entered into force on June 29, 2014.

<sup>8</sup> A protocol (signed on December 13, 2013) that amends the current TIEA entered into force on October 28, 2015.

<sup>9</sup> A new TIEA (signed on November 13, 2018) with Singapore entered into force on March 5, 2020.

<sup>10</sup> A new TIEA (signed on April 17, 2018) with Costa Rica entered into force on September 18, 2020.

## B. TIEAs Signed, Awaiting Final Action

Country	Date Signed	Action Required
Gibraltar	05-08-2014	To be determined upon release of the agreement.
Protocol to the OECD / Council of Europe Convention on Mutual Administrative Assistance on Tax Matters	05-27-2010	Will enter into force three months after five parties ratify the Protocol. If a party ratifies the Protocol after it has entered into force, then the Protocol binds that party beginning three months from the date of that party's ratification. Sent to the U.S. Senate on May 17, 2012, for advice and consent to ratification. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on April 1, 2014, and again on February 8, 2016.
Uruguay	10-24-2023	Agreement subject to domestic ratification procedures of Uruguay and the United States.

## C. TIEAs Under Negotiation

Belize	Preliminary discussions held the week of April 13, 1992. No recent activities.
El Salvador	An agreement initialed July 29, 1993. No recent activities.
Eswatini	As of August 1, 2023, negotiations are on-going.
Nicaragua	An agreement initialed June 14, 1991. No recent activities.

#### IV. FATCA Intergovernmental Agreements (FATCA IGAs)

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##### A. FATCA IGAs in Force

<b>Country</b>	<b>Effective Date</b>
Algeria	01-18-2017
Angola	10-02-2017
Anguilla	06-22-2017
Antigua and Barbuda	06-07-2017
Argentina	01-01-2023
Armenia	07-07-2019
Australia	06-30-2014
Austria	12-09-2014
Azerbaijan	11-05-2015
Bahamas	09-17-2015
Bahrain	03-05-2018
Barbados	09-25-2015
Belarus	07-29-2015
Belgium	12-23-2016
Bermuda	08-19-2014
Brazil	06-26-2015
British Virgin Islands	07-13-2015
Bulgaria	06-30-2015
Cambodia	12-23-2016
<b><i>Cabo Verde</i></b>	<b><i>02-07-2024</i></b>
Canada	06-27-2014
Cayman Islands	07-01-2014
Colombia	08-27-2015
Costa Rica	07-08-2019
Croatia	12-27-2016
Curaçao	08-03-2016
Cyprus	09-21-2015
Czech Republic	12-18-2014
Denmark	09-30-2015
Dominica	08-12-2019
Dominican Republic	07-17-2019
Estonia	07-09-2014
Finland	02-20-2015
France	10-14-2014
Georgia	09-18-2015
Germany	12-11-2013
Gibraltar	09-17-2015
Greece	12-13-2017
Greenland	11-30-2018
Grenada	04-06-2018
Guernsey	08-26-2015
Guyana	09-29-2017
The Holy See	06-10-2015
Honduras	02-19-2015
Hong Kong	07-06-2016
Hungary	07-16-2014
Iceland	09-22-2015

India	08-31-2015
Ireland	04-02-2014
Isle of Man	08-26-2015
Israel	08-29-2016
Italy	08-17-2015
Jamaica	09-24-2015
Jersey	10-28-2015
Kazakhstan	04-05-2022
Korea	09-08-2016
Kosovo	11-04-2015
Kuwait	01-28-2016
Latvia	12-15-2014
Liechtenstein	01-22-2015
Lithuania	10-07-2014
Luxembourg	07-29-2015
Macau	07-30-2021
Malaysia	10-03-2022
Malta	06-26-2014
Mauritius	08-29-2014
Mexico	04-10-2014 <sup>1</sup>
Moldova	01-21-2016
Montenegro	03-28-2018
Montserrat	10-28-2016
Netherlands	04-09-2015
New Zealand	07-03-2014
Norway	01-27-2014
Panama	10-25-2016
Poland	07-01-2015
Portugal	08-10-2016
Qatar	06-23-2015
Romania	11-03-2015
San Marino	08-30-2016
Saudi Arabia	02-28-2017
Serbia	01-08-2020
Singapore	01-01-2021 <sup>2</sup>
Slovak Republic	11-09-2015
Slovenia	07-01-2014
South Africa	10-28-2014
Spain	12-09-2013
St. Kitts and Nevis	04-28-2016
St. Lucia	09-01-2016
St. Vincent and the Grenadines	05-13-2016
Sweden	03-01-2015
Switzerland	06-02-2014
Trinidad and Tobago	09-22-2017
Tunisia	09-09-2019
Turkey	06-14-2021
Turkmenistan	11-06-2017
Turks and Caicos Islands	07-25-2016
Ukraine	11-18-2019
United Arab Emirates	02-19-2016

