



The Republic Of Seychelles

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

This document contains a provisional list of expected reservations and notifications to be made by **The Republic Of Seychelles** pursuant to Articles 28(7) and 29(4) of the Convention.

Article 2 – Interpretation of Terms

Notification - Agreements Covered by the Convention

Pursuant to Article 2(1)(a)(ii) of the Convention, **The Republic Of Seychelles** wishes the following agreement(s) to be covered by the Convention:

No	Title	Other Contracting Jurisdiction B	Original/Amending Instrument	Date of Signature	Date of Entry intoForce
1	Agreement between the Government of Jersey and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	Jersey	Original	28-Jul-15	5-Jan-17
2	Agreement between the Government of the Republic of The Republic Of Seychelles and the Government of the Republic of Mauritius for the avoidance of double taxation with respect to taxes on income.	Republic of Mauritius	Original	11-Mar-05	22-Jun-05
			Amending instruction (a)	03-Mar-2011	April 2012
3	Agreement between the Republic of The Republic Of Seychelles and the Kingdom of Belgium for the avoidance of double taxation with respect to taxes on income	Belgium	Original	27-Apr-06	10-09-15
			Amending Instrument (a)	14-Jul-09	N/A
4	Agreement between the Government of the Republic of South Africa and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	South Africa	Original	26-Aug-98	29-07-2002
			Amending Instrument (a)	04-04-2011	15-05-2012
5	Agreement between the Government of the Republic of China and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	China	Original	26-Aug-99	17-Dec-99
6	Agreement between the Government of the Republic of The Republic Of Seychelles and the Government of the Republic of Indonesia for the avoidance of double taxation with respect to taxes on income	Indonesia	Original	27-Sep-99	16-May-00

7	Agreement between the Government of the Republic of The Republic Of Seychelles and the Government of the Kingdom of Thailand for the avoidance of double taxation with respect to taxes on income	Thailand	Original	26-Apr-01	14-Apr-06
8	Agreement between the Government of the Sultanate of Oman and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	Oman	Original	13-Sep-03	20-Jan-04
9	Agreement between the Government of Malaysia and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	Malaysia	Original	03-Dec-03	10-Jul-06
10	Agreement between the Government of Botswana and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	Botswana	Original	26-Aug-04	22-Jun-05
11	Agreement between the Government of the Republic of The Republic Of Seychelles and the Government of the Socialist Republic Of Vietnam for the avoidance of double taxation with respect to taxes on income	Vietnam	Original	04-Oct-05	07-Jul-06
12	Agreement between the Government of the Republic of Cyprus and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	Cyprus	Original	28-Jun-2006	2-Nov-2006
13	Agreement between the Government of the Republic of The Republic Of Seychelles and the Kingdom of Qatar for the avoidance of double taxation with respect to taxes on income	Qatar	Original	01-Jul-06	10-Apr-07

14	Agreement between the Government of the United Arab Emirates and the Government of the Republic of The Republic Of Seychelles for the avoidance of double taxation with respect to taxes on income	UAE	Original	18-Sep-06	23-Apr-07
15	Convention between the Government of the Republic of The Republic Of Seychelles and the Government of Barbados for the avoidance of double taxation with respect to taxes on income	Barbados	Original	19-Oct-07	28-Feb-08
16	Agreement between the Government of the Republic of The Republic Of Seychelles and the Government of the State of Bahrain for the avoidance of double taxation with respect to taxes on income	Bahrain	Original	24-Apr-10	03-Feb-12
17	Agreement Between The Government Of The Principality Of Monaco And The Government Of The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Monaco	Original	04-Jan-10	01-Jan-13
18	Agreement Between The Government Of The Republic Of Singapore And The Government Of The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Singapore	Original	09-Jul-14	18-12-15
19	Agreement Between The Government Of The Republic Of Zambia And The Government Of The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Zambia	Original	07-Dec-10	04-Jun-12

