

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

GEORGIA

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

Article 2 – Interpretation of Terms

Notification - Agreements Covered by the Convention

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

No	Title	Other Contracting Jurisdiction	Original/Amending Instrument	Date of Signature	Date of Entry into Force
1.	Agreement between the Executive Authority of Georgia 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 and on capital	Czech Republic	Original	23-05-2006	04-05-2007
2.	CONVENTION ENTRE LE GOUVERNEMENT DE LA GEORGIE ET LE GOUVERNEMENT DE LA REPUBLIQUE FRANÇAISE EN VUE D'EVITER LES DOUBLES IMPOSITIONS ET DE PREVENIR L'EVASION FISCALE EN MATIERE D'IMPOTS SUR LE REVENU ET SUR LA FORTUNE შეთანხმება საქართველოს მთავრობასა და საფრანგეთის რესპუბლიკის მთავრობას შორის შემოსავლებსა და კაპიტალზე ორმაგი დაბეგვრის თავიდან აცილებისა და გადასახადების გადაუხდელობის აღვეთის შესახებ	French Republic	Original	07-03-2007	01-06-2010
3.	Agreement between the Government of Georgia and the Grand Duchy of Luxembourg	Grand Duchy of Luxembourg	Original	15-10-2007	14-12-2009

	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 capital				
4.	Convention between Georgia and the Hellenic Republic for the avoidance of double taxation with respect to taxes on income and capital	Hellenic Republic	Original	10-05-1999	20-10-2002
5.	Agreement between the Government of Georgia and the Government of Hungary for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Hungary	Original	16-02-2012	13-05-2012
6.	Agreement between Georgia and Iceland for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Iceland	Original	13-05-2015	28-12-2015
7.	Agreement between the Government of Georgia and the Government of Ireland for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Ireland	Original	20-11-2008	06-05-2010
8.	Convention between Georgia and the Government of the Italian Republic for the avoidance of double taxation with respect to taxes on income and on capital and the prevention of fiscal evasion	Italian Republic	Original	31-10-2000	19-02-2004
9.	Agreement between Georgia and the Kingdom of Belgium for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Kingdom of Belgium	Original	14-12-2000	04-05-2004
10.	Agreement between Georgia and the Kingdom of Norway for the avoidance of double taxation and	Kingdom of Norway	Original	10-11-2011	23-07-2012

	the prevention of fiscal evasion with respect to taxes on income				
11.	Agreement between Georgia and the Kingdom of Spain for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Kingdom of Spain	Original	07-06-2010	01-07-2011
12.	Agreement between the Government of Georgia 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	Kingdom of the Netherlands	Original	21-03-2002	21-02-2003
13.	Agreement between the Government of Georgia and the Government of the People's Republic of China for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	People's Republic of China	Original	22-06-2005	10-11-2005
14.	Convention between Georgia 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	Portuguese Republic	Original	21-12-2012	18-04-2015
15.	Convention between the Government of Georgia and the Government of the Principality of Liechtenstein for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Principality of Liechtenstein	Original	13-05-2015	21-12-2016
16.	Convention between Georgia and the Republic of Bulgaria for the avoidance of double taxation with respect to taxes on income and on capital	Republic of Bulgaria	Original	26-11-1998	01-07-1999
17.	Agreement between Georgia and the Republic of Croatia for the	Republic of Croatia	Original	18-01-2013	06-12-2013

	avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital				
18.	Agreement between the Government of Georgia and the Government of the Republic of Cyprus for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Republic of Cyprus	Original	13-05-2015	04-01-2016
19.	Convention between Georgia and the Republic of Estonia for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Republic of Estonia	Original	18-12-2006	27-12-2007
			Amending document	17-07-2010	11-03-2011
20.	Agreement between the Government of Georgia and the Government of the Republic of Finland for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Republic of Finland	Original	11-10-2007	23-07-2008
21.	Agreement between the Government of Georgia 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 and on capital	Republic of India	Original	24-08-2011	08-12-2011
22.	Agreement between the Government of Georgia 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	Republic of Korea	Original	31-03-2016	17-11-2016
23.	Convention between Georgia and the Republic of Latvia for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and capital	Republic of Latvia	Original	13-10-2004	04-04-2005
			Amending document	29-05-2012	27-11-2012

