



# Application under Double Taxation Agreement for an Exemption or partial relief from Icelandic Taxation

concerning payments or commissions to foreign parties for services or other activities, the utilisation of property rights or interests, sales profits/capital gains or dividend payments

## I Applicant

1 Applicant's name / beneficial owner		
2 Address (Street)		
3 State or province	4 Postcode - postoffice/city	
5 Country of residence (fiscal)	6 Tax identification number	
7 E-mail address	8 Telephone number	9 Fax number
10 Icelandic identification number	11 OECD code	

## II The exempted activity, services, rights and/or payments

12 Tax exemption concerning:	<input type="checkbox"/> Dividend payment	<input type="checkbox"/> Interests	<input type="checkbox"/> Sales profits/capital gains
	<input type="checkbox"/> Use of property rights, (usufruct)	<input type="checkbox"/> Lease of movables	<input type="checkbox"/> Individual personal services <input type="checkbox"/> Other service or activities
13 Details regarding the mark made in box 12			
14 Articles in relevant double taxation convention covering activities, services, property rights or interests, sales profits/capital gains or dividend payments			
15 Payer of the service, property rights, dividends, interests etc.			

## III Declaration and signature of the applicant

16 The undersigned, who has full power of attorney to obligate the applicant under law, hereby requests that the applicant be fully or partially exempted from the taxation of particular items. The exempted items are income or payments received from individuals or parties with a permanent residence in Iceland under the provisions of a double taxation agreement between the Republic of Iceland and..... (contracting country concerned).  The undersigned further declares the following: <ul style="list-style-type: none"> <li>• The applicant is the beneficial owner of the income.</li> <li>• The payments or income do not originate from a permanent establishment in Iceland with which the applicant is affiliated, as such establishments are defined in the above double taxation convention.</li> <li>• The payments or income are subject to taxation in the applicant's country of residence, where the applicant bears full and unlimited tax liability.</li> <li>• All information provided in this application is correct.</li> <li>• The applicant will immediately inform both the tax authorities in Iceland and in the applicant's country of residence of any changes in the information provided in this application that could affect whether an exemption is granted.</li> </ul>	
17 Application date	18 Signature of the applicant/applicant's representative according to a valid power of attorney
19 The applicant requests that the Directorate of Internal Revenue send its decision by: <input type="checkbox"/> e-mail <input type="checkbox"/> mail <input type="checkbox"/> fax	

## IV Confirmation of authorities

20 Confirmation of the Icelandic tax authorities <input type="checkbox"/> Application approved <input type="checkbox"/> Application denied  Certificate No. _____ Validity period of exemption _____	21 Confirmation of the tax authorities in the applicant's country of residence  We hereby confirm that the applicant bears full and unlimited tax liability in the country specified in box 16 of this form, and has permanent residence there with regard to the double taxation convention concerned.
Date _____ Signature and stamp of the tax authorities _____	Date _____ Signature and stamp of the tax authorities _____

See directions and explanatory notes for particular boxes on the back side of the last duplicate



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## Directions and explanatory notes for particular boxes

This application shall be completed by those with limited tax liability in Iceland, under paragraph 3, 6 and 7 of Article 3 of Act No. 90/2003 on income tax, to request exemption from taxation under the provisions of a double taxation convention concluded by Iceland and the state specified in the application. A tax exemption and tax refund may be applied for simultaneously. An application for a tax refund is made on form RSK 5.43, which can be printed from the Directorate of Internal Revenue's website, [www.rsk.is](http://www.rsk.is).

### Handwritten applications shall be completed in BLOCK CAPITALS.

The relevant foreign tax authorities under the double taxation convention shall certify the accuracy of specific information provided by the applicant. The application shall be sent to the Directorate of Internal Revenue at the following address:

**Ríkisskattstjóri  
Laugavegi 166  
150 Reykjavík  
Iceland**

To expedite processing of the application, foreign tax authorities can send the Directorate of Internal Revenue the certified application by fax to +354 562 4440, or as a PDF document to [rsk@rsk.is](mailto:rsk@rsk.is).

