

Sultanate of Oman
Tax Authority
Muscat



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جِهَاتُ الضَّرَائِبِ
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Sultanate Of Oman
Tax Authority

Status of List of Reservations and Notifications upon deposit of Instrument of Ratification.

This document contains the list of reservations and notifications made by the Sultanate of Oman as confirmed upon deposit of the instrument of ratification pursuant to Articles 28(6) and 29(3) of the Convention.

Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

Article 2 – Interpretation of Terms

Notification - Agreements Covered by the Convention

Pursuant to Article 2(1)(a)(ii) of the Convention, the Sultanate of Oman 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 سلطنة عمان وحكومة الجمهورية الجزائرية الديمقراطية الشعبية لتجنب الازدواج الضريبي ومنع التهرب الضريبي بالنسبة للضرائب على الدخل	Algeria	Original	09-04-2000	08-02-2003
2.	AGREEMENT BETWEEN THE GOVERNMENT OF THE SULTANATE OF OMAN AND THE GOVERNMENT OF 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	15-04-2007	05-02-2008
3.	AGREEMENT BETWEEN THE GOVERNMENT OF HIS MAJESTY THE SULTAN AND YANG DI-PUERTUAN OF BRUNEI DARUSSALAM 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	Brunei	Original	25-02-2008	28-06-2009
4.	AGREEMENT BETWEEN THE GOVERNMENT OF CANADA 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 AND ON CAPITAL	Canada	Original	30-06-2004	27-04-2005
5.	AGREEMENT BETWEEN	People's	Original	25-03-2002	20-07-2002

Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

No	Title	Other Contracting Jurisdiction	Original/ Amending Instrument	Date of Signature	Date of Entry into Force
	THE GOVERNMENT OF THE PEOPLE'S REPUBLIC OF CHINA 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	Republic of China			
6.	AGREEMENT BETWEEN THE REPUBLIC OF CROATIA AND THE SULTANATE OF OMAN FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME	Croatia	Original	21-12-2009	16-02-2011
7.	اتفاقية بين حكومة سلطنة عمان و حكومة الجمهورية الفرنسية لتجنب الازدواج الضريبي	France	Original	01-06-1989	01-08-1990
			Protocol	22-10-1996	01-02-2004
			Protocol	08-04-2012	01-03-2013
8.	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	Hungary	Original	02-11-2016	18-03-2017
9.	AGREEMENT BETWEEN THE GOVERNMENT OF THE SULTANATE OF OMAN 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	06-10-2004	05-08-2009
10.	CONVENTION BETWEEN THE GOVERNMENT OF THE ITALIAN REPUBLIC AND THE GOVERNMENT OF THE SULTANATE OF OMAN FOR THE AVOIDANCE OF DOUBLE TAXATION WITH RESPECT TO TAXES ON INCOME	Italy	Original	06-05-1998	22-10-2002

Sultanate of Oman
Tax Authority
Muscat



سَلْطَنَةُ عُمان
جِهَاتُ الضَّرَائِبِ
مَسْقَطُ

No	Title	Other Contracting Jurisdiction	Original/ Amending Instrument	Date of Signature	Date of Entry into Force
	AND THE PREVENTION OF FISCAL EVASION				
11.	AGREEMENT BETWEEN THE GOVERNMENT OF JAPAN 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	Japan	Original	09-01-2014	01-09-2014
12.	AGREEMENT BETWEEN THE REPUBLIC OF KOREA AND THE SULTANATE OF OMAN FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME	Republic of Korea	Original	23-09-2005	13-02-2006
13.	CONVENTION BETWEEN LEBANON AND OMAN FOR THE AVOIDANCE OF DOUBLE TAXATION	Lebanon	Original	12-04-2001	16-08-2001
14.	AGREEMENT BETWEEN THE GOVERNMENT OF THE REPUBLIC OF MAURITIUS 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	Mauritius	Original	30-03-1998	20-07-1998
15.	AGREEMENT BETWEEN THE GOVERNMENT OF THE REPUBLIC OF MOLDOVA 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 AND ON CAPITAL	Moldova	Original	03-04-2007	13-08-2007
16.	اتفاقية بين حكومة سلطنة عمان وحكومة المملكة المغربية لتجنب الازدواج الضريبي ومنع التهرب	Morocco	Original	15-12-2006	22-04-2009

