

Multilateral Convention (MLI) – Hungary Publishes English and Hungarian Synthesized Texts of Hungary-Portugal Treaty

7 August 2023

Report from IBFD Tax Treaties Unit

The Hungarian Ministry of Finance recently published the English and Hungarian synthesized texts of the [Hungary - Portugal Income Tax Treaty \(1995\)](#), displaying the modifications made to the treaty by the MLI.

Hungary and Portugal deposited their instrument of ratification of the MLI on, respectively, 25 March 2021 and 28 February 2020. The MLI therefore entered into force for Hungary on 1 July 2021 and for Portugal on 1 June 2020.

Portugal deposited a notification subsequent to ratification on 6 March 2023 (see [Multilateral Instrument \(MLI\) – Portugal Deposits Notification Subsequent to Ratification \(8 March 2023\)](#)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will generally have effect with respect to the [Hungary - Portugal Income Tax Treaty \(1995\)](#):

In Hungary and Portugal:

- with respect to taxes withheld at source on amounts paid or credited to non-residents, where the event giving rise to such taxes occurs on or after 1 January 2022; and
- with respect to all other taxes, for taxes levied with respect to taxable periods beginning on or after 1 January 2022.

In accordance with [paragraph 1 of article 36](#) of the MLI, the provisions of [Part VI](#) (Arbitration) of the MLI shall have effect with respect to this treaty with respect to cases presented to the competent authority of a contracting state (as described in [subparagraph a\) of paragraph 1 of article 19](#) (Mandatory Binding Arbitration) of the MLI), on or after 1 July 2021.

Furthermore, in accordance with [paragraph 2 of article 36](#) of the MLI, the provisions of [Part VI](#) (Arbitration) of the MLI will apply to a case presented to the competent authority of a contracting state prior to 1 July 2021 only if the competent authorities of both contracting states agree on its application to that specific case.

The purpose of the synthesized text is to facilitate the understanding of the application of the MLI but it is not in itself a source of law.

Hungary; Portugal - Multilateral Convention (MLI) – Hungary Publishes English and Hungarian Synthesized Texts of Hungary-Portugal Treaty (07 Aug. 2023), News IBFD.

Exported / Printed on 9 Mar. 2024 by hkermadi@deloitte.lu.