The Directorate of Internal Revenue will send its decision to the applicant and the foreign tax authorities when one has been reached.

### Notes on particular boxes on the form

**Box 1** Enter the name of the company or the individual. Only beneficial owners may apply for exemption from taxes of paid interests, dividends, royalties or capital gain.\*

**Boxes 2-4** Address of the applicant.

**Box 5** In the shaded section, please enter the country code for the country where the recipient of the payment has a permanent fiscal residence. The country code shall be in accordance with ISO 3166 (two letters), e.g., DK for Denmark. Country codes can be found on the Directorate of Internal Revenue's web site, [www.rsk.is](http://www.rsk.is).

In the non-shaded section, please enter the name of the country covered under the double taxation convention, specified in box 16.

**Box 6** Enter here the applicant's tax identification number (TIN) assigned under the laws and regulations of the country where the applicant has a permanent fiscal residence and unlimited tax liability. If a TIN is not available, then enter the applicant's ID No. (Social Security Number or comparable) used for tax purposes by the foreign tax authorities in the applicant's country of residence.

In the shaded section, enter the letter T if a TIN is used or the letter A if a TIN is not available and another foreign ID number is used. If neither a TIN nor an ID number is used in the relevant country for tax purposes, please indicate this by entering the letter X in the shaded section.

**Box 10** Please enter the applicant's Icelandic identification number if one has been assigned. However, box 6 should always be filled out, regardless of whether the applicant has an Icelandic identification number or not.

**Box 11** In the shaded section of this box, please enter the relevant OECD code for the applicant's legal form as specified below.

- 01 Individual
- 02 Corporation
- 03 Partnership
- 04 Business organisation other than corporation and partnership
- 05 Government or international organisation
- 06 Other
- 07 Unknown

**Box 13** The applicant should provide further explanations regarding the mark made in box 12.

- If the use of property rights (usufruct), is relevant, such as for patents, trademarks, manufacturing licences or rights to utilise industrial, commercial or scientific equipment, the type of property rights shall be specified, including patent numbers and the country of registration. If copyright is relevant, the type of property rights and name of the work(s) shall be specified. Also, the owner's (author's) name, address and country of residence shall be stated, as well as whether the owner or another party is the applicant.
- For use of movables, the type of lease payment shall be specified.
- For individual personal services (freelance) details shall be provided on the kind of activities and services provided.
- In the same fashion, details on services rendered or activities other than those specified above that can be subject to provisions of the relevant double taxation convention should be entered.
- If the sale of usufruct or movables is involved, one should specify what is sold and to whom as well as the name and the address of the buyer. The sales price and the sales proceeds are also relevant.°
- Regarding interests specify the accounts and transactions. An approved exemption regarding interests is applicable for the beneficial owner of the interests until further notice.
- Only the beneficial owner\* of the dividends/capital gains (i.e. the one who is entitled to the dividends/capital gains) can apply for an exemption from Icelandic, dividend tax and/or capital gains tax.

\* According to the Director of Internal Revenue the **real beneficial owner** is an entity who enjoys the benefits of owning a security or property, regardless of whose name the title is in. This implies that only the real beneficial owner himself can apply for an exemption/refund, enclosing documentation issued accordingly. An entity that is in fact acting on behalf of someone else as either trustee or investment manager, and is as such the registered or indirect owner of the dividends, is not entitled to an exemption/refund. Neither is an entity that receives the dividend payments and passes them directly on to other entities/persons entitled to an exemption/ refund.

If contract is available a copy shall be filed with the application.

**Box 16** Enter here the name of the country with which Iceland has concluded a double taxation convention relevant to this application.

## English country names and code elements

This list states country names in alphabetical order as given in ISO 3166-1 and the corresponding ISO 3166-1-alpha-2 code elements.

