Bosnia and Herzegovina

Status of List of Reservations and Notifications at the Time of Signature

This document contains a provisional list of expected reservations and notifications to be made by Bosnia and Herzegovina pursuant to Articles 28(7) and 29(4) of the Convention.

Article 2 - Interpretation of Terms

Notification - Agreements Covered by the Convention

Pursuant to Article 2(1)(a)(ii) of the Convention, Bosnia and Herzegovina wishes the following agreement(s) to be covered by the Convention:

No	Title	Other Contracting	Original/ Amending	Date of Signature	Date of Entry into
1	Agreement between Council of Ministers of Bosnia and Herzegovina and Council of Ministers of the Republic of Albania for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital and for the Prevention of Fiscal Evasion		Instrument Original	17-06-2008	Force 10-05-2012
2	Convention between Bosnia and Herzegovina and the People's Democratic Republic of Algeria for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Algeria	Original	09-02-2009	27-10-2010
3	Convention between the Republic of Austria and Bosnia and Herzegovina for the Avoidance of Double Taxation with respect to Taxes on Income and on Property	Austria	Original	16-12-2010	26-10-2011
4	Convention between the Government of the Republic of Azerbaijan and the Council of Ministers of Bosnia and Herzegovina for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Azerbaijan	Original	18-10-2012	26-12-2013

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5	Convention between	Belgium	Original	21-11-1980	26-05-1983
	the Kingdom of Belgium and				
	the Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation of Income and Capital				
6	Agreement between	People's	Original	02-12-1988	16-12-1989
	the Government of the People's	Republic of			
	Republic of China and	China			
	the Federal Executive Council of the	Cimia			
	Assembly of				
	1				
	the Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital				
7	Agreement between	Croatia	Original	07-06-2004	22-06-2005
	the Republic of Croatia and Bosnia				
	and Herzegovina				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital				
8	Convention between	Cyprus	Original	29-06-1985	08-09-1986
	the Socialist Federal Republic of	7,6.5			
	Yugoslavia and				
	the Republic of Cyprus				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
<u></u>	and on Capital	C-ool-	Onimica	20 44 2007	12.05.2010
9	Agreement between	Czech	Original	20-11-2007	12-05-2010
	the Czech Republic and	Republic			
	Bosnia and Herzegovina				
	for the Avoidance of Double				
	Taxation and				
	the Prevention of Fiscal Evasion				
	with respect to Taxes on Income				
	and on Capital				
10	Convention between	Finland	Original	08-05-1986	18-12-1987
	the Republic of Finland and				
	the Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital				
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11	Convention between	France	Original	28-03-1974	01-08-1975
	the Government of the French				
	Republic and				
	the Government of the				
	Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
12	Agreement between	Germany	Original	26-03-1987	03-12-1988
12	1 -	Germany	Original	20-03-1387	03-12-1388
	the Federal Republic of Germany				
	and				
	the Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital	1			
13	Convention between	Greece	Original	23-07-2007	12-07-2012
	Hellenic Republic and				
	the Bosnia and Herzegovina				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital				
14	Convention between	Hungary	Original	17-10-1985	03-07-1987
	the Socialist Federal Republic of	0, 1			
	Yugoslavia aAnd				
	the Hungarian People's Republic				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
1 -	and on Capital	lundon d	Original	02 11 2000	25 06 2012
15	Convention between	Ireland	Original	03-11-2009	25-06-2012
	Ireland and Bosnia and Herzegovina				
	for the Avoidance of Double				
	Taxation and				
	the Prevention of Fiscal Evasion				
	with respect to Taxes				
	on Income and Capital Gains				
16	Convention between	Italy	Original	24-02-1982	03-07-1985
	the Italian Republic and				
	the Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital				
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17	Agreement between	Jordan	Original	25-06-2007	01-01-2013
	Bosnia and Herzegovina and				
	the Government of the Kingdom of				
	Jordan				
	on Avoidance of Double Taxation				
	and				
	the Prevention of Fiscal Evasion				
	with respect to Taxes on Income				
18	Agreement between	Kuwait	Original	28-10-2008	11-02-2016
-	Bosnia and Herzegovina and		G.1.6.1.		
	the State of Kuwait				
	for the Avoidance of Double				
	Taxation				
	and the Prevention of Fiscal Evasion				
	with respect to Taxes				[
	on Income and on Capital				
19	·	Macedonia	Original	24-09-2013	02-06-2014
1 19	Agreement between		Original	24-09-2013	02-00-2014
	the Government of the Republic of	(FYR)			
	Macedonia and			1	
	the Council of Ministers of Bosnia				
	and Herzegovina				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital	_	_		
20	Agreement between	Malaysia	Original	21-06-2007	30-07-2012
	Malaysia and Bosnia and				
	Herzegovina				
	for the Avoidance of Double				
	Taxation and				
	the Prevention of Fiscal Evasion				
				1	
-	with respect to Taxes on Income			00.40.555	47 40 5551
21	Convention between	Moldova	Original	08-12-2003	17-12-2004
	the Republic of Moldova and				
	Bosnia and Herzegovina			1	
	for the Avoidance of Double			1	
	Taxation and			1	
	the Prevention of Fiscal Evasion			1	
	with respect to Taxes on Income			1	
	·				[
	and on Property			ļ	
22	Agreement between	Serbia and	Original	26-05-2004	02-06-2005
	Serbia and Montenegro and	Montenegro			
1	Bosnia and Herzegovina	(Montenegro		1	
	for the Avoidance of Double	j		1	
	Taxation	'			[
					[
	with respect to Taxes on Income				
I	and on Capital				

