

10 日本の税法上、還付請求書の「2」の外国法人が納税義務者とされるが、租税条約の規定によりその株主等である者（相手国居住者に限ります。）の所得として取り扱われる部分に対して租税条約の適用を受けることとされている場合の租税条約の適用を受ける割合に関する事項等(注4);

Details of proportion of income to which the convention mentioned in 1 above is applicable, if the foreign company mentioned in 2 above is taxable as a company under Japanese tax law, and the convention is applicable to income that is treated as income of the member (limited to a resident of the other contracting country) of the foreign company in accordance with the provisions of the convention (Note 4)

還付請求書の「2」の外国法人の株主等で租税条約の適用を受ける者の氏名又は名称 Name of member of the foreign company mentioned in 2 above, to whom the Convention is applicable	間接保有 Indirect Ownership	持分の割合 (%) Ratio of Ownership	受益の割合＝ 租税条約の適用を受ける割合 Proportion of benefit = Proportion for Application of Convention
	<input type="checkbox"/>	%	%
	<input type="checkbox"/>	%	%
	<input type="checkbox"/>	%	%
	<input type="checkbox"/>	%	%
	<input type="checkbox"/>	%	%
合計 Total		%	%

還付請求書の「2」の外国法人が支払を受ける「5」の対価について、「1」の租税条約の相手国の法令に基づきその株主等である者の所得として取り扱われる場合には、その根拠法令及びその効力を生じる日を記載してください。

If remuneration mentioned in 4 above that a foreign company mentioned in 2 above receives is treated as income of those who are its members under the law in the other contracting country of the convention mentioned in 1 above, enter the law that provides the legal basis to the above treatment and the date on which it will become effective.

根拠法令
Applicable law

効力を生じる日
Effective date

年 月 日

適用を受ける租税条約が特典条項を有する租税条約である場合;If the applicable convention has article of limitation on benefits
特典条項に関する付表の添付"Attachment Form for Limitation on Benefits Article" attached ☐有Yes

税務署 整理欄	通信日付印 の年月日		(西暦)年	月	日	備考	
		F12					

