

WHAT THIS DOCUMENT AIMS AT?

This document aims to **summarize the tax law on withholding tax and treatment thereof**, taking into account the amendments **vide the Finance Act, 2025**. The information summarized herein is general and based on our interpretation of the Income Tax Ordinance, 2001 and significant amendments thereto vide the Act becoming effective from July 01, 2025 – i.e. for the Tax Year 2026. 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 <i>Sec 148 & Part II First Schedule</i>				
Activity	Importer Category	Tax Rate		Nature of Tax
		Filer	Non-Filer	
Goods as per Part I of the Twelfth Schedule	All	1%	2%	Advance Tax for Industrial Undertaking
Goods as per Part II of the Twelfth Schedule	Comm. Importers	3.5%	7%	
	Others	2%	4%	
Goods as per Part III of the Twelfth Schedule	Commer. Importers	6%	12%	
	Others	5.5%	11%	Minimum Tax for All Other Cases
Goods mentioned in SRO 1125(I)/2011	Manufacturers	1%	2%	
Medicines not manufactured locally as certified by DRAP	All	4%	8%	
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%	
Note: Tax u/s 148 is not applicable where the payment for imported goods has been subjected to Digital Presence Proceeds Levy.				

IMPORT OF MOBILE PHONES <i>Sec148 & Part II of First Sch.</i>			
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 <i>Sec 149, 149(1A) Div. I Part I First Schedule</i>				
Taxable Salary		Rate of Tax		Sur-charge
From	To			
Up to 600,000		0%		9%, where the income exceeds Rs. 10M
600,001	1,200,000	1% on > Rs.0.6M		
1,200,001	2,200,000	6,000	11% on >Rs.1.2M	
2,200,001	3,200,000	116,000	23% on > Rs.2.2M	
3,200,001	4,100,000	346,000	30% on > Rs.3.2M	
Above 4,100,000		616,000	35% on > Rs.4.1M	
Pension (Final Tax)		5%	(Where age is below 70 years and amount > Rs. 10M)	
Directorship fee		20%		

Activity		Tax Rate		Nature of Tax	
		Filer	Non-Filer		
DIVIDEND Sec 150, Div. I Pt. III 1 st Sch. & Cl. 18C Pt. II & Cl. 11B Pt. IV 2 nd Sch.					
Paid by IPPs, when it is a pass-through item to be reimbursed by CPPAG		7.5%	15%	Final Tax	
Attributable to income from biomass & bagasse-based power projects					
From companies availing exemption or benefits from carried-forward business losses & tax credits		25%	50%		
From mutual funds (Proportional income basis from avg. annual investments in debt securities & equities)	Debt funds	Received by Company	29%		58%
		Other Recipients	25%		50%
	Equity funds		15%		30%
Received from REITs & other cases		15%	30%		
Dividend in specie		15%	30%		
From SPV	By REIT scheme	0%	0%		
	By others	35%	70%		
Intercompany dividend/ group taxation		Not Applicable			
Dividend to Transmission Line Projects under Transmission Line Policy, 2015					

PROFIT ON DEBT <i>Sec 151, Div. IA Pt. III 1st Sch./ Cl. 5AB Pt. II 2nd Sc.</i>				
Paid by Banks & Financial Institutions	Received by Companies			Advance Tax
	Received by Individuals/ AOPs			Final Tax
	Profit up to Rs. 5M	20%	40%	Advance Tax
Paid on Government Securities (e.g. National Saving, Post Office, T-Bills, etc.)	Received by Individuals	Profit up to Rs. 5M		Final Tax
		Profit above Rs. 5M		Advance Tax
	Received by AOPs	Profit up to Rs. 5M		Final Tax
		Profit above Rs. 5M		Advance Tax
Paid in other cases	Received by Companies	15%	30%	Advance Tax
	Received by Individuals/ AOPs	Profit up to Rs. 5M		Final Tax
		Profit above Rs. 5M		Advance Tax
Received by Resident Pakistanis on Government securities, purchased via FCVA under SBP's Scheme		10%		Final Tax