24.	Convention between Georgia and the Republic of Lithuania for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Republic of Lithuania	Original	11-09-2003	20-07-2004
25.	Agreement between Georgia and the Republic of San Marino for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Republic of San Marino	Original	28-09-2012	12-04-2013
26.	Agreement between Georgia and the Republic of Serbia for the avoidance of double taxation with respect to taxes on income and on capital	Republic of Serbia	Original	04-04-2012	09-01-2013
27.	Agreement between the Government of Georgia and the Government of the Republic of Singapore for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Republic of Singapore	Original	17-11-2009	28-06-2010
28.	Agreement between Georgia and the Republic of Slovenia for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capita	Republic of Slovenia	Original	06-12-2012	25-09-2013
29.	Agreement between Georgia and the Republic of Turkey for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income	Republic of Turkey	Original	21-11-2007	15-02-2010
30.	Convention between the Government of Georgia and the Government of Romania for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Romania	Original	11-12-1997	15-05-1999
31.	Agreement between Georgia and the Slovak Republic for the	Slovak Republic	Original	27-10-2011	29-07-2012

	avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital				
32.	Convention between the Government of Georgia 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	State of Israel	Original	12-05-2010	22-11-2011
33.	Convention between the Government of Georgia and the Government of Sweden for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital	Sweden	Original	06-11-2013	26-07-2014
34.	Agreement between the Government of Georgia 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	United Kingdom of Great Britain and Northern Ireland	Original	13-07-2004	11-10-2005
			Amending document	03-02-2010	17-12-2010

Article 3 – Transparent Entities

Reservation

Pursuant to Article 3(5)(a) of the Convention, **Georgia** 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, **Georgia** reserves the right for the entirety of Article 4 not to apply to 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, **Georgia** hereby chooses to apply Article 6(3).

Notification of Existing Preamble Language in Listed Agreements

Pursuant to Article 6(5) of the Convention, **Georgia** 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	Czech Republic	<desiring to promote and strengthen the economic, cultural and scientific relations between both States> by concluding an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital<,>
2	France	<désireux de promouvoir et renforcer les relations économiques, culturelles, scientifiques et techniques entre les deux Etats en > concluant une Convention en vue d'éviter les doubles impositions et de prévenir l'évasion fiscale en matière d'impôts sur le revenu et sur la fortune,
3	Luxembourg	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,
4	Greece	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
5	Hungary	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	Iceland	DESIRING to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income
7	Ireland	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
8	Italy	Desiring to conclude a Convention to avoid double taxation with respect to taxes on income and on capital and to prevent fiscal evasion
9	Belgium	<Desiring to promote and strengthen the economic, cultural,

		scientific and technical relations between both States> by concluding an Agreement for the avoidance of double taxation with respect to taxes on income and on capital
10	Norway	desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income,
11	Spain	< desiring to promote and strengthen the economic, cultural and scientific relations> by concluding an Agreement for the avoidance of double taxation with respect to taxes on income and on capital
12	the Netherlands	Desiring that an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income be concluded,
13	China	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
14	Portugal	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, <in order to promote and strengthen the economic relations between the two countries, have agreed as follows: >
15	Liechtenstein	<The Government of Georgia and the Government of the Principality of Liechtenstein, desiring to promote and strengthen economic relations> by concluding a Convention for the avoidance of double taxation with respect to taxes on income and on capital <,>
16	Bulgaria	desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
17	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
18	Cyprus	desiring to promote and strengthen the economic, cultural and scientific relations by concluding an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
19	Estonia	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	Finland	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
21	India	desiring to conclude an Agreement for the Avoidance of Double Taxation
22	Korea	<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,
23	Latvia	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,
24	Lithuania	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	San Marino	<desiring to promote and strengthen the economic, cultural and scientific relations> by concluding an Agreement for the avoidance of double taxation with respect to taxes on income and on capital,
26	Serbia	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital,
27	Singapore	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
28	Slovenia	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,
29	Turkey	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
30	Romania	<The Government of Georgia and the Government of Romania desiring to promote and strengthen the economic relations> by concluding a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital, <have agreed as follows:>
31	Slovak Republic	desiring to promote and strengthen the economic, cultural and scientific relations by concluding an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
33	Sweden	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,
34	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;

