

PROTOCOL

Further to the Agreement between the Government of the People's Republic of China and the Government of Malaysia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income dated on 23 November 1985, both sides have agreed upon the following provisions which form an integral part of the said Agreement.

In connection with Article 8 "Shipping and Air Transport";

For the purpose of paragraph 1, the tax to be exempted means all taxes in relation to the operation of aircraft in international traffic imposed in Malaysia, by the Income Tax Act 1967 and the Supplementary Income Tax Act 1967, and any tax similar to the business tax in China which may be imposed in Malaysia after signing of the Protocol; in China, the income tax and its local income tax, and the business tax imposed by the Income Tax Law and the Regulations on Business Tax. The exemption shall be effective from the date of the signing of this Protocol.

IN WITNESS whereof the undersigned, duly authorised thereto, by their respective Governments, have signed this Protocol.

DONE in duplicate at Beijing this 5th day of June, 2000 each in the Chinese, Bahasa Malaysia and English Languages, the three texts being equally authoritative. In the event of there being a dispute in the Interpretations, the English text shall prevail.

For the Government of
the People's Republic of China

For the Government of
Malaysia