PROTOCOL

At the signing of the Agreement between the Government of the People’s Republic of China and the Government of the Republic of Singapore for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income (hereinafter referred to as “the Agreement”) both sides have agreed upon the following provisions which form an integral part of the Agreement.

In connection with Article 8, “Shipping and Air Transport”:

(a) the exemption shall also include—

   (i) in China, the industrial and commercial consolidated tax and its surtax;

   (ii) in Singapore, any tax similar to the industrial and commercial consolidated tax and its surtax in China which may be imposed in Singapore after the signing of the Agreement;

(b) the exemption under the provisions of Article 8 and sub-paragraph (a) of this paragraph in respect of income derived from shipping carried on by an enterprise which is a resident of a Contracting State shall be effective only from the date a Shipping Agreement between China and Singapore enters into force.

IN WITNESS WHEREOF the undersigned, being duly authorised thereto, have signed this Protocol.

DONE in duplicate at Singapore this 18th day of April, 1986, in the English and Chinese languages, both texts being equally authoritative.

For the Government          For the Government
of the People’s Republic of China       of the Republic of Singapore