Sultanate of Oman
Tax Authority
Muscat



سَلْطَنَةُ عُمان
جِهَاتُ الضَّرَائِبِ
مَسْقَطُ

No	Title	Other Contracting Jurisdiction	Original/ Amending Instrument	Date of Signature	Date of Entry into Force
	الضريبي فيما يتعلق بالضرائب على الدخل				
17.	AGREEMENT BETWEEN THE KINGDOM OF THE NETHERLANDS AND THE SULTANATE OF OMAN FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME	Netherlands	Original	05-10-2009	28-12-2011
18.	AGREEMENT BETWEEN THE GOVERNMENT OF THE ISLAMIC REPUBLIC OF PAKISTAN 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	Pakistan	Original	12-06-1999	28-09-2002
19.	AGREEMENT BETWEEN THE SULTANATE OF OMAN AND THE PORTUGUESE REPUBLIC FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME	Portugal	Original	28-04-2015	26-07-2016
20.	AGREEMENT BETWEEN THE GOVERNMENT OF THE SULTANATE OF OMAN 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	Seychelles	Original	13-09-2003	20/01/2004
21.	AGREEMENT BETWEEN THE GOVERNMENT OF THE REPUBLIC OF SINGAPORE AND THE GOVERNMENT OF THE SULTANATE OF OMAN FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF	Singapore	Original	06-10-2003	07-04-2006

Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

No	Title	Other Contracting Jurisdiction	Original/ Amending Instrument	Date of Signature	Date of Entry into Force
	FISCAL EVASION WITH RESPECT TO TAXES ON INCOME				
22.	AGREEMENT BETWEEN THE SULTANATE OF OMAN AND THE SLOVAK REPUBLIC FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME	Slovak Republic	Original	25/3/2018	N/A
23.	AGREEMENT BETWEEN THE GOVERNMENT OF THE REPUBLIC OF SOUTH AFRICA 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	South Africa	Original	09-10-2002	29-12-2003
			Protocol	15-11-2011	05-11-2013
24.	AGREEMENT BETWEEN THE GOVERNMENT OF THE SULTANATE OF OMAN 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	15-08-2018	N/A
25.	CONVENTION BETWEEN THE SULTANATE OF OMAN AND THE KINGDOM OF SPAIN FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME	Spain	Original	30-04-2014	19-09-2015
26.	CONVENTION BETWEEN OMAN AND SUDAN FOR THE AVOIDANCE OF DOUBLE TAXATION WITH RESPECT TO TAXES ON INCOME	Sudan	Original	07-06-2003	05-11-2003
27.	AGREEMENT BETWEEN THE SWISS CONFEDERATION AND THE SULTANATE OF OMAN FOR THE	Switzerland	Original	22-05-2015	13-10-2016

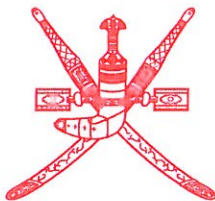
Sultanate of Oman
Tax Authority
Muscat



سَلْطَنَةُ عُمان
جِهَانُ الضَّرَائِبِ
مَسْقَطُ

No	Title	Other Contracting Jurisdiction	Original/Amending Instrument	Date of Signature	Date of Entry into Force
	AVOIDANCE OF DOUBLE TAXATION WITH RESPECT TO TAXES ON INCOME				
28.	AGREEMENT BETWEEN THE GOVERNMENT OF THE SULTANATE OF OMAN AND THE GOVERNMENT OF THE SYRIAN ARAB REPUBLIC FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME	Syria	Original	14-09-2005	17-01-2006
29.	AGREEMENT BETWEEN THE GOVERNMENT OF THE KINGDOM OF THAILAND 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	Thailand	Original	13-10-2003	27-02-2004
30.	اتفاقية تجنب الازدواج الضريبي بين حكومة سلطنة عمان و حكومة الجمهورية التونسية	Tunisia	Original	16-11-1997	22-04-1998
31.	AGREEMENT BETWEEN THE GOVERNMENT OF THE REPUBLIC OF TURKEY 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	Turkey	Original	31-05-2006	15-03-2010
32.	AGREEMENT BETWEEN THE GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND AND THE	United Kingdom	Original	23-02-1998	09-11-1998

Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

No	Title	Other Contracting Jurisdiction	Original/ Amending Instrument	Date of Signature	Date of Entry into Force
	GOVERNMENT OF THE SULTANATE OF OMAN FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME AND CAPITAL GAINS		Protocol	26-11-2009	09-01-2011
33.	AGREEMENT BETWEEN THE GOVERNMENT OF THE SULTANATE OF OMAN 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 ON CAPITAL	Uzbekistan	Original	30-03-2009	20-06-2009
			Protocol	05-10-2009	03-02-2010
34.	AGREEMENT BETWEEN THE GOVERNMENT OF THE SOCIALIST REPUBLIC OF VIETNAM 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	Vietnam	Original	18-04-2008	01-01-2009
35.	CONVENTION BETWEEN OMAN AND YEMEN FOR THE AVOIDANCE OF DOUBLE TAXATION	Yemen	Original	08-05-2002	06-03-2003



Article 3 – Transparent Entities

Reservation

Pursuant to Article 3(5)(a) of the Convention, the Sultanate of Oman 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)(b) of the Convention, the Sultanate of Oman reserves the right for the entirety of Article 4 not to apply to its Covered Tax Agreements that already address cases where a person other than an individual is a resident of more than one Contracting Jurisdiction by requiring the competent authorities of the Contracting Jurisdictions to endeavour to reach mutual agreement on a single Contracting Jurisdiction of residence. The following agreement(s) contain(s) provisions that are within the scope of this reservation.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
5	People's Republic of China	Article 4(3)

Notification of Existing Provisions in Listed Agreements

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

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Algeria	Article 4(3)
2	Belarus	Article 4(3)
3	Brunei	Article 4(3)
4	Canada	Article 4(5) and (6)
6	Croatia	Article 4(3)
7	France	Article 4(3)
8	Hungary	Article 4(3)
9	Iran	Article 4(3)
10	Italy	Article 4(3)
11	Japan	Article 4(3)
12	Republic of Korea	Article 4(3)
13	Lebanon	Article 4(3)

Sultanate of Oman
Tax Authority
Muscat



سَلْطَنَةُ عُمان
جِهَانُ الضَّرَائِبِ
مَسْقَطُ

Listed Agreement Number	Other Contracting Jurisdiction	Provision
14	Mauritius	Article 4(3)
15	Moldova	Article 4(3)
16	Morocco	Article 4(3)
17	Netherlands	Article 4(3)
18	Pakistan	Article 4(3)
19	Portugal	Article 4(3)
20	Seychelles	Article 4(3)
21	Singapore	Article 4(3)
٢٢	Slovak Republic	Article 4(3)
٢٣	South Africa	Article 4(3)
24	Sri Lanka	Article 4(3)
25	Spain	Article 4(3)
26	Sudan	Article 4(3)
27	Switzerland	Article 4(4)
28	Syria	Article 4(3)
29	Thailand	Article 4(3)
30	Tunisia	Article 4(3)
31	Turkey	Article 4(3)
32	United Kingdom	Article 4(3)
33	Uzbekistan	Article 4(3)
34	Vietnam	Article 4(3)
35	Yemen	Article 4(3)



Article 5 – Application of Methods for Elimination of Double Taxation

Reservation

Pursuant to Article 5(8) of the Convention, the Sultante of Oman reserves the right for the entirety of Article 5 not to apply with respect to all of its Covered Tax Agreements.

