

**PROTOCOL TO THE AGREEMENT BETWEEN
THE GOVERNMENT OF THE PEOPLE'S REPUBLIC OF CHINA AND THE
GOVERNMENT OF THE REPUBLIC OF INDONESIA FOR THE AVOIDANCE OF
DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH
RESPECT TO TAXES ON INCOME**

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

Having regard to the Agreement between the Government of the People's Republic of China and the Government of the Republic of Indonesia for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income, signed at Jakarta on the 7th day of November, 2001 (hereinafter referred to as "the Agreement"),

Have agreed that the following provisions shall form an integral part of the Agreement:

Article 1

With respect to Article 8 (Shipping and Air Transport), notwithstanding the provision of paragraph 2 of Article 8, a resident of a Contracting State engaged in the operation of aircraft in international traffic at the other Contracting State shall be exempted from Value Added Tax (VAT) or similar taxes in the other Contracting State.

Article 2

Both Contracting States shall notify each other through diplomatic channels that they have completed the internal legal procedures necessary for the entry into force of this Protocol. This Protocol shall enter into force on the thirtieth day upon the receipt of the latter notification. This Protocol shall have effect as respects income derived during the taxable years beginning on or after the first day of January next following that in which this Protocol enters into force.

IN WITNESS whereof the undersigned, being duly authorized thereto, have signed this Protocol.

Done at Beijing on the 26th day of March, 2015, in duplicate in the Chinese, Indonesian and English languages, all texts being equally authentic. In case of divergence in interpretation, the English text shall prevail.

**For the Government of
the People's Republic of China**

Wang Jun

**For the Government of
the Republic of Indonesia**

Soegeng Rahardjo