

Republic of Korea

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 the Republic of Korea 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, the Republic of Korea 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	Convention between the Government of the Republic of Korea and the Government of the Republic of Azerbaijan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Azerbaijan	Original	19-05-2008	25-11-2008
2	Convention between the Republic of Korea and the People's Republic of Bangladesh for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Bangladesh	Original	10-05-1983	22-08-1984
3	Convention between the Republic of Korea and the Kingdom of Belgium for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Belgium	Original	29-08-1977	19-09-1979
			Amending Instrument (a)	20-04-1994	31-12-1996
			Amending Instrument (b)	08-03-2010	01-12-2015
4	Convention between the Republic of Korea and the Republic of Bulgaria for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Bulgaria	Original	11-03-1994	22-06-1995
5	Convention between the Government of the Republic of Korea and the Government of Canada for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Canada	Original	05-09-2006	18-12-2006
6	Convention between the Republic of Korea and the Republic of Chile for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Chile	Original	18-04-2002	25-07-2003
7	Agreement between the Government of the Republic of Korea 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	China	Original	28-03-1994	28-09-1994
			Amending Instrument (a)	23-03-2006	04-07-2006

8	Convention between the Republic of Korea and the Republic of Colombia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Colombia	Original	27-07-2010	03-07-2014
9	Agreement between the Republic of Korea and the Republic of Croatia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Croatia	Original	13-11-2002	15-09-2006
10	Convention between the Government of the Republic of Korea and the Government of the Kingdom of Denmark for the Avoidance of Double Taxation with respect to Taxes on Income	Denmark	Original	11-10-1977	07-01-1979
11	Convention between the Government of the Republic of Korea and the Government of the Arab Republic of Egypt for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Egypt	Original	09-12-1992	05-02-1994
12	Convention between the Government of the Republic of Korea 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	Estonia	Original	23-09-2009	25-05-2010
13	Convention between the Republic of Korea and the Republic of Fiji for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Fiji	Original	19-09-1994	17-02-1995
14	Convention between the Republic of Korea and the Republic of Finland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Finland	Original	08-02-1979	23-12-1981
15	Convention entre le Gouvernement de la République de Corée et le Gouvernement de la République française tendant à éviter les doubles impositions et à prévenir l'évasion fiscale en matière d'impôts sur le revenu	France	Original	19-06-1979	01-02-1981
			Amending Instrument(a)	09-04-1991	01-03-1992
16	Convention between the Republic of Korea and the Republic of Gabon for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Gabon	Original	25-10-2010	02-12-2015

17	Agreement between the Government of the Republic of Korea and the Government of Georgia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Georgia	Original	31-03-2016	17-11-2016
18	Agreement between the Republic of Korea and the Federal Republic of Germany for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Germany	Original	10-03-2000	31-10-2002
19	Convention between the Republic of Korea and the Hellenic Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Greece	Original	20-03-1995	10-07-1998
20	Agreement between the Government of the Republic of Korea and the Government of the Hong Kong Special Administrative Region 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	Hong Kong	Original	08-07-2014	27-09-2016
21	Convention between the Government of the Republic of Korea and the Government of the Hungarian People's Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Hungary	Original	29-03-1989	01-04-1990
22	Convention between the Republic of Korea and the Republic of Iceland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Iceland	Original	15-05-2008	23-10-2008
23	Agreement between the Government of the Republic of Korea 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	India	Original	18-05-2015	12-09-2016
24	Agreement between the Republic of Korea and the Republic of Indonesia for the Avoidance of Double Taxation and the prevention of Fiscal Evasion with respect to Taxes on Income	Indonesia	Original	10-11-1988	03-05-1989

25	Convention between the Republic of Korea and Ireland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital Gains	Ireland	Original	18-07-1990	27-12-1991
26	Convention between the Government of the Republic of Korea and the Government of the State of Israel for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Israel	Original	18-03-1997	13-12-1997
27	Convention between the Government of the Republic of Korea and the Government of the Republic of Italy for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Italy	Original	10-01-1989	14-07-1992
			Amending Instrument(a)	03-04-2012	23-01-2015
28	Convention between the Republic of Korea and Japan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Japan	Original	08-10-1998	22-11-1999
29	Convention between the Republic of Korea and the Hashemite Kingdom of Jordan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Jordan	Original	24-07-2004	28-03-2005
30	Convention between the Government of the Republic of Korea and the Government of the Republic of Kazakhstan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Kazakhstan	Original	18-10-1997	09-04-1999
31	Convention between the Republic of Korea and the State of Kuwait for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital	Kuwait	Original	05-12-1998	13-06-2000
			Amending Instrument (a)	02-10-2007	27-12-2010
32	Convention between the Government of the Republic of Korea 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	Latvia	Original	15-06-2008	26-12-2009