Notification of Listed Agreements Not Containing Existing Preamble Language

Pursuant to Article 6(6) of the Convention, **Georgia** 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
3	Luxembourg
4	Greece
5	Hungary
6	Iceland
7	Ireland
8	Italy
10	Norway
12	the Netherlands
13	China

16	Bulgaria
17	Croatia
18	Cyprus
19	Estonia
20	Finland
23	Latvia
24	Lithuania
26	Serbia
27	Singapore
28	Slovenia
29	Turkey
31	Slovak Republic
32	Israel
33	Sweden
34	United Kingdom

Article 7 – Prevention of Treaty Abuse

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 7(17)(a) of the Convention, **Georgia** considers that the following agreements are not subject to a reservation under 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
2	France	Protocol Article 8
3	Luxembourg	Protocol Article 3
10	Norway	Article 10(7); Article 11(5); Article 12 (5); Article 20 (3)
11	Spain	Protocol paragraph (iii)
14	Portugal	Protocol 1 (c)
22	Korea	Article 10(6); Article 11(9); Article 12(7); Article 13(6); Article 21(5)
32	Israel	Article 26 (1; 2)
34	United Kingdom	Article 10(6); Article 11(5); Article 12(5); Article 21 (4)

Article 8 – Dividend Transfer Transactions

Reservation

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

Pursuant to Article 12(4) of the Convention, **Georgia** 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, **Georgia** reserves the right for Article 13 not to apply to its Covered Tax Agreements.

Article 14 – Splitting-up of Contracts

Pursuant to Article 14(3)(a) of the Convention, **Georgia** reserves the right for 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, **Georgia** 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, **Georgia** 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.	Czech Republic	Article 24(1) , first sentence
2.	France	Article 26(1) , first sentence
3.	Luxembourg	Article 26(1) , first sentence
4.	Greece	Article 26(1) , first sentence
5.	Hungary	Article 26(1) , first sentence
6.	Iceland	Article 23(1) , first sentence
7.	Ireland	Article 24(1) , first sentence
8.	Italy	Article 26(1) , first sentence
9.	Belgium	Article 26(1) , first sentence
10.	Norway	Article 23(1) , first sentence
11.	Spain	Article 26(1) , first sentence
12.	The Netherlands	Article 26(1) , first sentence
13.	China	Article 26(1) , first sentence
14.	Portugal	Article 25(1) , first sentence
15.	Liechtenstein	Article 24(1) , first sentence
16.	Bulgaria	Article 26(1) , first sentence
17.	Croatia	Article 24(1) , first sentence
18.	Cyprus	Article 25(1) , first sentence
19.	Estonia	Article 25(1) , first sentence
20.	Finland	Article 24(1) , first sentence
21.	India	Article 26(1) , first sentence
22.	Korea	Article 24(1) , first sentence
23.	Latvia	Article 26(1) , first sentence
24.	Lithuania	Article 26(1) , first sentence
25.	San Marino	Article 25(1) , first sentence
26.	Serbia	Article 26(1) , first sentence
27.	Singapore	Article 24(1) , first sentence
28.	Slovenia	Article 25(1) , first sentence
29.	Turkey	Article 24(1) , first sentence
30.	Romania	Article 27(1) , first sentence
31.	Slovak Republic	Article 24(1) , first sentence
32.	Israel	Article 24(1) , first sentence
33.	Sweden	Article 24(1) , first sentence
34.	United Kingdom	Article 26(1)

