

**RESERVATIONS AND NOTIFICATIONS UNDER THE MULTILATERAL CONVENTION TO  
IMPLEMENT TAX TREATY RELATED MEASURES TO PREVENT BASE EROSION AND PROFIT  
SHIFTING**



**Republic of Cyprus**

**Status of List of Reservations and Notifications upon Deposit of the Instrument of Ratification**

This document contains the list of reservations and notifications made by the Republic of Cyprus upon the deposit of the instrument of ratification, pursuant to Articles 28(5) and 29(1) of the Convention.

**Article 2 – Interpretation of Terms*****Notification - Agreements Covered by the Convention***

Pursuant to Article 2(1)(a)(ii) of the Convention, Republic of Cyprus wishes the following agreements to be covered by the Convention:

No	Title	Other Contracting Jurisdiction	Original/ Amending Instrument	Date of Signature	Date of Entry into Force
1	Agreement between the Government of the Republic of Cyprus and the Government of the Republic of Armenia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of Armenia	Original	17-01-2011	19-09-2011
2	Convention between the Republic of Cyprus and the Republic of Austria for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Republic of Austria	Original	20-03-1990	01-01-1991
			Amending Instrument - Protocol (a)	21-05-2012	01-04-2013
3	Convention between the Government of the Republic of Cyprus and the Government of the Union of Soviet Socialist Republics for the avoidance of Double Taxation of Income and Property	Union of Soviet Socialist Republics (Azerbaijan)	Original	29-10-1982	26-08-1983
4	Agreement between the Government of the Republic of Cyprus and the Government of the Kingdom of Bahrain for the Avoidance of Double Taxation with respect to Taxes on Income	Kingdom of Bahrain	Original	09-03-2015	26-04-2016
5	Convention between the Republic of Cyprus and Barbados for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Barbados	Original	03-05-2017	11-09-2017
6	Convention between the Government of the Republic of Cyprus and the Government of Belarus for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Property	Belarus	Original	29-05-1998	12-02-1999

7	Convention between the Republic of Cyprus and the Kingdom of Belgium for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Kingdom of Belgium	Original	14-05-1996	08-12-1999
8	Convention between the Republic of Cyprus and the Socialist Federal Republic of Yugoslavia for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Socialist Federal Republic of Yugoslavia (Bosnia and Herzegovina)	Original	29-06-1985	08-09-1986
9	Convention between the Republic of Cyprus and the Republic of Bulgaria for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Republic of Bulgaria	Original	30-10-2000	03-01-2001
10	Convention between the Republic of Cyprus and Canada for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Canada	Original	02-05-1984	03-09-1985
11	Agreement between the Government of the Republic of Cyprus and the Government of the People's Republic of China for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	People's Republic of China	Original	25-10-1990	05-10-1991
12	Agreement between the Republic of Cyprus and the Czech Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Czech Republic	New agreement	28-4-2009	26-11-2009
13	Agreement between the Republic of Cyprus and the Kingdom of Denmark for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Kingdom of Denmark	New agreement	11-10-2010	07-09-2011
14	Convention between the Republic of Cyprus and the Government of the Arab Republic of Egypt for the	Arab Republic of Egypt	Original	19-12-1993	14-03-1995

	Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income				
15	Convention between the Government of the Republic of Cyprus and the Government of the Republic of Estonia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of Estonia	Original	15-10-2012	08-10-2013
16	Convention between the Republic of Cyprus and the Federal Democratic Republic of Ethiopia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Federal Democratic Republic of Ethiopia	Original	30-12-2015	18-10-2017
17	Agreement between the Republic of Cyprus and the Republic of Finland for the Avoidance of Double Taxation with respect to Taxes on Income	Republic of Finland	Original	15-11-2012	28-04-2013
18	Convention between the Government of the Republic of Cyprus and the Government of the French Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	French Republic	Original	18-12-1981	01-04-1983
19	Agreement between the Government of the Republic of Cyprus and the Government of Georgia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Georgia	Original	13-05-2015	04-01-2016
20	<p>Σύμβαση μεταξύ του Βασιλείου της Ελλάδος και της Κύπρου περί Αποφυγής της Διπλής Φορολογίας και της Αποτροπής της Φοροδιαφυγής εν σχέσει προς τους Φόρους Εισοδήματος  <b>This DTT concluded in Greek</b></p> <p>Convention between the Republic of Cyprus and the Kingdom of Greece for the Avoidance of Double</p>	Kingdom of Greece (Hellenic Republic)	Original	30-03-1968	16-01-1969

	Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income				
21	Agreement between the Republic of Cyprus and the States of Guernsey for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	States of Guernsey	Original	15-07-2014 (In Cyprus)  29-07-2014 (In Guernsey)	04-03-2015
22	Convention between the Government of the Republic of Cyprus and the Government of the Hungarian People's for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Hungarian People's Republic (Hungary)	Original	30-11-1981	24-11-1982
23	Agreement between the Government of the Republic of Cyprus and the Government of Iceland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Iceland	Original	13-11-2014	22-12-2014
24	Agreement between the Government of the Republic of Cyprus and the Government of the Republic of India for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of India	New agreement	18-11-2016	14-12-2016
25	Agreement between the Government of the Republic of Cyprus and the Government of the Islamic Republic of Iran for the Avoidance of Double Taxation and Fiscal Evasion with respect to Taxes on Income	Islamic Republic of Iran	Original	04-08-2015	05-03-2017
26	Convention between Cyprus and Ireland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Ireland	Original	24-09-1968	12-07-1970
27	Convention between the Republic of Cyprus and Italy for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Italy	Original	24-04-1974	09-06-1983
			Amending Instrument - Protocol (a)	07-10-1980	09-06-1983

			Amending Instrument – Protocol (b)	04-06-2009	23-11-2010
28	Agreement between the Republic of Cyprus and Jersey for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Jersey	Original	11-07-2016	17-02-2017
29	Convention between the Republic of Cyprus and the Government of the State of Kuwait for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	State of Kuwait	New agreement	05-10-2010	30-10-2013
30	Convention between the Government of the Republic of Cyprus and the Government of the Union of Soviet Socialist Republics for the avoidance of double taxation of income and property	Union of Soviet Socialist Republics (Kyrgyzstan)	Original	29-10-1982	26-08-1983
31	Convention between the Government of the Republic of Cyprus and the Government of the Republic of Latvia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of Latvia	Original	24-05-2016	27-10-2016
32	Convention between the Republic of Cyprus and the Lebanese Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Lebanese Republic	Original	18-02-2003	14-04-2005
33	Convention between the Government of the Republic of Cyprus and the Government of the Republic of Lithuania for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of Lithuania	Original	21-06-2013	17-04-2014
34	Agreement between the Government of the Republic of Cyprus and the Government of Malta for the Avoidance of Double Taxation and the Prevention of	Malta	Original	22-10-1993	11-08-1994

	Fiscal Evasion with respect to Taxes on Income and on Capital				
35	Agreement between the Government of the Republic of Cyprus and the Government of the Republic of Mauritius for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Republic of Mauritius	Original  Amending Instrument - Protocol (a)	21-01-2000  23-10-2017	12-06-2000  02-05-2018
36	Convention between the Republic of Cyprus and the Government of the Republic of Moldova for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of Moldova	Original	28-01-2008	03-09-2008
37	Convention between the Republic of Cyprus and the Socialist Federal Republic of Yugoslavia for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Socialist Federal Republic of Yugoslavia (Montenegro)	Original	29-06-1985	08-09-1986
38	Convention between the Republic of Cyprus and the Kingdom of Norway for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Kingdom of Norway	New agreement	24-02-2014	08-07-2014
39	Agreement between the Government of the Republic of Cyprus and the Government of the Republic of Poland for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Republic of Poland	Original	04-06-1992	07-07-1993
			Amending Instrument - Protocol (a)	22-03-2012	09-11-2012
40	Convention between the Republic of Cyprus and the Portuguese Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Portuguese Republic	Original	19-11-2012	16-08-2013