23	Convention between the Kingdom of the Netherlands and the Socialist Federal Republic of Yugoslavia for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Netherlands	Original	22-02-1982	06-02-1983
24	Convention between the Kingdom of Norway and the Socialist Federal Republic of Yugoslavia	Norway	Original	01-09-1983	20-08-2008
	for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital		Amending Instrument (a)	20-08-2008	20-08-2008
25	Convention between Bosnia and Herzegovina and the Islamic Republic of Pakistan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Pakistan	Original	24-08-2004	07-02-2006
26	Convention between the Republic of Poland and Bosnia and Herzegovina for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Poland	Original	04-06-2014	07-03-2016
27	Agreement between the Government of the State of Qatar and the Council of Ministers of Bosnia and Herzegovina for the Avoidance of Double Taxation and Prevention of Fiscal Evasion with respect to Taxes on Income	Qatar	Original	21-07-2010	13-02-2012
28	Convention between Bosnia and Herzegovina and Romania for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Romania	Original	06-12-2016	18-05-2018

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29	Agreement between	Serbia and	Original	26-05-2004	02-06-2005
	Serbia and Montenegro and	Montenegro			
	Bosnia and Herzegovina	(Serbia)			
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital				
30	Convention between	Czechoslovak	Original	02-11-1981	17-04-1983
	the Czechoslovak Socialist Republic	Socialist			
	and	Republic			
	the Socialist Federal Republic of	(Slovak			
	Yugoslavia	Republic)			
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and Capital	cı ·	0	46.05.000	20.44.2225
31	Convention between	Slovenia	Original	16-05-2006	20-11-2006
	the Republic of Slovenia and				
	Bosnia and Herzegovina				
	for the Avoidance of Double Taxation and				
	the Prevention of Fiscal Evasion				
	with respect to Taxes on Income and on Capital				
32	Convention between	Spain	Original	05-02-2008	04-01-2011
32	the Kingdom of Spain and	Spairi	Original	05-02-2008	04-01-2011
	Bosnia and Herzegovina				
	for the Avoidance of Double				
	Taxation and				
	the Prevention of Fiscal Evasion				
	with respect to Taxes on Income				
	and on Capital				
33	Convention between	Sri Lanka	Original	07-05-1985	22-03-1986
	the Democratic Socialist Republic of			50 2000	55 _555
	Sri Lanka and				
	the Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and on Capital				
34	Convention between	Sweden	Original	18-06-1980	16-12-1981
	the Kingdom of Sweden and				
	the Socialist Federal Republic of				
	Yugoslavia				
	for the Avoidance of Double				
	Taxation				
	with respect to Taxes on Income				
	and Capital				

35	Convention between Bosnia and Herzegovina and the Republic of Turkey for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Turkey	Original	16-02-2005	23-04-2009
36	Agreement between United Arab Emirates and Bosnia and Herzegovina for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	United Arab Emirates	Original	18-09-2006	30-04-2007
37	Convention between the United Kingdom of Great Britain and Northern Ireland and the Socialist Federal Republic of Yugoslavia for the Avoidance of Double Taxation with respect to Taxes on Income	United Kingdom	Original	06-11-1981	16-09-1982

Article 3 - Transparent Entities

Reservation

Pursuant to Article 3(5)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 3 not to apply to its Covered Tax Agreements.

