

Ref: CO/CRM/955 /23

December 9, 2014

All Zonal Managers,
All Regional Managers (CRM)
All Sr/Divisional Managers,
M.D.C., Audit & Inspection

Re: Deduction of Income Tax at source from sum payable under the Life Insurance Policy to Non-resident Indians in terms of Section 195 of the Income Tax Act, 1961.

This is further reference to our circulars ref:CO/CRM/946/23 dt. 27/9/2014 and CO/CRM/953/23 dt. 14/11/2014 where provisions of section 194 DA of the Income Tax Act, 1961 were mentioned which require deduction of tax at source at the prescribed rate from any sum paid to a resident of India under a life insurance policy.

We have now received clarifications in respect of deduction of tax at source from sum payable under the Life Insurance policy to **Non-resident Indians including foreign nationals of Indian origin in terms of Section 195 of the Income Tax Act, 1961.** The details of the provisions are as follows:-

- 1) **If the policy is not exempted under section 10(10D) of the Income Tax Act, 1961 , then eligible policy payments made during the financial year will be eligible for deduction of tax at source under section 195 of the Income tax Act as per effective rate.** The policy will be treated as **NOT EXEMPTED** under section 10(10D) where
 - Policies issued on and after 1.4.2003 but upto 31.03.2012 where premium payable for any of the years during the policy term exceeds 20% of actual capital sum assured. **However, Death claim payment is exempted.**
 - Policies issued on and after 1.4.2012 and premium payable for any of the policy year during the term of the policy, exceed 10% of actual capital sum assured. **However, death claim payment is exempted.**
 - Any sum received under Jeevan Aadhar plan no -114, if dependant predeceases proposer of the policy sub to Section 80 DD(3) of Income tax act 1961. This is irrespective of date of commencement of policy.
 - Any policy issued on and after 1.4.2013 for the insurance on the life of any person who is (a) a person with disability or a person with severe disability as referred to in section 80 U or (b) suffering from disease or ailment as specified in the rules made under section 80 DDB where the premium payable in any of the year is more than 15% of the actual capital sum assured provided such disability or illness is disclosed by the life assured at the time of taking the policy.
 - Any sum received under a Key man insurance policy irrespective of date of commencement of policy.

- 2) If the policy is non-exempted under section 10(10D), then tax at source will be deducted from **eligible amount** under the policy **without any threshold limit** as per **effective rate of tax**. (Kindly note that in case of non-resident policyholders, there is no threshold limit of Rs. 1,00,000 as available to Indian resident under section 194 DA).
- 3) **Eligible amount** will be gross policy payment being settled under the policy reduced by premium amount paid by the policyholder during the policy term. **In other words, tax will be deducted on the gross amount of policy paid to policyholder which is in excess of premium paid by policyholder.**

In case of survival benefit or surrender value, the gross policy payment should be compared with the amount of premium paid upto due date of survival benefit claim or date of surrender value payment. If such eligible amount is zero or less, then there will be no need to deduct tax from policy amount.

- 4) **Effective rate of Tax** to be deducted at source where 'Taxability' status shown in India as per DTAA attachment to this circular under section 195 will be
 - At the rate of **30.9%** of the eligible policy payment as defined above if such policy payment is **less than or equal to Rs. 1 crore**.
 - At the rate of **33.99%** if such policy payment is **more than Rs. 1 crore**

As per statement of DTAA, if the column 'taxability' shows as 'In India', then the tax at source will be deducted from eligible policy payment. If the columns 'taxability' shows the name of the country other than India, then in such cases, there will be no need to deduct the tax from policy payments.

5) Applicability of DTTA (Double Taxation Avoidance Agreement) rates :-

DTAA (Double Taxation Avoidance Agreement) is a tax treaty that India has with various countries. The applicability of clauses of DTAA varies from country to country. Hence, our offices should refer to the rates of DTAA as per the country of the non-resident policy holder for deduction of tax at source. The tax will be deducted at such rate as given in point 4 above. The country wise rates of DTAA are given as an attachment.

