

URUGUAY

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 Uruguay 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, Uruguay 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 Kingdom of Belgium and the Oriental Republic of Uruguay for the avoidance of double taxation with respect to taxes on income and on capital and for the prevention of fiscal evasion.	Belgium	Original	23-08-2013	N/A
2	<p>Convenio entre el Gobierno de la República de Chile y el Gobierno de la República Oriental del Uruguay para eliminar la doble imposición con relación a los impuestos sobre la renta y el patrimonio y para prevenir la evasión y elusión fiscal.</p> <p><i>(Convention between the Government of the Republic of Chile and the Government of the Oriental Republic of Uruguay for the elimination of double taxation with respect to taxes on income and on capital and for the prevention of fiscal evasion and avoidance.)</i></p>	Chile	Original	01-04-2016	N/A
3	Convenio entre la República Oriental del Uruguay y la República de Ecuador para evitar la doble imposición en materia de impuestos	Ecuador	Original	26-05-2011	15-11-2012

	sobre la renta y sobre el patrimonio y prevenir la evasión fiscal. <i>(Convention between the Oriental Republic of Uruguay and the Republic of Ecuador for the avoidance of double taxation with respect to taxes on income and on capital and for the prevention of fiscal evasion.)</i>				
4	Agreement between the Republic of Finland 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 on capital.	Finland	Original	13-12-2011	06-02-2013
5	Acuerdo entre la República Oriental del Uruguay y la República Federal de Alemania para evitar la doble imposición y la reducción fiscal en materia de impuestos sobre la renta y sobre el patrimonio. <i>(Agreement between the Oriental Republic of Uruguay and the Federal Republic of Germany for the avoidance of double taxation and fiscal reduction with respect to taxes on income and on capital)</i>	Germany	Original	09-03-2010	28-12-2011
6	Convention between the Government of the Oriental Republic Of Uruguay and the Government of the Hungarian People's Republic for the avoidance of double taxation with respect to taxes on income and on capital.	Hungary	Original	25-10-1988	13-08-1993
7	Agreement between the Government of the Republic of India and the Government of the Oriental Republic of Uruguay for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital.	India	Original	08-09-2011	21-06-2013
8	Convention between the Republic of Korea and the Oriental Republic of Uruguay for the avoidance of double taxation and the prevention of fiscal	Korea	Original	29-11-2011	22-01-2013

	evasion with respect to taxes on income and on capital.				
9	Convention between the Principality of Liechtenstein and the Oriental Republic of Uruguay for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital.	Liechtenstein	Original	18-10-2010	03-09-2012
10	Convention between the Gran Duchy of Luxembourg 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 on capital.	Luxembourg	Original	10-03-2015	11-01-2017
11	Convention between Malta 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 on capital.	Malta	Original	11-03-2011	13-12-2012
12	Convenio entre la República Oriental del Uruguay y los Estados Unidos Mexicanos para evitar la doble imposición y prevenir la evasión fiscal en materia de impuestos sobre la renta y sobre el patrimonio. <i>(Convention between the Oriental Republic of Uruguay and the United Mexican States for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital)</i>	Mexico	Original	14-08-2009	29-12-2010
13	Convention between the Oriental Republic of Uruguay and the Portuguese Republic for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital.	Portugal	Original	30-11-2009	13-09-2012
14	Convention between the Oriental Republic of Uruguay and Romania for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital.	Romania	Original	14-09-2012	22-10-2014
15	Agreement between the Republic of	Singapore	Original	15-01-2015	14-03-2017

