Deposited on 28 February 2020

The Portuguese Republic

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 the Portuguese Republic 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, the Portuguese Republic 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 entre la République Portugaise et le Gouvernement de la République Algérienne Démocratique et Populaire en vue d'Éviter les Doubles Impositions, de Prévenir l'Évasion Fiscale et d'Établir des Règles d'Assistance Réciproque en Matière de Recouvrement d'Impôts sur le Revenu et sur la Fortune	Algeria	Original	02-12-2003	01-05-2006
2	Convention between the Portuguese Republic and the Principality of Andorra for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Andorra	Original	27-09-2015	23-04-2017
3	Convenção entre a República Portuguesa e a República da Áustria para evitar a Dupla Tributação em Matéria de Impostos sobre o Rendimento e sobre o Capital [Convention between the Portuguese Republic and the Republic of Austria for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital]	Austria	Original	29-12-1970	27-02-1972
4	Convention between the Portuguese Republic and the Kingdom of Bahrain for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Bahrain	Original	26-05-2015	01-11-2016
5	Convention between the Portuguese Republic and Barbados for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Barbados	Original	22-10-2010	07-10-2017
6	Convention entre le Portugal et la Belgique en vue d'Éviter les Doubles Impositions et de Régler Certaines Autres Questions en Matière d'Impôts sur le Revenu	Belgium	Original	16-07-1969	19-02-1971
			Amending Instrument (a)	06-03-1995	05-04-2001

7	Convenção entre a República Portuguesa e a República Federativa do Brasil Destinada a Evitar a Dupla Tributação e a Prevenir a Evasão Fiscal em Matéria de Impostos sobre o Rendimento [Convention between the Portuguese Republic and 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	16-05-2000	05-10-2001
8	Convention between the Portuguese Republic and the Republic of Bulgaria for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Bulgaria	Original	15-06-1995	18-07-1996
9	Convenção entre a República Portuguesa e a República de Cabo Verde para Evitar a Dupla Tributação em Matéria de Impostos sobre o Rendimento e Prevenir a Evasão Fiscal [Convention between the Portuguese Republic and the Republic of Cape Verde for the Avoidance of Double Taxation with respect to Taxes on Income and the Prevention of Fiscal Evasion]	Cabo Verde	Original	22-03-1999	15-12-2000
10	Convention between the Government of the Portuguese Republic and the Government of Canada for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Canada	Original	14-06-1999	24-10-2001
11	Convention between the Portuguese Republic and the Republic of Chile for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Chile	Original	07-07-2005	25-08-2008
12	Agreement between the Government of the Portuguese Republic 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 (People's Republic of)	Original	21-04-1998	08-06-2000

13	Convention between the Portuguese Republic and the Republic of Colombia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Colombia	Original	30-08-2010	30-01-2015
14	Convention entre la République Portugaise et la République de Côte d'Ivoire en vue d'Éviter la Double Imposition et de Prévenir l'Évasion Fiscale en Matière d'Impôts sur le Revenu	Côte d'Ivoire	Original	17-03-2015	18-08-2017
15	Convention between the Portuguese Republic and the Republic of Croatia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Croatia	Original	04-10-2013	28-02-2015
16	Convenção entre a República Portuguesa e a República de Cuba para Evitar a Dupla Tributação e Prevenir a Evasão Fiscal em Matéria de Impostos sobre o Rendimento [Convention between the Portuguese Republic and the Republic of Cuba for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income]	Cuba	Original	30-10-2000	28-12-2005
17	Convention between the Portuguese Republic and the Republic of Cyprus for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Cyprus	Original	19-11-2012	16-08-2013
18	Convention between the Portuguese Republic and the Czech Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Czech Republic	Original	24-05-1994	01-10-1997
19	Convention between the Portuguese Republic 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	14-12-2000	24-05-2002
20	Convention between the Portuguese Republic and the Republic of Estonia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Estonia	Original	12-05-2003	23-07-2004

21	Convention between the Portuguese Republic and the Federal Democratic Republic of Ethiopia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Ethiopia	Original	25-05-2013	09-04-2017
22	Convention between the Portuguese Republic and the Republic of Finland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income	Finland	Original	07-11-2016	N/A
23	Convention entre le Portugal et la France Tendant à Éviter les Doubles Impositions et à Établir des Règles d'Assistance Administrative Réciproque en Matière d'Impôts sur le Revenu	France	Original	14-01-1971	18-11-1972
			Amending Instrument (a)	25-08-2016	01-12-2017
24	Convention between the Portuguese Republic and Georgia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Georgia	Original	12-12-2012	18-04-2015
25	Convention between the Portuguese Republic and the Federal Republic of Germany for the Avoidance of Double Taxation with respect to Taxes on Income and on Capital	Germany	Original	15-07-1980	08-10-1982
26	Convention between the Government of the Portuguese Republic and the Government of the Hellenic Republic for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Greece	Original	02-12-1999	13-08-2002
27	Convenção entre a República Portuguesa e a República da Guiné-Bissau para Evitar a Dupla Tributação em Matéria de Impostos sobre o Rendimento e Prevenir a Evasão Fiscal [Convention between the Portuguese Republic and the Republic of Guinea-Bissau for the Avoidance of Double Taxation with respect to Taxes on Income and the Prevention of Fiscal Evasion]	Guinea-Bissau	Original	17-10-2008	05-07-2012
28	Agreement between the Portuguese Republic and the Hong Kong Special Administrative Region of the People's Republic of China for the Avoidance of Double Taxation and the	Hong Kong (China)	Original	22-03-2011	03-06-2012

	Prevention of Fiscal Evasion with respect to Taxes on Income				
29	Convention between the Portuguese Republic and the Republic of Hungary for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Hungary	Original	16-05-1995	08-05-2000
30	Convention between the Portuguese Republic and the Republic of Iceland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Iceland	Original	02-08-1999	11-05-2002
31	Convention between the Government of the Portuguese Republic 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	India	Original	11-09-1998	05-04-2000
			Amending Instrument (a)	24-06-2017	08-08-2018
32	Agreement between the Portuguese Republic and the Republic of Indonesia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Indonesia	Original	09-07-2003	11-05-2007
33	Convention between the Portuguese Republic and Ireland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Ireland	Original	01-06-1993	11-07-1994
			Amending Instrument (a)	11-11-2005	18-12-2006
34	Convention between the Portuguese Republic 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	Israel	Original	26-09-2006	18-02-2008
35	Convention entre la République portugaise et la République italienne tendant à éviter les doubles impositions et à prévenir l'évasion fiscale en matière d'impôts sur le revenu	Italy	Original	14-05-1980	15-01-1983
36	Convention between the Portuguese Republic and Japan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Japan	Original	19-12-2011	28-07-2013