33	Convention between the Government of the Republic of Korea 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	Lithuania	Original	20-04-2006	14-07-2007
34	Convention between the Government of the Republic of Korea and the Government of the Grand Duchy of Luxembourg for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Luxembourg	Original	07-11-1984	26-12-1986
			Amending Instrument(a)	29-05-2012	04-09-2013
35	Convention between the Republic of Korea and the Republic of Malta for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Malta	Original	25-03-1997	21-03-1998
36	Convention between the Republic of Korea and the United Mexican States for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Mexico	Original	06-10-1994	11-02-1995
37	Convention between the Republic of Korea and Mongolia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Mongolia	Original	17-04-1992	06-06-1993
38	Convention between the Republic of Korea and the Kingdom of Morocco for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Morocco	Original	27-01-1999	16-06-2000
39	Convention between the Republic of Korea and the Kingdom of the Netherlands for the Avoidance of Double Taxation and Prevention of Fiscal Evasion with respect to Taxes on Income	Netherlands	Original	25-10-1978	17-04-1981
			Amending Instrument(a)	06-11-1998	02-04-1999
40	Convention between the Government of the Republic of Korea and the Government of New Zealand for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	New Zealand	Original	06-10-1981	22-04-1983
			Amending Instrument(a)	14-07-1997	10-10-1997
41	Convention between the Republic of Korea and the Kingdom of Norway for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Norway	Original	05-10-1982	01-03-1984

42	Convention between the Republic of Korea 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	13-04-1987	20-10-1987
43	Agreement between the Government of the Republic of Korea and the Government of the Independent State of Papua New Guinea for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Papua New Guinea	Original	23-11-1996	21-04-1998
44	Convention between the Republic of Korea and the Republic of the Philippines for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Philippines	Original	21-02-1984	09-11-1986
45	Convention between the Government of the Republic of Korea and the Government of the Republic of Poland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Poland	Original	21-06-1991	21-02-1992
			Amending Instrument(a)	22-10-2013	15-10-2016
46	Convention between the Republic of Korea and the Portuguese Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Portugal	Original	26-01-1996	21-12-1997
47	Convention between the Government of the Republic of Korea and the Government of the State of Qatar for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Qatar	Original	27-03-2007	15-04-2009
48	Convention between the Government of the Republic of Korea and the Government of Romania for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital	Romania	Original	11-10-1993	06-10-1994
49	Convention between the Government of the Republic of Korea and the Government of the Russian Federation for the Avoidance of Double Taxation with respect to Taxes on Income	Russia	Original	19-11-1992	24-08-1995

50	Convention between the Government of the Republic of Korea and the Government of the Kingdom of Saudi Arabia for the Avoidance of Double Taxation and the Prevention of Tax Evasion with respect to Taxes on Income	Saudi Arabia	Original	24-03-2007	01-12-2008
51	Convention between the Republic of Korea and the Republic of Serbia for the Avoidance of Double Taxation with respect to Taxes on Income	Serbia	Original	22-01-2016	17-11-2016
52	Convention between the Republic of Korea and the Slovak Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Slovakia	Original	27-08-2001	08-07-2003
53	Convention between the Republic of Korea and the Republic of Slovenia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Slovenia	Original	25-04-2005	02-03-2006
54	Convention between the Republic of Korea and the Republic of South Africa for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	South Africa	Original	07-07-1995	07-01-1996
55	Convention between the Republic of Korea and the Kingdom of Spain for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Spain	Original	17-01-1994	21-11-1994
56	Convention between the Government of the Republic of Korea and the Government of the Democratic Socialist Republic of Sri Lanka for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Sri Lanka	Original	28-05-1984	20-06-1986
57	Convention between the Republic of Korea and the Kingdom of Sweden for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Sweden	Original	27-05-1981	09-09-1982
58	Convention between the Republic of Korea and Switzerland for the Avoidance of Double Taxation with respect to Taxes on Income	Switzerland	Original	12-02-1980	22-04-1981
			Amending Instrument(a)	28-12-2010	25-07-2012