	Singapore 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 on capital.				
16	<p>Convenio entre la República Oriental del Uruguay y el Reino de España para evitar la doble imposición y prevenir la evasión fiscal en materia de impuestos sobre la renta y sobre el patrimonio.</p> <p><i>(Convention between the Oriental Republic of Uruguay 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.)</i></p>	Spain	Original	09-10-2009	24-04-2011
17	Convention between the Swiss Confederation and the Oriental Republic of Uruguay for the avoidance of double taxation with respect to taxes on income and on capital.	Switzerland	Original	18-10-2010	28-12-2011
18	Convention between the Government of the United Arab Emirates 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 on capital.	United Arab Emirates	Original	10-10-2014	13-06-2016
19	Convention between the United Kingdom of Great Britain and Northern Ireland 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 on capital.	United Kingdom	Original	24-02-2016	14-11-2016
20	Agreement between the Government of the Socialist Republic of Viet Nam and the Government of the Oriental Republic of Uruguay for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital.	Viet Nam	Original	09-12-2013	26-07-2016

Article 3 - Transparent Entities

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 3(6) of the Convention, Uruguay considers that the following agreements contains a provision described in Article 3(4) that is not subject to a reservation under Article 3(5)(b) through (e). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
2	Chile	Article 1(2)
5	Germany	Article 4(4)
9	Liechtenstein	Protocol Ad. 1(c)
10	Luxembourg	Protocol Ad. 1(b)
11	Malta	Protocol Ad. 1(a) & 1(c)
12	Mexico	Article 4(4)
19	United Kingdom	Article 4(3)

Article 4 – Dual Resident Entities

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 4(4) of the Convention, Uruguay considers that the following agreements contains a provision described in Article 4(2) that is not subject to a reservation under Article 4(3)(b) through (d). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Belgium	Article 4(3)
2	Chile	Article 4(3)
3	Ecuador	Article 4(3)
4	Finland	Article 4(3)
5	Germany	Article 4(3)
6	Hungary	Article 4(3)
7	India	Article 4(3)
8	Korea	Article 4(3)
9	Liechtenstein	Article 4(3)
10	Luxembourg	Article 4(3)
11	Malta	Article 4(3)
12	Mexico	Article 4(3)
13	Portugal	Article 4(3)
14	Romania	Article 4(3)
15	Singapore	Article 4(3)
16	Spain	Article 4(3)
17	Switzerland	Article 4(3)
18	United Arab Emirates	Article 4(3)
19	United Kingdom	Article 4(4)
20	Viet Nam	Article 4(3)

Article 5 – Application of Methods for Elimination of Double Taxation

Notification of Choice of Optional Provisions

Pursuant to Article 5(10) of the Convention, Uruguay hereby chooses under Article 5(1) to apply Option C of that Article.

Notification of Existing Provisions in Listed Agreements

For jurisdictions choosing Option C:

Pursuant to Article 5(10) of the Convention, Uruguay considers that the following agreements include a provision described in Article 5(7). The Article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
5	Germany	Article 22(2)(a)
6	Hungary	Article 24(1)

Article 6 – Purpose of a Covered Tax Agreement

Notification of Choice of Optional Provisions

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

Notification of Existing Preamble Language in Listed Agreements

Pursuant to Article 6(5) of the Convention, Uruguay 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 preamble paragraph is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Preamble Text
1	Belgium	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital and for the prevention of fiscal evasion,
2	Chile	Deseando promover el desarrollo de su relación económica y fortalecer su cooperación en materias tributarias, Con la intención de concluir un Convenio para la eliminación de la doble imposición con relación a los impuestos sobre la renta y sobre el patrimonio sin crear oportunidades para situaciones de nula o reducida tributación a través de evasión o elusión fiscal (incluyendo aquellos acuerdos para el uso abusivo de tratados <i>–treaty-shopping–</i> dirigidos a que residentes de terceros Estados obtengan indirectamente beneficios de este Convenio), <i>(Desiring to further develop their economic relationship and to enhance their cooperation in tax matters, intending to conclude a Convention for the elimination of double taxation with respect to taxes on income and on capital without creating opportunities for non-taxation or reduced taxation through tax evasion or avoidance (including through treaty-shopping arrangements aimed at obtaining reliefs provided in this Convention for the indirect benefit of residents of third States),</i>
3	Ecuador	Deseando concluir un Convenio para evitar la doble imposición en materia de impuestos sobre la renta y sobre el patrimonio y prevenir la evasión fiscal
4	Finland	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,
6	Hungary	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
7	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 on capital and with a view to promoting economic cooperation between the two countries
8	Korea	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
9	Liechtenstein	<p>whereas the Contracting States recognise that the well-developed economic ties between the Contracting States call for further cooperation;</p> <p>whereas the Contracting States wish to develop their relationship further by cooperating to their mutual benefits in the field of taxation; and</p> <p>whereas the Contracting States wish to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital</p>
10	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,
11	Malta	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,
12	Mexico	<p>Deseando concluir un Convenio para evitar la doble imposición y prevenir la evasión fiscal en materia de impuestos sobre la renta y sobre el patrimonio,</p> <p><i>(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,)</i></p>
13	Portugal	<i>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,</i>