37	Convention between the Portuguese Republic and the Republic of Korea for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Korea	Original	26-01-1996	21-12-1997
38	Convention between the Portuguese Republic and the State of Kuwait for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Kuwait	Original	23-02-2010	05-12-2013
39	Convention between the Portuguese Republic and the Republic of Latvia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Latvia	Original	19-06-2001	07-03-2003
40	Convention between the Portuguese Republic and the Republic of Lithuania for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Lithuania	Original	14-02-2002	26-02-2003
41	Convention entre la République Portugaise et le Grand-Duché de Luxembourg Tendant à Éviter les Doubles Impositions et à Prévenir l'Évasion Fiscale en Matière d'Impôts sur le Revenu et sur la Fortune	Luxembourg	Original	25-05-1999	30-12-2000
			Amending Instrument (a)	07-09-2010	18-05-2012
42	Convenção entre o Governo de Portugal e o Governo de Macau para Evitar a Dupla Tributação e Prevenir a Evasão Fiscal em Matéria de Impostos sobre o Rendimento [Convention between the Government of Portugal and the Government of Macau for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income]	Macau (China)	Original	28-09-1999	01-01-1999
43	Convention between the Portuguese Republic and the Republic of Malta for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Malta	Original	26-01-2001	05-04-2002
44	Convention between the Portuguese Republic 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	11-11-1999	09-01-2001

45	Convention between the Portuguese Republic and the Republic of Moldova for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Moldova	Original	11-02-2009	18-10-2010
46	Convention between the Portuguese Republic and Montenegro for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Montenegro	Original	12-07-2016	07-12-2017
47	Convention entre la République Portugaise et le Royaume du Maroc en Vue d'Éviter la Double Imposition en Matière d'Impôts sur le Revenu	Morocco	Original	29-09-1997	27-06-2000
48	Convenção entre a República Portuguesa e a República de Moçambique para Evitar a Dupla Tributação em Matéria de Impostos sobre o Rendimento e Prevenir a Evasão Fiscal [Convention between the Portuguese Republic and the Republic of Mozambique for the Avoidance of Double Taxation with respect to Taxes on Income and the Prevention of Fiscal Evasion]	Mozambique	Original	21-03-1991	05-12-1993
			Amending Instrument (a)	24-03-2008	07-06-2009
49	Convention between the Portuguese Republic and 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	20-09-1999	11-08-2000
50	Convention between the Portuguese Republic and the Kingdom of Norway for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Norway	Original	10-03-2011	15-06-2012
51	Agreement between the Portuguese Republic and the Sultanate of Oman for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Oman	Original	28-04-2015	26-07-2016
52	Convention between the Portuguese Republic and the Islamic Republic of Pakistan for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Pakistan	Original	23-06-2000	04-06-2007

53	Convention between the Portuguese Republic and the Republic of Panama for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Panama	Original	27-08-2010	10-06-2012
54	Convention between the Portuguese Republic and the Republic of Peru for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Peru	Original	19-11-2012	12-04-2014
55	Convention between the Portuguese Republic and the Republic of Poland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Poland	Original	09-05-1995	04-02-1998
56	Agreement between the Portuguese Republic and the State of Qatar for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Qatar	Original	12-12-2011	04-04-2014
57	Convention between the Portuguese Republic 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	16-09-1997	14-07-1999
58	Convention between the Government of the Portuguese Republic and the Government of the Russian Federation for the Avoidance of Double taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Russia	Original	29-05-2000	11-12-2002
59	Convention between the Portuguese Republic and the Republic of San Marino for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	San Marino	Original	18-11-2010	03-12-2015
60	Convenção entre a República Portuguesa e a República Democrática de São Tomé e Príncipe para Evitar a Dupla Tributação e Prevenir a Evasão Fiscal em Matéria de Impostos sobre o Rendimento [Convention between the Portuguese Republic and the Democratic Republic of São Tomé and Príncipe for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income]	São Tomé and Príncipe	Original	13-07-2015	12-07-2017

61	Convention between the Portuguese Republic and the Kingdom of Saudi Arabia for the Avoidance of Double Taxation and the Prevention of Tax Evasion with respect to Taxes on Income	Saudi Arabia	Original	08-04-2015	01-09-2016
62	Convention entre la République Portugaise et la République du Sénégal en Vue D'Éviter la Double Imposition et de Prévenir l'Évasion Fiscale en Matière d'Impôts sur le Revenu	Senegal	Original	13-06-2014	20-03-2016
63	Agreement between the Portuguese Republic 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	06-09-1999	16-03-2001
			Amending Instrument (a)	28-05-2012	26-12-2013
64	Convention between the Portuguese Republic 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	05-06-2001	02-11-2004
65	Convention between the Portuguese Republic 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	05-03-2003	13-08-2004
66	Convention between the Portuguese Republic and the Republic of South Africa for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	South Africa	Original	13-11-2006	22-10-2008
67	Convenção entre a República Portuguesa e o Reino de Espanha para Evitar a Dupla Tributação e Prevenir a Evasão Fiscal em Matéria de Impostos sobre o Rendimento [Convention between the Portuguese Republic 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	26-10-1993	28-06-1995
68	Convention between the Portuguese Republic and the Kingdom of Sweden for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Sweden	Original	29-08-2002	19-12-2003
69		Switzerland	Original	26-09-1974	17-12-1975

	Convention entre le Portugal et la Suisse en Vue d'Éviter les Doubles Impositions en Matière d'Impôts sur le Revenu et sur la Fortune		Amending Instrument (a)	25-06-2012	21-10-2013
70	Convention between the Portuguese Republic and the Democratic Republic of Timor-Leste for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Timor-Leste	Original	27-09-2011	N/A
71	Convention entre la République Portugaise et la République Tunisienne en Vue d'Éviter la Double Imposition en Matière d'Impôts sur le Revenu	Tunisia	Original	24-02-1999	21-08-2000
72	Convention between the Portuguese Republic and the Republic of Turkey for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Turkey	Original	11-05-2005	18-12-2006
73	Convention between the Portuguese Republic and Ukraine for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Ukraine	Original	09-02-2000	11-03-2002
74	Convention between the Portuguese Republic and 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	17-01-2011	22-05-2012
75	Convention between the Portuguese Republic 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	United Kingdom	Original	27-03-1968	17-01-1969
76	Convention between the Portuguese Republic and 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	06-09-1994	18-12-1995
77	Convention between the Portuguese Republic and the Oriental Republic of Uruguay for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital	Uruguay	Original	30-11-2009	13-09-2012

