

## Hungary

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

This document contains the list of reservations and notifications made by Hungary 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, Hungary 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 Republic Of Hungary And The Republic Of Albania For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Albania	Original	14-11-1992	21-12-1995
2	Agreement Between The Government Of The Republic Of Hungary And The Government Of The Republic Of Armenia For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Armenia	Original	09-11-2009	26-10-2010
3	Agreement Between The Republic Of Hungary And Australia For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Australia	Original	29-11-1990	10-04-1992
4	Convention Between The People's Republic Of Hungary And The Republic Of Austria For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Austria	Original	25-02-1975	09-02-1976

5	Convention Between The Government Of The Republic Of Hungary 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	18-02-2008	15-12-2008
6	Convention Between The Government Of Hungary 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	Bahrain	Original	24-02-2014	19-06-2015
7	Convention Between The Republic Of Hungary And The Republic Of Belarus For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Belarus	Original	19-02-2002	24-06-2004
8	Convention Between The Government Of The Hungarian People's Republic And The Government Of The Kingdom Of Belgium For The Avoidance Of Double Taxation And Prevention Of Fiscal Evasion With Respect To Taxes On Income And Capital	Belgium	Original	19-07-1982	25-02-1984
9	Convention between the Hungarian People's Republic And the Socialist Federal Republic of Yugoslavia for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Bosnia and Herzegovina	Original	17-10-1985	03-07-1987

10	Convention Between The Government Of The Hungarian People's Republic And The Government Of The Federative Republic Of Brazil For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Brazil	Original	20-06-1986	13-07-1990
11	Convention Between The Republic Of Hungary And The Republic Of Bulgaria For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Bulgaria	Original	08-06-1994	07-09-1995
12	Convention Between The Government Of The Republic Of Hungary And The Government Of Canada For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Canada	Original	15-04-1992	01-10-1994
			Amending Instrument (a)	03-05-1994	26-04-1996
13	Agreement Between The Government Of The Republic Of Hungary 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	17-06-1992	31-12-1994
14	Agreement Between The Republic Of Hungary And The Republic Of Croatia For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Croatia	Original	30-08-1996	07-06-1998
15	Convention Between The Republic Of Hungary And 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	14-01-1993	27-12-1994

16	Convention Between The Government Of The Hungarian People's Republic And The Government Of The Republic Of Cyprus For The Avoidance Of Double Taxation With Respect To Taxes On Income And Capital	Cyprus	Original	30-11-1981	24-11-1982
17	Convention Between The Republic Of Hungary And The Kingdom Of Denmark For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Denmark	Original	27-04-2011	19-07-2012
18	Convention Between The Government Of The Republic Of Hungary 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	05-11-1991	22-05-1994
19	Convention Between The Republic Of Hungary 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	Estonia	Original	11-09-2002	05-07-2004
20	Convention Between The Hungarian People's Republic And The Republic Of Finland For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Finland	Original	25-10-1978	24-07-1981
21	Convention Between The Government Of The Hungarian People's Republic And The Government Of The French Republic For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	France	Original	28-04-1980	01-12-1981

22	Agreement Between The Government Of Hungary And The Government Of Georgia For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Georgia	Original	16-02-2012	13-05-2012
23	Agreement Between The Republic Of Hungary 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	28-02-2011	30-12-2011
24	Convention Between The Government Of The Hungarian People's Republic And The Government Of The Hellenic Republic For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Greece	Original	25-05-1983	17-02-1985
25	Agreement Between The Government Of The Republic Of Hungary 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	12-05-2010	23-02-2011
26	Convention Between The Republic Of Hungary And The Republic Of Iceland For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Iceland	Original	23-11-2005	07-02-2006