14	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,
15	Singapore	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,
16	Spain	deseando concluir un Convenio para evitar la doble imposición y prevenir la evasión fiscal en materia de impuestos sobre la renta y sobre el patrimonio, <i>(desiring to conclude a Convention for the avoidance of double taxation and for the prevention of fiscal evasion with respect to taxes on income and on capital,)</i>
17	Switzerland	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
18	United Arab Emirates	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 and on capital,
19	United Kingdom	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
20	Viet Nam	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,

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

Listed Agreement Number	Other Contracting Jurisdiction
1	Belgium
3	Ecuador
4	Finland
6	Hungary
7	India

8	Korea
10	Luxembourg
11	Malta
12	Mexico
13	Portugal
14	Romania
15	Singapore
16	Spain
17	Switzerland
18	United Arab Emirates
19	United Kingdom
20	Viet Nam

Article 7 – Prevention of Treaty Abuse

Notification of Choice of Optional Provisions

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

Pursuant to Article 7(17)(c) of the Convention, Uruguay hereby chooses to apply the Simplified Limitation on Benefits Provision pursuant to Article 7(6).

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 7(17)(a) of the Convention, Uruguay considers that the following agreements are not subject to a reservation under 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
2	Chile	Article 28(6)
3	Ecuador	Articles 11(7) & 12(7)
4	Finland	Protocol Ad.(3)(a)(b)(c)
7	India	Article 29(7)
8	Korea	Article 28
16	Spain	Protocol Ad. IV(2)(d)
19	United Kingdom	Article 23

Pursuant to Article 7(17)(c) of the Convention, Uruguay considers that the following agreements include a provision described in Article 7(14). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
2	Chile	Article 28(1) through (5)
3	Ecuador	Article 25
7	India	Article 29(2) through (6)

Article 8 – Dividend Transfer Transactions

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 8(4) of the Convention, Uruguay considers that the following agreements contain a provision described in Article 8(1). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Belgium	Article 10(2)(a)
2	Chile	Article 10(2)(a)
3	Ecuador	Article 10(2)(a)
4	Finland	Article 10(2)(a)
5	Germany	Article 10(2)(a)
8	Korea	Article 10(2)(a)
9	Liechtenstein	Article 10(2)(a)
10	Luxembourg	Article 10(2)(a)
11	Malta	Article 10(2)(a)
13	Portugal	Article 10(2)(a)
14	Romania	Article 10(2)(a)
15	Singapore	Article 10(2)(a)
16	Spain	Article 10(2)
17	Switzerland	Article 10(2)(a)
19	United Kingdom	Article 10(2)(a)
20	Vietnam	Article 10(2)(a)

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, Uruguay hereby chooses to apply Article 9(4).