Pursuant to Article 16(6)(b)(ii) of the Convention, **Georgia** 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.	Czech Republic	Article 24(1) , second sentence
2.	France	Article 26(1) , second sentence
3.	Luxembourg	Article 26(1) , second sentence
4.	Greece	Article 26(1) , second sentence
5.	Hungary	Article 26(1) , second sentence
6.	Iceland	Article 23(1) , second sentence
7.	Ireland	Article 24(1) , second sentence
8.	Italy	Article 26(1) , second sentence
9.	Belgium	Article 26(1) , second sentence
10.	Norway	Article 23(1) , second sentence
11.	Spain	Article 26(1) , second sentence
12.	The Netherlands	Article 26(1) , second sentence
13.	China	Article 26(1) , second sentence
14.	Portugal	Article 25(1) , second sentence
15.	Liechtenstein	Article 24(1) , second sentence
16.	Bulgaria	Article 26(1) , second sentence
17.	Croatia	Article 24(1) , second sentence
18.	Cyprus	Article 25(1) , second sentence
19.	Estonia	Article 25(1) , second sentence
20.	Finland	Article 24(1) , second sentence
21.	India	Article 26(1) , second sentence
22.	Korea	Article 24(1) , second sentence
23.	Latvia	Article 26(1) , second sentence
24.	Lithuania	Article 26(1) , second sentence
25.	San Marino	Article 25(1) , second sentence
26.	Serbia	Article 26(1) , second sentence
27.	Singapore	Article 24(1) , second sentence
28.	Slovenia	Article 25(1) , second sentence
29.	Turkey	Article 24(1) , second sentence
30.	Romania	Article 27(1) , second sentence
31.	Slovak Republic	Article 24(1) , second sentence
32.	Israel	Article 24(1) , second sentence
33.	Sweden	Article 24(1) , second sentence

Notification of Listed Agreements Not Containing Existing Provisions

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

Listed Agreement Number	Other Contracting Jurisdiction
34	United Kingdom

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

Listed Agreement Number	Other Contracting Jurisdiction
9	Belgium
14	Portugal

Article 17 – Corresponding Adjustments

Reservation

Pursuant to Article 17(3)(a) of the Convention, **Georgia** 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.	Czech Republic	Article 9(2)
2.	France	Article 9(2)
3.	Luxembourg	Article 9(2)
4.	Greece	Article 9(2)
5.	Hungary	Article 9(2)
6.	Iceland	Article 9(2)
7.	Ireland	Article 9(2)
8.	Italy	Article 9(2)
9.	Belgium	Article 9(2)
10.	Norway	Article 9(2)
11.	Spain	Article 9(2)
12.	The Netherlands	Article 9(2)
13.	China	Article 9(2)
14.	Portugal	Article 9(2)
15.	Liechtenstein	Article 9(2)
16.	Bulgaria	Article 9(2)
17.	Croatia	Article 9(2)
18.	Cyprus	Article 9(2)
19.	Estonia	Article 9(2)
20.	Finland	Article 9(2)
21.	India	Article 9(2)
22.	Korea	Article 9(2)
23.	Latvia	Article 9(2)
24.	Lithuania	Article 9(2)
25.	San Marino	Article 9(2)
26.	Serbia	Article 9(2)
27.	Singapore	Article 9(2)
28.	Slovenia	Article 9(2)

29.	Turkey	Article 9(2)
30.	Romania	Article 9(2)
31.	Slovak Republic	Article 9(2)
32.	Israel	Article 9(2)
33.	Sweden	Article 9(2)
34.	United Kingdom	Article 9(2)

Article 35 – Entry into Effect

Reservation

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