Hungary; Israel

Multilateral Convention (MLI) – Hungary Publishes English and Hungarian Synthesized Texts of Hungary-Israel 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 - Israel Income Tax Treaty (1991), displaying the modifications made to the treaty by the MLI.

Hungary and Israel deposited their instrument of ratification of the MLI on, respectively, 25 March 2021 and 13 September 2018. The MLI therefore entered into force for Hungary on 1 July 2021 and for Israel on 1 January 2019.

Unless stated otherwise in the synthesized text, the provisions of the MLI will generally have effect with respect to the Hungary - Israel Income Tax Treaty (1991):

In Hungary:

- 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 Israel:

- 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 the first day of the taxable period that begins on or
 after 1 July 2021; and
- with respect to all other taxes, for taxes levied with respect to taxable periods beginning on or after 1
 January 2022.

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.

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