Article 4 - Dual Resident Entities

Reservation

Pursuant to Article 4(3)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 4 not to apply to its Covered Tax Agreements.

Article 5 - Application of Methods for Elimination of Double Taxation

Reservation

Pursuant to Article 5(8) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 5 not to apply with respect to all of its Covered Tax Agreements.

Article 6 - Purpose of a Covered Tax Agreement

Notification of Existing Preamble Language in Listed Agreements

Pursuant to Article 6(5) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) is(are) not within the scope of a reservation under Article 6(4) and contain(s) preamble language described in Article 6(2). The text of the relevant preambular paragraph is identified below

Listed Agreement Number	Other Contracting Jurisdiction	Preamble Text ¹
1	Albania	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital and for the prevention of fiscal evasion
2	Algeria	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
3	Austria	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on property
4	Azerbaijan	desiring to <pre>cromote bilateral economic relations between the two countries> through conclusion of a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital</pre>
5	Belgium	desiring to conclude a Convention for the avoidance of double taxation of income and capital
6	People's Republic of China	Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital
7	Croatia	želeći sklopiti Ugovor o izbjegavanju dvostrukog oporezivanja porezima na dohodak i na imovinu
8	Cyprus	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
9	Czech Republic	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital
10	Finland	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
11	France	<le de="" de<br="" fédérative="" gouvernement="" la="" république="" socialiste="">Yougoslavie et le Gouvernement de la République française,> désireux de conclure une Convention tendant r´ éviter les doubles impositions en matičre d'impôts sur les revenus,</le>
12	Germany	Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital
13	Greece	Desiring to conclude a Convention for the avoidance of double

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¹ The preamble text would be inserted on a preambular paragraph basis. Where the relevant preambular paragraph also includes text that is not described in Article 6(2) (with the exception of minor variations), each jurisdiction may clarify that by bracketing such text (like the example in this column) so that it would not be modified by Article 6(1).

		toyation with respect to toyas an income and an conital
		taxation with respect to taxes on income and on capital,
		<wi>with the view to establishing stable conditions for</wi>
		comprehensive development for economic and other
		cooperation and investment between the two countries>
14	Hungary	Desiring to conclude a Convention for the avoidance of double
		taxation with respect to taxes on income and on capital
15	Ireland	desiring to conclude a Convention for
		the avoidance of double taxation and the prevention of fiscal
		evasion with respect to taxes on income and capital gains
16	Italy	Desiring to conclude a Convention for the avoidance of double
		taxation with respect to taxes on income and on capital
17	Jordan	desiring to conclude an Agreement for the avoidance of
		double taxation and the prevention of fiscal evasion with
		respect to taxes on income
18	Kuwait	Desiring to <pre>cpromote their mutual economic relations></pre>
		through the conclusion between them of an agreement for
		the avoidance of double taxation and the prevention of fiscal
		evasion with respect to taxes on income and on capital
19	Macedonia	Desiring to conclude an Agreement for the avoidance of
	(FYR)	double taxation with respect to taxes on income and on
		capital
20	Malaysia	Desiring to conclude an Agreement for the avoidance of
		double taxation and the prevention of fiscal evasion with
		respect to taxes on income
21	Moldova	desiring to conclude a Convention for the avoidance of double
		taxation and the prevention of fiscal evasion with respect to
		taxes on income and on property
22	Serbia and	Desiring to conclude an Agreement for the avoidance of
	Montenegro	double taxation with respect to taxes on income and on
	(Montenegro)	capital
23	Netherlands	Desiring to conclude a convention for the avoidance of double
		taxation with respect to taxes on income and on capital
24	Norway	desiring to conclude a Convention for the Avoidance of
		Double Taxation with respect to taxes on income and on
		capital
25	Pakistan	desiring to conclude a Convention for the Avoidance of
		Double Taxation and the prevention of fiscal evasion with
		Respect to Taxes on Income, <and and="" promote="" strengthen<="" td="" to=""></and>
		the economic relations between the two countries>
26	Poland	desiring to conclude a Convention for the avoidance of double
		taxation and the prevention of fiscal evasion with respect to
		taxes on income and on capital
27	Qatar	desiring to conclude an Agreement for the avoidance of
	20.000	double taxation and the prevention of fiscal evasion with
		respect to taxes on income
28	Romania	Desiring to conclude a Convention for the avoidance of double
		taxation and the prevention of fiscal evasion with respect to
		taxes on income,
29	Serbia and	Desiring to conclude an Agreement for the avoidance of
[Montenegro	double taxation with respect to taxes on income and on
	(Serbia)	capital
	(Sei Dia)	Capital