59	Convention between the Government of the Republic of Korea 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	Thailand	Original	16-11-2006	29-06-2007
60	Convention between the Government of the Republic of Korea and the Government of the Republic of Tunisia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Tunisia	Original	27-09-1988	25-11-1989
61	Convention between the Government of the Republic of Korea and the Cabinet of Ministers of Ukraine for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital	Ukraine	Original	29-09-1999	19-03-2002
62	Convention between the Government of the Republic of Korea and the Government of the United Kingdom of Great Britain and Northern Ireland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital Gains	United Kingdom	Original	25-10-1996	30-12-1996
63	Convention between the Republic of Korea and the Oriental Republic of Uruguay for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital	Uruguay	Original	29-11-2011	22-01-2013

Article 3 – Transparent Entities

Reservation

Pursuant to Article 3(5)(a) of the Convention, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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	Azerbaijan	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,
2	Bangladesh	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
3	Belgium	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
4	Bulgaria	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <and to further develop and facilitate their economic relationship,>
5	Canada	DESIRING to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
6	Chile	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;

7	China	desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
8	Colombia	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
9	Croatia	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	Denmark	desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income,
11	Egypt	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
12	Estonia	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
13	Fiji	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income <and for the encouragement of mutual trade and investment,>
14	Finland	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
15	France	désireux de conclure une Convention tendant à éviter les doubles impositions et à prévenir l'évasion fiscale en matière d'impôts sur le revenu,
16	Gabon	<Desiring to promote and strengthen the economic relations between the two countries and> to enter into a convention for the avoidance of double taxation and the prevention of fiscal evasion and fraud with respect to taxes on income,
17	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,
18	Germany	<Desiring to promote their mutual economic relations> by avoiding double taxation and preventing fiscal evasion,
19	Greece	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
20	Hong Kong	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
21	Hungary	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <and to further develop and facilitate their economic relationship,>
22	Iceland	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,
23	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>
24	Indonesia	Desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
25	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,
26	Israel	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	Italy	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
28	Japan	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
29	Jordan	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income,
30	Kazakhstan	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,
31	Kuwait	<DESIRING to promote their mutual economic relations> by removing fiscal obstacles through the conclusion of Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and capital,
32	Latvia	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income
33	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	Luxembourg	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,
35	Malta	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
36	Mexico	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <which shall hereafter be referred to as the

		“Convention”,>
37	Mongolia	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
38	Morocco	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
39	Netherlands	Desiring to conclude a convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
40	New Zealand	Desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
41	Norway	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
42	Pakistan	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
43	Papua New Guinea	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
44	Philippines	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
45	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 to further develop and facilitate their economic relationship,>
46	Portugal	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
47	Qatar	Desiring to conclude a convention for the avoidance of double taxation with respect to taxes on income;
48	Romania	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 <and to further develop and facilitate their economic relationship,>
49	Russia	<Desiring to promote and strengthen the development of economic, scientific, technical and cultural cooperation between both States and> for purposes of the avoidance of double taxation with respect to taxes on income,
50	Saudi Arabia	Desiring to conclude a convention for the avoidance of double taxation and the prevention of tax evasion with respect to taxes on

		income,
51	Serbia	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income, <with the view to establishing stable conditions for comprehensive development of economic and other cooperation and investment between the two countries,>
52	Slovakia	Desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income,
53	Slovenia	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
55	Spain	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
56	Sri Lanka	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
57	Sweden	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
58	Switzerland	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income,
59	Thailand	DESIRING to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
60	Tunisia	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
61	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 capital <and confirming their endeavour to the development and deepening of mutual economic relations,>
62	United Kingdom	DESIRING to conclude a new Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and capital gains;
63	Uruguay	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,

Article 7 – Prevention of Treaty Abuse

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 7(17)(a) of the Convention, the Republic of Korea 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
1	Azerbaijan	Articles 10(6), 11(8), 12(7), 13(6) and 21(4)
6	Chile	Articles 11(7) and 12(7)
8	Colombia	Article 26(1)(a) and (b)
17	Georgia	Articles 10(6), 11(9), 12(7), 13(6) and 21(5)
18	Germany	Article 27(2)
20	Hong Kong	Article 26(1)
23	India	Article 28(2)
31	Kuwait	Article 28A
36	Mexico	Articles 11(9) and 12(7)
43	Papua New Guinea	Article 11(9)
45	Poland	Article 22A(1)
47	Qatar	Protocol (4)
50	Saudi Arabia	Article 27
51	Serbia	Article 28(1)
61	Ukraine	Articles 11(9) and 12(6)
62	United Kingdom	Articles 10(6), 10(7), 11(10), 11(11), 12(7), 12(8), 22(4) and 22(5)
63	Uruguay	Article 28