6) Eligible policy payments where Tax at source will be deducted:-

Payments like survival benefit claim, maturity claim, discounted value of maturity claim, instalment under settlement option of maturity claim, gross surrender value, gross amount of surrender value in case of policy loan foreclosure, disability benefit under EPDB claim, any sickness benefit under critical illness, unclaimed and outstanding amounts, claims settled but outstanding where tax is not deducted but payment is made now are treated as 'Eligible policy payments'.

7) Definition of Non-Resident as per Income tax Act, 1961 is as follows:-

An individual or HUF will be treated as Non-resident, if any of the following conditions are satisfied:-

- **He/ she stayed outside India for 182 days or more during the previous financial year pertaining to the date of payment** OR
- He/ she stayed outside India for 365 days or more during the 4 preceding years and stays outside India for at least 60 days during the previous financial year pertaining to the date of payment. For person of Indian origin coming on a visit to India or Indian citizen going abroad for an employment, the period of 60 days should read as 182 days.

The decide the status of the life assured , our offices should call the photo copy of the passport or Tax residency certificate (TRC) from the concerned policyholder who request us to settle the policy payment to NRO/ NRI account in Indian currency. It will not be material whether policyholder has declared his status of non-residence at the time of taking the policy or at the time of payment under the policy. From copy of the passport or TRC paper, we have to ascertain the name of the country where life assured resides and applicability of ‘Taxability status’.

Tax Residency Certificate (TRC) is issued by the country where life assured declares the non-residence status. This certificate will consist name and address of the life assured, Tax identification number and regulations regarding payment of tax.

- 8) **Policy payment in foreign currency:-**If any policy payment is settled in foreign currency as per rules prescribed under foreign Exchange Management Regulations in favour of non-resident policyholder , then our offices will be required to refer such cases to CRM Dept , Central Office to know the rate at which tax will be deducted from policy payment on case to case basis. **In such cases, the office who settle the concerned payment should obtain F. NO 15CA and F. NO 15CB from Chartered Accountant at our cost.**
- 9) Our offices should insist for photo copy of the PAN card also. If policyholder produces the copy of the PAN card, then same may be entered in our system. Otherwise, same may be kept in blank. The office should ensure for incremental scanning of copy of PAN , tax residency certificate and copy of passport. Record of such payments effected, documents collected should be maintained manually.
- 10) The QLY statement for tax deducted at source under section 195 should submitted through e-TDS return under F. no 27 Q. kindly, refer the provisions of circular issued by Finance and Accounts Dept, Central office dt. 24/6/2010 ref: EDA/ZDB/934.
- 11) At present, no provision has been made to tag the policy as “ NRI’ in e-feap. Hence, user will be required to decide the eligibility for deduction of tax, calculate the amount of tax to be deducted and enter the said value in payment voucher manually. Shortly, SDC will make the provision for RFM to tag the policy as NRI.
- 12) All other conditions, provisions mentioned in earlier circular will also be applicable for the deduction of tax at source under section 195.

Kindly, bring the provisions of this circular into the knowledge of the offices under your control immediately.



Executive Director (CRM)

Statement showing tax rates under DTAA (Double Taxation Avoidance Agreement).

