

## The Kingdom of Bahrain

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

This document contains a provisional list of reservations and notifications to be made by **the Kingdom of Bahrain** 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 Kingdom of Bahrain** 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.	اتفاقية بين حكومة دولة البحرين وحكومة الجمهورية الجزائرية الديمقراطية الشعبية بشأن تجنب الازدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل	Algeria	Original	11-06-2000	29-09-2003
2.	Convention between the Government of the Kingdom of Bahrain and the Government of Republic of Austria with respect to taxes on income and on capital	Austria	Original	02-07-2009	01-02-2011
3.	Agreement between the Government of the Kingdom of Bahrain and the Government of 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	22-12-2015	30-04-2018
4.	Convention between the Government of the Kingdom of Bahrain and the Government of Barbados for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Barbados	Original	03-12-2012	16-07-2013
5.	Convention between the Government of the Republic of Belarus and the Government of the Kingdom of Bahrain for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Property	Belarus	Original	27-10-2002	16-04-2008
6.	Convention between the Kingdom of	Belgium	Original	04-11-2007	11-12-2014

	Belgium and the Kingdom of Bahrain for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital		Amending Instrument	23-11-2009	11-12-2014
7.	Agreement between the Governments of the Kingdom of Bahrain and the government of Bermuda for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Bermuda	Original	22-04-2010	29-01-2012
8.	Agreement between The Government of the Kingdom of Bahrain and the Government of His Majesty the Sultan and Yang Di-Pertuan of Brunei Darussalam for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income and on Capital	Brunei	Original	14-01-2008	18-07-2009
			Amending Instrument	18-12-2012	31-12-2014
9.	Convention between The Government of the Kingdom of Bahrain and the Government of the Republic of Bulgaria for the Avoidance of double Taxation with respect to taxes on Income and on Capital	Bulgaria	Original	26-06-2009	09-11-2010
10.	Agreement between the Government of the People's Republic of China and the Government of the Kingdom of Bahrain for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	China	Original	16-05-2002	15-08-2002
			Amending Instrument	16-09-2013	01-04-2016
11.	Agreement between the Government of the Kingdom of Bahrain and the Government of the Republic of Cyprus for the avoidance of double taxation with respect to taxes on income	Cyprus	Original	09-03-2015	26-04-2016
12.	Agreement between the Government of the Kingdom of Bahrain and the Government of the Czech Republic for the avoidance of double taxation and the Prevention of Fiscal Evasion with respect to taxes on income	Czech Republic	Original	24-05-2011	10-04-2012
13.	اتفاق بين حكومة مملكة البحرين وحكومة جمهورية مصر العربية بشأن تجنب الازدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل	Egypt	Original	26-04-2016	01-08-2018

14.	Agreement between the Government of the Kingdom of Bahrain 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	12-10-2012	23-12-2013
15.	CONVENTION ENTRE LE GOUVERNEMENT DE LA RÉPUBLIQUE FRANÇAISE ET LE GOUVERNEMENT DU ROYAUME DE BAHREÏN EN VUE D'ÉVITER LES DOUBLES IMPOSITIONS	France	Original	10-05-1993	10-08-1994
			Amending Instrument	07-05-2009	01-02-2011
16.	Agreement between the Government of the Kingdom of Bahrain and the Government of Georgia for the avoidance of double taxation and the Prevention of Fiscal Evasion with respect to taxes on income and capital	Georgia	Original	18-07-2011	01-08-2012
17.	Convention between the Government of the Kingdom of Bahrain and the Government of Hungary for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Hungary	Original	24-02-2014	19-06-2015
18.	Agreement between the Government of the Kingdom of Bahrain and the Government of the Islamic Republic of Iran for the avoidance of double taxation with respect to taxes on income and on capital	Iran	Original	19-10-2002	17-11-2007
19.	Convention between the Government of the Kingdom of Bahrain 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	29-10-2009	09-11-2010
20.	Agreement between the Government of the Kingdom of Bahrain and the Government of the Isle of Man for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Isle of Man	Original	03-02-2011	08-03-2012
21.	اتفاقية بين حكومة دولة البحرين وحكومة المملكة الأردنية الهاشمية بشأن تجنب الازدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل ورأس المال	Jordan	Original	08-02-2000	16-12-2001