Article 8 – Dividend Transfer Transactions

Reservation

Pursuant to Article 8(3)(a) of the Convention, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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, the Republic of Korea 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	Azerbaijan	Article 25(1), first sentence
2	Bangladesh	Article 25(1), first sentence
3	Belgium	Article 24(1), first sentence
4	Bulgaria	Article 25(1), first sentence
5	Canada	Article 24(1), first sentence

6	Chile	Article 25(1), first sentence
7	China	Article 25(1), first sentence
8	Colombia	Article 24(1), first sentence
9	Croatia	Article 26(1), first sentence
10	Denmark	Article 23(1)
11	Egypt	Article 25(1), first sentence
12	Estonia	Article 25(1), first sentence
13	Fiji	Article 25(1), first sentence
14	Finland	Article 24(1), first sentence
15	France	Article 25(1), first sentence
16	Gabon	Article 24(1), first sentence
17	Georgia	Article 24(1), first sentence
18	Germany	Article 25(1), first sentence
19	Greece	Article 25(1), first sentence
20	Hong Kong	Article 23(1), first sentence
21	Hungary	Article 25(1), first sentence
22	Iceland	Article 26(1), first sentence
23	India	Article 25(1), first sentence
24	Indonesia	Article 25(1), first sentence
25	Ireland	Article 25(1), first sentence
26	Israel	Article 26(1), first sentence
27	Italy	Article 25(1), first sentence
28	Japan	Article 25(1), first sentence
29	Jordan	Article 25(1), first sentence
30	Kazakhstan	Article 25(1), first sentence
31	Kuwait	Article 26(1), first sentence
32	Latvia	Article 25(1), first sentence
33	Lithuania	Article 25(1), first sentence
34	Luxembourg	Article 25(1), first sentence
35	Malta	Article 25(1), first sentence
36	Mexico	Article 25(1)
37	Mongolia	Article 25(1), first sentence
38	Morocco	Article 25(1), first sentence
39	Netherlands	Article 25(1)
40	New Zealand	Article 24(1), first sentence
41	Norway	Article 24(1), first sentence
42	Pakistan	Article 25(1), first sentence
43	Papua New Guinea	Article 25(1), first sentence
44	Philippines	Article 25(1), first sentence
45	Poland	Article 25(1), first sentence
46	Portugal	Article 25(1), first sentence
47	Qatar	Article 24(1), first sentence
48	Romania	Article 27(1), first sentence
49	Russia	Article 24(1), first sentence
50	Saudi Arabia	Article 24(1), first sentence
51	Serbia	Article 25(1), first sentence
52	Slovakia	Article 25(1), first sentence
53	Slovenia	Article 25(1), first sentence
54	South Africa	Article 25(1), first sentence
55	Spain	Article 25(1), first sentence
56	Sri Lanka	Article 25(1), first sentence
57	Sweden	Article 24(1), first sentence

58	Switzerland	Article 24(1), first sentence
59	Thailand	Article 25(1), first sentence
60	Tunisia	Article 24(1), first sentence
61	Ukraine	Article 25(1), first sentence
62	United Kingdom	Article 26(1)
63	Uruguay	Article 25(1), first sentence

Pursuant to Article 16(6)(b)(i) of the Convention, the Republic of Korea 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
27	Italy	Article 25(1), second sentence
44	Philippines	Article 25(1), second sentence
46	Portugal	Article 25(1), second sentence
47	Qatar	Article 24(1) , second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, the Republic of Korea 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	Azerbaijan	Article 25(1), second sentence
2	Bangladesh	Article 25(1), second sentence
3	Belgium	Article 24(1), second sentence
4	Bulgaria	Article 25(1), second sentence
5	Canada	Article 24(1), second sentence
6	Chile	Article 25(1), second sentence
7	China	Article 25(1), second sentence
8	Colombia	Article 24(1), second sentence
9	Croatia	Article 26(1), second sentence
11	Egypt	Article 25(1), second sentence
12	Estonia	Article 25(1), second sentence
13	Fiji	Article 25(1), second sentence
14	Finland	Article 24(1), second sentence
15	France	Article 25(1), second sentence
16	Gabon	Article 24(1), second sentence
17	Georgia	Article 24(1), second sentence
18	Germany	Article 25(1), second sentence
19	Greece	Article 25(1), second sentence
20	Hong Kong	Article 23(1), second sentence
21	Hungary	Article 25(1), second sentence
22	Iceland	Article 26(1), second sentence
23	India	Article 25(1), second sentence
24	Indonesia	Article 25(1), second sentence