41	Agreement between the Government of the Republic of Cyprus and Government of the State of Qatar for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	State of Qatar	Original	11-11-2008	20-03-2009
42	Convention between the Republic of Cyprus and the Government of the Socialist Republic of Romania for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Socialist Republic of Romania (Romania)	Original	16-11-1981	08-11-1982
43	Agreement between the Government of the Republic of Cyprus and the Government of the Russian Federation for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Russian Federation	Original	05-12-1998	17-08-1999
			Amending Instrument - Protocol (a)	07-10-2010	02-04-2012
44	Convention between the Republic of Cyprus and the Republic of San Marino for the Avoidance of Double Taxation with respect to Taxes on Income	Republic of San Marino	Original	27-04-2007	18-07-2007
			Amending Instrument - Protocol (a)	19-05-2017	27-06-2018
45	Convention between the Government of the Republic of Cyprus and the Government of the Kingdom of Saudi Arabia for the Avoidance of Double Taxation with respect to Taxes on Income and for the Prevention of Tax Evasion	Kingdom of Saudi Arabia	Original	03-01-2018	01-03-2019
46	Convention between the Republic of Cyprus and the Socialist Federal Republic of Yugoslavia for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Socialist Federal Republic of Yugoslavia (Serbia)	Original	29-06-1985	08-09-1986
47	Agreement between the Republic of Cyprus and the Government of the Republic of Seychelles for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Republic of Seychelles	Original	28-06-2006	02-11-2006



48	Agreement between the Republic of Cyprus and the Government of the Republic of Singapore for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of Singapore	Original	24-11-2000	08-02-2001
49	Convention between the Government of the Czechoslovak Socialist Republic and the Government of the Republic of Cyprus for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Czechoslovak Socialist Republic (Slovakia)	Original	15-04-1980	30-12-1980
50	Convention between the Republic of Cyprus and the Republic of Slovenia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Republic of Slovenia	Original	12-10-2010	14-09-2011
51	Agreement between the Republic of Cyprus and the Republic of South Africa for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Republic of South Africa	Original	26-11-1997	08-12-1998
			Amending Instrument – Protocol (a)	01-04-2015	18-09-2015
52	Convention between the Republic of Cyprus and the Kingdom of Spain for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Kingdom of Spain	Original	14-02-2013	28-05-2014
53	Convention between the Government of the Republic of Cyprus and the Kingdom of Sweden for the Avoidance of Double Taxation with respect to Taxes on Income	Kingdom of Sweden	Original	25-10-1988	13-11-1989
54	Agreement between the Government of the Republic of Cyprus and the Government of the Syrian Arab Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Syrian Arab Republic	Original	15-03-1992	22-02-1995

55	Convention between the Republic of Cyprus and the Government of the Kingdom of Thailand for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Kingdom of Thailand	Original	27-10-1998	04-04-2000
56	Convention between the Government of the Republic of Cyprus and the Government of Ukraine for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Ukraine	New agreement	08-11-2012	19-08-2013
			Amending Instrument – Protocol (a)	11-12-2015	28-11-2019
57	Agreement between the Government of the Republic of Cyprus and the Government of the United Arab Emirates for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	United Arab Emirates	Original	27-02-2011	17-03-2013
58	Convention between the Republic of Cyprus and the Government of the United States of America for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	United States of America	Original	19-03-1984	31-12-1985
59	Convention between the Government of the Republic of Cyprus and the Government of the Union of Soviet Socialist Republics for the avoidance of double taxation of income and property	Union of Soviet Socialist Republics (Uzbekistan)	Original	29-10-1982	26-08-1983

### Article 3 – Transparent Entities

#### *Reservation*

Pursuant to Article 3(5)(a), of the Convention, Republic of Cyprus will reserve the rights for the entirety of Article 3 not to apply to its Covered Double Tax Agreements.

### Article 4 – Dual Resident Entities

#### *Reservation*

Pursuant to Article 4(3)(a) of the Convention, Republic of Cyprus 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, Republic of Cyprus 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 Choice of Optional Provisions*

Pursuant to Article 6(6) of the Convention, Republic of Cyprus hereby chooses to apply Article 6(3).