78	Convention between the Portuguese Republic and the Republic of Venezuela for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Venezuela	Original	23-04-1996	08-01-1998
79	Agreement between the Portuguese Republic and the Socialist Republic of Viet Nam for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income	Viet Nam	Original	03-06-2015	09-11-2016

Article 3 – Transparent Entities

Reservation

Pursuant to Article 3(5)(a) of the Convention, the Portuguese Republic reserves the right for the entirety of Article 3 not to apply to its Covered Tax Agreements.

Article 4 – Dual Resident Entities

Reservation

Pursuant to Article 4(3)(a) of the Convention, the Portuguese Republic 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

Notification of Choice of Optional Provisions

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

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 5(10) of the Convention, the Portuguese Republic considers that the following agreement contains a provision described in Article 5(7). The article and paragraph number of such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
3	Austria	Article 23(1)

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 Portuguese Republic considers that the following agreements are not within the scope of a reservation under Article 6(4) and contain preamble language described in Article 6(2). The text of the relevant preambular paragraph is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Preamble Text
1	Algeria	<La République Portugaise et le Gouvernement de la République Algérienne Démocratique et Populaire,> désireux de conclure une convention, en vue d'éviter les doubles impositions, de prévenir l'évasion fiscale <et d'établir des règles d'assistance réciproque en matière de recouvrement d'impôts sur le revenu et sur la fortune, sont convenus des dispositions suivantes:>
2	Andorra	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income; Taking into account that the main purpose of this Convention is to eliminate international double taxation with regard to the different categories of income derived by residents of both States, as well as to prevent fiscal evasion;
3	Austria	<O Presidente da República Portuguesa e o Presidente Federal da República da Áustria,> desejando evitar a dupla tributação em matéria de impostos sobre o rendimento e sobre o capital, <decidiram concluir uma convenção e designaram para tal efeito como plenipotenciários:> <Der Präsident der Portugiesischen Republik und der Bundespräsident der Republik Österreich sind,> von dem Wunsche geleitet, auf dem Gebiete der Steuern vom Einkommen und vom Vermögen die Doppelbesteuerung zu vermeiden, <übereingekommen, ein Abkommen abzuschließen, und haben zu diesem Zweck zu ihren Bevollmächtigten ernannt:>
4	Bahrain	<The Portuguese Republic and 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, <have agreed as follows:>
5	Barbados	<The Portuguese Republic and Barbados,> 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:>
6	Belgium	<Le Président de la République Portugaise et Sa Majesté le Roi des Belges,> désireux d'éviter les doubles impositions et de régler certaines autres questions en matière d'impôts sur le revenu, <ont décidé de conclure une convention et ont nommé à cet effet pour leurs plénipotentiaires, savoir:>

7	Brazil	<A República Portuguesa e a República Federativa do Brasil, considerando os laços especiais existentes entre os dois países e> desejando concluir uma Convenção Destinada a Evitar a Dupla Tributação e a Prevenir a Evasão Fiscal em Matéria de Impostos sobre o Rendimento, <acordaram o seguinte:>
8	Bulgaria	<The Portuguese Republic and the Republic of Bulgaria,> 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:>
9	Cabo Verde	<A República de Cabo Verde e a República Portuguesa, desejando fomentar as suas relações económicas e culturais> pela eliminação da dupla tributação em matéria de impostos sobre o rendimento <e desenvolver a cooperação na área da fiscalidade, acordaram nas disposições seguintes:>
10	Canada	<The Government of the Portuguese Republic and the Government of Canada,> 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:>
11	Chile	<The Portuguese Republic and the Republic of Chile,> 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:>
12	China (People's Republic of)	<The Government of the Portuguese Republic and the Government of the 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, <have agreed as follows:>
13	Colombia	<The Portuguese Republic and the Republic of Colombia,> desiring to conclude a Convention 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 countries, have agreed as follows:>
14	Côte d'Ivoire	Désireux de conclure une Convention en vue d'éviter la double imposition et de prévenir l'évasion et la fraude fiscales en matière d'impôts sur le revenu; En tenant compte que le but principal de cette Convention est l'élimination de la double imposition internationale à l'égard des différentes catégories de revenus perçus par les résidents des deux Etats, ainsi que de prévenir l'évasion et la fraude fiscales;
15	Croatia	<The Portuguese Republic and the Republic of Croatia,> 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:>
16	Cuba	<O Governo da República Portuguesa e o Governo da República de Cuba,> desejando concluir uma Convenção para Evitar a Dupla Tributação e Prevenir a Evasão e Fraude Fiscal

		em Matéria de Impostos sobre o Rendimento, <Acordaram no seguinte:> <El Gobierno de la República Portuguesa y el Gobierno de la República de Cuba,> deseando concluir un Convenio para Evitar la Doble Imposición y Prevenir la Evasión y el Fraude Fiscal en Materia de Impuestos sobre la Renta <han convenido lo siguiente:>
17	Cyprus	<The Portuguese Republic and the Republic of Cyprus,> 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:>
18	Czech Republic	<The Government of the Portuguese Republic and the Government of the 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, <have agreed as follows:>
19	Denmark	<The Portuguese Republic and the Kingdom of Denmark,> 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 folloows:>
20	Estonia	<The Portuguese Republic and the Republic of Estonia,> 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:>
21	Ethiopia	<The Portuguese Republic and the Federal Democratic Republic of Ethiopia,> desiring to conclude a Convention 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 countries, have agreed as follows:>
22	Finland	Desiring to conclude a Convention for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income,
23	France	<Le Président de la République Portugaise et le Président de la République Française, désireux> d'éviter dans la mesure du possible les doubles impositions et <d'établir des règles d'assistance administrative réciproque en matière d'impôts sur le revenu, ont décidé de conclure une convention fiscale et ont nommé à cet effet comme plénipotentiaires:>
24	Georgia	<The Portuguese Republic and Georgia,> 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:>
25	Germany	<The Portuguese Republic and the Federal Republic of Germany, desiring to promote their bilateral economic relations> by avoiding double taxation with respect to taxes on income and capital, <have agreed as follows:>
26	Greece	<The Government of the Portuguese Republic and the