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 9(7) of the Convention, Uruguay considers that the following agreements contain 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	Belgium	Article 13(4)
2	Chile	Article 13(4)
4	Finland	Article 13(2)
5	Germany	Article 13(2)
7	India	Article 13(4)
8	Korea	Article 13(4)
9	Liechtenstein	Article 13(4)
10	Luxembourg	Article 13(4)
11	Malta	Article 13(4)
12	Mexico	Article 13(4)
13	Portugal	Article 13(4)
14	Romania	Article 13(4)
15	Singapore	Article 13(4)
16	Spain	Article 13(4)
17	Switzerland	Article 13(4)
18	United Arab Emirates	Article 13(4)
19	United Kingdom	Article 13(4)

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

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 10(6) of the Convention, Uruguay considers that the following agreement contains a provision described in Article 10(4). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
2	Chile	Article 28(7)

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, Uruguay 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, Uruguay considers that the following agreements include 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	Belgium	Article 5(5)
2	Chile	Article 5(5)
3	Ecuador	Article 5(5)(a)
4	Finland	Article 5(5)
5	Germany	Article 5(5)
6	Hungary	Article 5(5)
7	India	Article 5(5)(a)
8	Korea	Article 5(5)
9	Luxembourg	Article 5(5)
11	Malta	Article 5(5)
12	Mexico	Article 5(5)
13	Portugal	Article 5(5)
14	Romania	Article 5(5)
15	Singapore	Article 5(5)
16	Spain	Article 5(5)
17	Switzerland	Article 5(5)
18	United Arab Emirates	Article 5(5)(a)
19	United Kingdom	Article 5(5)
20	Viet Nam	Article 5(5)(a)

Pursuant to Article 12(6) of the Convention, Uruguay considers that the following agreements include 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	Belgium	Article 5(6)
2	Chile	Article 5(7)(a)
3	Ecuador	Article 5(6)
4	Finland	Article 5(6)
5	Germany	Article 5(6)
6	Hungary	Article 5(6)
7	India	Article 5(7)
8	Korea	Article 5(6)
9	Liechtenstein	Article 5(5)
10	Luxembourg	Article 5(6)

11	Malta	Article 5(6)
12	Mexico	Article 5(7)
13	Portugal	Article 5(6)
14	Romania	Article 5(6)
15	Singapore	Article 5(7)
16	Spain	Article 5(6)
17	Switzerland	Article 5(6)
18	United Arab Emirates	Article 5(7)
19	United Kingdom	Article 5(6)
20	Viet Nam	Article 5(7)

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

Notification of Choice of Optional Provisions

Pursuant to Article 13(7) of the Convention, Uruguay hereby chooses to apply Option A under Article 13(1).

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 13(7) of the Convention, Uruguay considers that the following agreements include a provision described in Article 13(5)(a) and are not subject to a reservation under Article 13(6)(b). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Belgium	Article 5(4)
2	Chile	Article 5(4)
3	Ecuador	Article 5(4)
4	Finland	Article 5(4)
5	Germany	Article 5(4)
6	Hungary	Article 5(4)
7	India	Article 5(4)
8	Korea	Article 5(4)
9	Liechtenstein	Article 5(4)
10	Luxembourg	Article 5(4)
11	Malta	Article 5(4)
12	Mexico	Article 5(4)
13	Portugal	Article 5(4)
14	Romania	Article 5(4)
15	Singapore	Article 5(4)
16	Spain	Article 5(4)
17	Switzerland	Article 5(4)
18	United Arab Emirates	Article 5(4)
19	United Kingdom	Article 5(4)
20	Viet Nam	Article 5(4)

Article 14 – Splitting-up of Contracts

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 14(4) of the Convention, Uruguay considers that the following agreement contains a provision described in Article 14(2) that is not subject to a reservation under Article 14(3)(b). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
2	Chile	2 nd paragraph of Article 5(3)