25	Ireland	Article 25(1), second sentence
26	Israel	Article 26(1), second sentence
28	Japan	Article 25(1), second sentence
29	Jordan	Article 25(1), second sentence
30	Kazakhstan	Article 25(1), second sentence
31	Kuwait	Article 26(1), second sentence
32	Latvia	Article 25(1), second sentence
33	Lithuania	Article 25(1), second sentence
34	Luxembourg	Article 25(1), second sentence
35	Malta	Article 25(1), second sentence
37	Mongolia	Article 25(1), second sentence
38	Morocco	Article 25(1), second sentence
40	New Zealand	Article 24(1), second sentence
41	Norway	Article 24(1), second sentence
42	Pakistan	Article 25(1), second sentence
43	Papua New Guinea	Article 25(1), second sentence
45	Poland	Article 25(1), second sentence
48	Romania	Article 27(1), second sentence
49	Russia	Article 24(1), second sentence
50	Saudi Arabia	Article 24(1), second sentence
51	Serbia	Article 25(1), second sentence
52	Slovakia	Article 25(1), second sentence
53	Slovenia	Article 25(1), second sentence
54	South Africa	Article 25(1), second sentence
55	Spain	Article 25(1), second sentence
56	Sri Lanka	Article 25(1), second sentence
57	Sweden	Article 24(1), second sentence
58	Switzerland	Article 24(1), second sentence
59	Thailand	Article 25(1), second sentence
60	Tunisia	Article 24(1), second sentence
61	Ukraine	Article 25(1), second sentence
63	Uruguay	Article 25(1), second sentence

Notification of Listed Agreements Not Containing Existing Provisions

Pursuant to Article 16(6)(c)(i) of the Convention, the Republic of Korea considers that the following agreement does not contain a provision described in Article 16(4)(b)(i).

Listed Agreement Number	Other Contracting Jurisdiction
36	Mexico

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

Listed Agreement Number	Other Contracting Jurisdiction
3	Belgium
6	Chile
10	Denmark
15	France
27	Italy
30	Kazakhstan

36	Mexico
39	Netherlands
43	Papua New Guinea
44	Philippines
46	Portugal
48	Romania
52	Slovakia
55	Spain
58	Switzerland
62	United Kingdom

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

Listed Agreement Number	Other Contracting Jurisdiction
3	Belgium
15	France

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

Listed Agreement Number	Other Contracting Jurisdiction
3	Belgium
6	Chile
8	Colombia
25	Ireland
27	Italy
61	Ukraine
62	United Kingdom

Article 17 – Corresponding Adjustments

Reservation

Pursuant to Article 17(3)(a) of the Convention, the Republic of Korea 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 agreements contain provisions that are within the scope of this reservation.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Azerbaijan	Article 9(2)
4	Bulgaria	Article 9(2)
5	Canada	Article 9(2)
6	Chile	Article 9(2)
8	Colombia	Article 9(2)
9	Croatia	Article 9(2)
12	Estonia	Article 9(2)
16	Gabon	Article 9(2)
17	Georgia	Article 9(2)
18	Germany	Article 9(2)
19	Greece	Article 9(2)

20	Hong Kong	Article 9(2)
22	Iceland	Article 9(2)
23	India	Article 9(2)
24	Indonesia	Article 9(2)
26	Israel	Article 9(2)
28	Japan	Article 9(2)
29	Jordan	Article 9(2)
30	Kazakhstan	Article 9(2)
31	Kuwait	Article 9(2)
32	Latvia	Article 9(2)
33	Lithuania	Article 9(2)
34	Luxembourg	Article 9(2)
35	Malta	Article 9(2)
37	Mongolia	Article 9(2)
38	Morocco	Article 9(2)
43	Papua New Guinea	Article 9(2)
45	Poland	Article 9(2)
47	Qatar	Article 9(2)
48	Romania	Article 9(2)
50	Saudi Arabia	Article 9(2)
51	Serbia	Article 9(2)
53	Slovenia	Article 9(2)
54	South Africa	Article 9(2)
58	Switzerland	Article 9(2)
59	Thailand	Article 9(2)
61	Ukraine	Article 9(2)
62	United Kingdom	Article 9(2)
63	Uruguay	Article 9(2)