22.	Convention between the Government of the Kingdom of Bahrain and the Government of the Republic of Korea for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Korea	Original	01-05-2012	26-04-2013
23	اتفاقية بين حكومة مملكة البحرين وحكومة الجمهورية اللبنانية بشأن تجنب الازدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل	Lebanon	Original	07-08-2003	30-09-2005
24.	Convention between the Kingdom of Bahrain and 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	06-05-2009	10-11-2010
25.	Agreement between the Government of the Kingdom of Bahrain and the Government of Malaysia for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Malaysia	Original	14-06-1999	31-07-2000
			Amending Instrument	14-10-2010	20-02-2012
26.	Convention between the Government of the Kingdom of Bahrain and the Government of Malta for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Malta	Original	12-04-2010	28-02-2012
27.	Convention between the Government of the Kingdom of Bahrain 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	10-10-2010	22-02-2012
28.	اتفاقية بين دولة البحرين والمملكة المغربية بشأن تجنب الازدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل	Morocco	Original	07-04-2000	10-02-2001
			Amending Instrument	25-04-2016	N/A
29.	Convention between the Government of the Kingdom of Bahrain and the Government of the Kingdom of the Netherlands for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Netherlands	Original	16-04-2008	24-12-2009
30	Convention between the Government of the Kingdom of Bahrain and the Government of the	Pakistan	Original	27-06-2005	25-09-2009
			Amending Instrument	08-04-2019	N/A

	Islamic Republic of Pakistan for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income				
31	Convention between the Government of the State of Bahrain and the Government of the Republic of the Philippines for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and capital	Philippines	Original Amending Instrument	07-11-2001 13-04-2017	14-10-2003 N/A
32.	Convention between the Kingdom of Bahrain and the Portuguese Republic for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Portugal	Original	26-05-2015	01-11-2016
33.	Agreement between the Government of the Kingdom of Bahrain 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 capital	Seychelles	Original	24-04-2010	03-02-2012
34.	Agreement between the Government of the Kingdom of Bahrain 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	Singapore	Original Amending Instrument	18-02-2004 14-10-2009	31-12-2004 29-09-2012
35.	Agreement between the Government of the Kingdom of Bahrain 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	24-06-2011	11-07-2014
36.	اتفاقية بين حكومة مملكة البحرين وحكومة جمهورية السودان بشأن تجنب الازدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل	Sudan	Original	22-03-2006	N/A
37.	اتفاقية بين حكومة دولة البحرين وحكومة الجمهورية العربية السورية لتجنب الازدواج الضريبي ومنع التهرب من الضرائب فيما يتعلق بالضرائب على الدخل	Syria	Original	20-09-2000	25-10-2001
38.	Agreement between the Government of the Kingdom of Bahrain and the Governmnet of the Republic of Tajikistan for the	Tajikistan	Original	28-05-2014	10-02-2016

	avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income				
39.	Convention between the Government of the State of Bahrain 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 Amending Protocol	03-11-2001 25-04-2017	27-12-2003 28-03-2018
40.	Agreement between the Government of the Kingdom of Bahrain and the government of the Republic of Turkey for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Turkey	Original	14-11-2005	02-09-2007
41.	Convention between the Government of the Kingdom of Bahrain and the Government of Turkmenistan for the avoidance of double taxation with respect to taxes on income and capital	Turkmenistan	Original	09-02-2011	13-05-2012
42.	Agreement between the Government of the Kingdom of Bahrain 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 on capital gains	United Kingdom	Original	10-03-2010	19-12-2012
43.	Agreement between the Government of the Kingdom of Bahrain and the Government of the Republic of Uzbekistan for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and property	Uzbekistan	Original	05-06-2009	12-01-2011
44.	اتفاقية بين حكومة مملكة البحرين وحكومة الجمهورية اليمنية بشأن تجنب الازدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل ورأس المال	Yemen	Original	28-12-2002	14-07-2004

### **Article 3 – Transparent Entities**

#### ***Reservation***

Pursuant to Article 3(5)(a) of the Convention, **the Kingdom of Bahrain** 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 Kingdom of Bahrain** 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 Kingdom of Bahrain** 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, **the Kingdom of Bahrain** hereby chooses to apply Article 6(3).