Article 6 – Purpose of a Covered Tax Agreement

Notification of Existing Preamble Language in Listed Agreements

Pursuant to Article 6(5) of the Convention, the Sultante of Oman considers that the following agreement(s) is(are) not within the scope of a reservation under Article 6(4) and contain(s) 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 منهما في إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب الضريبي بالنسبة للضرائب على الدخل قد اتفقتا على ما يلي
2.	Belarus	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,
3.	Brunei	Desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
4.	Canada	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,
5.	People's Republic of China	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
6.	Croatia	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
7.	France	رغبة منهما في إبرام اتفاقية لتجنب الازدواج الضريبي قد اتفقتا على ما يأتي
8.	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 to further develop and facilitate their relationship,>
9.	Iran	Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and on capital,

Sultanate of Oman
Tax Authority
Muscat



سَلْطَنَةُ عُومَانِ
جِهَانُ الضَّرَائِبِ
مَسْقَطُ

Listed Agreement Number	Other Contracting Jurisdiction	Preamble Text
10.	Italy	Desiring to conclude a Convention to avoid double taxation with respect to taxes on income and to prevent fiscal evasion,
11.	Japan	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
12.	Republic of Korea	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
13.	Labanon	رغبة منهما في إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب الضريبي بالنسبة للضرائب على الدخل
14.	Mauritius	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income;
15.	Moldova	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
16.	Morocco	رغبة منهما في تنمية و تعزيز علاقاتهما الاقتصادية من خلال إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب الضريبي فيما يتعلق بالضرائب على الدخل
17.	Netherlands	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
18.	Pakistan	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
19.	Portugal	<The Portuguese Republic and the Sultanate of Oman,> desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income, <in order to promote and strengthen the economic relations between the two States, have agreed as follows:>
20.	Seychelles	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
21.	Singapore	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,

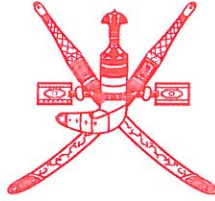
Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

Listed Agreement Number	Other Contracting Jurisdiction	Preamble Text
22.	Slovak Republic	desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
23.	South Africa	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 promote and strengthen the economic relations between the two countries,>
24.	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,
25.	Spain	desiring to conclude a convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income,
26.	Sudan	رغبة منهما في إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب الضريبي بالنسبة للضرائب على الدخل
27.	Switzerland	desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income
28.	Syria	رغبة منهما في إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب الضريبي بالنسبة للضرائب على الدخل
29.	Thailand	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
30.	Tunisia	رغبة منهما في إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب الضريبي بالنسبة للضرائب على الدخل
31.	Turkey	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
32.	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 capital gains,
33.	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 capital,
34.	Vietnam	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
35.	Yemen	رغبة منهما في إبرام اتفاقية لتجنب الازدواج الضريبي ومنع التهرب الضريبي بالنسبة للضرائب على الدخل

Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

Article 7 – Prevention of Treaty Abuse

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 7(17)(a) of the Convention, the Sultanate of Oman considers that the following agreement(s) is(are) not subject to a reservation described in Article 7(15)(b) and contain(s) a provision described in Article 7(2). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Algeria	Article 10(6), Article 11(8), Article 12(7)
2	Belarus	Article 11(8), Article 12(8)
3	Brunei	Article 10(8), Article 11(9), Article 12(7), Article 13(7)
4	Canada	Article 10(6), Article 11(8), Article 12(8)
6	Croatia	Article 11(9), Article 12(7)
8	Hungary	Article 28
11	Japan	Paragraph 6 of the Protocol
12	Republic of Korea	Article 10(6), Article 11(9), Article 12(7), Article 22(3)
13	Lebanon	Article 11(8), Article 12(7)
15	Moldova	Article 10(6), Article 11(9), Article 12(7), Article 13(7)
19	Portugal	Paragraph 1(c) of the Protocol
20	Seychelles	Article 10(8), Article 11(9), Article 12(7), Article 13(7)
21	Singapore	Article 10(8), Article 11(9), Article 12(7)
22	Slovak Republic	Article 10(5), Article 11(8), Article 12(7)
23	South Africa	Article 10(8), Article 11(6), Article 12(7)
24	Sri Lanka	Article 10(6), Article 11(9), Article 12(7)
25	Spain	Protocol I A 4
26	Sudan	Article 10(6), Article 11(8), Article 12(7)
27	Switzerland	Protocol I(b)
29	Thailand	Article 10(6), Article 11(8), Article 12(7), Article 22(3)
32	United Kingdom	Article 10(6), Article 11(5), Article 12(7), Article 21(4)
33	Uzbekistan	Article 10(8), Article 11(9), Article 12(7)
34	Vietnam	Article 10(6), Article 11(9), Article 12(7), Article 13(7)
35	Yemen	Article 10(6), Article 11(8), Article 12(7)



