



## Hong Kong Tax Newsflash

### Hong Kong-Jordan tax treaty signed

**Hong Kong | Tax & Business Advisory | 11 September 2025 | Issue 249**

Hong Kong SAR (HK) signed a Comprehensive Double Tax Agreement (CDTA) with Jordan on 4 September 2025. Jordan is one of the economies participating in the Belt and Road Initiative. This is the 53<sup>rd</sup> CDTA concluded by HK.

Below is a comparison of the withholding tax rates applicable to dividends, interest and royalties, under the respective domestic tax law and the HK-Jordan CDTA:

	Dividends	Interest	Royalties
HK non-CDTA rate	0%	0%	4.95% / 16.5% <sup>1</sup>
Jordan non-CDTA rate	0%	7% / 10% <sup>2</sup>	10%
HK-Jordan CDTA rate	0% / 5% <sup>3, 4</sup>	0% / 5% <sup>4</sup>	5%

In addition to the provision of more beneficial withholding tax rates, the CDTA provides beneficial treatment on capital gains. For example, capital gains derived by a HK investor from the disposal of shares in a Jordan company are generally exempt from tax in Jordan under the CDTA, unless the company is land-rich<sup>5</sup>. Nevertheless, under certain circumstances<sup>6</sup> (e.g., the shares of the land-rich company are listed, the land-rich company holds a building which is used by the company as its office etc.), the capital gains from the disposal of such a land-rich company may still be exempt from tax in Jordan.

The HK-Jordan CDTA will come into force after the completion of ratification procedures by both jurisdictions. The CDTA can be downloaded from this [link](#).

<sup>1</sup> The 4.95% rate generally applies. If the royalty is paid to an associated entity and the intellectual property has been owned by a person carrying on business in HK, 16.5% applies. If the taxpayer is eligible for two-tiered tax rates, 2.475% (or 8.25% if higher rate) applies on the first HKD 2 million of assessable profits and 4.95% (or 16.5% if higher rate) on the remaining amount.

<sup>2</sup> The 10% rate generally applies. A 7% rate applies to interest from deposits, commissions, and profit participations of Islamic banks in the investment of such deposits, when paid to banks and financial institutions, licensed companies permitted to accept deposits, and specialized lending institutions in Jordan.

<sup>3</sup> As the CDTA rate is higher than the current non-CDTA rate, the current non-CDTA rate would generally apply.

<sup>4</sup> 0% if it is paid to the Government of Jordan / HK, the HK Monetary Authority, the Exchange Fund of HK, the Central Bank of Jordan, or any entity wholly or mainly owned by the Government of Jordan / HK as may be agreed from time to time between the competent authorities of both jurisdictions; otherwise, the rate will be 5%.

<sup>5</sup> A company deriving more than 50% of its value directly or indirectly from immovable property situated in Jordan during the 365 days preceding the disposal.

<sup>6</sup> Circumstances under which gains from alienation of shares or comparable interests in land-rich entities shall be taxable only in the location of the taxpayer's residence are:

- (a) shares quoted on a stock exchange agreed upon by the competent authorities of HK and Jordan; or
- (b) shares alienated or exchanged in the framework of a corporate reorganisation, such as a merger, demerger (scission), or similar operation; or
- (c) shares in a company deriving more than 50% of its value from immovable property in which it carries on its business.

Once the CDTA enters into force, the [HK-Jordan Air Services Income Agreement](#), which provides similar exemptions for the operation of aircraft in international traffic as those under Article 8 of the CDTA, will cease to have effect.

Tax Newsflash is published for the clients and professionals of Deloitte Touche Tohmatsu. The contents are of a general nature only. Readers are advised to consult their tax advisors before acting on any information contained in this newsletter.

---

## Authors

### **Doris Chik**

Tax Partner

+852 2852 6608

[dchik@deloitte.com.hk](mailto:dchik@deloitte.com.hk)

### **Carmen Cheung**

Senior Tax Manager

+852 2740 8660

[carmcheung@deloitte.com.hk](mailto:carmcheung@deloitte.com.hk)

### **Kiwi Fung**

Tax Manager

+852 2258 6162

[kifung@deloitte.com.hk](mailto:kifung@deloitte.com.hk)

---

For more information, please contact:

### **Tax & Business Advisory**

#### **Southern Region Leader**

### **Jennifer Zhang**

Tax Partner

+852 2258 6228

[jennifzhang@deloitte.com.hk](mailto:jennifzhang@deloitte.com.hk)

### **Hong Kong Leader**

### **Anthony Lau**

Tax Partner

+852 2852 1082

[antlau@deloitte.com.hk](mailto:antlau@deloitte.com.hk)

### **International and M&A Tax Services**

#### **National Leader**

### **Vicky Wang**

Tax Partner

+86 21 6141 1035

[vicwang@deloittecn.com.cn](mailto:vicwang@deloittecn.com.cn)

---



#### About Deloitte

Deloitte China provides integrated professional services, with our long-term commitment to be a leading contributor to China's reform, opening-up and economic development. We are a globally connected firm with deep roots locally, owned by our partners in China. With over 20,000 professionals across 31 Chinese cities, we provide our clients with a one-stop shop offering world-leading audit, tax and consulting services.

We serve with integrity, uphold quality and strive to innovate. With our professional excellence, insight across industries, and intelligent technology solutions, we help clients and partners from many sectors seize opportunities, tackle challenges and attain world-class, high-quality development goals.

The Deloitte brand originated in 1845, and its name in Chinese (德勤) denotes integrity, diligence and excellence. Deloitte's global professional network of member firms now spans more than 150 countries and territories. Through our mission to make an impact that matters, we help reinforce public trust in capital markets, enable clients to transform and thrive, empower talents to be future-ready, and lead the way toward a stronger economy, a more equitable society and a sustainable world.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which is a separate and independent legal entity, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Bengaluru, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Mumbai, New Delhi, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo.

This communication contains general information only, and none of DTTL, its global network of member firms or their related entities is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication.