

PROTOCOL

At the signing of the Convention between the Government of the Republic of Moldova and the Government of the Republic of Macedonia for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital, both sides have agreed upon the following provisions, which shall form an integral part of the Convention:

In the case of Moldova, the term “capital” all through this Convention shall mean “property”, except in the following Articles:

Article 9, paragraph 1;
Article 10, paragraph 2; and
Article 23, paragraph 4.

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

DONE at Skopje on February 21, 2006 in two originals each in the Moldovan, Macedonian and English languages, both originals being equally authentic. In the case of appearance of some divergences of interpretation or application of the provisions of this Protocol, the English text shall prevail.

**For the Government of
the Republic of Moldova**

**For the Government of
the Republic of Macedonia**