United Kingdom	08-11-2014
Uzbekistan	07-07-2017
Vietnam	07-07-2016

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<sup>1</sup> The FATCA IGA signed with Mexico on April 9, 2014, replaces the FATCA IGA signed on November 19, 2012.

<sup>2</sup> On January 1, 2021, a FATCA IGA signed with Singapore on November 13, 2018, entered into force. This FATCA IGA supersedes the FATCA IGA signed on December 9, 2014, that had entered into force on March 28, 2015.

## B. FATCA IGAs Signed and in Effect, Awaiting Final Action

Country	Date Signed	Action Required
Chile	03-05-2014	Agreement subject to domestic ratification procedures of Chile.
Japan	06-11-2013	Agreement subject to domestic ratification procedures of Japan.
Philippines	07-13-2015	Agreement subject to domestic ratification procedures of the Philippines.
Seychelles	07-01-2019	Agreement subject to domestic ratification procedures of Seychelles.
Taiwan	12-22-2016	Agreement subject to domestic ratification procedures of Taiwan.
Thailand	03-04-2016	Agreement subject to domestic ratification procedures of Thailand.

## C. FATCA IGAs Not Yet Signed But Treated as in Effect\*

Country	Date Identified as Being Treated as in Effect
China	06-26-2014
Haiti	06-30-2014
Indonesia	05-04-2014
Iraq	06-30-2014
Nicaragua	06-30-2014
Paraguay	06-06-2014
Peru	05-01-2014

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\* On April 2, 2014, the Internal Revenue Service released Announcement 2014-17 indicating that a jurisdiction that has reached a FATCA IGA in substance can be treated as having a FATCA IGA in effect until December 31, 2014, if: (1) such FATCA IGA is reached in substance prior to July 1, 2014; and (2) such jurisdiction consents to having the status of such FATCA IGA disclosed. On December 1, 2014, the Internal Revenue Service released Announcement 2014-38 indicating that a jurisdiction that has reached a FATCA IGA in substance will be treated beyond December 31, 2014, as having a FATCA IGA in effect, provided the jurisdiction demonstrates firm resolve to sign the FATCA IGA as soon as possible. On August 1, 2016, the IRS released an advance version of Announcement 2016-27. This announcement provides that each jurisdiction that is treated as if it had an IGA in effect and that wishes to continue this treatment must provide the Treasury Department, by December 31, 2016, with a detailed explanation of why the jurisdiction has not yet brought the IGA into force and provide a step-by-step plan that the jurisdiction intends to follow in order to sign the IGA (if it has not been signed) and bring the IGA into force.

## D. FATCA IGAs Signed But Not Yet Treated as in Effect

Country	Date Signed	Action Required
None		

## E. FATCA IGAs Under Negotiation

Eswatini	FATCA IGA negotiations are underway.
Lebanon	The U.S. Treasury Department is working to explore options for a FATCA IGA.
Pakistan	In a press release dated June 24, 2014, the Pakistani government noted FATCA IGA negotiations are underway.
Russia	According to a Russian press release published in April 2014, FATCA IGA negotiations with Russia have been suspended.

- Saint Maarten The U.S. Treasury Department is working to explore options for a FATCA IGA.
- Singapore On August 2, 2016, the United States and Singapore jointly announced that negotiations are ongoing for an IGA that provides for reciprocal automatic exchange of information with respect to financial accounts under FATCA. On October 24, 2017, the United States and Singapore jointly announced that these negotiations have concluded.
- Sri Lanka Sri Lankan banks have been directed to comply with the FATCA regime by entering into foreign financial institution agreements with the IRS.