20	Agreement Between The Government Of The Democratic Socialist Republic Of Sri Lanka And The Government Of The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Sri Lanka	Original	23-Sep-11	26-Mar-14
21	Agreement Between Bermuda And The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Bermuda	Original	24-May-12	19-Jul-13
22	Convention Between The Grand Duchy Of Luxembourg And The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income And On Capital	Luxembourg	Original	06-Jun-12	19-Aug-13
23	Convention Between The Republic Of The Republic Of Seychelles 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	14-July-12	01-Jan-14
24	Agreement Between The Republic Of San Marino And The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation With Respect To Taxes On Income	San Marino	Original	28-Sept-12	30-May-13
			Amending instrument (a)	11-Jun-2014	19-May-2015
25	Agreement Between The Government Of The Kingdom Of Swaziland And The Government Of The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Swaziland	Original	18-Oct-12	11-Feb-15

26	Agreement Between The Government Of The Isle Of Man And The Government Of The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Isle of Man	Original	28-Mar-13	16-Dec-13
27	Agreement Between The States Of Guernsey And The Government Of The Republic Of The Republic Of Seychelles For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Guernsey	Original	27-Jan-14	6-Oct-16
28	Agreement Between The Government Of The Republic Of The Republic Of Seychelles And The Government Of The Republic Of Kenya For The Avoidance Of Double Taxation And The Prevention Of Fiscal Evasion With Respect To Taxes On Income	Kenya	Original	17-Mar-14	9-Apr-15

Article 3 – Transparent Entities

Reservation

Pursuant to Article 3(5)(a) of the Convention, **The Republic Of Seychelles** 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 Republic Of Seychelles** reserves the right for the entirety of Article 4 not to apply to its Covered Tax Agreements.

Article 5 – Application of Methods for Elimination of Double Taxation

Reservation

Pursuant to Article 5(8) of the Convention, **The Republic Of Seychelles** reserves the right for the entirety of Article 5 not to apply with respect to all of its Covered Tax Agreements.

Article 6 – Purpose of a Covered Tax Agreement

Notification of Choice of Optional Provisions

Pursuant to Article 6(6) of the Convention, **The Republic Of Seychelles** hereby chooses to apply Article 6(3).

Notification of Existing Preamble Language in Listed Agreements

Pursuant to Article 6(5) of the Convention, **The Republic Of Seychelles** considers that the following agreements are not within the scope of a reservation under Article 6(4) and contains 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	Jersey	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
2	Mauritius	Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income,
3	Belgium	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
4	South Africa	desiring to promote and strengthen the economic relations between the two countries,
5	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	Indonesia	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
7	Thailand	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,
8	Oman	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
9	Malaysia	DESIRING to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
10	Botswana	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
11	Vietnam	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 Contracting States,

12	Cyprus	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,
13	Qatar	Desiring to conclude an Agreement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to taxes on income;
14	UAE	Desiring to promote and strengthen the economic relation by concluding an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital
15	Barbados	desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
16	Bahrain	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,
17	Monaco	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
18	Singapore	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
19	Zambia	Desiring to promote and strengthen the economic relations between the two countries;
20	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,
21	Bermuda	Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
22	Luxembourg	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital,
23	Ethiopia	Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
24	San Marino	wishing to conclude an Agreement for the avoidance of double taxation with respect to taxes on income and to strengthen the disciplined development of economic relations between the two States in the framework of greater cooperation.
25	Swaziland	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,
26	Isle of man	DESIRING to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
27	Guernsey	DESIRING to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,

28	Kenya	desiring to conclude an agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,
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Notification of Listed Agreements Not Containing Existing Preamble Language

Pursuant to Article 6(6) of the Convention, the Republic of The Republic Of Seychelles considers that the following agreements does not contain preamble language referring to a desire to develop an economic relationship or to enhance co-operation in tax matters.

Listed Agreement Number	Other Contracting Jurisdiction
1	Jersey
2	Mauritius
3	Belgium
4	South Africa
5	China
6	Indonesia
7	Thailand
8	Oman
9	Malaysia
10	Botswana
11	Vietnam
12	Cyprus
13	Qatar
14	UAE
15	Barbados
16	Bahrain
17	Monaco
18	Singapore
28	Kenya
27	Guernsey
26	Isle of man
25	Swaziland
24	San Marino
23	Ethiopia
22	Luxembourg
19	Zambia
20	Sri Lanka
21	Bermuda

Article 7 – Prevention of Treaty Abuse

Statement of Acceptance of the PPT as an Interim Measure

Pursuant to Article 7(17)(a) of the Convention, **The Republic Of Seychelles** hereby expresses a statement that while **The Republic Of Seychelles** accepts the application of Article 7(1) alone as an interim measure, it intends where possible to adopt a limitation on benefits provision, in addition to or in replacement of Article 7(1), through bilateral negotiation.