### Notification of Existing Preamble Language in Listed Agreements

Pursuant to Article 6(5) of the Convention, **the Kingdom of Bahrain** 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	Algeria	رغبة في عقد اتفاقية لتجنب الإزدواج الضريبي على الضرائب المفروضة على الدخل
2	Austria	Desiring to conclude a Convention with respect to taxes on income and on capital,
3	Bangladesh	Desiring to conclude an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
4	Barbados	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
5	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,
6	Belgium	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of tax fraud and fiscal evasion with respect to taxes on income and on capital,
7	Bermuda	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
8	Brunei	Desiring to conclude an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and capital,
9	Bulgaria	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
10	China	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
11	Cyprus	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income;
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	Egypt	رغبة منهما في إبرام اتفاق لتجنب الإزدواج الضريبي ومنع التهرب من الضرائب بالنسبة للضرائب على الدخل
15	France	رغبة منهما في عقد اتفاقية بشأن تجنب الإزدواج الضريبي ، Désireux de conclure une convention en vue d'éviter les doubles



		impositions
16	Georgia	concluding an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
17	Hungary	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
18	Iran	Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital;
19	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,
20	Isle of Man	Desiring to conclude an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
21	Jordan	رغبة منهما في عقد إتفاقية لتجنب الإزدواج الضريبي على الضرائب المفروضة على الدخل ورأس المال
22	Korea	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
23	Lebanon	رغبة منهما في عقد إتفاقية لتجنب الإزدواج الضريبي على الضرائب المفروضة على الدخل
24	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,
25	Malaysia	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income
26	Malta	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
27	Mexico	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
28	Morocco	رغبة منهما في تنمية وتعزيز علاقتهما الاقتصادية من خلال إبرام إتفاقية لتجنب الإزدواج الضريبي و منع التهرب من الضرائب بالنسبة للضرائب على الدخل
29	Netherlands	Desiring that a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income be concluded by both States,
30	Pakistan	desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income
31	Philippines	desiring, to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income and on Capital,
32	Portugal	Desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
33	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,

34	Singapore	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income
35	Sri Lanka	desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
36	Sudan	رغبة في عقد اتفاقية لتجنب الازدواج الضريبي على الضرائب المفروضة على الدخل
37	Syria	رغبة منهما في تعزيز علاقتهما الاقتصادية المتبادلة من خلال إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب فيما يتعلق بالضرائب على الدخل
38	Tajikistan	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income.
39	Thailand	Desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
40	Turkey	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
41	Turkmenistan	Desiring to conclude a Convention for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital,
42	United Kingdom	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 gains;
43	Uzbekistan	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 Property
44	Yemen	رغبة منهما في عقد اتفاقية لتجنب الازدواج الضريبي على الضرائب المفروضة على الدخل ورأس المال،

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

Pursuant to Article 6(6) of the Convention, **the Kingdom of Bahrain** 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	Algeria
2	Austria
3	Bangladesh
4	Barbados
5	Belarus
6	Belgium
7	Bermuda
8	Brunei
9	Bulgaria
10	China
11	Cyprus
12	Czech Republic
13	Egypt
14	Estonia
15	France

16	Georgia
17	Hungary
18	Iran
19	Ireland
20	Isle of Man
21	Jordan
22	Korea
23	Lebanon
24	Luxembourg
25	Malaysia
26	Malta
27	Mexico
28	Morocco
29	Netherlands
30	Pakistan
31	Philippines
32	Portugal
33	Seychelles
34	Singapore
35	Sri Lanka
36	Sudan
37	Syria
38	Tajikistan
39	Thailand
40	Turkey
41	Turkmenistan
42	United Kingdom
43	Uzbekistan
44	Yemen

**Article 7 – Prevention of Treaty Abuse*****Notification of Choice of Optional Provisions***

Pursuant to Article 7(17)(b) of the Convention, **the Kingdom of Bahrain** hereby chooses to apply article 7(4).