Sr No	Country of non-resident Of policyholder	Article No	Taxability in	Rate Applicabl e u/s 195	Clause under DTAA
1	Australia	22	India	30.90%	1. Items of income of a resident of one of the Contracting States which are not expressly mentioned in the foregoing Articles of this Agreement shall be taxable only in that State.
					2. However, any such income derived by a resident of one of the Contracting States from sources in the other Contracting State may also be taxed in that other State.
					It is quite evident that the source of income is India, hence clause 2 would apply
2	Austria	22	India	30.90%	3.Items of income of a resident of a Contracting State not dealt within the foregoing Articles of this Convention, and arising in the other Contracting State may be taxed in that other State.
3	Brazil	22	India	30.90%	3.Items of income of a resident of a Contracting State, arising in the other Contracting State and not dealt with in the foregoing Articles of this Convention, may be taxed in that other State.
4	Canada	22	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing Articles, and arising in the other Contracting State, may be taxed in that other State.
5	China	22	India	30.90%	3.Items of income of a resident of a Contracting State not dealt within the foregoing Articles of this Agreement and arising in the other Contracting State may be taxed in that other Contracting State.
6	Italy	23	India	30.90%	3.Items of income of a resident of a Contracting State, wherever arising, not dealt within the foregoing Articles of this Convention may be taxed in both the Contracting States
7	Kenya	24	India	30.90%	1. Items of income of a resident of a Contracting State which are not expressly mentioned in the foregoing articles of this Convention in respect of

					which he is subject to tax in that State shall be taxable only in that State.
					2. If such income is derived by a resident of a Contracting State from sources in the other Contracting State, such income may also be taxed in the State in which it arises, and according to the law of that State
					It is quite evident that the source of income is India, hence clause 2 would apply
8	Korea	23	Korea		Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention, shall be taxable only in that State
9	Malaysia	23	India	30.90%	Notwithstanding the provisions of paragraphs 1 and 2, items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other State.
10	New Zealand	22	India	30.90%	Items of income of a resident of a Contracting State not dealt within the foregoing Articles of this Convention shall be taxable only in that State except that, if such income arises in the other Contracting State, it may also be taxed in that other State.
11	Qatar	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Agreement and arising in the other Contracting State may also be taxed in that other State
12	Saudi Arabia	22	Saudi Arabia		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that Contracting State.
13	Singapore	23	India	30.90%	Items of income which are not expressly mentioned in the foregoing Articles of this Agreement may be taxed in accordance with the taxation laws of the respective Contracting States.

14	South Africa	21	South Africa		Items of income arising in a Contracting State which are not dealt with in the foregoing Articles of this Agreement may be taxed in that State.
15	Sri Lanka	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Convention and arising in the other Contracting State may also be taxed in that other State
16	Swiss Confederations	22	Switzerland		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
17	Thailand	22	India	30.90%	Items of income of a resident of a Contracting State, wherever arising, not expressly dealt with in the foregoing articles may be taxed in that State. Such items of income may also be taxed in the Contracting State where the income arises.
18	UAE	22	UAE		1. Subject to the provisions of paragraph (2), items of income of a resident of a Contracting State, wherever arising, which are not expressly dealt with in the foregoing articles of this Agreement, shall be taxable only in that Contracting State.
19	UK	23	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Convention, and arising in the other Contracting State may be taxed in that other State
20	USA	23	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Convention and arising in the other Contracting State may also be taxed in that other State
21	Vietnam	23	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in other Contracting State may also be taxed in that other State.
22	France	23	France		3. Items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Convention, and arising in the other Contracting State may be taxed in that of the Contracting State

23	Germany	21	Germany		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
24	Afghanistan	Limited agreements	India	30.90%	DTAA Limited to income of enterprises operating aircraft with Afghanistan
25	African Congress Mission	Limited agreements	India	30.90%	Agreement with African National Congress Mission - Exemption from income-tax on salaries and employments paid by the mission to their representative other than Indian nationals
26	Albania	22	Albania		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
27	Argentina	TIEA	India	30.90%	No clause regarding Taxation
28	Armenia	22	India	30.90%	4. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Convention and arising in the other Contracting State may also be taxed in that other State
29	Bahamas	TIEA	India	30.90%	No clause regarding Taxation
30	Bahrain	TIEA	India	30.90%	No clause regarding Taxation
31	Bangladesh	24	India	30.90%	The laws in force in each Contracting State shall continue to govern the taxation of incomes in the respective Contracting States, except where express provision to the contrary has been made in this Convention.
32	Belarus	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement, and arising in the other Contracting State may be taxed in that other State.
33	Belgium	22	India	30.90%	3. Notwithstanding the provisions of paragraphs 1 and 2, items of income of a resident of a Contracting State not dealt with in the foregoing Articles of the Agreement and arising in the other Contracting State may also be taxed in that other State.
34	Belize	TIEA	India	30.90%	No clause regarding Taxation