INVESTMENTS IN SUKUKS <i>Sec 151, Div. IB, Pt. III 1st Sch</i>			
Returns received by Companies	25%	50%	Advance Tax
Returns rec by AOPs/ Individuals	Up to Rs. 1M	10%	20%
	Above Rs.1M up to 5M		Final Tax
	Above Rs. 5M	12.5%	25%
			Minimum Tax

PREMATURE DISPOSAL OF DEBT SECURITIES <i>Sec 151A Div. IIIAA, Pt. III 1st Sch</i>			
Gain on premature disposal of debt securities (T-Bills, etc.)	15%	30%	Advance Tax

PAYMENTS TO NON-RESIDENTS <i>Sec 152, Div. IV Pt. I, Div. II Pt. III 1st Sch. & Cl. 5A, 5AA, 5AC Pt. II 2nd Schedule</i>				
Royalty/ fees for technical services or Fee of offshore digital services	15%			Final Tax
Money transfer operations, Card network services, Payment gateway services, Interbank financial telecom services	10%			
IT services and IT enabled services	4%	8%		
Contracts/ subcontract under a construction, assembly/ installation project (including supply of supervisory activities thereto) and Advertisement services by TV Satellite Channels	7%			Minimum Tax
Insurance/ re-insurance premium	5%			

Activity		Tax Rate		Nature of Tax
		Filer	Non-Filer	
Advertisement services relaying from outside Pakistan		10%		Final Tax
Foreign produced commercials for TV channel/ other media		20%		
Capital gain to Foreign Companies on disposal of Debt Instruments & Govt. Securities invested via SCRA	If holding period is 6 months or more	10%		
	If holding period is less than 6 months	20%		
Capital gain to individuals on disposal of debt instruments and Govt. Securities invested via FCVA or NRVA		10%		Final Tax
Profit on debt from investments exclusively made through a SCRA				
Individuals receiving profit on Govt. Securities purchased via a foreign bank account, NRVA or FCYAs		10%		
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%		
Other payments		20%		Advance Tax

PAYMENTS TO PE OF NON-RESIDENTS <i>Sec 152, Div. II Pt. III 1st Sch.</i>			
For Goods supplied	Company	5%	10%
	Other than Company	5.5%	11%
Transport Freight forwarding Air cargo services Courier Manpower outsourcing Hotel services Security guard Software development Tracking services Advertising (other than by print/ electronic media) Share registrar services Engineering services Car rentals Building maintenance Inspection, certification & testing Training services Oilfield services		8%	16%
IT & IT enabled services		4%	8%
Contract by sports persons		15%	30%
Other services			
Contracts other than for goods & services		8%	16%

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 Listed Companies and Companies Engaged in Manu- facturing
Sale of cigarettes by distributors		2.5%	5%	
Sale of 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:				Minimum Tax for all other cases
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	By companies	Toll Manufacturing	9%	18%
		Others	5%	10%
	By AOPs & Individuals	Toll Manufacturing	11%	22%
		Others	5.5%	11%
Sale of gold & silver and articles thereof		1%	2%	Advance Tax
Notes: (1) 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. (c) Public limited companies, where a Certificate for WHT Exemption has been issued by the Commissioner. (2) Tax to be withheld at reduced rate , where a Certificate to this effect has been issued by the Commissioner.				

PAYMENTS FOR SERVICES <i>Sec 153(1)(b), 153(2), Div. III & Div. IV Pt. III 1st Schedule</i>				
Transport Freight forwarding Air cargo services Courier Manpower outsourcing Hotel services Security guard Software development Tracking services Advertising (other than by print/ electronic media) Share registrar services Engineering/ Architectural services Warehousing Services rendered by AMC's 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				Minimum Tax
IT services and IT enabled services		4%	8%	
Advertising services electronic/ print		1.5%	3%	
Other services		15%	30%	
Stitching, dying, printing, embroidery, washing, sizing & weaving to Exporters		1%	2%	Final Tax
Payment by digital means		1%	2%	
Payment of cash on delivery		2%	4%	
Note Not applicable if aggregate annual payment is under Rs.30,000				
EXECUTION OF CONTRACTS <i>Sec 153(1)(c), Div III Pt III 1st Sch.</i>				
Contracts performed by Listed Companies		7.5%	15%	Advance Tax
Contracts performed by Other Companies				Minimum Tax
Contracts performed Individuals/ AOPs		8%	16%	
Contracts performed by sportspersons		15%	30%	

GOODS & SERVICES ACQUIRED VIA E-COMMERCE Sec 6A, Div IVA Pt I 1st Sch. & Sec 153 (2A) Div III, Pt III 1st Sch.			
Payment via digital means	1%	2%	Final Tax
Payment of cash on delivery	2%	4%	
Note Poses a challenge of taxing one economic activity twice for sale of imported goods.			