		Government of the Hellenic Republic,> 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:>
27	Guinea-Bissau	<A República Portuguesa e a República da Guiné-Bissau,> desejando celebrar uma convenção para evitar a dupla tributação e prevenir a evasão fiscal em matéria de impostos sobre o rendimento, <acordaram nas disposições seguintes:>
28	Hong Kong (China)	<The Portuguese Republic and the Hong Kong Special Administrative Region of the 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, <have agreed as follows:>
29	Hungary	<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:>
30	Iceland	<The Portuguese Republic and the Republic of Iceland,> 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:>
31	India	<The Government of the Portuguese Republic and the Government of the Republic of India,> 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:>
32	Indonesia	<The Portuguese Republic and the Republic of Indonesia,> desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <have agreed as follows:>
33	Ireland	<The Government of the Portuguese Republic and the Government of Ireland,> 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:>
34	Israel	<The Portuguese Republic and the Government of the State of Israel,> 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:>
35	Italy	<Le Gouvernement de la République portugaise et le Gouvernement de la République italienne,> désireux de conclure une Convention, en vue d'éviter les doubles impositions et de prévenir l'évasion fiscal, en matière d'impôts sur le revenu, <sont convenus des dispositions suivantes:>
36	Japan	<The Portuguese Republic and Japan,> 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:>
37	Korea	<The Government of the Portuguese Republic and the Government of the Republic of Korea,> 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:>
38	Kuwait	<The Government of the Portuguese Republic and the Government of the State of Kuwait, desiring to promote their mutual economic relations> through the conclusion between both Contracting States of a convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income <have agreed as follows:>
39	Latvia	<The Portuguese Republic and the Republic of Latvia,> 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:>
40	Lithuania	<The Portuguese Republic and the Republic of Lithuania,> 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:>
41	Luxembourg	<Le Gouvernement de la République Portugaise et le Gouvernement du Grand-Duché de Luxembourg,> 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 <sont convenus de ce qui suit:>
42	Macau (China)	<O Governo de Portugal e o Governo de Macau, devidamente autorizado pelo competente órgão de soberania da República Portuguesa com o assentimento do Governo da República Popular da China,> desejando celebrar uma convenção entre a República Portuguesa e Macau para evitar a dupla tributação e prevenir a evasão fiscal em matéria de impostos sobre o rendimento, <acordaram entre si o seguinte:>
43	Malta	<The Government of the Portuguese Republic and the Government of the Republic of Malta,> 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:>
44	Mexico	<The Portuguese Republic and the United Mexican States,> desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, which shall hereafter be referred to as the «Convention», <have agreed as follows:>
45	Moldova	<The Portuguese Republic and the Republic of Moldova,> 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:>
46	Montenegro	<The Portuguese Republic and Montenegro,> 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:>
47	Morocco	<Le Gouvernement de la République Portugaise et le Gouvernement du Royaume du Maroc,> désireux de conclure une Convention en vue d'éviter la double imposition en matière d'impôts sur le revenu, <sont convenus des dispositions suivantes:>
48	Mozambique	<A República Portuguesa e a República de Moçambique, desejando fomentar as suas relações económicas e culturais> pela eliminação da dupla tributação em matéria de impostos sobre o rendimento <e desenvolver a cooperação na área da fiscalidade, acordaram nas disposições seguintes:>
49	Netherlands	<The Portuguese Republic and the Kingdom of the Netherlands,> desiring that a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital be concluded by both States, <have agreed as follows:>
50	Norway	<The Portuguese Republic and the Kingdom of Norway,> 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:>
51	Oman	<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:>
52	Pakistan	<The Government of the Portuguese Republic and the Government of the Islamic Republic of Pakistan,> 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:>
53	Panama	<The Portuguese Republic and the Republic of Panama,> desiring to conclude a Convention 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 countries, have agreed as follows:>
54	Peru	<The Portuguese Republic and the Republic of Peru,> desiring to conclude a Convention 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 countries, have agreed as follows:>
55	Poland	<The Government of the Portuguese Republic and the Government of the Republic of Poland,> 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:>
56	Qatar	<The Portuguese Republic and the State of Qatar,> desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <have agreed as follows:>
57	Romania	<The Government of the Portuguese Republic and the Government of Romania> desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital, <have agreed as follows:>
58	Russia	<The Government of the Portuguese Republic and the Government of the Russian Federation,> desiring to conclude a convention for the avoidance of doube taxation and the prevention of fiscal evasion with respect to taxes on income, <have agreed as follows:>
59	San Marino	<The Portuguese Republic and the Republic of San Marino,> 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 strengthen the disciplined development of economic relations between the two States in the framework of greater cooperation, have agreed as follows:>
60	São Tomé and Príncipe	<A República Portuguesa e a República Democrática de São Tomé e Príncipe,> desejando celebrar uma Convenção para evitar a dupla tributação e prevenir a evasão fiscal em matéria de impostos sobre o rendimento, <tendo em vista promover e reforçar as relações económicas entre os dois países, acordam no seguinte:>
61	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, <in order to promote and strengthen the economic relations between the two countries;>
62	Senegal	<La République Portugaise et la République du Sénégal,> désireuses de conclure une Convention en vue d'éviter la double imposition et de prévenir l'évasion fiscale en matière d'impôts sur le revenu, <sont convenues des dispositions suivantes:>
63	Singapore	<The Portuguese Republic and the Republic of Singapore,> desiring to conclude an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <have agreed as follows:>
64	Slovak Republic	<The Portuguese Republic and the 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, <have agreed as follows:>
65	Slovenia	<The Portuguese Republic and the Republic of 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, <have agreed as follows:>
66	South Africa	<The Portuguese Republic and the Republic of South Africa,> 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 promote and strengthen the economic relations between the two countries, have agreed as follows:>
67	Spain	<A República Portuguesa e o Reino de Espanha,> desejando concluir uma Convenção para Evitar a Dupla Tributação e Prevenir a Evasão Fiscal em Matéria de Impostos sobre o Rendimento, <acordaram no seguinte:> <El Reino de España y la República Portuguesa,> deseando concluir un Convenio para Evitar la Doble Imposición y Prevenir la Evasión Fiscal en Materia de Impuestos sobre la Renta, <han acordado lo siguiente:>
68	Sweden	<The Portuguese Republic and the Kingdom of Sweden,> 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:>
69	Switzerland	<Le Gouvernement portugais et le Conseil fédéral suisse,> désireux de conclure une convention en vue d'éviter les doubles impositions en matière d'impôts sur le revenu et sur la fortune, <sont convenus des dispositions suivantes:>
70	Timor-Leste	<The Portuguese Republic and the Democratic Republic of Timor-Leste,> 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:>
71	Tunisia	<Le Gouvernement de la République Portugaise et le Gouvernement de la République Tunisienne,> désireux de conclure une Convention, en vue d'éviter la double imposition en matière d'impôts sur le revenu, <sont convenus des dispositions suivantes:>
72	Turkey	<The Portuguese Republic and the Republic of Turkey,> 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	Ukraine	<The Portuguese Republic and Ukraine,> desiring to conclude a Convention for the avoidace of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital <and confirming their endeavour to develop mutual economic relations, have agreed as follows:>
74	United Arab Emirates	<The Portuguese Republic and the United Arab Emirates, desiring to promote their mutual economic relations> through the conclusion between them of a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <have agreed as follows:>

