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Hong Kong Tax Newsflash
Hong Kong-Norway tax treaty signed

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Hong Kong SAR (HK) signed a Comprehensive Double Tax Agreement (CDTA) with Norway on 16 December 2025. This is the 55th 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-Norway CDTA:

	Dividends	Interest	Royalties
HK non-CDTA rate	0%	0%	4.95% / 16.5%[1]
Norway non-CDTA rate	0% / 25%[2]	0% / 15%[3]	0% / 15%[3]
HK-Norway CDTA rate	5% / 15%[4]	5%	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 Norwegian company are generally exempt from tax in Norway under the CDTA, unless the company is land-rich[5]. Nevertheless, under certain circumstances[6] (e.g., the shares of the land-rich company are listed, the shares are disposed under a corporate reorganisation etc.), the capital gains from the disposal of such a land-rich company may still be exempt from tax in Norway.

The HK-Norway CDTA will come into force after the completion of ratification procedures by both jurisdictions. The CDTA can be downloaded from this link.

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[1] 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.

[2] The 25% rate generally applies. If the dividend is paid to a company resident in the European Economic Area (EEA) that conducts real business activities in the EEA jurisdiction, 0% applies.

[3] The 15% rate applies to interest / royalties paid to certain related companies resident in low tax jurisdictions, where companies are subject to an effective corporate income tax rate that is less than two-thirds of the rate applicable to comparable Norwegian companies; otherwise, the rate is 0%.

[4] 5% if the beneficial owner is a company which holds directly at least 10% of the capital of the company paying the dividends throughout a 365-day period; 15% in all other cases.

[5] A company deriving more than 50% of its value directly or indirectly from immovable property situated in Norway during the 365 days preceding the disposal.

[6] 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 Norway; 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.

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