### *Notification of Existing Preamble Language in Listed Agreements*

Pursuant to Article 6(5) of the Convention, Republic of Cyprus considers that the following agreements are not within the scope of a reservation under Article 6(4) and contain 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	Republic of Armenia	<confirming their desire to develop and strengthen the economic, scientific, technical and cultural cooperation between both States and> desiring to conclude an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
2	Republic of Austria	desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
3	Union of Soviet Socialist Republics (Azerbaijan)	<confirming their desire, in accordance with the Final Act of the Conference on Security and Cooperation in Europe signed in Helsinki on August 1, 1975, towards the development and deepening of economic, industrial, scientific, technical and cultural cooperation, and> with the aim of avoiding double taxation,
4	Kingdom of Bahrain	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income;
5	Barbados	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
6	Belarus	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,

7	Kingdom of Belgium	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,
8	Socialist Federal Republic of Yugoslavia (Bosnia and Herzegovina)	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
9	Republic of Bulgaria	desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
10	Canada	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,
11	People's Republic of China	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;
12	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,
13	Kingdom of Denmark	desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income,
14	Arab Republic of Egypt	desiring to conclude a convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
15	Republic of Estonia	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
16	Federal Democratic Republic of Ethiopia	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
17	Republic of Finland	Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income,
18	French Republic	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,
19	Georgia	desiring to promote and strengthen the economic, cultural and scientific relations by concluding an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,

20	Kingdom of Greece (Hellenic Republic)	Επιθυμούσαι την αποφυγή της διπλής φορολογίας και της φοροδιαφυγής εν σχέσει προς τους φόρους εισοδήματος, <b>This DTT concluded in Greek</b>  desiring to avoid double taxation and to prevent fiscal evasion with respect to taxes on income,
21	States of Guernsey	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,
22	Hungarian People's Republic (Hungary)	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital;
23	Iceland	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
24	Republic of India	desiring to conclude an Agreement for the Avoidance of Double Taxation and the prevention of fiscal evasion with respect to taxes on income <and with a view to promoting economic cooperation between the two countries, ... >
25	Islamic Republic of Iran	Desiring to conclude an Agreement for the avoidance of double taxation and fiscal evasion with respect to taxes on income,
26	Ireland	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
27	Italy	Desiring to conclude a Convention to avoid double taxation and to prevent fiscal evasion with respect to taxes on income
28	Jersey	desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to taxes on income,
29	State of Kuwait	desiring to promote their mutual economic relations through the conclusion between them of a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
30	Union of Soviet Socialist Republics (Kyrgyzstan)	<confirming their desire, in accordance with the Final Act of the Conference on Security and Cooperation in Europe signed in Helsinki on August 1, 1975, towards the development and deepening of economic, industrial, scientific, technical and cultural cooperation, and> with the aim of avoiding double taxation,

31	Republic of Latvia	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
32	Lebanese Republic	<desiring to promote and strengthen their economic co-operation by> concluding a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
33	Republic of Lithuania	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
34	Malta	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,
35	Republic of Mauritius	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,
36	Republic of Moldova	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
37	Socialist Federal Republic of Yugoslavia (Montenegro)	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
38	Kingdom of Norway	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to taxes on income,
39	Republic of Poland	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital <and to promote their mutual economic relations by removing fiscal obstacles>
40	Portuguese Republic	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
41	State of Qatar	desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income,
42	Socialist Republic of Romania (Romania)	<desiring to promote and strengthen the economic relations between the two countries on the basis of respecting the principles of independence and national sovereignty, equality in rights, reciprocal advantage

		and non-interference in domestic matters, > have decided to conclude the Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income and Capital.
43	Russian Federation	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital <and with a view to promote economic cooperation between the two countries>
44	Republic of San Marino	wishing to conclude a Convention for the avoidance of double taxation with respect to taxes on income <and to strengthen the disciplined development of economic relations between the two States in the framework of greater cooperation>
45	Kingdom of Saudi Arabia	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and for the prevention of tax evasion;
46	Socialist Federal Republic of Yugoslavia (Serbia)	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
47	Republic of Seychelles	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,
48	Republic of Singapore	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
49	Czechoslovak Socialist Republic (Slovakia)	<Being aware of the need to facilitate trade and to encourage economic cooperation in conformity with the Final Act of the Conference on Security and Cooperation in Europe.> Have decided to conclude the Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income and on Capital.
50	Republic of Slovenia	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
51	Republic of South Africa	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 <and with a view to promote and strengthen the economic relations between the two countries,>

