

## **PROTOCOL of 27<sup>th</sup> OCTOBER, 1998**

At the signing of the Convention between the Government of the Kingdom of Thailand and the Government of the Republic of Cyprus for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on income, the undersigned have agreed upon the following provisions which will form an integral part of the Convention:

1. With reference to paragraph 3(a) and (b) of Article 5, it is understood that the use of facilities for delivery shall be deemed to constitute a permanent establishment if they are used as a sales outlet.
2. With reference to paragraph 2 of Article 8, it is understood that in the event that a Contracting State foregoes the right to tax or applies a lesser tax rate on income derived by an enterprise of any other country from the operation of ships in international traffic, such treatment shall be extended through mutual agreement between the competent authorities.