

PROTOCOL

At the time of signing of the Convention between the Republic of Moldova and Ireland 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 shall form an integral part of the Convention:

Ad Article 4:

It is understood that a recognised pension fund established in a Contracting State shall be regarded as a resident of that State notwithstanding that the income of the fund is not taxed in that State. There shall be regarded as a recognised pension fund any fund that is established for the purpose of providing retirement benefits.

It is understood that a Common Contractual Fund (CCF) established in Ireland shall not be regarded as a resident of Ireland and shall be treated as fiscally transparent for the purposes of granting tax treaty benefits.

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

Done at Chişinău on 28th May, 2009, in two originals in the Moldovan and English languages, both texts being equally authentic.

For the Republic of Moldova

For Ireland