52	Kingdom of 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
53	Kingdom of Sweden	desiring to conclude a Convention for the Avoidance of Double Taxation with respect to taxes on Income,
54	Syrian Arab Republic	Desiring to conclude an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income;
55	Kingdom of Thailand	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
56	Ukraine	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income <and confirming their endeavour to the development and deepening of mutual economic relations,>
57	United Arab Emirates	<Desiring to promote their mutual economic relations> 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,
58	United States of America	desiring to conclude a convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
59	Union of Soviet Socialist Republics (Uzbekistan)	<confirming their desire, in accordance with the Final Act of the Conference on Security and Cooperation in Europe signed in Helsinki on August 1, 1975, towards the development and deepening of economic, industrial, scientific, technical and cultural cooperation, and> with the aim of avoiding double taxation,

***Notification of Listed Agreements Not Containing Existing Preamble Language***

Pursuant to Article 6(6) of the Convention, Republic of Cyprus considers that the following agreements do not contain preamble language referring to a desire to develop an economic relationship or to enhance co-operation in tax matters

Listed Agreement Number	Other Contracting Jurisdiction
1	Republic of Armenia
2	Republic of Austria
3	Union of Soviet Socialist Republics (Azerbaijan)



4	Kingdom of Bahrain
5	Barbados
6	Belarus
7	Kingdom of Belgium
8	Socialist Federal Republic of Yugoslavia (Bosnia and Herzegovina)
9	Republic of Bulgaria
10	Canada
11	People's Republic of China
12	Czech Republic
13	Kingdom of Denmark
14	Arab Republic of Egypt
15	Republic of Estonia
16	Federal Democratic Republic of Ethiopia
17	Republic of Finland
18	French Republic
19	Georgia
20	Kingdom of Greece (Hellenic Republic)
21	States of Guernsey
22	Hungarian People's Republic (Hungary)
23	Iceland
24	Republic of India
25	Islamic Republic of Iran
26	Ireland
27	Italy
28	Jersey
29	State of Kuwait

30	Union of Soviet Socialist Republics (Kyrgyzstan)
31	Republic of Latvia
32	Lebanese Republic
33	Republic of Lithuania
34	Malta
35	Republic of Mauritius
36	Republic of Moldova
37	Socialist Federal Republic of Yugoslavia (Montenegro)
38	Kingdom of Norway
39	Republic of Poland
40	Portuguese Republic
41	State of Qatar
42	Socialist Republic of Romania (Romania)
43	Russian Federation
44	Republic of San Marino
45	Kingdom of Saudi Arabia
46	Socialist Federal Republic of Yugoslavia(Serbia)
47	Republic of Seychelles
48	Republic of Singapore
49	Czechoslovak Socialist Republic (Slovakia)
50	Republic of Slovenia
51	Republic of South Africa
52	Kingdom of Spain
53	Kingdom of Sweden
54	Syrian Arab Republic
55	Kingdom of Thailand
56	Ukraine

57	United Arab Emirates
58	United States of America
59	Union of Soviet Socialist Republics (Uzbekistan)

## **Article 7 – Prevention of Treaty Abuse**

### **Notification of Choice of Optional Provisions**

Pursuant to Article 7(17)(b) of the Convention, Republic of Cyprus hereby chooses to apply Article 7(4).

