



Withholding Tax (WHT)

Complete Reference Guide — Nigeria 2026

Edition:	January 2026
Jurisdiction:	Federal Republic of Nigeria
Authority:	Nigeria Revenue Service (NRS) — formerly FIRS
Legislation:	CITA Cap. C21 LFN 2004; Finance Acts 2019–2023
Applies to:	All resident companies, individuals & non-residents

This guide covers WHT rates, who must deduct, how to remit to NRS, how to claim WHT credits, penalties for non-compliance, state-level WHT nuances, Finance Act amendments, treaty relief, and practical worked examples.

Disclaimer: This document is for information purposes only and does not constitute legal or tax advice. Tax rules change — always verify with a qualified tax professional or the NRS.

Table of Contents

1. What is Withholding Tax?
2. Legal & Regulatory Framework
3. Who Must Deduct WHT
4. WHT Rates 2026 — Full Schedule
5. Step-by-Step: Deducting & Remitting WHT
6. How to Claim WHT Credit
7. Calculation Examples
8. State-Level WHT Obligations
9. Non-Residents & Double Tax Treaties
10. Finance Act Amendments (2019–2023)
11. WHT Exemptions & Exclusions
12. Record-Keeping Requirements
13. Penalties & Enforcement
14. Common Mistakes & How to Avoid Them
15. Compliance Checklist
16. Frequently Asked Questions

1. What is Withholding Tax (WHT)?

Withholding Tax (WHT) is an advance payment mechanism where the payer of income deducts a specified percentage of tax from the gross amount due to the recipient, and remits it directly to the Nigeria Revenue Service (NRS). It is not a separate tax but rather an advance payment of the recipient's income tax or company income tax (CIT) liability.

Unlike Pay-As-You-Earn (PAYE), which applies to employment income, WHT applies to business transactions — contracts, rents, royalties, dividends, and interest. The recipient ultimately uses the WHT certificate as a tax credit when filing their annual return.

Key Principle

WHT is a CREDIT mechanism — it is deducted from gross payments and offset against the payee's final tax liability. Excess WHT can be refunded.

The payer is the withholding agent. Failure to deduct makes the payer personally liable for the undeducted tax.

WHT vs PAYE — Key Differences

Feature	WHT	PAYE
Applies to	Business transactions (contracts, rent, dividends, etc.)	Employment income (salary, wages)
Who deducts?	Payer of invoice/contract	Employer
Rate	5%–10% depending on payment type	Graduated 7%–24% on taxable income
Final tax?	No — advance payment; credit on annual return	Final deduction; reconciled annually
Authority	NRS (federal) / State IRS (state)	State IRS where employee resides

2. Legal & Regulatory Framework

WHT in Nigeria is governed by multiple statutes and regulations that have evolved significantly through the Finance Acts:

Companies Income Tax Act (CITA) Cap. C21 LFN 2004

Primary legislation imposing WHT on company payments. Section 78–80 deal specifically with deduction at source.

Personal Income Tax Act (PITA) Cap. P8 LFN 2004

Governs WHT on payments to individuals. Section 69–72 cover deductions at source.

Petroleum Industry Act (PIA) 2021

Introduced Hydrocarbon Tax and Upstream Petroleum Operations Tax, with specific WHT provisions for the upstream oil sector.

Finance Act 2019

Lowered the minimum WHT registration threshold, introduced WHT on digital/online services, and clarified WHT on technical fees.

Finance Act 2020

Expanded scope to cover payments made to non-resident companies for digital services consumed in Nigeria (6% DST for large companies).

Finance Act 2021

Introduced reduced WHT rates for small companies (0%) and clarified rules on Real Estate Investment Trust (REIT) distributions.

Finance Act 2023

Updated NRS branding (FIRS renamed NRS), aligned treaty relief procedures, introduced electronic WHT certificates.

NRS Public Notice / Practice Notes

NRS periodically issues practice notes clarifying sectoral application of WHT — e.g., construction, agriculture, oil & gas.