27	Convention Between The Republic Of Hungary And The Republic Of India For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	India	Original	03-11-2003	04-03-2005
28	Agreement Between The Government Of The Hungarian People's Republic And The Government Of The Republic Of Indonesia For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Indonesia	Original	19-10-1989	15-02-1993
29	Convention Between The Republic Of Hungary And Ireland For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Ireland	Original	25-04-1995	05-12-1996
30	Convention Between The Government Of The Republic Of Hungary And The Government Of The State Of Israel For The Avoidance Of Double Taxation And For The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Israel	Original	14-05-1991	13-11-1992
31	Convention Between The Government Of The Hungarian People's Republic And The Government Of The Italian Republic For The Avoidance Of Double Taxation With Respect To Taxes On Income And Capital And The Prevention Of Fiscal Evasion	Italy	Original	16-05-1977	01-12-1980

32	Convention Between Japan And The Hungarian People's Republic For The Avoidance Of Double Taxation With Respect To Taxes On Income	Japan	Original	13-02-1980	25-10-1980
33	Convention Between The Republic Of Hungary And The Republic Of Kazakhstan For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Kazakhstan	Original	07-12-1994	03-03-1996
34	Convention Between The Government Of The Hungarian People's Republic 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	29-03-1989	01-04-1990
35	Agreement Between The Republic Of Hungary And The State Of Kuwait For The Avoidance Of Double Taxation With Respect To Taxes On Income And Capital And For The Fostering Of Economic Relations	Kuwait	Original	17-01-1994	21-12-1994
			Amending Instrument (a)	09-12-2001	06-05-2003
36	Convention Between The Republic Of Hungary And The Republic Of Latvia For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Latvia	Original	14-05-2004	22-12-2004
37	Convention Between Hungary And 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	Liechtenstein	Original	29-06-2015	24-12-2015

38	Convention Between The Republic Of Hungary 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	Lithuania	Original	12-05-2004	22-12-2004
39	Convention Between Hungary 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	Luxemburg	Original	10-03-2015	26-01-2017
40	Agreement Between The Government Of The Hungarian People's Republic 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	22-05-1989	25-12-1992
41	Agreement Between The Republic Of Hungary And Malta For The Avoidance Of Double Taxation	Malta	Original	06-08-1991	29-11-1992
42	Convention Between The Republic Of Hungary 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	24-06-2011	31-12-2011
43	Convention Between The Government Of The Republic Of Hungary And The Government Of The Kingdom Of Morocco For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Morocco	Original	12-12-1991	20-08-2000



44	Convention Between The Government Of The Hungarian People's Republic 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 And On Capital	Netherlands	Original	05-06-1986	25-09-1987
45	Convention Between The Hungarian Government And The Macedonian Government For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	North Macedonia	Original	13-04-2001	14-03-2002
46	Convention Between The Government Of The Hungarian People's Republic And the Government Of The Kingdom Of Norway For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Norway	Original	21-10-1980	20-09-1981
47	Agreement Between The Government Of Hungary And The Government Of The Sultanate Of Oman For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Oman	Original	02-11-2016	18-03-2017
48	Convention Between The Republic Of Hungary And The Islamic Republic Of Pakistan For The Avoidance Of Double Taxation With Respect To Taxes On Income	Pakistan	Original	24-02-1992	06-02-1994
			Amending Instrument (a)	14-07-2020	19-11-2020
49	Convention Between The Republic Of Hungary 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	13-06-1997	07-02-1998
50	Convention Between	Poland	Original	23-09-1992	10-09-1995

	The Republic Of Hungary And The Republic Of Poland For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital		Amending Instrument (a)	27-06-2000	01-05-2002
51	Convention Between The Republic Of Hungary And The Portuguese Republic For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Portugal	Original	16-05-1995	22-02-1999
52	Agreement Between The Government Of Hungary 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	18-01-2012	21-04-2012
53	Convention Between The Republic Of Hungary 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	16-09-1993	14-12-1995
54	Convention Between The Republic Of Hungary And The Russian Federation For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Russia	Original	01-04-1994	03-11-1997
55	Convention Between The Republic Of Hungary And The Republic Of San Marino For The Avoidance Of Double Taxation With Respect To Taxes On Income	San Marino	Original	15-09-2009	03-12-2010

