

**AGREEMENT**

**BETWEEN**

The Government of the People's Republic of China and the Government of the Republic of Seychelles,

Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,

HAVE agreed as follows:

## **Article 1**

### ***Personal Scope***

This Agreement shall apply to persons who are residents of one or both of the Contracting States.

## **Article 2**

### ***Taxes Covered***

1. This Agreement shall apply to taxes on income imposed on behalf of a



or aircraft is operated solely between places in the other Contracting State;

(i) the term "competent authority" means:

(i)





2.

adopted shall, however, be such that the result shall be in accordance with the principles contained in this Article.

5.

2.

profits, even if the dividends paid or the undistributed profits consist wholly or partly of profits or income arising in such other State.

## **Article 11**

### ***Interest***

1. Interest arising in a Contracting State and paid to a resident of the other Contracting State may be taxed in that other State.
2. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest. The competent authorities of the Contracting States shall by mutual agreement settle the mode of application of this limitation.
3. Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State and derived by the Government of the other Contracting State, a local authority and the Central Bank thereof or any financial institution wholly







enterprise of a Contracting State in international traffic, shall be taxable only in that Contracting State.

## **Article 16**

### ***Directors' Fees***





- (b) In Seychelles, Chinese tax paid by residents of Seychelles in respect of income taxable in China, in accordance with the provisions of this Agreement, shall be deducted from the taxes due according to Seychelles fiscal law. Such deductions shall not, however, exceed an amount which bears to the total Seychelles tax payable the same ratio as the income concerned bears to the total income.
2. For the purposes of paragraph 1 of this Article, the terms “Seychelles tax paid” and “Chinese tax paid” shall be deemed to include the amount of tax which would have been paid in Seychelles or China, as the case may be, but for an exemption or reduction granted in accordance with laws designed to promote economic development in that Contracting State.

## **Article 24**

### *Non-Discrimination*

1. Nationals of a Contracting State shall not be subjected in the other Contracting