Article 8 – Dividend Transfer Transactions

Reservation

Pursuant to Article 8(3)(a) of the Convention, the Sultanate of Oman 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 Sultanate of Oman 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 Sultanate of Oman 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 Sultanate of Oman 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 Sultanate of Oman 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

Sultanate of Oman
Tax Authority
Muscat



سَلْطَنَةُ عُومَانِ
 جِهَانُ الضَّرَائِبِ
 مَسْقَطُ

Pursuant to Article 13(6)(a) of the Convention, the Sultanate of Oman 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 Sultanate of Oman 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 Sultanate of Oman reserves the right for the entirety of Article 15 not to apply to the Covered Tax Agreement to which the reservations described in Article 12(4), Article 13(6)(a) or (c), and Article 14(3)(a) apply.



Article 16 – Mutual Agreement Procedure

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 16(6)(a) of the Convention, the Sultanate of Oman considers that the following agreement(s) contain(s) 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 25(1), first sentence
2	Belarus	Article 25(1), first sentence
3	Brunei	Article 26(1), first sentence
4	Canada	Article 25(1), first sentence
5	People's Republic of China	Article 25(1), first sentence
6	Croatia	Article 25(1), first sentence
7	France	Article 20(1), first sentence
8	Hungary	Article 25(1), first sentence
9	Iran	Article 25(1), first sentence
10	Italy	Article 25(1), first sentence
11	Japan	Article 24(1), first sentence
12	Republic of Korea	Article 25(1), first sentence
13	Lebanon	Article 25(1), first sentence
14	Mauritius	Article 24(1), first sentence
15	Moldova	Article 27(1), first sentence
16	Morocco	Article 24(1), first sentence
17	Netherlands	Article 25(1), first sentence
18	Pakistan	Article 26(1), first sentence
19	Portugal	Article 25(1), first sentence
20	Seychelles	Article 26(1), first sentence
21	Singapore	Article 24(1), first sentence
22	Slovak Republic	Article 25(1), first sentence
23	South Africa	Article 23(1), first sentence
24	Sri Lanka	Article 25(1), first sentence
25	Spain	Article 25(1), first sentence
26	Sudan	Article 24(1), first sentence
27	Switzerland	Article 24(1), first sentence
28	Syria	Article 25(1), first sentence
29	Thailand	Article 25(1), first sentence
30	Tunisia	Article 25(1), first sentence
31	Turkey	Article 24(1), first sentence
32	United Kingdom	Article 26(1)

Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

Listed Agreement Number	Other Contracting Jurisdiction	Provision
33	Uzbekistan	Article 26(1), first sentence
34	Vietnam	Article 25(1), first sentence
35	Yemen	Article 24(1), first sentence

Pursuant to Article 16(6)(b)(i) of the Convention, the Sultanate of Oman considers that the following agreement(s) contain(s) 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
2	Belarus	Article 25(1), second sentence
3	Brunei	Article 26(1), second sentence
4	Canada	Article 25(1), second sentence
6	Croatia	Article 25(1), second sentence
7	France	Article 20(1), second sentence
9	Iran	Article 25(1), second sentence
10	Italy	Article 25(1), second sentence
13	Lebanon	Article 25(1), second sentence
18	Pakistan	Article 26(1), second sentence
20	Seychelles	Article 26(1), second sentence
21	Singapore	Article 24(1), second sentence
22	Slovak Republic	Article 25(1), second sentence
28	Syria	Article 25(1), second sentence
33	Uzbekistan	Article 26(1), second sentence
34	Vietnam	Article 25(1), second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, the Sultanate of Oman considers that the following agreement(s) contain(s) 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 25(1), second sentence
5	People's Republic of China	Article 25(1), second sentence
8	Hungary	Article 25(1), second sentence
11	Japan	Article 24(1), second sentence
12	Republic of Korea	Article 25(1), second sentence
14	Mauritius	Article 24(1), second sentence