56	Convention Between The Government Of Hungary 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 And On Capital	Saudi Arabia	Original	24-03-2014	01-05-2015
57	Convention Between The Republic Of Hungary And The Federal Republic Of Yugoslavia For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Serbia	Original	20-06-2001	13-12-2002
58	Agreement Between The Republic Of Hungary And The Republic Of Singapore For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Singapore	Original	17-04-1997	18-12-1998
59	Convention Between The Republic Of Hungary And The Slovak Republic For The Avoidance Of Double Taxation And the Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Slovak Republic	Original	05-08-1994	21-12-1995
60	Convention Between The Republic Of Hungary 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 Capital	Slovenia	Original	26-08-2004	23-12-2005
61	Convention Between The Republic Of Hungary And The Republic Of South Africa For The Avoidance Of Double Taxation with Respect To Taxes On Income	South Africa	Original	04-03-1994	05-05-1996

62	Convention Between The Government Of The Hungarian People's Republic And The Government Of Spain For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And Capital	Spain	Original	09-07-1984	20-05-1987
63	Convention Between The Government Of The Hungarian People's Republic And The Government Of The Kingdom Of Sweden For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Sweden	Original	12-10-1981	15-08-1982
64	Convention Between Hungary And The Swiss Confederation For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Switzerland	Original	12-09-2013	09-11-2014
65	Convention Between The Government Of The Hungarian People's Republic 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	18-05-1989	10-12-1989
66	Convention Between The Republic Of Hungary And The Republic Of Tunisia For The Avoidance Of Double Taxation With Respect To Taxes On Income	Tunisia	Original	22-10-1992	19-07-1997
67	Agreement Between The Republic Of Hungary And The Republic Of Turkey For The Avoidance Of Double Taxation With Respect To Taxes On Income	Turkey	Original	10-03-1993	09-11-1995

68	Convention Between The Republic Of Hungary And Ukraine For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Property	Ukraine	Original	19-05-1995	24-06-1996
69	Agreement Between The Government Of Hungary And The Government Of The United Arab Emirates For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	United Arab Emirates	Original	30-04-2013	04-10-2014
70	Convention Between The Republic Of Hungary And 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	07-09-2011	28-12-2011
71	Convention Between The Government Of The Hungarian People's Republic And The Government Of The United States Of America For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	United States	Original	12-02-1979	18-09-1979
72	Convention Between The Government Of The Republic Of Hungary And The Government Of The United States Of America For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	United States	Original	04-02-2010	N/A

73	Convention Between The Government Of The Hungarian People's Republic And The Government Of The Oriental Republic Of Uruguay For The Avoidance Of Double Taxation With Respect To Taxes On Income And On Capital	Uruguay	Original	25-10-1988	13-08-1993
74	Agreement Between The Republic Of Hungary And The Socialist Republic Of Vietnam For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Vietnam	Original	26-08-1994	30-06-1995

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

#### ***Reservation***

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

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

Pursuant to Article 6(5) of the Convention, Hungary 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	Albania	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
2	Armenia	<The Government of the Republic of Hungary and the Government of the Republic of Armenia,> 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 to further develop and facilitate their relationship,>
3	Australia	DESIRING to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
4	Austria	attól az óhajtól vezetve, hogy a jövedelem-, a hozadéki és a vagyonadók területén elkerüljék a kettős adóztatást, von dem Wunsche geleitet, die Doppelbesteuerung auf dem Gebiete der Steuern vom Einkommen, Ertrag und vom Vermögen zu vermeiden,
5	Azerbaijan	<The Government of the Republic of Hungary and the Government of the Republic of 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, <and to further develop and facilitate their relationship,>
6	Bahrain	<The Government of Hungary and the Government of the Kingdom of Bahrain,> 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 relationship,>
7	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 capital, <and to further develop and facilitate their relationship,>
8	Belgium	Désireux de conclure une convention tendant à éviter les doubles impositions et à prévenir l'évasion fiscale en matière d'impôts sur le revenu et sur la fortune et <de promouvoir et renforcer les relations économiques entre les deux pays>,
9	Bosnia and Herzegovina	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
10	Brazil	Desiring to conclude a Convention for the avoidance of

