PROTOCOL

At the moment of signing the Convention between the Government of the Republic of Moldova and the Council of Ministers of Serbia and Montenegro for the Avoidance of Double Taxation with respect to taxes on Income and on Property, the undersigned have agreed that the following provision shall form an integral part of the Convention.

ad Articles: 2, 4 and 19.

The term "political subdivisions" means:

- (1) in the case of the state community Serbia and Montenegro, Member States;
- (2) in the case of Moldova, administrative-territorial units.

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

Done at Chisinau on 9 June 2005 in two originals, in the Moldovan, Serbian and English languages, both originals being equally authentic. In case of any divergence of interpretation, the English text shall prevail.

For the Government of the Republic of Moldova

For the Council of Ministers of Serbia and Montenegro