*Sultanate of Oman
Tax Authority
Muscat*



سلطنة عُمان
جهاز الضرائب
مسقط

Listed Agreement Number	Other Contracting Jurisdiction	Provision
15	Moldova	Article 27(1), second sentence
16	Morocco	Article 24(1), first sentence
17	Netherlands	Article 25(1), second sentence
19	Portugal	Article 25(1), second sentence
23	South Africa	Article 23(1), second sentence
24	Sri Lanka	Article 25(1), second sentence
25	Spain	Article 25(1), second sentence
26	Sudan	Article 24(1), second sentence
27	Switzerland	Article 24(1), second sentence
29	Thailand	Article 25(1), second sentence
30	Tunisia	Article 25(1), second sentence
31	Turkey	Article 24(1), second sentence
32	United Kingdom	Exchange of Notes 8
35	Yemen	Article 24(1), second sentence

Notification of Listed Agreements Not Containing Existing Provisions

Pursuant to Article 16(6)(c)(ii) of the Convention, the Sultanate of Oman considers that the following agreement(s) do(es) not contain a provision described in Article 16(4)(b)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
4	Canada
10	Italy
27	Switzerland
31	Turkey
32	United Kingdom

Pursuant to Article 16(6)(d)(ii) of the Convention, the Sultanate of Oman considers that the following agreement(s) do(es) not contain a provision described in Article 16(4)(c)(ii).

Listed Agreement Number	Other Contracting Jurisdiction
2	Belarus
3	Brunei
6	Croatia
10	Italy
15	Moldova
18	Pakistan
19	Portugal
20	Seychelles
21	Singapore
22	Slovak Republic

*Sultanate of Oman
Tax Authority
Muscat*



سَلْطَنَةُ عُومَانِ
جِهَانُ الضَّرَائِبِ
مَسْقَطُ

Listed Agreement Number	Other Contracting Jurisdiction
23	South Africa
29	Thailand
32	United Kingdom
33	Uzbekistan
34	Vietnam

Article 17 – Corresponding Adjustments

Reservation

Pursuant to Article 17(3)(a) of the Convention, the Sultanate of Oman 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 agreement(s) contain(s) provisions that are within the scope of this reservation.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Algeria	Article 9(2)
2	Belarus	Article 9(2)
3	Brunei	Article 9(2)
4	Canada	Article 9(2)
5	People's Republic of China	Article 9(2)
6	Croatia	Article 9(2)
8	Hungary	Article 9(2)
9	Iran	Article 9(2)
10	Italy	Article 9(2)
11	Japan	Article 9(2)
12	Republic of Korea	Article 9(2)
13	Lebanon	Article 9(2)
15	Moldova	Article 9(2)
16	Morocco	Article 9(2)
17	Netherlands	Article 9(2)
18	Pakistan	Article 9(2)
19	Portugal	Article 9(2)
20	Seychelles	Article 9(2)
21	Singapore	Article 9(2)
22	Slovak Republic	Article 9(2)
23	South Africa	Article 9(2)
24	Sri Lanka	Article 9(2)
25	Spain	Article 9(2)
26	Sudan	Article 9(2)

Sultanate of Oman
Tax Authority
Muscat



سلطنة عُمان
جهاز الضرائب
مسقط

Listed Agreement Number	Other Contracting Jurisdiction	Provision
27	Switzerland	Article 9(2)
28	Syria	Article 9(2)
29	Thailand	Article 9(2)
31	Turkey	Article 9(2)
32	United Kingdom	Article 9(2)
33	Uzbekistan	Article 9(2)
34	Vietnam	Article 9(2)
35	Yemen	Article 9(2)