AFGHANISTAN	AF	GIBRALTAR	GI	PAKISTAN	PK
ÅLAND ISLANDS	AX	GREECE	GR	PALAU	PW
ALBANIA	AL	GREENLAND	GL	PALESTINIAN TERRITORY, OCCUPIED	PS
ALGERIA	DZ	GRENADA	GD	PANAMA	PA
AMERICAN SAMOA	AS	GUADELOUPE	GP	PAPUA NEW GUINEA	PG
ANDORRA	AD	GUAM	GU	PARAGUAY	PY
ANGOLA	AO	GUATEMALA	GT	PERU	PE
ANGUILLA	AI	GUINEA	GN	PHILIPPINES	PH
ANTARCTICA	AQ	GUINEA-BISSAU	GW	PITCAIRN	PN
ANTIGUA AND BARBUDA	AG	GUYANA	GY	POLAND	PL
ARGENTINA	AR	HAITI	HT	PORTUGAL	PT
ARMENIA	AM	HEARD ISLAND AND MCDONALD ISLANDS	HM	PUERTO RICO	PR
ARUBA	AW	HOLY SEE (VATICAN CITY STATE)	VA	QATAR	QA
AUSTRALIA	AU	HONDURAS	HN	RÉUNION	RE
AUSTRIA	AT	HONG KONG	HK	ROMANIA	RO
AZERBAIJAN	AZ	HUNGARY	HU	RUSSIAN FEDERATION	RU
BAHAMAS	BS	ICELAND	IS	RWANDA	RW
BAHRAIN	BH	INDIA	IN	SAINT HELENA	SH
BANGLADESH	BD	INDONESIA	ID	SAINT KITTS AND NEVIS	KN
BARBADOS	BB	IRAN, ISLAMIC REPUBLIC OF	IR	SAINT LUCIA	LC
BELARUS	BY	IRAQ	IQ	SAINT PIERRE AND MIQUELON	PM
BELGIUM	BE	IRELAND	IE	SAINT VINCENT AND THE GRENADINES	VC
BELIZE	BZ	ISRAEL	IL	SAMOA	WS
BENIN	BJ	ITALY	IT	SAN MARINO	SM
BERMUDA	BM	JAMAICA	JM	SAO TOME AND PRINCIPE	ST
BHUTAN	BT	JAPAN	JP	SAUDI ARABIA	SA
BOLIVIA	BO	JORDAN	JO	SENEGAL	SN
BOSNIA AND HERZEGOVINA	BA	KAZAKHSTAN	KZ	SERBIA AND MONTENEGRO	CS
BOTSWANA	BW	KENYA	KE	SEYCHELLES	SC
BOUVET ISLAND	BV	KIRIBATI	KI	SIERRA LEONE	SL
BRAZIL	BR	KOREA, DEMOCRATIC PEOPLE'S REPUBLIC OF	KP	SINGAPORE	SG
BRITISH INDIAN OCEAN TERRITORY	IO	KOREA, REPUBLIC OF	KR	SLOVAKIA	SK
BRUNEI DARUSSALAM	BN	KUWAIT	KW	SLOVENIA	SI
BULGARIA	BG	KYRGYZSTAN	KG	SOLOMON ISLANDS	SB
BURKINA FASO	BF	LAO PEOPLE'S DEMOCRATIC REPUBLIC	LA	SOMALIA	SO
BURUNDI	BI	LATVIA	LV	SOUTH AFRICA	ZA
CAMBODIA	KH	LEBANON	LB	SOUTH GEORGIA AND THE SOUTH SANDWICH ISLANDS	GS
CAMEROON	CM	LESOTHO	LS	SPAIN	ES
CANADA	CA	LIBERIA	LR	SRI LANKA	LK
CAPE VERDE	CV	LIBYAN ARAB JAMAHIRIYA	LY	SUDAN	SD
CAYMAN ISLANDS	KY	LIECHTENSTEIN	LI	SURINAME	SR
CENTRAL AFRICAN REPUBLIC	CF	LITHUANIA	LT	SVALBARD AND JAN MAYEN	SJ