### ***Notification of Existing Provisions in Listed Agreements***

Pursuant to Article 7(17)(a) of the Convention, Republic of Cyprus considers that the following agreements are not subject to a reservation described in Article 7(15)(b) and contain 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
12	Czech Republic	Protocol (2)
43	Russian Federation	Article 29

## **Article 8 – Dividend Transfer Transactions**

### ***Reservation***

Pursuant to Article 8(3)(a) of the Convention, Republic of Cyprus 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**

### ***Reservation***

Pursuant to Article 9(6)(a) of the Convention, Republic of Cyprus reserves the right for Article 9(1) not to apply to its Covered Tax Agreements.

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

### ***Reservation***

Pursuant to Article 10(5)(a) of the Convention, Republic of Cyprus 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, Republic of Cyprus 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**

### ***Reservation***

Pursuant to Article 12(4) of the Convention, Republic of Cyprus reserves the right for the entirety of Article 12 not to apply to its Covered Tax Agreements.

## **Article 13 – Artificial Avoidance of Permanent Establishment Status through the Specific Activity Exemptions**

### ***Reservation***

Pursuant to Article 13(6)(a) of the Convention, Republic of Cyprus 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, Republic of Cyprus 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**

### ***Reservation***

Pursuant to Article 15(2) of the Convention, Republic of Cyprus reserves the right for the entirety of Article 15 not to apply to the Covered Tax Agreement to which the reservations described in Article 12(4), Article 13(6)(a) or (c), and Article 14(3)(a) apply.

## **Article 16 – Mutual Agreement Procedure**

### ***Notification of Existing Provisions in Listed Agreements***

Pursuant to Article 16(6)(a) of the Convention, Republic of Cyprus considers that the following agreements contain a provision described in Article 16(4)(a)(i). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Republic of Armenia	Article 24(1), first sentence
2	Republic of Austria	Article 25(1), first sentence
3	Union of Soviet Socialist Republics (Azerbaijan)	Article 18 (1), first sentence

4	Kingdom of Bahrain	Article 23(1), first sentence
5	Barbados	Article 25(1), first sentence
6	Belarus	Article 25(1), first sentence
7	Kingdom of Belgium	Article 25(1), first sentence
8	Socialist Federal Republic of Yugoslavia (Bosnia and Herzegovina)	Article 24(1), first sentence
9	Republic of Bulgaria	Article 26(1), first sentence
10	Canada	Article 26(1), first sentence
11	People's Republic of China	Article 26(1), first sentence
12	Czech Republic	Article 23(1), first sentence
13	Kingdom of Denmark	Article 23(1), first sentence
14	Arab Republic of Egypt	Article 25(1), first sentence
15	Republic of Estonia	Article 23(1), first sentence
16	Federal Democratic Republic of Ethiopia	Article 26(1), first sentence
17	Republic of Finland	Article 23(1), first sentence
18	French Republic	Article 27(1), first sentence
19	Georgia	Article 25(1), first sentence
20	Kingdom of Greece (Hellenic Republic)	Article 23(1)
21	States of Guernsey	Article 24(1), first sentence
22	Hungarian People's Republic (Hungary)	Article 26(1), first sentence
23	Iceland	Article 23(1), first sentence
24	India	Article 25(1), first sentence
25	Iran	Article 24(1), first sentence
26	Ireland	Article 24(1)
27	Italy	Article 25(1), first sentence
28	Jersey	Article 24(1), first sentence
29	State of Kuwait	Article 24(1), first sentence
30	Union of Soviet Socialist Republics (Kyrgyzstan)	Article 18 (1), first sentence
31	Latvia	Article 25(1), first sentence
32	Lebanese Republic	Article 24(1), first sentence
33	Republic of Lithuania	Article 25(1), first sentence
34	Malta	Article 26(1), first sentence
35	Republic of Mauritius	Article 26(1), first sentence
36	Republic of Moldova	Article 23(1), first sentence
37	Socialist Federal Republic of Yugoslavia (Montenegro)	Article 24(1), first sentence
38	Kingdom of Norway	Article 24(1), first sentence
39	Republic of Poland	Article 26(1), first sentence
40	Portuguese Republic	Article 25(1), first sentence
41	State of Qatar	Article 25(1), first sentence
42	Socialist Republic of Romania	Article 28(1)
43	Russian Federation	Article 25(1), first sentence
44	Republic of San Marino	Article 24(1), first sentence
45	Kingdom of Saudi Arabia	Article 24(1), first sentence