		double taxation and the prevention of fiscal evasion with respect to taxes on income
11	Bulgaria	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
12	Canada	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
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 <for further development and promotion of their economic relationship>
14	Croatia	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital
15	Czech Republic	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
16	Cyprus	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital;
17	Denmark	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 relationship,
18	Egypt	Desiring to conclude a Convention for the avoidance of the double taxation and the prevention of fiscal evasion with respect to taxes on income
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	<Mindful of the principles set forth in the Final Act of the Conference on Security and Cooperation in Europe and> desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
21	France	Désireux de conclure une Convention tendant à éviter les doubles impositions en matière d'impôts sur le revenu et sur la fortune
22	Georgia	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
24	Greece	desiring to avoid double taxation with respect to taxes on income and on capital;



25	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;
26	Iceland	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
27	India	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income
28	Indonesia	DESIRING to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
29	Ireland	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
30	Israel	Desiring to conclude a Convention for the avoidance of double taxation and for the prevention of fiscal evasion with respect to taxes on income,
31	Italy	<Désireux de développer et de faciliter les relations économiques mutuelles> ont décidé de conclure une Convention tendant à éviter les doubles impositions en matière d'impôts sur le revenu et sur la fortune et à prévenir les évasions fiscales
32	Japan	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income,
33	Kazakhstan	<Republic of Kazakhstan and Republic of Hungary desiring to enhance and develop economic, scientific, technical and cultural relations between both States and> 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, <have agreed as follows:>
34	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 to further develop and facilitate their economic relationship,>
36	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,
37	Liechtenstein	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 relationship without creating opportunities for non-taxation or reduced taxation through tax evasion or avoidance,

38	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,
39	Luxemburg	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 relationship>
40	Malaysia	Desiring to conclude an Agreement 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>,
41	Malta	Desiring to conclude an Agreement for the Avoidance of Double Taxation and the prevention of fiscal evasion with respect to taxes on income,
42	Mexico	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 relationship,
43	Morocco	– désireux d’éviter les doubles impositions en matière d’impôts sur le revenu, <– attachant une importance particulière à la promotion et au renforcement des relations économiques entre leurs pays>
44	Netherlands	Desiring to replace by a new convention the Convention for the avoidance of double taxation with respect to direct taxes,
45	North Macedonia	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 relationship,
46	Norway	have decided to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
47	Oman	desiring to conclude an Agreement 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 relationships,>
48	Pakistan	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income <and to further develop and facilitate their economic relationship>
49	Philippines	Desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
50	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 on capital <and to further develop and facilitate their economic relationships>,
51	Portugal	<The Portuguese Republic and the Republic of Hungary,> desiring to conclude a convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <have agreed as follows:>
52	Qatar	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <and to further develop and foster their relationship,>
53	Romania	Desiring to promote and strengthen the economic relations between the two countries 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,
54	Russia	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
55	San Marino	wishing to conclude a Convention for the avoidance of double taxation with respect to taxes on income <and to strengthen the disciplined development of economic relations between the two States in the framework of greater cooperation>
56	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 and on capital, and to further develop and facilitate their relationship;
57	Serbia	desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital,
58	Singapore	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
59	Slovak Republic	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
60	Slovenia	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,
61	South Africa	desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income <and to further develop and facilitate their relationship,>
62	Spain	Desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital

63	Sweden	desiring to avoid double taxation with respect to taxes on income and on capital
64	Switzerland	DESIRING to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
65	Thailand	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 economic relationship>
66	Tunisia	Désireux de conclure une convention en vue d'éviter les doubles impositions en matière d'impôt sur le revenu et de promouvoir et renforcer les relations économiques entre les deux pays.
67	Turkey	Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and to further develop and facilitate their economic relationship
68	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 on property, <and confirming their endeavour to the development and their deepening of mutual relations,>
69	United Arab Emirates	<Desiring to promote their mutual economic relations> through the conclusion between them of an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
70	United Kingdom	<The Republic of Hungary and the United Kingdom of Great Britain and Northern 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,
71	United States	<The Government of the Hungarian People's Republic and the Government of the United States of America, desiring to further expand and facilitate mutual economic relations,> have resolved to conclude a convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
72	United States	<The Government of the Republic of Hungary and the Government of the United States of America,> desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <have agreed as follows:>
73	Uruguay	Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and on capital
74	Vietnam	Desiring to conclude an Agreement for the avoidance of

		double taxation and the prevention of fiscal evasion with respect to taxes on income,
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***Notification of Listed Agreements Not Containing Existing Preamble Language***