35	Bermuda	TIEA	India	30.90%	No clause regarding Taxation
36	Bhutan	21	India	30.90%	3. Notwithstanding the provisions of paragraphs 1 and 2, items of income of a resident of a contracting state not dealt within the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other state.
37	Botswana	23	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing articles of the Agreement and arising in the other Contracting State may also be taxed in that other State.
38	British Virgin	TIEA	India	30.90%	No clause regarding Taxation
39	Bulgaria	23	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Convention and arising in the other Contracting State may be taxed in that other State.
40	Cayman Island	TIEA	India	30.90%	No clause regarding Taxation
41	Columbia	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other State.
42	Cyprus	23	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other State.
43	Czech Republic	22	Czech Republic		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
44	Denmark	21	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Convention, and arising in the other Contracting State may be taxed in that other State.
45	Estonia	22	Estonia		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.

46	Ethopia	22	Ethopita		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
47	Fiji	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other State.
48	Finland	21	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may be taxed in that other State.
49	Georgia	22	Georgia		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
50	Gibraltar	TIEA	India	30.90%	No clause regarding Taxation
51	Greece		India	30.90%	No clause regarding Taxation
52	Guernsey	TIEA	India	30.90%	No clause regarding Taxation
53	Kingdom of Jordan	22	Kingdom of Jordan		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
54	Hungary	22	Hungary		1. Items of income of a resident of a Contracting State wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
55	Iceland	22	Iceland		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
56	Indonesia	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt within the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other State

57	Iran	Limited agreements	India	30.90%	DTAA Limited to income of enterprises operating aircraft with Iran
58	Ireland	22	Ireland		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
59	Israel	22	Israel		1.Items of income of a resident of a Contracting State, wherever arising not dealt within the foregoing Articles of this Convention shall be taxable only in that State.
60	Japan	22	India	30.90%	items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Convention and arising in the other Contracting State may be taxed in that other Contracting State.
61	Jersey	TIEA	India	30.90%	No clause regarding Taxation
62	Kazakstan	22	Kazakstan		1.Items of income of a resident of a Contracting State, wherever arising not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
63	Kuwait	22	Kuwait		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
64	Krygyz Republic	22	Krygyz Republic		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
65	Latvia	22	Latvia		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
66	Lebanon	Ltd to Aircraft	India	30.90%	No clause regarding Taxation
67	Liberia	TIEA	India	30.90%	No clause regarding Taxation
68	Libya		India	30.90%	No clause regarding Taxation

69	Lithuania	22	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other State
70	Luxemborg	22	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Agreement and arising in the other Contracting State may be taxed in that other State.
71	Marcoa sar	TIEA	India	30.90%	No clause regarding Taxation
72	Maldives	SAARC	India	30.90%	No clause regarding Taxation
73	Malta	22	Malta		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
74	Mauritius	22	Mauritius		1.Subject to the provisions of paragraph (2) of this article, items of income of a resident of a Contracting State, wherever arising, which are not expressly dealt with in the foregoing articles of this Convention, shall be taxable only in that Contracting State.
75	Mongolia	22	India	30.90%	3.items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Agreement and arising in the other Contracting State may also be taxed in that other Contracting State.
76	Montenegro	23	Montenegro		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
77	Morocco	22	Morocco		1.Subject to the provisions of paragraph 2, items of income of a resident of a Contracting State, wherever arising, which are not expressly dealt with in the foregoing articles of this Convention, shall be taxable only in that Contracting State.
78	Mozambique	22	Mozambique		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of

