Multilateral Convention (MLI) – Hungary Publishes English and Hungarian Synthesized Texts of Hungary-Latvia 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 - Latvia Income and Capital Tax Treaty (2004), displaying the modifications made to the treaty by the MLI.

Hungary and Latvia deposited their instrument of ratification of the MLI on, respectively, 25 March 2021 and 29 October 2019. The MLI therefore entered into force for Hungary on 1 July 2021 and for Latvia on 1 February 2020.

Latvia expanded the application of the Multilateral BEPS Convention on its existing treaties on 20 April 2021 (see Multilateral Instrument (MLI) – Latvia Expands Application of MLI on Existing Treaties (21 April 2021)).

Unless stated otherwise in the synthesized text, the provisions of the MLI will generally have effect with respect to the Hungary - Latvia Income and Capital Tax Treaty (2004):

In Hungary and Latvia:

- 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.

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

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