

**AGREEMENT BETWEEN CHINA AIRLINES LIMITED AND THAI
AIRWAYS INTERNATIONAL LIMITED FOR THE RECIPROCAL
EXEMPTION FROM TAXES ON INCOME DERIVED FROM THE
OPERATION OF INTERNATIONAL AIR TRANSPORT**

China Airlines Limited and Thai Airways International Limited,

being desirous of concluding an Agreement for the reciprocal exemption from taxes on income derived from the operation of international air transport; having recommended to their respective tax authorities for approval the Memorandum of Understanding between two Parties done on September 24, 1982; and having been duly authorized by such respective tax authorities for this purpose, have agreed as follows:

1. Each Party shall exempt the other Party, on the basis of reciprocity, from income tax and any other taxes, which may be chargeable in the nature of income tax, with respect to the operation of international air transport.
2. This Agreement shall be effective on the date of signature, provided, however, that the tax exemptions provided in the preceding paragraph during the period from January 1st 1983, to the date of this Agreement are hereby granted.
3. This Agreement shall remain in force unless and until terminated by either Party, after consultation with its respective tax authorities, upon written notice on or before the 30th day of June of any calendar year, and, in such event, this Agreement shall cease to be effective for income accrued or derived on or after January 1st of the following calendar year.

IN WITNESS WHEREOF, the undersigned, being duly authorized for this purpose, have signed this Agreement.

Done at Taipei on this 30th day of June 1984, in duplicate, in the English language.

For the China Airlines Limited For the Thai Airways International Limited

General President
Chang Lin-Teh

Air Chief President
Marshal Bancha Sukhanusasna