Pursuant to Article 6(6) of the Convention, Hungary 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
4	Austria
9	Bosnia and Herzegovina
12	Canada
14	Croatia
15	Czech Republic
17	Denmark
19	Estonia
20	Finland
24	Greece
25	Hong Kong
32	Japan
36	Latvia
37	Liechtenstein
38	Lithuania
41	Malta
42	Mexico
45	North Macedonia
49	Philippines
51	Portugal
54	Russia
56	Saudi Arabia
57	Serbia
58	Singapore
59	Slovak Republic
60	Slovenia
63	Sweden
64	Switzerland

66	Tunisia
67	Turkey
70	United Kingdom
72	United States
74	Vietnam

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

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

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

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

Pursuant to Article 7(17)(a) of the Convention, Hungary 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
6	Bahrain	Article 27
30	Israel	Article 25
33	Kazakhstan	Article 11(8), Article 12(7)
37	Liechtenstein	Article 28
42	Mexico	Article 22 (1) and (2)
47	Oman	Article 28
56	Saudi Arabia	Article 28
64	Switzerland	Protocol 3
68	Ukraine	Article 11(7), Article 12(6)
70	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, Hungary 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, Hungary 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, Hungary 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, Hungary 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, Hungary 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, Hungary 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, Hungary 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, Hungary 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**

### ***Reservation***

Pursuant to Article 16(5)(a) of the Convention, Hungary reserves the right for the first sentence of Article 16(1) not to apply to its Covered Tax Agreements on the basis that it intends to meet the minimum standard for improving dispute resolution under the OECD/G20 BEPS Package by ensuring that under each of its Covered Tax Agreements (other than a Covered Tax Agreement that permits a person to present a case to the competent authority of either Contracting Jurisdiction), where a person considers that the actions of one or both of the Contracting Jurisdictions result or will result for that person in taxation not in accordance with the provisions of the Covered Tax Agreement, irrespective of the remedies provided by the domestic law of those Contracting Jurisdictions, that person may present the case to the competent authority of the Contracting Jurisdiction of which the person is a resident or, if the case presented by that person comes under a provision of a Covered Tax Agreement relating to non-discrimination based on nationality, to that of the Contracting Jurisdiction of which that person is a national; and the competent authority of that Contracting Jurisdiction will implement a bilateral notification or consultation process with the competent authority of the other Contracting Jurisdiction for cases in which the competent authority to which the mutual agreement procedure case was presented does not consider the taxpayer's objection to be justified.

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

Pursuant to Article 16(6)(b)(i) of the Convention, Hungary 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
12	Canada	Article 25(1), second sentence
28	Indonesia	Article 25(1), second sentence
49	Philippines	Article 24(1), second sentence
51	Portugal	Article 25(1), second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, Hungary 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	Albania	Article 26(1), second sentence
2	Armenia	Article 25(1), second sentence
3	Australia	Article 25(1), second sentence