3. Who Must Deduct WHT

There is no turnover threshold for WHT obligations — if you make a qualifying payment, you must deduct. The following categories are obligated:

- All incorporated companies (public and private) registered in Nigeria
- Government ministries, departments, and agencies (MDAs) at all levels
- Parastatals and government-owned enterprises
- Banks and other financial institutions (for interest and dividend payments)
- Individuals carrying on a trade or business (for contract payments)
- Trustees and estate administrators paying income to beneficiaries
- Real Estate Investment Trusts (REITs) distributing income
- Foreign companies operating through a fixed base or permanent establishment in Nigeria
- Digital service companies with significant economic presence in Nigeria

Important: No Threshold

Unlike VAT (■25m registration threshold), WHT has NO minimum turnover threshold. Even a one-off qualifying payment triggers the obligation to deduct and remit. Ignorance of this rule is not a defence.

4. WHT Rates 2026 — Full Schedule

The table below shows the current WHT rates applicable to resident and non-resident payees. Rates may be modified by Double Taxation Treaties (see Section 9).

Payment Type / Income Category	Resident Individual	Resident Company	Non-Resident (Default)
Contracts (General Supply & Service)	5%	5%	10%
Consultancy / Professional Fees	5%	5%	10%
Technical / Management Fees	5%	5%	10%
Agency / Commission Fees	5%	5%	10%
Construction Contracts	5%	5%	10%
Rent — Land & Buildings	10%	10%	10%
Rent — Equipment / Plant & Machinery	10%	10%	10%
Dividends	10%	10%	10%
Interest on Loans & Deposits	10%	10%	10%
Royalties	10%	10%	10%
Directors' Fees / Sitting Allowances	10%	10%	10%
Hire of Plant & Equipment	5%	5%	10%
Advertising Services	5%	5%	10%
Courier & Haulage	5%	5%	10%
Sales by Auction	5%	5%	10%
Insurance Premium (reinsurance)	5%	5%	10%
Supply of Goods (single supplier >₦10m)	5%	5%	10%
Digital / Online Services (non-resident)	—	—	6% DST*
Small Company Payments (CITA Finance Act 2021)	5%	0%**	10%

* Digital Services Tax (DST) rate applies to non-resident companies with significant economic presence and annual Nigerian revenue exceeding ₦25m. ** Small companies (turnover ≤ ₦25m) enjoy a 0% CIT rate but are NOT fully exempt from WHT deductions on payments they receive — the credit mechanism still applies.

Resident vs Non-Resident

A Resident is: (i) an individual domiciled or ordinarily residing in Nigeria, or who spends 183+ days in Nigeria in a 12-month period; (ii) a company incorporated in Nigeria, or a foreign company whose management & control is exercised in Nigeria.

A Non-Resident faces the higher 10% default rate on all income types. Treaty relief may reduce this — see Section 9.

5. Step-by-Step: Deducting & Remitting WHT

The full compliance cycle — from receiving an invoice to obtaining a certificate — is described below:

1 Receive Invoice / Payment Instruction

Determine whether the payment type is listed in the WHT schedule. Obtain the payee's Tax Identification Number (TIN). If the payee cannot provide a TIN, still deduct WHT — the certificate will reference the transaction.

2 Determine the Correct Rate

Identify if the payee is resident or non-resident. Check if a Double Tax Treaty applies (requires Form DT01 + residency certificate from the payee's home country). Apply 5% or 10% as appropriate.

3 Deduct WHT Before Payment

Subtract the WHT from the gross invoice amount. E.g., ₦1,000,000 invoice @ 5% WHT → deduct ₦50,000, pay ₦950,000 to supplier.

4 Record the Transaction

Record the gross invoice, WHT amount, payee TIN, and payment date in your accounting system. Maintain a WHT deduction register.

5 Remit via TaxPro Max (within 21 days)

Log into taxpromax.nrs.gov.ng. Select 'Withholding Tax' → 'New WHT Remittance'. Enter payee TIN, gross amount, WHT rate, WHT amount, and payment category. Confirm payment via approved bank or card. The 21-day window runs from the date of deduction, NOT the invoice date.

6 Issue WHT Credit Certificate

After remittance, download the auto-generated WHT certificate from TaxPro Max. Provide the original to the payee — this is their legal proof of credit. Failure to issue the certificate attracts a ₦25,000 fine per certificate.

7 File Monthly WHT Return

Even if no WHT was deducted in a given month, file a nil return on TaxPro Max. Monthly returns are due by the 21st of the following month.

6. How to Claim WHT Credit

WHT is an advance payment — it is not a final tax. Here is how to reclaim it on your annual return:

1 Collect All WHT Certificates

Request WHT certificates from every payer who deducted from your invoices. Certificates must show: payer TIN, payee TIN, gross amount, rate, WHT deducted, date.