CHAD	TD	LUXEMBOURG	LU	SWAZILAND	SZ
CHILE	CL	MACAO	MO	SWEDEN	SE
CHINA	CN	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF	MK	SWITZERLAND	CH
CHRISTMAS ISLAND	CX	MADAGASCAR	MG	SYRIAN ARAB REPUBLIC	SY
COCOS (KEELING) ISLANDS	CC	MALAWI	MW	TAIWAN, PROVINCE OF CHINA	TW
COLOMBIA	CO	MALAYSIA	MY	TAJIKISTAN	TJ
COMOROS	KM	MALDIVES	MV	TANZANIA, UNITED REPUBLIC OF	TZ
CONGO	CG	MALI	ML	THAILAND	TH
CONGO, THE DEMOCRATIC REPUBLIC OF THE	CD	MALTA	MT	TIMOR-LESTE	TL
COOK ISLANDS	CK	MARSHALL ISLANDS	MH	TOGO	TG
COSTA RICA	CR	MARTINIQUE	MQ	TOKELAU	TK
CÔTE D'IVOIRE	CI	MAURITANIA	MR	TONGA	TO
CROATIA	HR	MAURITIUS	MU	TRINIDAD AND TOBAGO	TT
CUBA	CU	MAYOTTE	YT	TUNISIA	TN
CYPRUS	CY	MEXICO	MX	TURKEY	TR
CZECH REPUBLIC	CZ	MICRONESIA, FEDERATED STATES OF	FM	TURKMENISTAN	TM
DENMARK	DK	MOLDOVA, REPUBLIC OF	MD	TURKS AND CAICOS ISLANDS	TC
DJIBOUTI	DJ	MONACO	MC	TUVALU	TV
DOMINICA	DM	MONGOLIA	MN	UGANDA	UG
DOMINICAN REPUBLIC	DO	MONTSERRAT	MS	UKRAINE	UA
ECUADOR	EC	MOROCCO	MA	UNITED ARAB EMIRATES	AE
EGYPT	EG	MOZAMBIQUE	MZ	UNITED KINGDOM	GB
EL SALVADOR	SV	MYANMAR	MM	UNITED STATES	US
EQUATORIAL GUINEA	GQ	NAMIBIA	NA	UNITED STATES MINOR OUTLYING ISLANDS	UM
ERITREA	ER	NAURU	NR	URUGUAY	UY
ESTONIA	EE	NEPAL	NP	UZBEKISTAN	UZ
ETHIOPIA	ET	NETHERLANDS	NL	VANUATU	VU
FALKLAND ISLANDS (MALVINAS)	FK	NETHERLANDS ANTILLES	AN	Vatican City State see HOLY SEE	
FAROE ISLANDS	FO	NEW CALEDONIA	NC	VENEZUELA	VE
FIJI	FJ	NEW ZEALAND	NZ	VIET NAM	VN
FINLAND	FI	NICARAGUA	NI	VIRGIN ISLANDS, BRITISH	VG
FRANCE	FR	NIGER	NE	VIRGIN ISLANDS, U.S.	VI
FRENCH GUIANA	GF	NIGERIA	NG	WALLIS AND FUTUNA	WF
FRENCH POLYNESIA	PF	NIUE	NU	WESTERN SAHARA	EH
FRENCH SOUTHERN TERRITORIES	TF	NORFOLK ISLAND	NF	YEMEN	YE
GABON	GA	NORTHERN MARIANA ISLANDS	MP	Zaire see CONGO, THE DEMOCRATIC REPUBLIC OF THE	
GAMBIA	GM	NORWAY	NO	ZAMBIA	ZM
GEORGIA	GE	OMAN	OM	ZIMBABWE	ZW
GERMANY	DE				
GHANA	GH				