



Treaty Series No. 7 (2019)

# Protocol

between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the Republic of Cyprus to Amend the Convention for the Elimination of Double Taxation with Respect to Taxes on Income and on Capital Gains and the Prevention of Tax Evasion and Avoidance, Signed at Nicosia On 22 March 2018

Nicosia, 19 December 2018

[The Protocol entered into force on 2 October 2019]

*Presented to Parliament  
by the Secretary of State for Foreign and Commonwealth Affairs  
by Command of Her Majesty  
October 2019*



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ISBN 978-1-5286-1629-4

CCS1019200870 10/19

Printed on paper containing 75% recycled fibre content minimum  
Printed in the UK by the APS Group on behalf of the Controller of Her Majesty's Stationery Office

**PROTOCOL BETWEEN THE GOVERNMENT OF THE UNITED  
KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND AND  
THE GOVERNMENT OF THE REPUBLIC OF CYPRUS TO AMEND THE  
CONVENTION FOR THE ELIMINATION OF DOUBLE TAXATION  
WITH RESPECT TO TAXES ON INCOME AND ON CAPITAL GAINS  
AND THE PREVENTION OF TAX EVASION AND AVOIDANCE,  
SIGNED AT NICOSIA ON 22 MARCH 2018**

The Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the Republic of Cyprus;

Desiring to conclude a Protocol to amend the Convention between the Government of the Republic of Cyprus and the Government of the United Kingdom of Great Britain and Northern Ireland for the elimination of double taxation with respect to taxes on income and on capital gains and the prevention of tax evasion and avoidance signed at Nicosia on 22 March 2018 (hereinafter referred to as “the Convention”);

Have agreed as follows:

**ARTICLE I**

The following new paragraph shall be inserted immediately following paragraph 4 of Article 29 (Entry into force) of the Convention:

“5. Notwithstanding the entry into force of the Convention signed 22 March 2018, where an individual was entitled to the benefits of paragraph 1 of Article 19 (Pensions) of the prior Convention signed 20 June 1974, as amended on 2 April 1980, at the time of entry into force of this Convention, that individual may make an election that the provisions of that Article, and not the provisions of paragraph 2 of Article 18 of this Convention, shall continue to apply for calendar years ending on or before 31 December 2024. Unless revoked by the individual, that election shall have effect for the calendar year in which it is made and for subsequent years ending on or before 31 December 2024. Elections and revocations under this Article should be made in writing to the Competent Authority of the Contracting State from which the pension or similar remuneration is paid. The Contracting State that receives the election shall notify the other State. Where an election has been revoked, no further election under this paragraph may be made.”

## ARTICLE II

Each of the Contracting States shall notify the other, in writing, through diplomatic channels, of the completion of the procedures required by its laws for the bringing into force of this Protocol. This Protocol shall enter into force on the date of the later of these notifications and shall thereupon have effect:

- a) in Cyprus:
  - (i) in respect of taxes withheld at source, for amounts paid or credited on or after the 1st January 2019; and
  - (ii) in respect of other taxes, for taxable years beginning on or after 1st January 2019.
- b) in the United Kingdom:
  - (i) in respect of taxes withheld at source, for amounts paid or credited on or after 1st January 2019;
  - (ii) in respect of income tax, for any year of assessment beginning on or after 6th April 2019;

DONE in duplicate at Nicosia on the 19<sup>th</sup> day of December 2018, in duplicate, in the English and Greek languages, both texts being equally authoritative. In case of any divergence of interpretation the English text shall prevail.

**For the Government of the United  
Kingdom of Great Britain and  
Northern Ireland:**

**STEPHEN LILLIE**

**For the Government of the  
Republic of Cyprus:**

**HARRIS GEORGIADIS**

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978-1-5286-1629-4