



## Final Protocol - 26<sup>th</sup> November, 1997

### SOUTH AFRICA

At the moment of signing the Agreement between the Government of the Republic of Cyprus and the Government of the Republic of South Africa for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital, the undersigned have agreed that the following provisions shall form an integral part of the Agreement.

Concerning Article 10 it is understood that dividends arising in South Africa are not subjected to South African tax. Should there be any change in this system, or any change in the system presently applied in Cyprus, the Contracting States will reconsider the provisions of that Article at the request of either State.