46	Socialist Federal Republic of Yugoslavia (Serbia)	Article 24(1), first sentence
47	Republic of Seychelles	Article 24(1), first sentence
48	Republic of Singapore	Article 24(1), first sentence
49	Czechoslovak Socialist Republic (Slovakia)	Article 26(1)
50	Republic of Slovenia	Article 24(1), first sentence
51	Republic of South Africa	Article 25(1), first sentence
52	Kingdom of Spain	Article 24(1), first sentence
53	Kingdom of Sweden	Article 23(1), first sentence
54	Syrian Arab Republic	Article 24(1), first sentence
55	Kingdom of Thailand	Article 24(1), first sentence
56	Ukraine	Article 23(1), first sentence
57	United Arab Emirates	Article 24(1), first sentence
58	United States of America	Article 27(1), first sentence
59	Union of Soviet Socialist Republics (Uzbekistan)	Article 18 (1), first sentence

Pursuant to Article 16(6)(b)(i) of the Convention, Republic of Cyprus considers that the following agreements contain 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
10	Canada	Article 26(1), second sentence
27	Italy	Article 25(1), second sentence
32	Lebanese Republic	Article 24(1), second sentence
41	State of Qatar	Article 25(1), second sentence
44	Republic of San Marino	Article 24(1), second sentence
47	Republic of Seychelles	Article 24(1), second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, Republic of Cyprus considers that the following agreements contain 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	Republic of Armenia	Article 24(1), second sentence
2	Republic of Austria	Article 25(1), second sentence
4	Kingdom of Bahrain	Article 23(1), second sentence
5	Barbados	Article 25(1), second sentence
6	Belarus	Article 25(1), second sentence
7	Kingdom of Belgium	Article 25(1), second sentence
8	Socialist Federal Republic of Yugoslavia (Bosnia and Herzegovina)	Article 24(1), second sentence
9	Republic of Bulgaria	Article 26(1), second sentence

11	People's Republic of China	Article 26(1), second sentence
12	Czech Republic	Article 23(1), second sentence
13	Kingdom of Denmark	Article 23(1), second sentence
14	Arab Republic of Egypt	Article 25(1), second sentence
15	Republic of Estonia	Article 23(1), second sentence
16	Federal Democratic Republic of Ethiopia	Article 26(1), second sentence
17	Republic of Finland	Article 23(1), second sentence
18	French Republic	Article 27(1), second sentence
19	Georgia	Article 25(1), second sentence
21	States of Guernsey	Article 24(1), second sentence
22	Hungarian People's Republic (Hungary)	Article 26(1), second sentence
23	Iceland	Article 23(1), second sentence
24	India	Article 25(1), second sentence
25	Iran	Article 24(1), second sentence
28	Jersey	Article 24(1), second sentence
29	State of Kuwait	Article 24(1), second sentence
31	Latvia	Article 25(1), second sentence
33	Republic of Lithuania	Article 25(1), second sentence
34	Malta	Article 26(1), second sentence
35	Republic of Mauritius	Article 26(1), second sentence
36	Republic of Moldova	Article 23(1), second sentence
37	Socialist Federal Republic of Yugoslavia (Montenegro)	Article 24(1), second sentence
38	Kingdom of Norway	Article 24(1), second sentence
39	Republic of Poland	Article 26(1), second sentence
40	Portuguese Republic	Article 25(1), second sentence
43	Russian Federation	Article 25(1), second sentence
45	Kingdom of Saudi Arabia	Article 24(1), second sentence
46	Socialist Federal Republic of Yugoslavia (Serbia)	Article 24(1), second sentence
48	Republic of Singapore	Article 24(1), second sentence
50	Republic of Slovenia	Article 24(1), second sentence
51	Republic of South Africa	Article 25(1), second sentence
52	Kingdom of Spain	Article 24(1), second sentence
53	Kingdom of Sweden	Article 23(1), second sentence
54	Syrian Arab Republic	Article 24(1), second sentence
55	Kingdom of Thailand	Article 24(1), second sentence
56	Ukraine	Article 23(1), second sentence
57	United Arab Emirates	Article 24(1), second sentence

