

**PROTOCOL AMENDING THE AGREEMENT BETWEEN THE
GOVERNMENT OF THE PEOPLE’S REPUBLIC OF CHINA AND THE
GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN AND
NORTHERN IRELAND FOR THE AVOIDANCE OF DOUBLE TAXATION
AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO
TAXES ON INCOME AND ON CAPITAL GAINS**

The Government of the People’s Republic of China and the Government of the United Kingdom of Great Britain and Northern Ireland,

Desiring to amend the Agreement between the Government of the People’s Republic of China and the Government of the United Kingdom of Great Britain and Northern Ireland for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital gains signed at London on 27 June 2011 (hereinafter referred to as “the Agreement”),

Have agreed as follows:

ARTICLE I

Sub-paragraph a) of paragraph 2 of Article 10 of the Agreement shall be deleted and replaced by the following:

- “a) 5 per cent of the gross amount of the dividends if the beneficial owner is a company which holds directly at least 25 per cent of the capital of the company paying the dividends;”

ARTICLE II

Each of the Contracting States shall notify the other, through diplomatic channels in writing, of the completion of the procedures required by its law for the bringing into force of this Protocol. This Protocol shall enter into force on the date of the later of these notifications and shall thereupon have effect in accordance with paragraph 1 of Article 28 of the Agreement.

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

DONE at Beijing on the 27th day of February, 2013, in duplicate in the Chinese and English languages, both texts being equally authoritative.

**For the Government of the
People's Republic of China**

**For the Government of the United
Kingdom of Great Britain and
Northern Ireland**