

WHAT THIS DOCUMENT AIMS AT?

The purpose of this document is to summarize the tax law on withholding tax and treatment thereof, taking into account significant amendments vide the Finance Act, 2022 and Tax Laws (Second Amendment) Ord. dt. Aug 22, 2022. These tax rates and treatments are effective from July 01, 2022 – i.e., for the Tax Year 2023. The information summarized herein is general and based on our interpretation of law. This information does not constitute any opinion or advice and may also not be acceptable to taxation authorities in a particular case. Tax laws are subject to change from time to time and we do neither warrant at any time the currency of the above details nor accept any responsibility to update the same.

IMPORTS Sec 148 & Part II First Schedule				
Activity	Importer Category	Tax Rate		Nature of Tax
		Filer	Non-Filer	
Imports of Goods as per Part I of the Twelfth Schedule	All	1%	2%	Advance Tax for Industrial Undertaking importing goods other than Edible oil, Packing material, Paper and Paper-board or Plastics
Imports of Goods as per Part II of the Twelfth Schedule	Commercial Importers	3.5%	7%	
	Others	2%	4%	
Imports of Goods as per Part III of the Twelfth Schedule	All	5.5%	11%	Minimum Tax for All Other Cases
Imports of Goods mentioned in SRO 1125(I)/2011	Manufacturers	1%	2%	
Imports of medicines not manufactured locally as certified by DRAP	All	4%	8%	
Imports of CKD Kits for electrical vehicles (small cars/ SUVs with up to 50 kWh battery) and LCVs with up to 150 kWh battery	All	1%	2%	

IMPORT OF MOBILE PHONES Sec148 & Part II of First Sch.			
C&F Value (USD)	CBU	CKD/ SKD	Nature of Tax
Up to 30, except smartphone	Rs. 70	NIL	Adv. Tax for Industrial Undertaking
From 31 to 100	Rs. 100	NIL	
From 101 to 200	Rs. 930	NIL	
From 201 to 350	Rs. 970	NIL	Min. Tax for All Other Cases
From 351 to 500	Rs. 5,000	Rs. 3,000	
Above 500	Rs. 11,500	Rs. 5,200	
Note: Advance tax is to be increased by 100% for Non-filers			

SALARY Sec 149, Div. I Part I First Schedule			
Taxable Income		Rate of Tax	
From	To		
Up to 600,000		0%	
600,001	1,200,000	2.5% on amount exceeding Rs.0.6M	
1,200,001	2,400,000	15,000	PLUS
2,400,001	3,600,000	165,000	
3,600,001	6,000,000	405,000	
6,000,001	12,000,000	1,005,000	
Above 12,000,000	2,955,000	35% on amount > Rs.12M	
Rate of advance tax deductible is 20% on directorship fee or fee for attending board meetings For more detailed information on salary taxation please visit: https://www.tagm.co/pdf/Update-Salary(TY-2023).pdf			

Activity	Tax Rate		Nature of Tax
	Filer	Non-Filer	
DIVIDEND Sec 150, Div. I Pt. III 1st Sch. & Cl. 11B Pt. IV 2nd Sch.			
Dividend paid by IPPs, when it is a pass-through item to be reimbursed by CPPAG	7.5%	15%	Final Tax
Dividend attributable to income from biomass & baggas based power projects			
Dividend received where company is availing exemption or benefiting from c/f business losses & tax credits	25%	50%	
Mutual funds, REITs & other cases	15%	30%	
Dividend in specie	15%	30%	
Dividend from	By REIT scheme	0%	0%
SPV received:	By others	35%	70%
Intercorporate dividend/ group taxation		Not Applicable	

PROFIT ON DEBT Sec 151, Div. IA Pt. III 1 st Sch./ Cl. 5AB Pt. II 2 nd Sc.			
Received by Company	15%	30%	Advance Tax
Received by AOP/ individual			Final Tax
Received by Resident Pakistanis on Government securities, purchased via FCVA under SBP's Scheme	10%		Final Tax

