

PROTOCOL

At the moment of signature of the Agreement between the Government of Malta and the Government of the People's Republic of China for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income, both parties have agreed upon the following provisions which will form an integral part of the Agreement:

1. With reference to Article 7, each Contracting State shall tax the profit from the business of insurance in accordance with the provisions of its own law.

2. With reference to Article 8, this Agreement shall not affect the application of the provisions of Article 18 in respect of taxation of the Agreement on Maritime Transport signed in Beijing between the Government of the People's Republic of China and the Government of Malta on September 10, 1991.

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

DONE at Beijing on the second day of February 93 in duplicate in the Chinese and English languages, both texts being equally authentic.

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

**For the Government
of Malta**