

## PROTOCOL

At the moment of signature of the Agreement between the Government of the Republic of Moldova and the Government of the State of Kuwait for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital, the undersigned have agreed upon the following provision which shall be an integral part of this Agreement.

In the case of Moldova, the term "capital" all through this Agreement shall mean "property", except in the following Articles:

1. Article 4, Paragraph 2 c);
2. Article 9, Paragraph 1;
3. Article 25, Paragraphs 3 and 4.

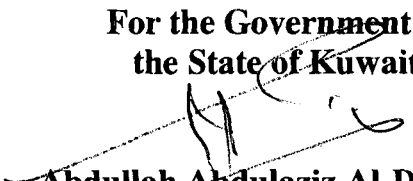
IN WITNESS WHEREOF the undersigned, duly authorised thereto, have signed this Protocol.

DONE at Chisinau on 15 March, 2010, corresponding to the 29 Rabil 1431 H in two originals each in the Moldovan, Arabic, 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**

  
**Victor BARBANEAGRA,  
Deputy Minister of Finance  
Of the Republic of Moldova**

**For the Government of  
the State of Kuwait**

  
**Abdullah Abdulaziz Al-Duwaikh,  
Ambassador of the State of Kuwait  
to the Republic of Moldova**