5	Azerbaijan	Article 25(1), second sentence
6	Bahrain	Article 24(1), second sentence
7	Belarus	Article 26(1), second sentence
8	Belgium	Article 25(1), second sentence
9	Bosnia and Herzegovina	Article 25(1), second sentence
11	Bulgaria	Article 26(1), second sentence
13	China	Article 25(1), second sentence
14	Croatia	Article 25(1), second sentence
15	Czech Republic	Article 25(1), second sentence
16	Cyprus	Article 26(1), second sentence
17	Denmark	Article 23(1), second sentence
18	Egypt	Article 25(1), second sentence
19	Estonia	Article 25(1), second sentence
20	Finland	Article 25(1), second sentence
21	France	Article 26(1), second sentence
22	Georgia	Article 26(1), second sentence
23	Germany	Article 24(1), second sentence
24	Greece	Article 26(1), second sentence
25	Hong Kong	Article 23(1), second sentence
26	Iceland	Article 24(1), second sentence
27	India	Article 25(1), second sentence
29	Ireland	Article 25(1), second sentence
30	Israel	Article 26(1), second sentence
31	Italy	Article 26(1), second sentence
32	Japan	Article 25(1), second sentence
33	Kazakhstan	Article 25(1), second sentence
34	Korea	Article 25(1), second sentence
35	Kuwait	Article 25(1), second sentence
36	Latvia	Article 25(1), second sentence
37	Liechtenstein	Article 25(1), second sentence
38	Lithuania	Article 25(1), second sentence
39	Luxemburg	Article 25(1), second sentence
40	Malaysia	Article 25(1), second sentence
41	Malta	Article 25(1), second sentence
42	Mexico	Article 25(1), second sentence
43	Morocco	Article 25(1), second sentence
44	Netherlands	Article 26(1), second sentence
45	North Macedonia	Article 26(1), second sentence

47	Oman	Article 25(1), second sentence
48	Pakistan	Article 26(1), second sentence
50	Poland	Article 26(1), second sentence
52	Qatar	Article 24(1), second sentence
53	Romania	Article 27(1), second sentence
54	Russia	Article 25(1), second sentence
55	San Marino	Article 24(1), second sentence
56	Saudi Arabia	Article 25(1), second sentence
57	Serbia	Article 26(1), second sentence
58	Singapore	Article 26(1), second sentence
59	Slovak Republic	Article 25(1), second sentence
60	Slovenia	Article 25(1), second sentence
61	South Africa	Article 25(1), second sentence
62	Spain	Article 26(1), second sentence
63	Sweden	Article 25(1), second sentence
64	Switzerland	Article 25(1), second sentence
65	Thailand	Article 25(1), second sentence
66	Tunisia	Article 24(1), second sentence
68	Ukraine	Article 25(1), second sentence
69	United Arab Emirates	Article 25(1), second sentence
73	Uruguay	Article 26(1), second sentence
74	Vietnam	Article 25(1), second sentence

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

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

Listed Agreement Number	Other Contracting Jurisdiction
42	Mexico

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

Listed Agreement Number	Other Contracting Jurisdiction
4	Austria
8	Belgium
10	Brazil
12	Canada
18	Egypt
42	Mexico

49	Philippines
51	Portugal
53	Romania
62	Spain
64	Switzerland
65	Thailand
67	Turkey
70	United Kingdom
72	United States

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

Listed Agreement Number	Other Contracting Jurisdiction
3	Australia
21	France

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

Listed Agreement Number	Other Contracting Jurisdiction
3	Australia
8	Belgium
10	Brazil

## Article 17 – Corresponding Adjustments

### *Reservation*

Pursuant to Article 17(3)(a) of the Convention, Hungary 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	Albania	Article 9(2)
2	Armenia	Article 9(2)
3	Australia	Article 9(3)
5	Azerbaijan	Article 9(2)
6	Bahrain	Article 9(2)
7	Belarus	Article 9(2)
11	Bulgaria	Article 9(2)

12	Canada	Article 9(2)
17	Denmark	Article 9(2)
18	Egypt	Article 9(2)
22	Georgia	Article 9(2)
23	Germany	Article 9(2)
25	Hong Kong	Article 9(2)
26	Iceland	Article 9(2)
27	India	Article 9(2)
29	Ireland	Article 9(2)
35	Kuwait	Article 9(2)
37	Liechtenstein	Article 9(2)
39	Luxemburg	Article 9(2)
41	Malta	Article 9(3)
42	Mexico	Article 9(2)
44	Netherlands	Article 9(2)
45	North Macedonia	Article 9(2)
47	Oman	Article 9(2)
48	Pakistan	Article 9(2)
49	Philippines	Article 8(2)
51	Portugal	Article 9(2)
52	Qatar	Article 9(2)
55	San Marino	Article 9(2)
56	Saudi Arabia	Article 9(2)
60	Slovenia	Article 9(2)
61	South Africa	Article 9(2)
63	Sweden	Article 9(2)
64	Switzerland	Article 9(2)
67	Turkey	Article 9(2)
69	United Arab Emirates	Article 10(2)
70	United Kingdom	Article 9(2)
72	United States	Article 9(2)

## **Article 18 – Choice to Apply Part VI**

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

Pursuant to Article 18 of the Convention, Hungary hereby chooses to apply Part VI.