Article 16 – Mutual Agreement Procedure

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 16(6)(a) of the Convention, Uruguay 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	Belgium	Article 24(1)1st
2	Chile	Article 25(1)1st
3	Ecuador	Article 26(1)1st
4	Finland	Article 24(1)1st
5	Germany	Article 24(1)1st
6	Hungary	Article 26(1)1st
7	India	Article 26(1)1st
8	Korea	Article 25(1)1st
9	Liechtenstein	Article 25(1)1st
10	Luxembourg	Article 24(1)1st
11	Malta	Article 24(1)1st
12	Mexico	Article 25(1)1st
13	Portugal	Article 26(1)1st
14	Romania	Article 24(1)1st
15	Singapore	Article 25(1)1st
16	Spain	Article 24(1)1st
17	Switzerland	Article 25(1)1st
18	United Arab Emirates	Article 24(1)1st
19	United Kingdom	Article 25(1)1st
20	Viet Nam	Article 26(1)1st

Pursuant to Article 16(6)(b)(ii) of the Convention, Uruguay considers that the following agreements include 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	Belgium	Article 24(1)2nd
2	Chile	Article 25(1)2nd
3	Ecuador	Article 26(1)2nd
4	Finland	Article 24(1)2nd
5	Germany	Article 24(1)2nd
6	Hungary	Article 26(1)2nd
7	India	Article 26(1)2nd
8	Korea	Article 25(1)2nd
9	Liechtenstein	Article 25(1)2nd

10	Luxembourg	Article 24(1)2nd
11	Malta	Article 24(1)2nd
12	Mexico	Article 25(1)2nd
13	Portugal	Article 26(1)2nd
14	Romania	Article 24(1)2nd
15	Singapore	Article 25(1)2nd
16	Spain	Article 24(1)2nd
17	Switzerland	Article 25(1)2nd
18	United Arab Emirates	Article 24(1)2nd
19	United Kingdom	Article 25(1)2nd
20	Viet Nam	Article 26(1)2nd

Pursuant to Article 16(6)(c)(i) of the Convention, Uruguay considers that the following agreement does not include the provisions described in Article 16(4)(b)(i).

Listed Agreement Number	Other Contracting Jurisdiction
12	Mexico

Pursuant to Article 16(6)(c)(ii) of the Convention, Uruguay considers that the following agreements do not include the provisions described in Article 16(4)(b)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
2	Chile
12	Mexico
17	Switzerland

Pursuant to Article 16(6)(d)(ii) of the Convention, Uruguay considers that the following agreements do not include the provisions described in Article 16(4)(c)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
1	Belgium
2	Chile
12	Mexico
13	Portugal

Article 17 – Corresponding Adjustments

Reservation

Pursuant to Article 17(3)(a) of the Convention, Uruguay 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	Belgium	Article 9(2)
2	Chile	Article 9(2)
3	Ecuador	Article 9(2)
4	Finland	Article 9(2)
5	Germany	Article 9(2)
7	India	Article 9(2)
8	Korea	Article 9(2)
9	Liechtenstein	Article 9(2)
10	Luxembourg	Article 9(2)
11	Malta	Article 9(2)
12	Mexico	Article 9(2)
13	Portugal	Article 9(2)
14	Romania	Article 9(2)
15	Singapore	Article 9(2)
16	Spain	Article 9(2)
17	Switzerland	Article 9(2)
18	United Arab Emirates	Article 9(2)
19	United Kingdom	Article 9(2)
20	Viet Nam	Article 9(2)

Article 35 – Entry into Effect

Notification of Choice of Optional Provisions

Pursuant to Article 35(3) of the Convention, solely for purposes of its own application of Article 35(1)(b) and 5(b), Uruguay hereby chooses to replace the reference to “taxable periods beginning on or after the expiration of a period” with a reference to “taxable periods beginning on or after the first day of the next calendar year beginning on or after the expiration of a period”.

Reservation

Pursuant to Article 35(6) of the Convention, Uruguay reserves the right for Article 35(4) not to apply with respect its Covered Tax Agreements.