INVESTMENTS IN SUKUS Sec 151, Div. IB Pt. III 1 st Schedule			
Returns received by Companies	25%	50%	Adv. Tax
Returns rec. by AOPs/ Individuals	Up to Rs. 1M	10%	20%
	Above Rs.1M upto 5M	12.5%	25%
	Above Rs. 5M		Min. Tax

PAYMENTS TO NON-RESIDENTS Sec 152, Div. IV Pt. I, Div. II Pt. III 1 st Sch. & Cl. 5A, 5AA, 5AC Pt. II 2 nd Schedule				
Royalty/ fees for technical services	15%	10%	Final Tax	Final Tax
Fee for offshore digital services, Money transfer operations, Card network services, Payment gateway services, Interbank financial telecom. Services				
Contracts/ subcontract under a construction, assembly/ installation project (including supply of supervisory activities therefor) and Advertisement services by TV Satellite Channels	7%			
Insurance/ re-insurance premium	5%	10%	Final Tax	Final Tax
Advertisement services relaying from outside Pakistan	10%			
Foreign produced commercials for TV channel/ other media	20%			
Capital gain to foreign companies on disposal of Debt Instruments & Govt. securities invested via SCRA	10%	10%	Final Tax	Final Tax
Profit on debt from investments exclusively made through a SCRA				
Capital gain to individuals on disposal of debt instruments and Govt. Securities invested via FCVA or NRVA				

Activity	Tax Rate		Nature of Tax
	Filer	Non-Filer	
Individuals receiving profit on Govt. Securities purchased via a foreign bank account, NRVA or FCYAs	10%		Final Tax
Profit on FCYAs or COLs under SBP's FC Account Scheme	0%		Exempt
Profit received by NRPs from PKR accounts on funds exclusively remitted from aboard in FCY	0%		Exempt
Other payments	20%		Adv. Tax

PAYMENTS TO PE OF NON-RESIDENTS Sec 152, Div. II Pt. III 1 st Sch.				
For services rendered	By PE of NR company	8%	16%	Minimum Tax
	Other PEs	10%	20%	
Contract by sports persons		10%	20%	
For other contracts		7%	14%	

SUPPLY OF GOODS INCLUDING TOLL MANUFACTURING Sec 153(1)(a), Div. III Pt. III 1 st Sch, Cl 24A, 24C, 31, 45A Pt. II 2 nd Sch.				
Sale of rice, cotton seed or edible oil	1.5%	3%	Advance Tax for companies and Companies Engaged in Manu- facturing	Minimum Tax for other cases
Sale of cigarettes & pharma products by distributors	1%	2%		
Sale by distributors, dealers, sub- dealers, wholesales & Tier-1 retailers integrated & configured with Board (also appearing on Sales Tax ATL) of the following: FMCG Fertilizer Electronics (excluding mobile phones) Sugar Cement Steel Edible oil	0.25%	0.5%		
Sales, supplies & services by taxpayers in the following sectors: Textile & articles thereof Carpets Leather & articles thereof Artificial leather footwear Surgical goods Sports Goods	1%	2%		
Supplies & services to above sectors by Yarn Traders	0.5%	1%		
Other supplies/ sales (incl. Toll Manufacturing)	By companies	4%	8%	Adv. Tax
	By AOPs & Individuals	4.5%	9%	
Sale of gold & silver and articles thereof	1%	2%		
Note No tax to be withheld in case of: (a) where aggregate annual payment is below Rs.75,000 (b) purchase of an asset under lease & buy back agreement by Banks and Non-banking Finance Companies.				