75	United Kingdom	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income;
76	United States	<The Government of the Portuguese Republic 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:>
77	Uruguay	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;
78	Venezuela	<The Government of the Portuguese Republic and the Government of the Republic of Venezuela,> 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:>
79	Viet Nam	<The Portuguese Republic and the Socialist Republic of Viet Nam,> desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, <in order to promote and strengthen the economic relations between the two countries, have agreed as follows:>

Article 7 – Prevention of Treaty Abuse

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 7(17)(a) of the Convention, the Portuguese Republic considers that the following agreements are not subject to a reservation described in 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	Andorra	Article 28(4)
4	Bahrain	Article 27(3)
5	Barbados	Article 27(3)
11	Chile	Paragraph 6 of the Protocol
13	Colombia	Article 26(3)
14	Côte d'Ivoire	Article 30(3)
21	Ethiopia	Paragraph 1(c) of the Protocol
22	Finland	Paragraph 1(c) of the Protocol
23	France	Article 31bis(2)
24	Georgia	Paragraph 1(c) of the Protocol
26	Greece	Articles 11(7) and 12(7)
28	Hong Kong (China)	Paragraph 3 of the Protocol
36	Japan	Article 21
44	Mexico	Protocol (Ad articles 11 and 12)
45	Moldova	Paragraph 2(c) of the Protocol
46	Montenegro	Article 27(3)
51	Oman	Paragraph 1(c) of the Protocol
53	Panama	Article 27(3)
54	Peru	Paragraph 11(c) of the Protocol
56	Qatar	Paragraph 1(c) of the Protocol
59	San Marino	Article 28(1)
60	São Tomé and Príncipe	Article 29(3)
61	Saudi Arabia	Article 27(2)
62	Senegal	Article 30(3)
69	Switzerland	Article 27(3)
70	Timor-Leste	Article 29(3)
74	United Arab Emirates	Article 27(3)
79	Viet Nam	Paragraph 1(c) of the Protocol

Article 8 – Dividend Transfer Transactions

Reservation

Pursuant to Article 8(3)(b)(i) of the Convention, the Portuguese Republic reserves the right for the entirety of Article 8 not to apply to its Covered Tax Agreements to the extent that the provisions described in Article 8(1) already include a minimum holding period. The following agreements contain provisions that are within the scope of this reservation.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Algeria	Article 10(2)(b)
2	Andorra	Article 10(2)(a)
7	Brazil	Article 10(2)(a)
8	Bulgaria	Article 10(3)
10	Canada	Article 10(2)(a)(ii)
18	Czech Republic	Article 10(3)
29	Hungary	Article 10(3)
30	Iceland	Article 10(2)(a)
31	India	Article 10(2)(a)(ii) and (b)(ii)
36	Japan	Article 10(2)(a)(i) and (ii)
37	Korea	Article 10(3)
43	Malta	Article 10(2)(a)(ii)
47	Morocco	Article 10(2)(a)
50	Norway	Article 10(2)(a)
52	Pakistan	Article 10(2)(ii)
55	Poland	Article 10(3)
57	Romania	Article 10(3)
58	Russia	Article 10(3)
64	Slovak Republic	Article 10(3)
66	South Africa	Article 10(2)(b)
69	Switzerland	Article 10(3)(b)
72	Turkey	Article 10(2)(a)
73	Ukraine	Article 10(3)
76	United States	Article 10(3)

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 8(4) of the Convention, the Portuguese Republic considers that the following agreements contain a provision described in Article 8(1) that is not subject to a reservation described in Article 8(3)(b). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
4	Bahrain	Article 10(2)(a)
5	Barbados	Article 10(2)(a)
10	Canada	Article 10(2)(a)(i)
11	Chile	Article 10(2)(a)
15	Croatia	Article 10(2)(a)
16	Cuba	Article 10(2)(a)

21	Ethiopia	Article 10(2)(a)
22	Finland	Article 10(2)(a)
24	Georgia	Article 10(2)(a)
28	Hong Kong (China)	Article 10(2)(a)
34	Israel	Article 10(2)(a) and (b)
38	Kuwait	Article 10(2)(a)
45	Moldova	Article 10(2)(a)
46	Montenegro	Article 10(2)(a)
51	Oman	Article 10(2)(b)
53	Panama	Article 10(2)(a)
54	Peru	Article 10(2)(a)(i) and (ii)
56	Qatar	Article 10(2)(a)
59	San Marino	Article 10(2)(a)
60	São Tomé and Príncipe	Article 10(2)(a)
61	Saudi Arabia	Article 10(2)(a)
62	Senegal	Article 10(2)(a)
65	Slovenia	Article 10(2)(a)
67	Spain	Article 10(2)(a)
69	Switzerland	Article 10(2)(a)
70	Timor-Leste	Article 10(2)(a)
74	United Arab Emirates	Article 10(2)(a)
75	United Kingdom	Article 10(2)(a)(i) and (ii)
77	Uruguay	Article 10(2)(a)
79	Viet Nam	Article 10(2)(a) and (b)

Article 9 – Capital Gains from Alienation of Shares or Interests of Entities Deriving their Value Principally from Immovable Property

Notification of Choice of Optional Provisions

Pursuant to Article 9(8) of the Convention, the Portuguese Republic hereby chooses to apply Article 9(4).