EXPORTS <i>Sec 154 Div. IV Pt. III 1st Sch, Cl. 47C Pt. IV 2nd Schedule</i>			
Realization of export proceeds			Minimum Tax @ 1% and 1% Advance Tax
Goods sold per inland back-to-back LC			
Export of goods by units in EPZ	1% + 1%		
Payments under DTR Rules & Export Facilitation Scheme, 2021 to indirect exporters by direct exporters			Not Applicable
Cooking oil/ vegetable ghee exported to Afghanistan, if tax u/s 148 is paid	0%		

EXPORT OF SERVICES <i>Sec 154A IVA Pt. III 1st Schedule</i>			
Software, IT or IT-enabled services by PSEB registered taxpayers	0.25%		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	1%		OR/ Optional Advance Tax
Construction contracts executed outside Pakistan			
Foreign indenting commission			

RENT OF IMMOVABLE PROPERTY <i>Sec 155, Div. V Pt. III 1st Sch.</i>			
Company		15%	Advance Tax (Rates to be increased by 100% for Non-filers)
Individual & AOP	Annual Rent (Rs.)		
	From To	Tax	
	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	

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

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

CASH WITHDRAWAL <i>Sec 231AB</i>			
Cash withdrawal exceeding Rs. 50,000	0%	0.8%	Advance Tax

TAX ON MOTOR VEHICLES <i>Sec 231B Div. VII Pt. IV 1st Schedule</i>			
Purchase/ registration	Various		Increased by 200%
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%	

TAX ON FOREIGN DOMESTIC WORKERS <i>Sec 231C</i>			
Agency/ Sponsor/ Person to whom visa is issued or renewed for Foreign National	Rs. 200K	Rs. 400K	Advance Tax

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

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

COMMERCIAL, INDUSTRIAL ELECTRICITY CONSUMERS <i>Sec 235, Div. IV Pt. IV 1st Sch., Cl. 66 Pt. IV 2nd Schedule</i>				
Gross Monthly Bill	Tax <i>Not applicable to Specified Sectors</i>	For Companies		
From To		Nature of Tax	Advance Tax	
Up to Rs. 500	NIL			
Rs. 501 Rs. 20,000	10% of amount			
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

DOMESTIC ELECTRICITY CONSUMERS <i>S 235, Div. IV, Pt. IV 1st Sch</i>		
Monthly bill up to Rs. 25,000	0%	Advance Tax
Monthly bill exceeds Rs. 25,000	7.5%	

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

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

SALE/ TRANSFER/ DISPOSAL OF IMMOVABLE PROPERTY <i>Sec 236C, Div. X Pt. IV 1st Schedule</i>				
By NRPs where the property acquired via FCVA or NRVA		3% (In lieu of CGT)		Final Tax
All other cases	Acquired in same year	3%	6%	Minimum Tax
		Inheritance/ Gift	Not Applicable	N/A
		Range	Filer	Late Filer
	Other cases	Up to 50M	4.5%	7.5%
		From 50M to 100M	5%	8.5%
		Exceed 100M	5.5%	9.5%

ON TV PLAYS & ADVERTISEMENT <i>S236CA, Div. XA Pt. IV 1st Sch.</i>			
Per episode tax on foreign-produced TV drama serial	Rs.1M	Rs.2M	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	0.2M	

ON FUNCTIONS AND GATHERINGS <i>S236CB, Div. XI Pt. IV 1st Sch.</i>			
Advance tax on functions and gatherings	10%	20%	Advance Tax

TAX ON SALES TO DISTRIBUTORS, DEALERS & WHOLESALE BY MANUFACTURERS & COMMERCIAL IMPORTERS <i>Sec 236G, Div. XIV Pt. IV 1st Schedule</i>		
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