

SECOND PROTOCOL TO THE AGREEMENT BETWEEN THE
GOVERNMENT OF NEW ZEALAND AND THE
GOVERNMENT OF THE REPUBLIC OF SINGAPORE
FOR THE AVOIDANCE OF DOUBLE TAXATION AND
THE PREVENTION OF FISCAL EVASION WITH
RESPECT TO TAXES ON INCOME

The Government of New Zealand and the Government of the
Republic of Singapore,

Having regard to the Agreement between the Government of
New Zealand and the Government of the Republic of Singapore
for the Avoidance of Double Taxation and the Prevention of
Fiscal Evasion with respect to Taxes on Income done at
Singapore on 21 August 1973 (hereinafter referred to as
"the Agreement"),

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

ARTICLE I

Notwithstanding paragraph (3) of Article 19 of the
Agreement, a New Zealand resident deriving income from
Singapore, being income referred to in that paragraph,
shall not be deemed to have paid Singapore tax in respect

of such income where the competent authority of New Zealand considers, after consultation with the competent authority of Singapore, that it is inappropriate to do so having regard to:

- (a) whether any arrangements have been entered into by any person for the purpose of taking advantage of paragraph (3) of Article 19 for the benefit of that person or any other person;
- (b) whether any benefit accrues or may accrue to a person who is neither a New Zealand resident nor a Singapore resident;
- (c) the prevention of fraud or the avoidance of the taxes to which the Agreement applies;
- (d) any other matter which the competent authorities consider relevant in the particular circumstances of the case including any submissions from the New Zealand resident concerned.

ARTICLE II

Article I of this Second Protocol shall apply to income derived on or after 1 July 1993.

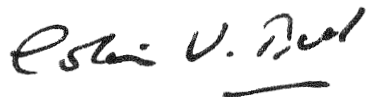
ARTICLE III

- (1) The Contracting States shall notify each other through diplomatic channels that the constitutional requirements for the entry into force of this Second Protocol have been complied with.
- (2) This Second Protocol shall enter into force on the date of the later of the notification referred to in paragraph 1 of this Article.

DONE at Singapore in duplicate this 15th day of July 1993 in the English language.



FOR THE GOVERNMENT OF THE
REPUBLIC OF SINGAPORE



FOR THE GOVERNMENT OF
NEW ZEALAND