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

Pursuant to Article 7(17)(a) of the Convention, **the Kingdom of Bahrain** considers that the following agreements are not subject to a reservation described in Article 7(15)(b) and contains 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
6	Belgium	Article 28
8	Brunei	Articles 10(5), 11(9), 12(9), 13(7)
12	Czech Republic	Article 26
13	Egypt	Article 28
17	Hungary	Article 27
22	Korea	Article 27
27	Mexico	Article 21(1)
32	Portugal	Article 27(3)
42	United Kingdom	Articles 10(6), 11(7), 12(5)

**Article 8 – Dividend Transfer Transactions*****Reservation***

Pursuant to Article 8(3)(a) of the Convention, **the Kingdom of Bahrain** 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 Kingdom of Bahrain** 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 Kingdom of Bahrain** 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 Kingdom of Bahrain** 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 Kingdom of Bahrain** 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 Kingdom of Bahrain** 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 Kingdom of Bahrain** 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 Kingdom of Bahrain** reserves the right for the entirety of Article 15 not to apply to the Covered Tax Agreements 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 Kingdom of Bahrain** 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	Algeria	Article 28(1), first sentence
2	Austria	Article 24(1), first sentence
3	Bangladesh	Article 26(1), first sentence
4	Barbados	Article 25(1), first sentence
5	Belarus	Article 24(1), first sentence
6	Belgium	Article 25(1), first sentence
7	Bermuda	Article 24(1), first sentence
8	Brunei	Article 26(1), first sentence
9	Bulgaria	Article 26(1), first sentence
10	China	Article 25(1), first sentence
11	Cyprus	Article 23(1), first sentence
12	Czech Republic	Article 23(1), first sentence
13	Egypt	Article 25(1), first sentence
14	Estonia	Article 23(1), first sentence
15	France	Article 21(1), first sentence
16	Georgia	Article 25(1), first sentence
17	Hungary	Article 24(1), first sentence
18	Iran	Article 25(1), first sentence
19	Ireland	Article 24(1), first sentence
20	Isle of Man	Article 23(1), first sentence
21	Jordan	Article 26(1), first sentence
22	Korea	Article 24(1), first sentence
23	Lebanon	Article 26(1), first sentence
24	Luxembourg	Article 24(1), first sentence
25	Malaysia	Article 27(1), first sentence
26	Malta	Article 23(1), first sentence
27	Mexico	Article 24(1), first sentence
28	Morocco	Article 25(1), first sentence
29	Netherlands	Article 25(1), first sentence
30	Pakistan	Article 24(1), first sentence
31	Philippines	Article 26(1), first sentence
32	Portugal	Article 25(1), first sentence
33	Seychelles	Article 24(1), first sentence
34	Singapore	Article 24(1), first sentence
35	Sri Lanka	Article 25(1), first sentence
36	Sudan	Article 27(1), first sentence
37	Syria	Article 25(1), first sentence
38	Tajikistan	Article 24(1), first sentence
39	Thailand	Article 26(1), first sentence
40	Turkey	Article 24(1)
41	Turkmenistan	Article 24(1), first sentence