## **Article 19 – Mandatory Binding Arbitration**

### ***Reservation***

Pursuant to Article 19(12) of the Convention, Hungary reserves the right for the following rules to apply with respect to its Covered Tax Agreements notwithstanding the other provisions of Article 19:

- a) any unresolved issue arising from a mutual agreement procedure case otherwise within the scope of the arbitration process provided for by the Convention shall not be submitted to arbitration, if a decision on this issue has already been rendered by a court or administrative tribunal of either Contracting Jurisdiction;
- b) if, at any time after a request for arbitration has been made and before the arbitration panel has delivered its decision to the competent authorities of the Contracting Jurisdictions, a decision concerning the issue is rendered by a court or administrative tribunal of one of the Contracting Jurisdictions, the arbitration process shall terminate.

## **Article 23 – Type of Arbitration Process**

### ***Reservation***

Pursuant to Article 23(2) of the Convention, for the purpose of applying Article 23 to its Covered Tax Agreements, Hungary reserves the right for Article 23(1) not to apply to its Covered Tax Agreements.

## **Article 24 – Agreement on a Different Resolution**

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

Pursuant to Article 24(1) of the Convention, Hungary hereby chooses to apply Article 24(2).

## **Article 28 – Reservations**

### ***Reservation Formulated for Scope of Arbitration***

Pursuant to Article 28(2)(a) of the Convention, Hungary formulates the following reservations with respect to the scope of cases that shall be eligible for arbitration under the provisions of Part VI.

1. Hungary reserves the right to exclude from the scope of Part VI any case that falls within the scope of application of the Convention on the Elimination of Double Taxation in Connection with the Adjustment of Profits of Associated Enterprises (90/436/EEC) as amended or any subsequent regulation replacing, amending or updating these rules.
2. Hungary reserves the right to exclude from the scope of Part VI any case that falls within the scope of application of the COUNCIL DIRECTIVE (EU) 2017/1852 of 10 October 2017 on tax dispute resolution mechanisms in the European Union or any subsequent regulation replacing, amending or updating these rules.
3. Hungary reserves the right to exclude from the scope of Part VI – on a case-by-case

basis – any case where penalties were imposed in relation to the adjusted income or capital for tax fraud, wilful default and gross negligence in accordance with Hungary’s domestic rules included in Section 41/J. paragraph (12) of the Act XXXVII of 2013 on Certain Rules of International Administrative Cooperation in Relation to Taxes and Other Public Duties. Any subsequent provision replacing, amending or updating these rules would also be included in this reservation. Hungary shall notify the Depositary of any such subsequent provision.

4. Hungary reserves the right to exclude from the scope of Part VI any case which the competent authorities of both Contracting Jurisdictions agree that are not suitable for arbitration. Such agreement shall be reached before the date on which arbitration proceedings would otherwise have begun and shall be notified to the person who presented the case.
5. Hungary reserves the right to exclude from the scope of Part VI any case which relates to questions of dispute relating to income or capital earned in a tax year commencing before 1 January 2018.

## **Article 35 – Entry into Effect**

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

Pursuant to Article 35(3) of the Convention, solely for the purpose of its own application of Article 35(1)(b) and 5(b), Hungary 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 1 January of the next year beginning on or after the expiration of a period”.

### ***Reservation***

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

## **Article 36 – Entry into Effect of Part VI**

### ***Reservation***

Pursuant to Article 36(2) of the Convention, Hungary reserves the right for Part VI to apply to a case presented to the competent authority of a Contracting Jurisdiction prior to the later of the dates on which the Convention enters into force for each of the Contracting Jurisdictions to the Covered Tax Agreement only to the extent that the competent authorities of both Contracting Jurisdictions agree that it will apply to that specific case.