POSITIONS ON ARTICLE 26 (EXCHANGE OF INFORMATION) AND ITS COMMENTARY

Positions on the Article

- 1. [Deleted]
- 2. India reserves the right to include documents or certified copies of the documents within the scope of this Article.
- 2.1 Morocco and Thailand reserve the right not to include the words "The exchange of information is not restricted by Articles 1 and 2" in paragraph 1.

Position on the Commentary

3. As regards paragraph 10.3 of the Commentary, Hong Kong, China wishes to clarify its position on the exchange of information that existed prior to the entry into force of the bilateral agreement. In view of its domestic law requirements, Hong Kong, China will only exchange information relating to taxable periods after the agreement came into operation.

POSITIONS ON ARTICLE 28 (MEMBERS OF DIPLOMATIC MISSIONS AND CONSULAR POSTS) AND ITS COMMENTARY

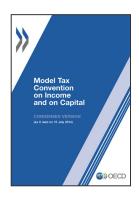
Position on the Article

1. Considering that Hong Kong, China is not a sovereign state but a special administrative region of the People's Republic of China, Hong Kong, China reserves the right to replace "diplomatic missions" by "government missions" in this Article.

POSITIONS ON ARTICLE 29 (TERRITORIAL EXTENSION) AND ITS COMMENTARY

Position on the Article

1. Indonesia, Malaysia, the People's Republic of China, Singapore and Thailand reserve their position on this Article.



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