42	United Kingdom	Article 23(1)
43	Uzbekistan	Article 25(1), first sentence
44	Yemen	Article 28(1), first sentence

Pursuant to Article 16(6)(b)(i) of the Convention, **the Kingdom of Bahrain** 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
15	France	Article 21(1), second sentence
21	Jordan	Article 26(1), second sentence
30	Pakistan	Article 24(1), second sentence
31	Philippines	Article 26(1), second sentence
33	Seychelles	Article 24(1), second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, **the Kingdom of Bahrain** 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	Algeria	Article 28(1), second sentence
2	Austria	Article 24(1), second sentence
3	Bangladesh	Article 26(1), second sentence
4	Barbados	Article 25(1), second sentence
5	Belarus	Article 24(1), second sentence
6	Belgium	Article 25(1), second sentence
7	Bermuda	Article 24(1), second sentence
8	Brunei	Article 26(1), second sentence
9	Bulgaria	Article 26(1), second sentence
10	China	Article 25(1), second sentence
11	Cyprus	Article 23(1), second sentence
12	Czech Republic	Article 23(1), second sentence
13	Egypt	Article 25(1), second sentence
14	Estonia	Article 23(1), second sentence
16	Georgia	Article 25(1), second sentence
17	Hungary	Article 24(1), second sentence
18	Iran	Article 25(1), second sentence
19	Ireland	Article 24(1), second sentence
20	Isle of Man	Article 23(1), second sentence
22	Korea	Article 24(1), second sentence
23	Lebanon	Article 26(1), second sentence
24	Luxembourg	Article 24(1), second sentence
25	Malaysia	Article 27(1), second sentence
26	Malta	Article 23(1), second sentence
27	Mexico	Article 24(1), second sentence

28	Morocco	Article 25(1), second sentence
29	Netherlands	Article 25(1), second sentence
32	Portugal	Article 25(1), second sentence
34	Singapore	Article 24(1), second sentence
35	Sri Lanka	Article 25(1), second sentence
36	Sudan	Article 27(1), second sentence
37	Syria	Article 25(1), second sentence
38	Tajikistan	Article 24(1), second sentence
39	Thailand	Article 26(1), second sentence
41	Turkmenistan	Article 24(1), second sentence
43	Uzbekistan	Article 25(1), second sentence
44	Yemen	Article 28(1), second sentence

### ***Notification of Listed Agreements Not Containing Existing Provisions***

Pursuant to Article 16(6)(c)(i) of the Convention, **the Kingdom of Bahrain** considers that the following agreements do not contain a provision described in Article 16(4)(b)(i).

Listed Agreement Number	Other Contracting Jurisdiction
13	Egypt
27	Mexico

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

Listed Agreement Number	Other Contracting Jurisdiction
18	Iran
25	Malaysia
27	Mexico
35	Sri Lanka
39	Thailand
40	Turkey
42	United Kingdom

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

Listed Agreement Number	Other Contracting Jurisdiction
1	Algeria
13	Egypt
21	Jordan
23	Lebanon
28	Morocco
36	Sudan
37	Syria
44	Yemen

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



Listed Agreement Number	Other Contracting Jurisdiction
6	Belgium
27	Mexico
32	Portugal
33	Seychelles

**Article 17 – Corresponding Adjustments*****Notification of Existing Provisions in Listed Agreements***

Pursuant to Article 17(4) of the Convention, **the Kingdom of Bahrain** 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	Algeria	Article 10(2)
2	Austria	Article 9(2)
3	Bangladesh	Article 9(2)
4	Barbados	Article 9(2)
5	Belarus	Article 9(2)
6	Belgium	Article 9(2)
7	Bermuda	Article 9(2)
8	Brunei	Article 9(2)
9	Bulgaria	Article 9(2)
10	China	Article 9(2)
11	Cyprus	Article 9(2)
13	Egypt	Article 9(2)
14	Estonia	Article 9(2)
16	Georgia	Article 9(2)
17	Hungary	Article 9(2)
18	Iran	Article 9(2)
19	Ireland	Article 9(2)
20	Isle of Man	Article 9(2)
21	Jordan	Article 9(2)
22	Korea	Article 9(2)
23	Lebanon	Article 9(2)
24	Luxembourg	Article 9(2)
26	Malta	Article 9(2)
27	Mexico	Article 9(2)
28	Morocco	Article 9(2)
29	Netherlands	Article 9(2)
31	Philippines	Article 9(2)
32	Portugal	Article 9(2)
34	Singapore	Article 9(2)
35	Sri Lanka	Article 9(2)
36	Sudan	Article 10(2)
37	Syria	Article 9(2)
38	Tajikistan	Article 9(2)
40	Turkey	Article 9(2)
41	Turkmenistan	Article 9(2)
42	United Kingdom	Article 9(2)
43	Uzbekistan	Article 9(2)
44	Yemen	Article 10(2)