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 9(7) of the Convention, the Portuguese Republic considers that the following agreements contain a provision described in Article 9(1). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
2	Andorra	Article 13(4)
4	Bahrain	Article 13(4)
5	Barbados	Article 13(4)
10	Canada	Article 13(4)
11	Chile	Article 13(4)(a)
12	China (People's Republic of)	Article 13(4)
13	Colombia	Article 13(4)
14	Côte d'Ivoire	Article 13(4)
15	Croatia	Article 13(4)
17	Cyprus	Article 13(4)
20	Estonia	Article 13(1)
21	Ethiopia	Article 13(4)
22	Finland	Article 13(4)
23	France	Article 14(1), third sentence
24	Georgia	Article 13(4)
27	Guinea-Bissau	Article 13(4)
28	Hong Kong (China)	Article 13(4)
31	India	Article 13(4)
33	Ireland	Article 13(2)
34	Israel	Article 13(4)
36	Japan	Article 13(2)
38	Kuwait	Article 13(4)
39	Latvia	Article 13(1)
40	Lithuania	Article 13(1)
43	Malta	Article 13(2)
44	Mexico	Article 13(5)
45	Moldova	Article 13(4)
46	Montenegro	Article 13(4)
48	Mozambique	Article 13(4)
50	Norway	Article 13(4)
51	Oman	Article 13(4)
53	Panama	Article 13(5)

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54	Peru	Article 13(5)
56	Qatar	Article 13(4)
57	Romania	Article 13(4)
59	San Marino	Article 13(4)
60	São Tomé and Príncipe	Article 14(4)
61	Saudi Arabia	Article 13(4)
62	Senegal	Article 14(4)
65	Slovenia	Article 13(2)
66	South Africa	Article 13(4)
67	Spain	Article 13(2)
69	Switzerland	Article 13(3)
70	Timor-Leste	Article 13(4)
73	Ukraine	Article 13(2)
74	United Arab Emirates	Article 13(4)
76	United States	Article 14(2)
77	Uruguay	Article 13(4)
78	Venezuela	Article 13(4)
79	Viet Nam	Article 13(4)

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

Reservation

Pursuant to Article 10(5)(a) of the Convention, the Portuguese Republic 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)(b) of the Convention, the Portuguese Republic reserves the right for the entirety of Article 11 not to apply to its Covered Tax Agreements that already contain the provisions described in Article 11(2). The following agreement contains provisions that are within the scope of this reservation.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
76	United States	Subparagraphs b) and c) of paragraph 1 of the Protocol

Article 12 – Artificial Avoidance of Permanent Establishment Status through Commissionnaire Arrangements and Similar Strategies

Reservation

Pursuant to Article 12(4) of the Convention, the Portuguese Republic 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

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 13(8) of the Convention, the Portuguese Republic considers that the following agreements contain a provision described in Article 13(5)(b). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Algeria	Article 5(4)
2	Andorra	Article 5(4)
3	Austria	Article 5(3)
4	Bahrain	Article 5(5)
5	Barbados	Article 5(4)
6	Belgium	Article 5(3)
7	Brazil	Article 5(4)
8	Bulgaria	Article 5(4)
9	Cabo Verde	Article 5(4)
10	Canada	Article 5(4)
11	Chile	Article 5(4)
12	China (People's Republic of)	Article 5(4)
13	Colombia	Article 5(4)
14	Côte d'Ivoire	Article 5(4)
15	Croatia	Article 5(4)
16	Cuba	Article 5(5)
17	Cyprus	Article 5(4)
18	Czech Republic	Article 5(4)
19	Denmark	Article 5(4)
20	Estonia	Article 5(4)
21	Ethiopia	Article 5(4)
22	Finland	Article 5(4)
23	France	Article 5(3)
24	Georgia	Article 5(4)
25	Germany	Article 5(4)
26	Greece	Article 5(5)
27	Guinea-Bissau	Article 5(4)
28	Hong Kong (China)	Article 5(4)
29	Hungary	Article 5(4)
30	Iceland	Article 5(4)
31	India	Article 5(4)
32	Indonesia	Article 5(4)
33	Ireland	Article 5(4)
34	Israel	Article 5(4)
35	Italy	Article 5(3)
36	Japan	Article 5(4)
37	Korea	Article 5(4)
38	Kuwait	Article 5(6)
39	Latvia	Article 5(4)
40	Lithuania	Article 5(4)

41	Luxembourg	Article 5(4)
42	Macau (China)	Article 5(4)
43	Malta	Article 5(4)
44	Mexico	Article 5(4)
45	Moldova	Article 5(4)
46	Montenegro	Article 5(4)
47	Morocco	Article 5(4)
48	Mozambique	Article 5(4)
49	Netherlands	Article 5(4)
50	Norway	Article 5(5)
51	Oman	Article 5(4)
52	Pakistan	Article 5(3)
53	Panama	Article 5(4)
54	Peru	Article 5(4)
55	Poland	Article 5(4)
56	Qatar	Article 5(4)
57	Romania	Article 5(4)
58	Russia	Article 5(4)
59	San Marino	Article 5(4)
60	São Tomé and Príncipe	Article 5(4)
61	Saudi Arabia	Article 5(4)
62	Senegal	Article 5(4)
63	Singapore	Article 5(4)
64	Slovak Republic	Article 5(4)
65	Slovenia	Article 5(4)
66	South Africa	Article 5(4)
67	Spain	Article 5(4)
68	Sweden	Article 5(4)
69	Switzerland	Article 5(3)
70	Timor-Leste	Article 5(4)
71	Tunisia	Article 5(4)
72	Turkey	Article 5(4)
73	Ukraine	Article 5(4)
74	United Arab Emirates	Article 5(5)
75	United Kingdom	Article 5(3)
76	United States	Article 5(5)
77	Uruguay	Article 5(4)
78	Venezuela	Article 5(4)
79	Viet Nam	Article 5(4)

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Article 14 – Splitting-up of Contracts

Reservation

Pursuant to Article 14(3)(a) of the Convention, the Portuguese Republic reserves the right for the entirety of Article 14 not to apply to its Covered Tax Agreements.