## V. Reciprocal Shipping/Aviation Agreements

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### A. Reciprocal Shipping/Aviation Agreements in Force

Country	Effective Date
Angola	01-01-2006
Argentina	01-01-1987
Bahamas	01-01-1987
Bahrain	01-01-1999
Belgium	01-01-1987
Bolivia	03-31-1999
Cape Verde	01-01-2005
Chile (aviation only)	01-01-1987
China <sup>3, 6</sup>	01-01-1981
Colombia	01-01-1987
Cyprus	01-01-1987
Denmark	01-01-1987
El Salvador (aviation only)	01-01-1987
Ethiopia	01-01-1998
Fiji	01-01-1996
Finland	01-01-1987
Ghana	01-01-2001
Greece	01-01-1987
Greenland	01-01-2011
Hong Kong (shipping only) Terminated <sup>3</sup>	01-01-2021
India	01-01-1987
Isle of Man (shipping only)	01-01-1987
Japan	01-01-1987
Jersey	01-01-1997
Jordan	01-01-1987
Liberia	01-01-1987
Luxembourg	01-01-1987
Malaysia	01-01-1987
Malta	01-01-1997
Marshall Islands (shipping only)	01-01-1987
Mexico <sup>4</sup>	01-01-1987
Norway	01-01-1987
Pakistan (shipping only)	01-01-1987
Panama	01-01-1987
Peru (shipping only)	01-01-1987
Russia <sup>2</sup>	01-01-1991
St. Vincent & the Grenadines	01-01-1987
Saudi Arabia	01-01-1999
Singapore	01-01-1987
Sweden	01-01-1987
Taiwan	01-01-1987
United Arab Emirates	01-01-1994
Venezuela	01-01-1987

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Rev. Rul. 2008-17, issued March 7, 2008, modifying and superseding Rev. Rul. 2001-48, which had modified and superseded Rev. Rul. 89-42, as supplemented by Rev. Rul. 97-31 and corrected by Announcement 97-75, provides that the following countries qualify for the reciprocal exemption by virtue of their domestic law: Antigua and Barbuda (shipping only), Aruba, Barbados, Bermuda, Brazil,<sup>1</sup> British Virgin Islands, Bulgaria, Cayman Islands, Chile (shipping only), Croatia, Ecuador (shipping only),<sup>5</sup> Gibraltar, Israel, Kuwait (shipping only), Monaco, The Netherlands, The Netherlands Antilles, Peru (aviation only), Portugal,<sup>1</sup> Qatar (aviation only), Spain,<sup>1</sup> Surinam, Turkey, Turks & Caicos, Uruguay, Vanuatu and the U.S. Virgin Islands.

<sup>1</sup> Local law exempts corporations only.

<sup>2</sup> The Russian Federation entered into a diplomatic note effective retroactively to January 1, 1991. This note was terminated on January 1, 1994, the general effective date of the new U.S.-Russia Income Tax Treaty.

<sup>3</sup> On October 20, 2020, the IRS and U.S. Treasury released Announcement 2020-40 confirming that the termination takes effect on January 1, 2021, and shall have effect for taxable years beginning on or after January 1, 2021. On August 19, 2020, the U.S. Department of State announced that it notified the Hong Kong authorities of the suspension or termination of the agreement. The IRS announced in Notice 97-40 that the United States will continue to treat Hong Kong and China as separate countries for purposes of the Reciprocal Shipping Exemption and that the Shipping Agreement with Hong Kong will continue to apply.

<sup>4</sup> Mexico entered into a diplomatic note with the United States. This note was terminated on January 1, 1994, the general effective date of the new U.S.-Mexico Income Tax Treaty.

<sup>5</sup> The exemption is generally effective for all open years beginning on or after January 1, 1987.

<sup>6</sup> A shipping and aircraft agreement between the United States and China was signed on March 5, 1982, and became effective retroactively to January 1, 1981. Note that, unlike other shipping and aircraft agreements, this agreement was ratified by the President on September 6, 1983, after receiving the advice and consent of the U.S. Senate (as required for treaties). This agreement is considered a "limited treaty" and in Rev. Rul. 2008-17 the IRS includes China in its list of countries (Table II) currently granting equivalent exemptions by income tax treaty. The U.S.-China Income Tax Treaty (with Protocols) does not include a provision relating to the international operation of ships and aircraft.

## B. Reciprocal Shipping/Aviation Agreements Under Negotiation

Costa Rica Negotiations suspended.