2 Reconcile with Bank Statements

Match WHT amounts to receipts. Discrepancies (e.g., payer deducted but did not remit) should be flagged — a certificate issued without remittance is invalid.

3 File Annual Tax Return

Companies: file CIT return on TaxPro Max by 6 months after accounting year-end. Individuals: file PITA return by 31 March of the following year (or state deadline).

4 Offset WHT Against Tax Liability

On the return, enter total WHT credits. These reduce your computed tax due. If WHT > Tax Liability, a refund claim arises.

5 Apply for WHT Refund (if applicable)

Submit Form WHT-R on TaxPro Max with all supporting certificates. NRS has 90 days to process; in practice allow 3–6 months. If NRS fails to pay within 180 days, interest accrues at CBN MPR + 5% in your favour.

Tip: Verify Remittance

A WHT certificate is only valid if the payer actually remitted to NRS. You can verify remittance status on TaxPro Max using the payer's TIN and the certificate serial number before filing your annual return.

7. Calculation Examples

Example 1 — Freelance IT Consultant

Contract Value (Invoice)	■500,000
WHT Rate (Professional Fees — Resident)	5%
WHT Deducted	■25,000
Net Amount Paid to Consultant	■475,000
Consultant's Annual CIT/PIT Liability (assumed)	■40,000
Less: WHT Credit	-■25,000
Balance Tax Payable	■15,000

The consultant receives ■475,000 and a WHT certificate for ■25,000, which reduces their tax bill from ■40,000 to ■15,000.

Example 2 — Commercial Landlord (Company Tenant)

Annual Commercial Rent	■2,000,000
WHT Rate (Rent — Land & Buildings)	10%
WHT Deducted by Company Tenant	■200,000
Net Rent Received by Landlord	■1,800,000
Landlord's Annual PIT/CIT Liability (assumed)	■150,000
Less: WHT Credit	-■200,000
Excess WHT — Refund Claimable	■50,000

Because WHT (■200,000) exceeds tax liability (■150,000), the landlord can claim a ■50,000 refund from NRS.

Example 3 — Non-Resident Company (No Treaty)

Technical Service Fee (non-resident company)	■5,000,000
WHT Rate (Non-Resident Default)	10%
WHT Deducted	■500,000
Net Amount Paid to Non-Resident	■4,500,000
Remittance Deadline	Within 21 days of payment

The non-resident company may claim credit in its home country if a Double Tax Treaty exists between Nigeria and that country.

Example 4 — Construction Contract (₦50m Project)

Progress Payment Invoice #1	₦10,000,000
WHT Rate (Construction Contract — Resident)	5%
WHT Deducted on Invoice #1	₦500,000
Net Paid on Invoice #1	₦9,500,000
Total WHT across 5 invoices (₦10m each)	₦2,500,000
Contractor's Annual CIT Liability (assumed)	₦2,000,000
Excess WHT Refundable	₦500,000

WHT is deducted on each individual progress payment. Large contractors often accumulate significant WHT credits which can be refunded or carried forward.

8. State-Level WHT Obligations

A common source of confusion is the split between federal and state WHT jurisdiction. Both CITA (federal) and PITA (state) impose WHT obligations, but they apply to different categories of payees:

Payee Category	Governing Law	Administering Authority	Filing Portal
Nigerian companies & deemed residents	CITA	NRS (Federal)	TaxPro Max
Individual residents (sole traders, freelancers)	PITA	State Internal Revenue Service (SIRS)	State portal (e.g., Lagos LIRS e-Tax)
Partnerships	PITA	SIRS of partner's state of residence	State portal
Cooperatives	PITA	SIRS	State portal
Non-residents (default)	CITA	NRS	TaxPro Max

Notable State Variations:

- **Lagos State (LIRS):** Lagos has one of the most active state tax administrations. LIRS enforces WHT on individual contractors rigorously and has its own WHT audit programme.
- **Rivers State (RIRS):** Significant oil & gas service contracts in Port Harcourt. RIRS sometimes asserts concurrent jurisdiction where both federal and state WHT appear applicable — get professional advice on overlapping obligations.
- **FCT-IRS:** The Federal Capital Territory IRS administers PITA for individuals resident in Abuja.
- **Harmonisation:** The Joint Tax Board (JTB) works towards harmonisation of state WHT practices, but rates and procedures still vary — always confirm with the relevant SIRS.