					this Agreement shall be taxable only in that State.
79	Myanmar	22	Myanmar		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
80	Namibia	22	India	30.90%	Items of income not dealt within the foregoing articles of this Convention and derived from sources within a Contracting State shall be taxable only in that State.
81	Nepal	22	Nepal		1.Items of income of a resident of a Contracting State, wherever arising, not dealt within the foregoing Articles of this Agreement shall be taxable only in that State.
82	Netherlands		India	30.90%	No clause regarding Taxation
83	Norway	22	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing articles of this Agreement and arising in the other Contracting State may also be taxed in that other State
84	Oman	24	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may also be taxed in that other State.
85	Uruguay	22	India	30.90%	3.Items of income of a resident of a Contracting State not dealt within the foregoing articles of this Agreement and arising in the other Contracting State may also be taxed in that other State
86	Poland	23	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement, and arising in the other Contracting State may be taxed in that other State
87	Pakistan	Limited agreements	India	30.90%	DTAA Limited to income from International air transport with Pakistan

88	Republic of Yemen	Limited agreements	India	30.90%	DTAA Limited to income from International air transport with Yemen
89	Phillippines	23	Phillippines		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State
90	Portugese Republic	22	Portugese Republic		1.Items of income of a resident of a Contracting State, wherever arising, not dealt within the foregoing Articles of this Convention shall be taxable only in that State.
91	LIECHTENS TEIN	TIEA	India	30.90%	No clause regarding Taxation
92	Monaco	TIEA	India	30.90%	No clause regarding Taxation
93	Romania	22	Romania		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that State.
94	Russia		Russia		1.Items of income of a resident of a Contracting State, wherever arising, which are not dealt with in the foregoing Articles of this Agreement, shall be taxable only in that Contracting State.
95	Serbia		Serbia		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
96	Slovenia		Slovenia		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
97	Spain	23	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Convention, and arising in the other Contracting State may be taxed in that other State.
98	Sudan		Sudan		1.Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of

					this Agreement shall be taxable only in that State.
99	Sweden		Sweden		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.
100	Syria		Syria		1. Items of income of a resident of a Contracting State, wherever arising, not dealt within the foregoing Articles of this Agreement shall be taxable only in that State.
101	Taipei		Taipei		1. Items of income of a resident of a territory, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that territory.
102	Tajikistan		Tajikistan		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing articles of this Agreement shall be taxable only in that State.
103	Tanzania		Tanzania		1. Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing articles of this Agreement shall be taxable only in that State.
104	Trinidad and Tobago	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Convention and arising in the other Contracting State may also be taxed in that other State
105	Turkey	21	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with the foregoing Articles of this Agreement arising in the other Contracting State may also be taxed in that other State.
106	Turkmenistan	22	India	30.90%	3. Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Convention and arising in the other Contracting State may also be taxed in that other State.
107	Egypt	23	India	30.90%	The laws in force in either of the Contracting States will continue to govern assessment and taxation of income in the respective Contracting States except where express provision to the contrary is made in this Convention.

108	Uganda		Uganda		1.Items of income of a resident of a territory, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that territory.
109	Ukraine	22	India	30.90%	3. Notwithstanding the provisions of paragraphs 1 and 2, items of income of a resident of a Contracting State not dealt within the foregoing articles of this Convention, and arising in the other Contracting State may also be taxed in that other Contracting State.
110	Mexico	22	India	30.90%	Items of income of a resident of a Contracting State not dealt with in the foregoing Articles of this Agreement and arising in the other Contracting State may be taxed in that other State.
111	Uzbekistan	23	India	30.90%	3.Items of income of a resident of a Contracting State not dealt with in the foregoing article of this Agreement and arising in the other Contracting State may also be taxed in that other Contracting State.
112	Zambia	23	India	30.90%	Items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing articles of this Convention shall be taxable only in that State except that if such income arises in the other Contracting State, it may also be taxed in that other State