

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

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Report from IBFD Tax Treaties Unit

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

Hungary and Ukraine deposited their instrument of ratification of the MLI on, respectively, 25 March 2021 and 8 August 2019. The MLI therefore entered into force for Hungary on 1 July 2021 and for Ukraine on 1 December 2019.

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

In Hungary and Ukraine:

- 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.

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.