Rica

Honduras Expressed interest in exchange of notes relating to airlines only.

Hong Kong Discussions on airlines only.

Kong

Kenya Expressed interest in exchange of notes relating to airlines only.

Kuwait On May 28, 2014, the United States and Kuwait signed a Memorandum of Understanding (MOU) evidencing a reciprocal tax exemption for income derived from the international operation of aircraft. The MOU enters into force on the date of the later of the notifications by each party and is to have effect with respect to taxable years beginning on or after January 1 following such later notification.

Latvia Draft texts of agreement relating to both shipping and airlines have been exchanged and are being reviewed.

Mauritius Negotiations suspended.

Tonga Negotiations suspended.



## VI. Social Security Totalization Agreements

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### A. Social Security Totalization Agreements in Force

Country	Effective Date
Australia	10-01-2002
Austria	11-01-1991
(Austria—Supplementary Agreement)	01-01-1997
Belgium (with protocol)	07-01-1984
Brazil	10-01-2018
Canada with Supplementary Agreement	08-01-1984
(Canada—2nd Supplementary Agreement)	10-01-1997
Chile	12-01-2001
Czech Republic	01-01-2009
(Czech Republic—Supplementary Agreement)	05-01-2016
Denmark	10-01-2008
Finland	11-01-1992
France	07-01-1988
Germany <sup>1</sup>	12-01-1979
(Germany—Supplementary Agreement)	03-01-1988
(Germany—2nd Supplementary Agreement)	05-01-1996
Greece	09-01-1994
Hungary	09-01-2016
Iceland	03-01-2019
Ireland	09-01-1993
Italy	11-01-1978
(Italy—Supplementary Agreement)	01-01-1986
Japan	10-01-2005
Luxembourg	11-01-1993
Netherlands (with protocol)	11-01-1990
(Netherlands—Supplementary Protocol)	05-01-2003
Norway	07-01-1984
(Norway—Supplementary Agreement)	09-01-2003
Poland	03-01-2009
Portugal	08-01-1989
Slovak Republic	05-01-2014
Slovenia	02-01-2019
South Korea	04-01-2001
Spain	04-01-1988
(Spain—Supplementary Agreement)	08-26-2014
Sweden	01-01-1987
(Sweden—Supplementary Agreement)	11-01-2007
Switzerland <sup>2</sup>	08-01-2014
United Kingdom	01-01-1985
(United Kingdom—Benefits based on combined periods of coverage)	01-01-1988
(United Kingdom—Supplementary Agreement)	09-01-1997
Uruguay	11-01-2018

<sup>1</sup> Reunification has extended application of the agreement to former East German territory effective October 3, 1990.

<sup>2</sup> This social security agreement with Switzerland (signed on December 3, 2012) replaces the social security agreement signed in 1979, as amended by a 1988 protocol.

**B. Social Security Totalization Agreements Signed, Awaiting Final Action**

<b>Country</b>	<b>Date Signed</b>	<b>Status</b>
Mexico	06-29-2004	The Agreement must be submitted to the U.S. Congress and the Mexican Senate for review.
Romania	03-23-2023	Agreement subject to domestic ratification procedures of the United States and Romania. Romania ratified this agreement on January 3, 2024.
<i>Spain</i>	<i>04-08-2024</i>	<i>Agreement subject to domestic ratification procedures of the United States and Spain.</i>

**C. Social Security Totalization Agreements Under Negotiation**

Albania	No formal discussions are underway.
Argentina	Meetings for preliminary discussions held during the week of June 9, 1997. No recent activity reported.
Bulgaria	Meeting held on January 6, 2015. No formal discussions are underway.
India	Meeting held on January 25, 2015. According to a statement published by the Office of the United States Trade Representative on November 23, 2021, there are ongoing discussions on an agreement.
Israel	Initial inquiries made. No recent interest expressed by Israel.
Italy	U.S. negotiators have proposed a supplementary agreement. No recent activity reported.
Latvia	No formal discussions have been held.
New Zealand	Initial inquiries made. Meetings held June 6 and 7, 1991. Discussions held the week of April 27, 1998. No recent activity reported.
Paraguay	Paraguay has expressed an interest in beginning negotiations. No formal discussions have been held.
San Marino	No formal discussions have been held.

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