30	Czechoslovak Socialist Republic (Slovak Republic)	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
31	Slovenia	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital
32	Spain	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital
33	Sri Lanka	desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital desiring
34	Sweden	to conclude a Convention for the avoidance of double taxation with respect to taxes on income and capital
35	Turkey	Desiring to conclude a Convention for avoidance of double taxation with respect to taxes on income and capital
36	United Arab Emirates	Desiring to conclude an Agreement for avoidance of double taxation with respect to taxes on income and capital
37	United Kingdom	Desiring to conclude a convention for the avoidance of double taxation with respect to taxes on income

Article 7 - Prevention of Treaty Abuse

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 7(17)(a) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) is(are) not subject to a reservation described in Article 7(15)(b) and contain(s) a provision described in Article 7(2). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
17	Jordan	Article 11 (7)
26	Poland	Article 26 (1)

Article 8 - Dividend Transfer Transactions

Reservation

Pursuant to Article 8(3)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 8 not to apply to its Covered Tax Agreements.

Article 9 - Capital Gains from Alienation of Shares or Interests of Entities Deriving their Value Principally from Immovable Property

Notification of Choice of Optional Provisions

Pursuant to Article 9(8) of the Convention, Bosnia and Herzegovina hereby chooses to apply Article 9(4).

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 9(7) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) contain(s) a provision described in Article 9(1). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Albania	Article 13(4)
4	Azerbaijan	Article 13(4)
7	Croatia	Article 13(4)
10	Finland	Protocol Article 3
11	France	Article 13(1)
15	Ireland	Article 13(4)
17	Jordan	Article 13(4)
21	Moldova	Article 13(4)
22	Serbia and Montenegro (Montenegro)	Article 13(4)
25	Pakistan	Article 13(4)
26	Poland	Article 13(4)
28	Romania	Article 13(4)
29	Serbia and Montenegro (Serbia)	Article 13(4)
32	Spain	Article 13(4)

Article 10 - Anti-abuse Rule for Permanent Establishments Situated in Third Jurisdictions

Reservation

Pursuant to Article 10(5)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 10 not to apply to its Covered Tax Agreements.

Article 11 - Application of Tax Agreements to Restrict a Party's Right to Tax its Own Residents

Reservation

Pursuant to Article 11(3)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 11 not to apply to its Covered Tax Agreements.

Article 12 - Artificial Avoidance of Permanent Establishment Status through Commissionnaire Arrangements and Similar Strategies

