

Multilateral Convention (MLI) – Norway Publishes English Synthesized Text of Cyprus-Norway Treaty

15 January 2024

Report from IBFD Tax Treaties Unit

On 15 January 2024, the Norwegian Ministry of Finance published the English synthesized text of the [Cyprus - Norway Income Tax Treaty \(2014\)](#), displaying the modifications made to the treaty by the MLI.

Norway and Cyprus deposited their instrument of ratification of the MLI on, respectively, 17 July 2019 and 23 January 2020. The MLI therefore entered into force for Norway on 1 November 2019 and for Cyprus on 1 May 2020.

Unless stated otherwise in the synthesized text, the provisions of the MLI will have effect with respect to the [Cyprus - Norway Income Tax Treaty \(2014\)](#):

In Norway and Cyprus:

- 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 2021; and
- with respect to all other taxes, for taxes levied with respect to taxable periods beginning on or after 1 November 2020.

Furthermore, [Paragraph 4 of article 35](#) of the MLI does not apply.

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.