

2. The term "permanent establishment" includes especially:
 - (a) a place of management;
 - (b) a branch;
 - (c) an office;
 - (d) a factory;
 - (e) a workshop; and
 - (f) a mine, an oil or gas well, a quarry or any other place relating to the exploration for or the exploitation of natural resources.
3. The term "permanent establishment" shall also include:
 - (a) a building site or construction or installation project and the supervisory activities in connection therewith, but only if such building site, construction or activity lasts more than six months; and
 - (b) the furnishing of services, including consultancy services, by an enterprise through employees or other individuals engaged by the enterprise for such purposes, but only where activities of that nature continue within the country for a period or periods aggregating more than 183 days within any twelve month period.

For the purposes of computing the time limits in this paragraph, activities carried on by an enterprise associated with another enterprise within the meaning of *Article 9* shall be aggregated with the period during which activities are carried on by the enterprise if the activities between the associated enterprises are connected.

4. Notwithstanding the preceding provisions of this Article, the term "permanent establishment" shall be deemed not to include:
 - (a) the use of facilities solely for the purpose of storage, display or delivery of goods or merchandise belonging to the enterprise;
 - (b) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of storage, display or delivery;
 - (c) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of processing by another enterprise;
 - (d) the maintenance of a fixed place of business solely for the purpose of purchasing goods or merchandise or of collecting information, for the enterprise;
 - (e) the maintenance of a fixed place of business solely for the purpose of advertising, supplying information or scientific research for the enterprise, if such activity is of a preparatory or auxiliary character.