

Russia Temporarily Suspends Certain Provisions of 38 Tax Treaties with 'Unfriendly' States

8 August 2023

Report from IBFD Tax Treaties Unit

On 8 August 2023, the President of Russia signed Decree No. 585, temporarily suspending specific provisions of international tax treaties. While the tax treaties themselves will continue to hold validity, the suspension primarily impacts reduced tax rates on dividends, interest, and royalties applicable to businesses. As of now, there are no intentions to denounce these treaties entirely.

Furthermore, the Ministry of Foreign Relations will communicate the suspension to the authorities of the countries involved, which currently amounts to a total of 38 tax treaties. The suspension process involves government action, including sending a draft law on suspension to the State Duma (lower chamber of the Russian parliament) for approval. The Decree was published in the Official Gazette on 8 August 2023, taking effect and suspending the provisions below from the same date. These steps reflect Russia's approach to addressing violations of its economic interests within the legal framework of existing international treaties.

The suspension of certain tax provisions affect the following tax treaties:

- [Albania](#): articles 5-23 and 25;
- [Australia](#): articles 5-21, 23 and points 1, 2 and 4-8 of the final protocol;
- [Austria](#): articles 5-22, 24, 26.1, 26.2 and points 1, paragraph "ad article 5", paragraph "ad article 6", paragraph "ad article 7", paragraph "ad articles 7 and 9", paragraph "ad article 25" of the final protocol;
- [Belgium](#): articles 5-22, 24, 27, and point 3 of the final protocol;
- [Bulgaria](#): articles 5-22 and 24;
- [Canada](#), articles 5-22, 24, 28 and the final protocol;
- [Croatia](#): articles 5-22 and 24;
- [Cyprus](#): articles 5-22, 24, 27 and 29;
- the [Czech Republic](#): articles 5-22 and 24;
- [Denmark](#): articles 5-22 and 24;
- [Finland](#): articles 5-21, 23 and the final protocol;
- [France](#): articles 5-22, 24 and points 2-9 of the final protocol;
- [Germany](#): articles 5-22, 24 and points 2-7 of the final protocol;
- [Greece](#): articles 5-22 and 24;
- [Hungary](#): articles 5-22 and 24;
- [Iceland](#): articles 5-23 and 25;
- [Ireland](#): articles 5-22 and 24;
- [Italy](#): articles 5-23, 25 and points a-d and f of the final protocol;
- [Japan](#): articles 5-21, 23, 26 and points 1-3 of the final protocol;

- [Korea \(Rep.\)](#): articles 5-21 and 23;
- [Lithuania](#): articles 5-23, 25, 28 and the final protocol;
- [Luxembourg](#): articles 5-22, 24, 28 and 29;
- [Malta](#): articles 5-21, 23, 27 and point 2 of the final protocol;
- [Montenegro](#): articles 5-23 and 25;
- [New Zealand](#): articles 5-21, 23 and points 2-11 of the final protocol
- [North Macedonia](#): articles 5-23 and 25;
- [Norway](#): articles 5-22, 24, 27 and the final protocol;
- [Poland](#): articles 4-20 and 22;
- [Portugal](#): articles 5-22, 24 and points 2-4 of the final protocol;
- [Romania](#): articles 5-23 and 25;
- [Singapore](#): articles 5-22, 24 and points 3.1-7 of the final protocol;
- the [Slovak Republic](#): articles 5-22 and 24;
- [Slovenia](#): articles 5-23 and 25;
- [Spain](#): articles 5-22, 24 and points II-VIII of the final protocol;
- [Sweden](#): articles 5-22, 24, 27, 28, 30 and point 2 of the final protocol;
- [Switzerland](#): articles 5-22, 24, 25B, and points 3-6 of the final protocol;
- the [United Kingdom](#): articles 5-21, 23, 24 and points a-f of the exchange of notes of 1994; and
- the [United States](#): articles 1(4), 5-21, 23 and the final protocol.

Further developments will be reported as they occur.

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