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 12(5) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) contain(s) a provision described in Article 12(3)(a). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Albania	Article 5(5)
2	Algeria	Article 5(5)
3	Austria	Article 5(5)
4	Azerbaijan	Article 5(5)(a)
5	Belgium	Article 5(4)
6	People's Republic of China	Article 5(5)
7	Croatia	Article 5(5)
8	Cyprus	Article 5(5)
9	Czech Republic	Article 5(5)
10	Finland	Article 5(5)
11	France	Article 5(4)
12	Germany	Article 5(5)
13	Greece	Article 5(5)
14	Hungary	Article 5(5)
15	Ireland	Article 5(5)
16	Italy	Article 5(4)
17	Jordan	Article 5(5)(a)
18	Kuwait	Article 5(7)(a)
19	Macedonia (FYR)	Article 5(5)
20	Malaysia	Article 5(6)(a)
21	Moldova	Article 5(5)
22	Serbia and Montenegro	Article 5(5)
	(Montenegro)	
23	Netherlands	Article 5(5)
24	Norway	Article 5(5)
25	Pakistan	Article 5(5)
26	Poland	Article 5(5)
27	Qatar	Article 5(5)
28	Romania	Article 5(5)
29	Serbia and Montenegro	Article 5(5)
	(Serbia)	
30	Czechoslovak Socialist Republic	Article 5(5)
	(Slovak Republic)	
31	Slovenia	Article 5(5)
32	Spain	Article 5(5)
33	Sri Lanka	Article 5(5)(a)
34	Sweden	Article 5(4)
35	Turkey	Article 5(5)
36	United Arab Emirates	Article 5(5)
37	United Kingdom	Article 5(4)

Pursuant to Article 12(6) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) contain(s) a provision described in Article 12(3)(b). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Albania	Article 5(6)
2	Algeria	Article 5(6)
3	Austria	Article 5(6)
4	Azerbaijan	Article 5(7)
5	Belgium	Article 5(5)
6	People's Republic of China	Article 5(6)
7	Croatia	Article 5(6)
8	Cyprus	Article 5(6)
9	Czech Republic	Article 5(6)
10	Finland	Article 5(6)
11	France	Article 5(5)
12	Germany	Article 5(6)
13	Greece	Article 5(6)
14	Hungary	Article 5(6)
15	Ireland	Article 5(6)
16	Italy	Article 5(5)
17	Jordan	Article 5(7)
18	Kuwait	Article 5(8)
19	Macedonia (FYR)	Article 5(6)
20	Malaysia	Article 5(7)
21	Moldova	Article 5(6)
22	Serbia and Montenegro	Article 5(6)
	(Montenegro)	
23	Netherlands	Article 5(6)
24	Norway	Article 5(6)
25	Pakistan	Article 5(6)
26	Poland	Article 5(6)
27	Qatar	Article 5(6)
28	Romania	Article 5(6)
29	Serbia and Montenegro	Article 5(6)
	(Serbia)	
30	Czechoslovak Socialist Republic	Article 5(6)
	(Slovak Republic)	
31	Slovenia	Article 5(6)
32	Spain	Article 5(6)
33	Sri Lanka	Article 5(6)
34	Sweden	Article 5(5)
35	Turkey	Article 5(6)
36	United Arab Emirates	Article 5(6)
37	United Kingdom	Article 5(5)

Article 13 - Artificial Avoidance of Permanent Establishment Status through the Specific Activity Exemptions

Reservation

Pursuant to Article 13(6)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 13 not to apply to its Covered Tax Agreements.

Article 14 - Splitting-up of Contracts

Reservation

Pursuant to Article 14(3)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 14 not to apply to its Covered Tax Agreements.

Article 15 - Definition of a Person Closely Related to an Enterprise

Article 16 - Mutual Agreement Procedure

Reservation

Pursuant to Article 16(5)(a) of the Convention, Bosnia and Herzegovina reserves the right for the first sentence of Article 16(1) not to apply to its Covered Tax Agreements on the basis that it intends to meet the minimum standard for improving dispute resolution under the OECD/G20 BEPS Package by ensuring that under each of its Covered Tax Agreements (other than a Covered Tax Agreement that permits a person to present a case to the competent authority of either Contracting Jurisdiction), where a person considers that the actions of one or both of the Contracting Jurisdictions result or will result for that person in taxation not in accordance with the provisions of the Covered Tax Agreement, irrespective of the remedies provided by the domestic law of those Contracting Jurisdictions, that person may present the case to the competent authority of the Contracting Jurisdiction of which the person is a resident or, if the case presented by that person comes under a provision of a Covered Tax Agreement relating to non-discrimination based on nationality, to that of the Contracting Jurisdiction of which that person is a national; and the competent authority of that Contracting Jurisdiction will implement a bilateral notification or consultation process with the competent authority of the other Contracting Jurisdiction for cases in which the competent authority to which the mutual agreement procedure case was presented does not consider the taxpayer's objection to be justified.