9. Non-Residents & Double Taxation Treaties

Non-resident companies and individuals are subject to a 10% WHT rate by default. However, Nigeria has concluded Double Taxation Agreements (DTAs) with several countries that may reduce this rate:

Treaty Country	Dividends	Interest	Royalties	Notes
United Kingdom	10%/7.5%	7.5%	7.5%	7.5% if beneficial owner holds $\geq 25\%$ shares
France	10%/15%	12.5%	12.5%	—
Netherlands	10%/12.5%	12.5%	12.5%	—
Belgium	10%/12.5%	12.5%	12.5%	—
Canada	15%/12.5%	12.5%	12.5%	—
South Africa	7.5%/10%	7.5%	7.5%	Reduced if $\geq 25\%$ holding
China (PRC)	7.5%	7.5%	7.5%	Applies to PRC companies
Pakistan	10%/12.5%	10%	10%	—
Romania	12.5%/15%	12.5%	12.5%	—
Czech Republic	10%/12.5%	10%	10%	—
Slovak Republic	10%/12.5%	10%	10%	—
Philippines	10%/15%	10%	10%	—
South Korea	7.5%/10%	7.5%	7.5%	—
Spain	7.5%/10%	7.5%	7.5%	—
Sweden	7.5%/10%	7.5%	7.5%	—

Note: Treaty rates above are indicative — always consult the specific treaty text. To benefit from treaty rates, the non-resident payee must provide: (i) a valid Certificate of Residence from their home country tax authority; (ii) completed Form DT01 (NRS treaty relief application); (iii) proof of beneficial ownership.

Countries WITHOUT a Treaty (Default 10%)

The USA, Germany, Japan, UAE, India, and most African countries do NOT have active DTAs with Nigeria as at 2026. The default 10% non-resident WHT applies. Businesses should structure cross-border payments carefully to avoid double taxation.

10. Finance Act Amendments (2019–2023)

The Finance Acts have significantly amended the WHT landscape. Below is a summary of key changes:

Finance Act	Key WHT Change
FA 2019	Expanded WHT to cover digital transactions. Introduced WHT on payments for online advertising, streaming, and app services by non-resident platforms.
FA 2019	Clarified that WHT applies to the gross invoice (before VAT) — VAT should NOT be included in the WHT base.
FA 2020	Digital Services Tax (DST): non-resident companies with 'significant economic presence' (Nigerian revenue > ₦25m/yr) subject to 6% DST, collected via WHT by Nigerian business customers.
FA 2021	Small company exemption: companies with turnover ≤ ₦25m pay 0% CIT but remain subject to WHT deduction by their customers. WHT certificates can be used to reclaim any deductions.
FA 2021	REIT distributions: Real Estate Investment Trusts must withhold 10% on income distributions to unitholders (individuals and companies).
FA 2022	Transfer pricing (TP) transactions between related parties are not exempt from WHT. Inter-company charges for management fees, technical fees, and IP licensing are subject to standard WHT rates.
FA 2023	FIRS rebranded as Nigeria Revenue Service (NRS). TaxPro Max remains the remittance portal. Electronic WHT certificates introduced — physical certificates no longer required.
FA 2023	Penalty regime enhanced: prosecution of serial non-remitters possible; directors of companies personally liable for unremitted WHT.

11. WHT Exemptions & Exclusions

Certain payments and entities are exempt from WHT — either by statute, NRS practice note, or treaty:

Exempt Payments:

- Employment income (covered by PAYE instead — no double taxation of salaries)
- Dividends paid to a company holding $\geq 25\%$ of shares in the paying company (participation exemption under CITA s.23)
- Interest paid on Federal Government bonds and approved government securities
- Interest paid on savings deposits by individuals (below ₦100,000/year threshold)
- Payments for petty purchases below the de minimis threshold set by NRS practice note (generally < ₦10,000 per transaction from individuals)
- Agricultural produce sold directly from farm (primary agricultural activity)
- Payments between related companies within an approved tax consolidation group (limited application)
- VAT amounts — WHT is applied to the net-of-VAT base, not gross invoice inclusive of VAT

Exempt Entities:

- Federal and State governments (as payees — they do not pay tax on their own sovereign income)
- Approved pension fund administrators on investment income within approved funds
- Charitable and non-profit organisations with an NRS exemption letter (Section 23 CITA) — but only on income directly related to charitable activities
- NRS-approved venture capital companies on qualifying investments
- Free Trade Zone (FTZ) enterprises — income earned within the FTZ from approved FTZ activities may be exempt from WHT

Caution on Informal Exemptions

Some businesses mistakenly believe they are exempt based on verbal assurances or informal practice. An exemption is ONLY valid if backed by a formal NRS exemption letter or specific statutory provision. Always get written confirmation.

