

## **PROTOCOL**

At the signing of the Agreement between the Government of the People's Republic of China and the Government of the Republic of Korea for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income, both sides have agreed upon the following provisions which form an integral part of the Agreement.

1. In respect of Article 8 "Shipping and Air Transport", it is understood that China shall exempt the business tax on the operation of ships or aircraft in international traffic by an enterprise of Korea and Korea shall exempt the value added tax on the operation of ships or aircraft in international traffic by an enterprise of China.

2. In respect of Article 15 "Dependent Personal Services", it is understood that employees who are sent by the shipping or air transportation enterprises of a Contracting State to the other Contracting State shall be taxable on their remuneration only in the first-mentioned Contracting State.

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

DONE in duplicate at Beijing this 28th day of March of the year one thousand nine hundred and ninety four in the Chinese, Korean and English languages, all texts being equally authentic.

In case of any divergence of interpretation, the English text shall prevail.

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

**For the Government**  
**of the Republic of Korea**