Pursuant to Article 16(6)(c)(ii) of the Convention, Republic of Cyprus considers that the following agreements do not contain a provision described in Article 16(4)(b)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
3	Union of Soviet Socialist Republics (Azerbaijan)
7	Kingdom of Belgium

10	Canada
14	Arab Republic of Egypt
20	Kingdom of Greece (Hellenic Republic)
25	Iran
26	Ireland
27	Italy
30	Union of Soviet Socialist Republics (Kyrgyzstan)
41	State of Qatar
42	Socialist Republic of Romania
48	Republic of Singapore
49	Czechoslovak Socialist Republic (Slovakia)
55	Kingdom of Thailand
59	Union of Soviet Socialist Republics (Uzbekistan)

Pursuant to Article 16(6)(d)(i) of the Convention, Republic of Cyprus considers that the following agreements do not contain a provision described in Article 16(4)(c)(i).

Listed Agreement Number	Other Contracting Jurisdiction
3	Union of Soviet Socialist Republics (Azerbaijan)
18	French Republic
30	Union of Soviet Socialist Republics (Kyrgyzstan)
58	United States of America
59	Union of Soviet Socialist Republics (Uzbekistan)

Pursuant to Article 16(6)(d)(ii) of the Convention, Republic of Cyprus considers that the following agreements do not contain a provision described in Article 16(4)(c)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
7	Kingdom of Belgium
27	Italy
40	Portuguese Republic
43	Russian Federation
56	Ukraine

## Article 17 – Corresponding Adjustments

### *Notification of Existing Provisions in Listed Agreements*

Pursuant to Article 17(4) of the Convention, Republic of Cyprus considers that the following agreements contain a provision described in Article 17(2). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Republic of Armenia	Article 9(2)
2	Republic of Austria	Article 9(2)
4	Kingdom of Bahrain	Article 9(2)



5	Barbados	Article 9(2)
6	Belarus	Article 9(2)
9	Republic of Bulgaria	Article 9(2)
10	Canada	Article 9(2)
11	People's Republic of China	Article 9(2)
13	Kingdom of Denmark	Article 9(2)
15	Republic of Estonia	Article 9(2)
16	Federal Democratic Republic of Ethiopia	Article 9(2)
17	Republic of Finland	Article 9(2)
19	Georgia	Article 9(2)
21	States of Guernsey	Article 9(2)
23	Iceland	Article 9(2)
24	India	Article 9(2)
25	Iran	Article 9(2)
28	Jersey	Article 9(2)
29	State of Kuwait	Article 9(2)
31	Latvia	Article 9(2)
32	Lebanese Republic	Article 9(2)
33	Republic of Lithuania	Article 9(2)
34	Malta	Article 9(3)
35	Republic of Mauritius	Article 9(2)
36	Republic of Moldova	Article 9(2)
38	Kingdom of Norway	Article 9(2)
39	Republic of Poland	Article 9(2)
40	Portuguese Republic	Article 9(2)
41	State of Qatar	Article 9(2)
42	Socialist Republic of Romania	Article 9(2)
43	Russian Federation	Article 9(2)
44	Republic of San Marino	Article 9(2)
45	Kingdom of Saudi Arabia	Article 9(2)
47	Republic of Seychelles	Article 9(2)
48	Republic of Singapore	Article 9(2)
50	Republic of Slovenia	Article 9(2)
51	Republic of South Africa	Article 9(2)
52	Kingdom of Spain	Article 9(2)
53	Kingdom of Sweden	Article 9(2)
54	Syrian Arab Republic	Article 9(2)
55	Kingdom of Thailand	Article 9(2)
56	Ukraine	Article 9(2)
57	United Arab Emirates	Article 10(2)
58	United States of America	Article 11 (3)