



Hong Kong and Kazakhstan are launching negotiations on a Double Tax Treaty

Contacts

Elena Kaeva

Partner

Tax, Legal and People services

elena.kaeva@pwc.com

Timur Zhursunov

Partner

Tax, Legal and People services

timur.zhursunov@pwc.com

Aliya Ibrayeva, ADIT

Director

International Tax Structuring
Services

aliya.ibrayeva@pwc.com

Kazakhstan and Hong Kong Special Administrative Region representatives are planning to hold the first round of negotiations on a double tax treaty to be concluded from 24 to 28 August 2026.

It is worth noting that the existing double tax treaty between the Republic of Kazakhstan and the Government of the People's Republic of China does not extend to Hong Kong. Currently, Hong Kong SAR is included in Kazakhstan's list of jurisdictions with preferential taxation. This implies that Kazakhstan-source income derived by Hong Kong SAR residents are subject to withholding tax at a rate of 20%.

Conclusion of a double tax treaty would allow taxpayers to benefit from reduced tax rates on cross-border transactions. Before entering into force, the double tax treaty will need to be negotiated, signed, and ratification notes to be exchanged by both contracting jurisdictions.

It is also worth noting that Kazakhstan and Hong Kong already participate in the automatic exchange of financial account information under international tax transparency standards.

We continue monitoring key changes related to international taxation and would be glad to discuss the potential impact of these changes on your business.

If you are interested in additional information, please contact us.