12. Record-Keeping Requirements

Proper records are essential both for your own WHT credit claims and to defend NRS audits. CITA requires a minimum of 6 years' retention.

Document	Purpose	Retention
Original invoices / contracts	Proof of gross payment and WHT base	6 years
WHT Deduction Register (monthly)	Chronological log of all deductions, payee TINs, amounts	6 years
TaxPro Max remittance receipts	Proof of remittance to NRS	6 years
WHT Credit Certificates received (as payee)	Supporting evidence for credit claims on annual return	6 years after return filed
WHT Certificates issued (as payer)	Evidence certificates were issued to payees	6 years
Monthly WHT Returns (filed)	Filed returns on TaxPro Max — download PDFs	6 years
Payee TIN verification records	Proof payee TIN was verified before payment	6 years
Treaty relief applications (Form DT01)	Evidence treaty rate was legitimately applied	6 years
Correspondence with NRS / SIRS	Audit trail for any disputed WHT	Until resolution + 3 years

Digital Record-Keeping

NRS TaxPro Max automatically stores electronic WHT certificates and filed returns. However, do not rely solely on the portal — download and backup all certificates and returns to your own secure storage. Portal data can be lost during system upgrades or account resets.

13. Penalties & Enforcement

The NRS has significantly increased enforcement activity. Penalties are cumulative and can compound rapidly:

Violation	Penalty	Authority
Failure to deduct WHT	Payer liable for full undeducted WHT + 10% penalty on the unpaid tax	CITA s.79
Late remittance (after 21 days)	10% of tax due + interest at CBN MPR + 2% p.a. from due date	CITA s.80
Failure to file monthly WHT return	■25,000 per month of default	CITA s.55
Failure to issue WHT certificate to payee	■25,000 per certificate not issued	NRS Practice Note
Fraudulent WHT certificate	Fine + imprisonment up to 3 years under CITA	CITA s.93
Persistent non-remittance (serial offender)	Criminal prosecution; personal liability of directors	FA 2023 s.38
Understating WHT deducted on return	100% penalty on understated amount + interest	CITA s.81
Not maintaining WHT records	■10,000 per day for each day of default during audit	CITA s.91

Enforcement Trends (2024–2026):

- NRS has deployed automated matching systems that cross-reference VAT invoice data with WHT remittances — discrepancies trigger audit flags
- Banks are required to report large cash transactions and flag accounts with unusual payment patterns to NRS
- NRS conducts sector-specific WHT audits (construction, oil & gas, telecoms) annually
- Directors of companies can now be personally prosecuted under Finance Act 2023 for unremitted WHT — the corporate veil offers limited protection
- Tax Clearance Certificates (TCCs) will be withheld or revoked where WHT defaults are discovered

14. Common Mistakes & How to Avoid Them

■ Including VAT in the WHT Base

WHT should be calculated on the net invoice amount BEFORE VAT. Example: Invoice ₦1,000,000 + VAT ₦75,000 = ₦1,075,000 total. Apply WHT to ₦1,000,000 only, NOT ₦1,075,000.

■ Missing the 21-Day Remittance Deadline

Many businesses remit at month-end without checking whether individual deductions already breach the 21-day window. Use a WHT tracker per transaction, not per month.

■ Not Collecting Payee TINs

WHT certificates without valid payee TINs may not be accepted by NRS. Obtain TINs during vendor onboarding, not at invoice time.

■ Wrong Rate for Non-Residents

Using 5% (resident rate) for a non-resident payee. Always confirm residency status before applying any rate below 10%.

■ Ignoring WHT on Rent Paid to Individuals

Corporate tenants must deduct 10% WHT even when paying rent to individual landlords. Domestic arrangements are not exempt.

■ Not Filing Nil Returns

If no WHT was deducted in a month, a nil return must still be filed. Non-filing triggers automatic ₦25,000 penalty per month.