PAYMENTS FOR SERVICES Sec 153(1)(b), 153(2), Div. III & Div. IV Pt. III 1 st Schedule				
Transport Freight forwarding Air cargo services Courier Manpower outsourcing Hotel services Security guard Software development IT & IT enabled services Tracking services Advertising (other than by print/ electronic media) Share registrar services Engineering/ Architectural services Warehousing Services rendered by AMCs Data services Telecom. infrastructure (tower) services Car rentals Building maintenance Services rendered by PSEL & PMEL Inspection, certification & testing Training services Oilfield services Telecom Collateral management Travel & tours REIT management NCCPL services	3%	6%	Minimum Tax	
Advertising services electronic/ print media				1.5%
Other services	By companies	8%		16%
	By AOPs & Individuals	10%		20%
Stitching, dying, printing, embroidery, washing, sizing & weaving to Exporters	1%	2%		
Note Not applicable if aggregate annual payment is under Rs.30,000				

EXECUTION OF CONTRACTS Sec 153(1)(c), Div III Pt III 1st Sch.				
Executed for Listed Companies	6.5%	13%	Adv. Tax	Minimum Tax
Executed for Other Companies	10%	20%		
Performed by sportspersons	7%	14%		

EXPORTS Sec 154 Div. IV Pt. III 1 st Sch, Cl. 47C Pt. IV 2 nd Schedule			
Realization of export proceeds	1%	Final Tax	Final Tax
Goods sold per inland back-to-back LC			
Export of goods by units in EPZ			
Payments under DTRE Rules to indirect exporters by direct exporters	0%	Exempt	Exempt
Cooking oil/ vegetable ghee exported to Afghanistan, if tax u/s 148 is paid			

EXPORT OF SERVICES Sec 154A IVA Pt. III 1 st Schedule				
Software, IT or IT-enabled services by PSEB registered taxpayers	0.25%	1%	OR/ Optional Advance Tax	Final Tax, subject to specified conditions
Services/ technical services	Rendered abroad			
	Exported from Pakistan			
Royalty/ commission/ franchise fees received by a resident company from a foreign entity for use of intellectual property outside Pakistan				
Construction contracts executed outside Pakistan				
Foreign indenting commission				

RENT OF IMMOVABLE PROPERTY Sec 155, Div. V Pt. III 1 st Sch.				
Company	15%			Advance Tax
Individual & AOP	Annual Rent (Rs.)		Tax	
	From	To		
	Up to 300,000		NIL	
	300,001	600,000	5% of rent exceeding Rs.300K	
	600,001	2,000,000	Rs.15K + 10% of rent above Rs.600K	
	Above 2,000,000		Rs.155K + 25% of rent above Rs.2M	
Note Rates to be increased by 100% for Non-filers				

PRIZES AND WINNINGS Sec 156, Div. VI Pt. III 1 st Schedule			
On a prize bond or crossword puzzle	15%	30%	Final Tax
Raffle, lottery, winning quiz & prizes on sales promotion schemes.	20%	40%	

PETROLEUM PRODUCTS Sec 156A, Div. VIA Pt. III 1 st Schedule			
Commission amount / discount allowed to a petrol pump operator	12%	24%	Final Tax

Activity	Tax Rate		Nature of Tax
	Filer	Non-Filer	
TAX ON MOTOR VEHICLES Sec 231B Div. VII Pt. IV 1 st Schedule			
Purchase/ registration	Various	Increased by 200%	Advance Tax
Electric Vehicles (EV) value Rs.5M >	3%		
Transfer of registration/ ownership	Various		
Sale/ transfer of EV valuing Rs.5M >	Rs.20K		
Sale of vehicle on Own-Money	Various		
Leasing to a non-filer	N/A	4%	

BROKERAGE & COMMISSION Sec 233, Div. II Pt. IV 1 st Schedule			
Advertising agent	10%	20%	Minimum Tax
Life insurance commission-Rs.0.5M pa	8%	16%	
Others	12%	24%	

TAX ON MOTOR VEHICLES Sec 234, Div. VII & III Pt. IV 1 st Schedule			
Goods Transport Vehicle Based on laden weight	Rs.2.5/ Kg	Increased by 100%	Advance Tax
Goods Transport Vehicle Laden weight 8,120Kg > after 10 yrs. of registration	Rs.1.2K		
Passenger transport vehicle playing for hire Based on seating & air- conditioning	Various		
Motor vehicle Based on engine capacity	Various		

