# Tax Flash

## *Protocol between Greece and Switzerland introduced before Parliament*

**December 2011**

**On December 19, 2011 a Protocol signed between Greece and Switzerland amending the relevant Convention for the avoidance of double taxation with respect to taxes on income ("DTC") and particularly said DTC's articles relating to dividends, interest and capital gains taxation, as well as to the procedures for mutual agreement and the exchange of information,** was introduced before the Greek Parliament for adoption.

In particular, the amendments induced by the Protocol are as follows:

**Dividends**: Maximum dividend WHT imposed on dividends distributed by a Greek company to a Swiss tax resident is reduced from 35% to 15% in general, and 5% when the Swiss beneficial owner is a company, other than a partnership, participating directly by at least 25% in the share capital of the Greek company paying the dividends.

**Interest**: The WHT applicable upon payment of interest in the source State has been determined to 7% (reduced from 10%) on the gross amount of interest.

**Capital gains**: The capital gains derived from the alienation of shares or other participation rights, deriving more than 50% of their value directly or indirectly from immovable property may also be taxed in the State where such immovable property is situated.

**Exchange of information between the tax authorities**: The Exchange of Information between the two States clause of the DTC has been materially amended and broadened to allow for more far-reaching effects.

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*This information is intended only as a general update for interested persons and should not be used as a basis for decision making. For further details please contact PwC: 268, Kifissias Avenue 15232 Halandri tel. +30 210 6874400*