■ Treating WHT as a Final Tax

Some payees fail to file annual returns assuming WHT covers everything. WHT is only an advance payment — failure to file the annual return is a separate offence.

■ Using Invalid Treaty Rates Without Documentation

Applying a reduced treaty rate without obtaining Form DT01 and a residency certificate exposes the payer to NRS assessments for the difference.

15. Compliance Checklist

Use this checklist to ensure full WHT compliance. Tick each item when confirmed:

REGISTRATION

- Company or individual is registered as a WHT agent on TaxPro Max
- Valid TIN obtained and verified for all vendors/suppliers
- Vendor onboarding form includes TIN field and residency declaration

EACH PAYMENT CYCLE

- Reviewed all outgoing payments to identify WHT-applicable types
- Confirmed correct rate (5% vs 10%, resident vs non-resident)
- Checked for any applicable treaty relief (Form DT01 on file if needed)
- WHT calculated on net-of-VAT invoice amount
- WHT deducted and net amount paid to payee
- WHT certificate generated on TaxPro Max and sent to payee

MONTHLY OBLIGATIONS

- WHT remittance filed on TaxPro Max within 21 days of each deduction
- Monthly WHT return filed by 21st of following month (nil if no deductions)
- Remittance receipts downloaded and backed up

ANNUAL OBLIGATIONS

- All WHT certificates received from payers collected and reconciled
- WHT credit schedule prepared as part of annual tax return
- Annual CIT/PIT return filed on time (CIT: 6 months after year-end; PIT: 31 March)
- Excess WHT refund application filed if applicable

RECORD-KEEPING

- WHT deduction register maintained and up to date
- All records retained for minimum 6 years
- Electronic backups of TaxPro Max certificates and returns

16. Frequently Asked Questions

Q What is the difference between WHT and VAT?

A VAT is a consumption tax charged ON TOP of the invoice (7.5% rate) and remitted by the seller. WHT is deducted FROM the invoice by the buyer/payer and remitted on behalf of the seller. They are completely separate obligations.

Q Do freelancers (individuals) have to remit WHT?

A Freelancers do not typically deduct WHT on payments they receive — their clients do. However, if a freelancer runs a business and PAYS contractors, they must deduct and remit WHT on those payments.

Q Is WHT deductible as a business expense?

A No. WHT deducted is not a business expense — it is a tax advance. The WHT certificate is a credit against your tax liability. However, unrelieved WHT that cannot be refunded may, in some circumstances, be treated as a deductible expense after formal NRS ruling — seek professional advice.

Q Can a company remit WHT in foreign currency?

A For non-resident payees, WHT can be converted using the CBN exchange rate on the date of deduction and remitted in Naira. Do not remit in foreign currency unless specifically authorised by NRS.

Q What if my customer deducts WHT but does not remit?

A The WHT certificate is invalid if the payer has not remitted. You cannot claim the credit on your annual return for unremitted WHT. Report the payer to NRS — they become personally liable for the unremitted amount plus a 10% penalty.

Q How long does an NRS WHT refund take?

A NRS has 90 days to respond to refund applications. In practice, most refunds take 3–6 months. If NRS does not act within 180 days, interest at CBN MPR + 5% accrues in your favour. You can also apply the unrefunded amount as credit against future tax liabilities.

Q Are startup companies exempt from WHT?

A No. Startups incorporated under CAMA are subject to WHT from their first qualifying payment. The only relief for small businesses is the 0% CIT rate (turnover ≤ ₦25m) — but this only affects CIT, not WHT deduction obligations.

Q What happens during a WHT audit?

A NRS auditors will request 6 years of WHT deduction registers, remittance receipts, vendor TIN verifications, and WHT certificates. Gaps trigger assessments. Ensure your records are complete before an audit notice arrives — post-audit document assembly is suspicious.

Q Do churches and NGOs need to deduct WHT?

A Religious organisations and NGOs are not exempt from DEDUCTING WHT on payments they make (e.g., building contracts, professional services). They are only exempt from tax ON THEIR OWN INCOME if they hold an NRS exemption letter.

Q Is WHT applicable to intra-group transactions?

A Yes, as clarified under Finance Act 2022. WHT applies to management fees, technical fees, IP licensing, and intercompany service charges between related parties. This is particularly relevant for multinational groups.