COMMERCIAL, INDUSTRIAL ELECTRICITY CONSUMERS Sec 235, Div. IV Pt. IV 1 st Sch., Cl. 66 Pt. IV 2 nd Schedule					
Gross Monthly Bill		Tax Not applicable to Specified Sectors		For Companies	
From	To			Nature of Tax	Advance Tax
Up to Rs. 500		NIL			
Rs. 501	Rs. 20,000	10% of amount		Other Taxpayers	
Above Rs. 20,000		Commercial Consumer	Rs.1,950 + 12% above Rs.20,000	Annual Bill (Rs.)	Nature of Tax
		Industrial Consumer	Rs.1,950 + 5% over Rs.20,000	Up to 360K	Minimum Tax
				Above 360K	Advance Tax

Activity	Tax Rate		Nature of Tax
	Filer	Non-Filer	
DOMESTIC ELECTRICITY CONSUMERS S235, Div. IV, Pt. IV 1 st Sch			
Monthly bill up to Rs. 25,000	0%		Advance Tax
Monthly bill exceeds Rs. 25,000	7.5%		

TELEPHONE USERS Sec 236, Div. V Pt. IV 1 st Schedule			
Landline bills exceeding Rs.1,000	10%	Advance Tax	Advance Tax
Internet & Mobile subscriptions	15%		

SALE BY AUCTION Sec 236A, Div. VIII Pt. IV 1 st Schedule				
Sale by public auction/ tender	Property/ goods	10%	20%	Advance Tax
	Immoveable Property	5%	10%	
Lease of collection rights	Fee or Other levies	10%	20%	Final Tax
	Toll			

SALE/ TRANSFER/ DISPOSAL OF IMMOVABLE PROPERTY Sec 236C, Div. X Pt. IV 1 st Schedule				
By NRPs where the property acquired via FCVA or NRVA		2%		Final Tax (in lieu of CGT)
All other cases	Acquired in same year	2%	4%	Min. Tax
	Inheritance/ Gift	Not Applicable		N/A
	Other cases	2%	4%	Adv. Tax

ON TV PLAYS & ADVERTISEMENT S236CA, Div. XA Pt. IV 1 st Sch.				
Per episode tax on foreign-produced TV drama serial	Rs. 1M	Rs. 2M	Minimum Tax	Minimum Tax
Tax on foreign-produced single-episode TV play	Rs. 3M	Rs. 6M		
Per second tax on advertisement starring foreign actor	Rs. 0.1M	Rs. 0.2M		

TAX ON SALES TO DISTRIBUTORS, DEALERS & WHOLESALESA BY MANUFACTURERS & COMMERCIAL IMPORTERS Sec 236G, Div. XIV Pt. IV 1 st Schedule				
Fertilizers	ATL Status	I. Tax	S. Tax	0.25%
		I. Tax	X	0.7%
		X	X	1.4%
Pharmaceuticals Poultry & animal feed Edible oil & ghee Auto-parts Tyres Varnishes Chemicals Cosmetics IT equipment Electronics Sugar Cement Iron & steel products Motorcycles Pesticides Cigarettes Glass Textile Beverages Paint Foam	0.1%	0.2%	Advance Tax	Advance Tax

TAX ON SALES TO RETAILERS & WHOLESALESA BY MANUFACTURERS, DISTRIBUTORS, DEALERS, WHOLESALESA & COMMERCIAL IMPORTERS Sec 236H, Div. XV Pt. IV 1 st Schedule				
Pharmaceuticals Poultry & animal feed Edible oil & ghee Auto-parts Tyres Varnishes Chemicals Cosmetics IT equipment Electronics Sugar Cement Iron & steel products Motorcycles Pesticides Cigarettes Glass Textile Beverages Paint Foam	0.5%	1%	Advance Tax	Advance Tax

PURCHASE OF IMMOVABLE PROPERTY Sec 236K, Div. XVIII Pt. IV 1 st Schedule				
By NRPs for property acquired via FCVA or NRVA		2%		Final Tax
All other cases	Inheritance/ Gift	Not Applicable		N/A
	Normal Purchase	2%	7%	Adv. Tax

FOREIGN PAYMENTS VIA DEBIT/ PRE-PAID