Article 16 – Mutual Agreement Procedure

Reservation

Pursuant to Article 16(5)(a) of the Convention, the Portuguese Republic 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, the Portuguese Republic 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
3	Austria	Article 25(1), second sentence
6	Belgium	Article 24(1), second sentence
7	Brazil	Article 25(1), second sentence
9	Cabo Verde	Article 25(1), second sentence
10	Canada	Article 24(1), second sentence
23	France	Article 26(1), second sentence
25	Germany	Article 26(1), second sentence
26	Greece	Article 24(1), second sentence
29	Hungary	Article 25(1), second sentence
32	Indonesia	Article 25(1), second sentence
33	Ireland	Article 25(1), second sentence
35	Italy	Article 24(1), second sentence
37	Korea	Article 25(1), second sentence
41	Luxembourg	Article 26(1), second sentence
48	Mozambique	Article 25(1), second sentence
58	Russia	Article 25(1), second sentence
67	Spain	Article 25(1), second sentence
69	Switzerland	Article 25(1), second sentence
71	Tunisia	Article 24(1), second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, the Portuguese Republic considers that the following agreements contain a provision that provides that a case referred to in the first sentence of Article 16(1) must be presented within a specific time period that is at least three years from the first notification of the action resulting in taxation not in accordance with the provisions of the Covered Tax Agreement. The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Algeria	Article 25(1), second sentence
2	Andorra	Article 24(1), second sentence
4	Bahrain	Article 25(1), second sentence
5	Barbados	Article 25(1), second sentence
8	Bulgaria	Article 25(1), second sentence
11	Chile	Article 24(1), second sentence
12	China (People's Republic of)	Article 25(1), second sentence
13	Colombia	Article 24(1), second sentence
14	Côte d'Ivoire	Article 25(1), second sentence
15	Croatia	Article 25(1), second sentence
16	Cuba	Article 25(1), second sentence
17	Cyprus	Article 25(1), second sentence
18	Czech Republic	Article 25(1), second sentence
19	Denmark	Article 25(1), second sentence
20	Estonia	Article 25(1), second sentence
21	Ethiopia	Article 26(1), second sentence
22	Finland	Article 23(1), second sentence
24	Georgia	Article 25(1), second sentence
27	Guinea-Bissau	Article 25(1), second sentence
28	Hong Kong (China)	Article 24(1), second sentence
30	Iceland	Article 25(1), second sentence
31	India	Article 25(1), second sentence
34	Israel	Article 25(1), second sentence
36	Japan	Article 24(1), second sentence
38	Kuwait	Article 25(1), second sentence
39	Latvia	Article 26(1), second sentence
40	Lithuania	Article 26(1), second sentence
42	Macau (China)	Article 25(1), second sentence
43	Malta	Article 24(1), second sentence
44	Mexico	Article 25(1), second sentence
45	Moldova	Article 25(1), second sentence
46	Montenegro	Article 24(1), second sentence
47	Morocco	Article 25(1), second sentence
49	Netherlands	Article 27(1), second sentence
50	Norway	Article 25(1), second sentence
51	Oman	Article 25(1), second sentence
52	Pakistan	Article 25(1), second sentence
53	Panama	Article 24(1), second sentence
54	Peru	Article 24(1), second sentence
55	Poland	Article 25(1), second sentence
56	Qatar	Article 25(1), second sentence

57	Romania	Article 26(1), second sentence
59	San Marino	Article 25(1), second sentence
60	São Tomé and Príncipe	Article 26(1), second sentence
61	Saudi Arabia	Article 24(1), second sentence
62	Senegal	Article 26(1), second sentence
63	Singapore	Article 26(1), second sentence
64	Slovak Republic	Article 25(1), second sentence
65	Slovenia	Article 26(1), second sentence
66	South Africa	Article 25(1), second sentence
68	Sweden	Article 24(1), second sentence
70	Timor-Leste	Article 26(1), second sentence
72	Turkey	Article 25(1), second sentence
73	Ukraine	Article 26(1), second sentence
74	United Arab Emirates	Article 25(1), second sentence
76	United States	Article 27(1), second sentence
77	Uruguay	Article 26(1), second sentence
78	Venezuela	Article 25(1), second sentence
79	Viet Nam	Article 24(1), second sentence

Notification of Listed Agreements Not Containing Existing Provisions

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

Listed Agreement Number	Other Contracting Jurisdiction
6	Belgium

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

Listed Agreement Number	Other Contracting Jurisdiction
1	Algeria
3	Austria
6	Belgium
9	Cabo Verde
10	Canada
11	Chile
23	France
25	Germany
26	Greece
29	Hungary
30	Iceland
32	Indonesia
33	Ireland
35	Italy
37	Korea
41	Luxembourg

44	Mexico
48	Mozambique
63	Singapore
67	Spain
69	Switzerland
71	Tunisia
75	United Kingdom
78	Venezuela

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

Listed Agreement Number	Other Contracting Jurisdiction
6	Belgium
23	France

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

Listed Agreement Number	Other Contracting Jurisdiction
1	Algeria
4	Bahrain
5	Barbados
6	Belgium
7	Brazil
9	Cabo Verde
10	Canada
11	Chile
13	Colombia
15	Croatia
17	Cyprus
18	Czech Republic
21	Ethiopia
22	Finland
24	Georgia
25	Germany
27	Guinea-Bissau
30	Iceland
33	Ireland
34	Israel
35	Italy
38	Kuwait
41	Luxembourg
44	Mexico
45	Moldova
46	Montenegro

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48	Mozambique
50	Norway
51	Oman
54	Peru
58	Russia
59	San Marino
60	São Tomé and Príncipe
61	Saudi Arabia
62	Senegal
64	Slovak Republic
70	Timor-Leste
72	Turkey
73	Ukraine
74	United Arab Emirates
75	United Kingdom
77	Uruguay
79	Viet Nam