Notification of Choice of Optional Provisions

Pursuant to Article 7(17)(b) of the Convention, **The Republic Of Seychelles** hereby chooses to apply Article 7(4).

Notification of Existing Provisions in Listed Agreements

Pursuant to Article 7(17)(a) of the Convention, **The Republic Of Seychelles** 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
3	Belgium	Article 27

Article 8 – Dividend Transfer Transactions

Reservation

Pursuant to Article 8(3)(a) of the Convention, **The Republic Of Seychelles** 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 Republic Of Seychelles** 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 Republic Of Seychelles** 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 Republic Of Seychelles** 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 Republic Of Seychelles** reserves the right for the entirety of Article 12 not to apply to its Covered Tax Agreements.

Article 13 – Artificial Avoidance of Permanent Establishment Status through the Specific Activity Exemptions

Reservation

Pursuant to Article 13(6)(a) of the Convention, **The Republic Of Seychelles** 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 Republic Of Seychelles** 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 Republic Of Seychelles** 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)(b)(i) of the Convention, **The Republic Of Seychelles** 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
4	South Africa	Article 25(1), second sentence
6	Indonesia	Article 25(1), second sentence
8	Oman	Article 26(1), second sentence
12	Cyprus	Article 24(1), second sentence
13	Quatar	Article 24(1), second sentence
14	UAE	Article 25(1), second sentence
16	Barhain	Article 24(1), second sentence

17	Monaco	Article 25(1), second sentence
20	Sri Lanka	Article 25(1), second sentence
21	Bermuda	Article 25(1), second sentence
23	Ethiopia	Article 26(1), second sentence
24	San marino	Article 24(1), second sentence
28	Kenya	Article 25(1), second sentence

Pursuant to Article 16(6)(b)(ii) of the Convention, **The Republic Of Seychelles** 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	Jersey	Article 23(1), second sentence
3	Belgium	Article 23(1), second sentence
5	China	Article 25(1), second sentence
7	Thailand	Article 25(1), second sentence
9	Malaysia	Article 25(1), second sentence
15	Barbados	Article 25(1), second sentence
18	Singapore	Article 24(1), second sentence
10	Botswana	Article 25(1), second sentence
11	Vietnam	Article 25(1), second sentence
19	Zambia	Article 24(1), second sentence
22	Luxembourg	Article 24(1), second sentence
25	Swaziland	Article 25(1), second sentence
26	Isle of Man	Article 24(1), second sentence
27	Guernsey	Article 24(1), second sentence

Notification of Listed Agreements Not Containing Existing Provisions

Pursuant to Article 16(6)(c)(ii) of the Convention, **The Republic Of Seychelles** 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	Provision
4	South Africa	Article 25(2) second sentence
6	Indonesia	Article 25(2), second sentence
7	Thailand	Article 25(2), second sentence
9	Malaysia	Article 25(1), second sentence

Pursuant to Article 16(6)(d)(ii) of the Convention, **The Republic Of Seychelles** 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	Provision
3	Belgium	23(3)
8	Oman	26(3)
14	UAE	25(3)
16	Barhain	24(3)

Article 17 – Corresponding Adjustments

Reservation

Pursuant to Article 17(3)(b) of the Convention, **The Republic of Seychelles** reserves the right for the entirety of Article 17 not to apply to its Covered Tax Agreements on the basis that in the absence of a provision referred to in Article 17(2) in its Covered Tax Agreement:

- i) it shall make the appropriate adjustment referred to in Article 17(1); or
- ii) its competent authority shall endeavour to resolve the case under the provisions of a Covered Tax Agreement relating to mutual agreement procedure.

Article 35 – Entry into Effect

Reservation

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