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 16(6)(b)(i) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) contain(s) a provision that provides that a case referred to in the first sentence of Article 16(1) must be presented within a specific time period that is shorter than three years from the first notification of the action resulting in taxation not in accordance with the provisions of the Covered Tax Agreement. The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
16	Italy	Article 25(1), second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) contain(s) a provision that provides that a case referred to in the first sentence of Article 16(1) must be presented within a specific time period that is at least three years from the first notification of the action resulting in taxation not in accordance with the provisions of the Covered Tax Agreement. The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Albania	Article 26(1), second sentence
2	Algeria	Article 26(1), second sentence
3	Austria	Article 25(1), second sentence
4	Azerbaijan	Article 26(1), second sentence
5	Belgium	Article 24(1), second sentence
6	People's Republic of China	Article 25(1), second sentence
7	Croatia	Article 26(1), second sentence

9	Czech Republic	Article 24(1), second sentence
10	Finland	Article 24(1), second sentence
12	Germany	Article 26(1), second sentence
13	Greece	Article 26(1), second sentence
14	Hungary	Article 25(1), second sentence
15	Ireland	Article 25(1), second sentence
17	Jordan	Article 25(1), second sentence
18	Kuwait	Article 26(1), second sentence
19	Macedonia (FYR)	Article 26(1), second sentence
20	Malaysia	Article 25(1), second sentence
21	Moldova	Article 26(1), second sentence
22	Serbia and Montenegro	Article 26(1), second sentence
	(Montenegro)	
23	Netherlands	Article 25(1), second sentence
24	Norway	Article 25(1), second sentence
25	Pakistan	Article 25(1), second sentence
26	Poland	Article 24(1), second sentence
27	Qatar	Article 25(1), second sentence
28	Romania	Article 23(1), second sentence
29	Serbia and Montenegro	Article 26(1), second sentence
	(Serbia)	
31	Slovenia	Article 25(1), second sentence
32	Spain	Article 25(1), second sentence
33	Sri Lanka	Article 25(1), second sentence
34	Sweden	Article 26(1), second sentence
35	Turkey	Article 26(1), second sentence
36	United Arab Emirates	Article 27(1), second sentence

Notification of Listed Agreements Not Containing Existing Provisions

Pursuant to Article 16(6)(c)(i) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) do(es) not contain a provision described in Article 16(4)(b)(i).

Listed Agreement Number	Other Contracting Jurisdiction	
8	Cyprus	
11	France	
30	Czechoslovak Socialist Republic (Slovak Republic)	
34	Sweden	
37	United Kingdom	

Pursuant to Article 16(6)(c)(ii) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) do(es) not contain a provision described in Article 16(4)(b)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
5	Belgium
16	Italy

Pursuant to Article 16(6)(d)(ii) of the Convention, Bosnia and Herzegovina considers that the following agreement(s) do(es) not contain a provision described in Article 16(4)(c)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
5	Belgium
16	Italy

Article 17 - Corresponding Adjustments

Reservation

Pursuant to Article 17(3)(a) of the Convention, Bosnia and Herzegovina reserves the right for the entirety of Article 17 not to apply to its Covered Tax Agreements that already contain a provision described in Article 17(2). The following agreement(s) contain(s) provisions that are within the scope of this reservation.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Albania	Article 9(2)
2	Algeria	Article 9(2)
3	Austria	Article 9(2)
4	Azerbaijan	Article 9(2)
7	Croatia	Article 9(2)
9	Czech Republic	Article 9(2)
13	Greece	Article 9(2)
15	Ireland	Article 9(2)
17	Jordan	Article 9(2)
18	Kuwait	Article 9(2)
19	Macedonia (FYR)	Article 9(2)
20	Malaysia	Article 9(2)
21	Moldova	Article 9(2)
22	Serbia and Montenegro	Article 9(2)
	(Montenegro)	
25	Pakistan	Article 9(2)
26	Poland	Article 9(2)
27	Qatar	Article 9(2)
28	Romania	Article 9(2)
29	Serbia and Montenegro (Serbia)	Article 9(2)
31	Slovenia	Article 9(2)
32	Spain	Article 9(2)
35	Turkey	Article 9(2)
36	United Arab Emirates	Article 9(2)