Article 17 – Corresponding Adjustments

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 17(4) of the Convention, the Portuguese Republic considers that the following agreements contain a provision described in Article 17(2). The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Algeria	Article 9(2)
2	Andorra	Article 9(2)
4	Bahrain	Article 9(2)
5	Barbados	Article 9(2)
8	Bulgaria	Article 9(2)
9	Cabo Verde	Article 9(2)
10	Canada	Article 9(2)
11	Chile	Article 9(2)
12	China (People's Republic of)	Article 9(2)
13	Colombia	Article 9(2)
14	Côte d'Ivoire	Article 9(2)
15	Croatia	Article 9(2)
16	Cuba	Article 9(2)
17	Cyprus	Article 9(2)
18	Czech Republic	Article 9(2)
19	Denmark	Article 9(2)
20	Estonia	Article 9(2)
21	Ethiopia	Article 9(2)
22	Finland	Article 9(2)
24	Georgia	Article 9(2)
26	Greece	Article 9(2)
27	Guinea-Bissau	Article 9(2)
28	Hong Kong (China)	Article 9(2)
29	Hungary	Article 9(2)
30	Iceland	Article 9(2)
31	India	Article 9(2)
32	Indonesia	Article 9(2)
33	Ireland	Article 9(2)
34	Israel	Article 9(2)
36	Japan	Article 9(2)
38	Kuwait	Article 9(2)
39	Latvia	Article 9(2)
40	Lithuania	Article 9(2)
41	Luxembourg	Article 9(2)
42	Macau (China)	Article 9(2)
43	Malta	Article 9(2)
44	Mexico	Article 9(2)
45	Moldova	Article 9(2)
46	Montenegro	Article 9(2)
47	Morocco	Article 9(2)
48	Mozambique	Article 9(2)

49	Netherlands	Article 9(2)
50	Norway	Article 9(2)
51	Oman	Article 9(2)
52	Pakistan	Article 9(2)
53	Panama	Article 9(2)
54	Peru	Article 9(2)
55	Poland	Article 9(2)
56	Qatar	Article 9(2)
57	Romania	Article 9(2)
58	Russia	Article 9(2)
59	San Marino	Article 9(2)
60	São Tomé and Príncipe	Article 9(2)
61	Saudi Arabia	Article 9(2)
62	Senegal	Article 9(2)
63	Singapore	Article 9(2)
64	Slovak Republic	Article 9(2)
65	Slovenia	Article 9(2)
66	South Africa	Article 9(2)
67	Spain	Article 9(2)
68	Sweden	Article 9(2)
69	Switzerland	Article 9(2)
70	Timor-Leste	Article 9(2)
71	Tunisia	Article 9(2)
72	Turkey	Article 9(2)
73	Ukraine	Article 9(2)
74	United Arab Emirates	Article 9(2)
75	United Kingdom	Article 22(4)
76	United States	Article 9(2)
77	Uruguay	Article 9(2)
78	Venezuela	Article 9(2)
79	Viet Nam	Article 9(2)

Article 18 – Choice to Apply Part VI

Notification of Choice of Optional Provisions

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

Article 19 – Mandatory Binding Arbitration

Reservations

Pursuant to Article 19(11) of the Convention, for purposes of applying Article 19 to its Covered Tax Agreements, the Portuguese Republic reserves the right to replace the two-year period set forth in Article 19(1)(b) with a three-year period.

Pursuant to Article 19(12) of the Convention, the Portuguese Republic 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

Reservations

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

Pursuant to Article 23(7) of the Convention, the Portuguese Republic reserves the right for Part VI not to apply with respect to all Covered Tax Agreements for which the other Contracting Jurisdiction makes a reservation pursuant to Article 23(6).

Notification of Choice of Optional Provisions

Pursuant to Article 23(4) of the Convention, the Portuguese Republic hereby chooses to apply Article 23(5).

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Article 24 – Agreement on a Different Resolution

Notification of Choice of Optional Provisions

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

Article 26 – Compatibility

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 26(1) of the Convention, the Portuguese Republic considers that the following agreement is not within the scope of a reservation under Article 26(4) and contains a provision that provides for arbitration of unresolved issues arising from a mutual agreement procedure case. The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
36	Japan	Article 24(5) and paragraphs 12 and 13 of the Protocol

Article 28 – Reservations

Reservations Formulated for Scope of Arbitration

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

1. The Portuguese Republic reserves the right to limit the scope of issues eligible for arbitration under the Convention to the following:

i. Issues arising under provisions akin to Article 5 (Permanent Establishment) of the OECD Model Tax Convention;
ii. Issues arising under provisions akin to Article 7 (Business Profits) of the OECD Model Tax Convention; and
iii. Issues arising under provisions akin to Article 9 (Associated Enterprises) of the OECD Model Tax Convention.

2. The Portuguese Republic reserves the right to exclude from the scope of Part VI cases concerning items of income or capital that are not taxed by a Contracting Jurisdiction either because they are not included in the taxable base in that Contracting Jurisdiction or because they are subject to an exemption or zero tax rate provided only under the domestic tax law of that Contracting Jurisdiction.

3. The Portuguese Republic reserves the right to exclude from the scope of Part VI cases involving the conduct of a person directly affected by the case that, by final ruling resulting from judicial or administrative proceedings, has been subject to a penalty for tax fraud, wilful default or gross negligence. For this purpose, penalties for tax fraud, wilful default or gross negligence shall include the penalties for tax crimes as well as for other serious tax infringements as defined by Article 23(3) of RGIT (*Regime Geral das Infrações Tributárias*), enacted by the Law 15/2001, of 5 June 2001. Any subsequent provisions replacing, amending or updating these provisions would also be comprehended. The Portuguese Republic shall notify the Depositary of any such subsequent provisions.

4. The Portuguese Republic reserves the right to exclude from the scope of Part VI cases involving the application of domestic general anti-avoidance rules or anti-abuse rules contained in a Covered Tax Agreement as modified by the Convention. For this purpose, the Portuguese Republic´s domestic general anti-avoidance rules shall include Articles 38 and 39 of LGT (*Lei Geral Tributária*) enacted by the Decree-Law 398/98, of 17 December 1998, as amended. Any subsequent rules replacing, amending or updating these anti-avoidance rules would also be comprehended. The Portuguese Republic shall notify the Depositary of any such subsequent provisions.

5. The Portuguese Republic reserves the right to exclude from the scope of Part VI cases eligible for arbitration under the Convention on the Elimination of Double Taxation in Connection with the Adjustment of Profits of Associated Enterprises (90/436/EEC), as amended, or the European Union Council Directive (EU) 2017/1852 of 10 October 2017 on tax dispute resolution mechanisms in the European Union, or under any other instrument of the European Union.

Article 35 – Entry into Effect

Reservation

Pursuant to Article 35(6) of the Convention, the Portuguese Republic 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, the Portuguese Republic 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.