(b) with respect to taxes levied not on the basis of a taxable year, for taxes levied on or after 1 January in the calendar year next following that in which the notice is given.

IN WITNESS WHEREOF the undersigned, being duly authorised thereto by their respective Governments, have signed this Convention.

DONE in duplicate at Yerevan this twenty-sixth day of December, 2024, in the Japanese, Armenian and English languages, all texts being equally authentic. In case of any divergence of interpretation, the English text shall prevail.

For Japan:
青木　豊

For the Republic of Armenia:
Վահե Միշայի Հովհաննիսյան

PROTOCOL

At the signing of the Convention between Japan and the Republic of Armenia for the Elimination of Double Taxation with respect to Taxes on Income and the Prevention of Tax Evasion and Avoidance (hereinafter referred to as “the Convention”), Japan and the Republic of Armenia have agreed upon the following provisions which shall form an integral part of the Convention.

1. With reference to Article 5 of the Convention:

It is understood that each of the places of business listed in paragraph 2 of Article 5 of the Convention constitutes a permanent establishment as defined in paragraph 1 of that Article only if it meets the requirements of paragraph 1 of that Article.

2. With reference to Article 11 of the Convention:

If, after the date of signature of the Convention, Armenia concludes an agreement with a third jurisdiction containing provisions which limit taxation in Armenia on an item of income described in paragraph 2 of Article 11 of the Convention to a rate of tax lower than that provided for in that paragraph or exempt such item of income from tax in Armenia, the Contracting States shall, at the request of Japan, enter into negotiations with a view to incorporating such lower rate of tax or exemption from tax into the Convention. The competent authority of Armenia shall notify the competent authority of Japan of such event immediately after it has happened.

3. With reference to paragraph 5 of Article 24 of the Convention: