

*IIA. With reference to Article 4*

It is understood that the term "resident of one of the States" also includes:

a) the Government of that State or a political subdivision or local authority thereof or any agency or instrumentality of any such Government, subdivision or authority;

b) a trust, company or other organization constituted and operated exclusively to administer or provide benefits under one or more funds or plans established to provide pension, retirement or other employee benefits that is generally exempt from tax in one of the States and is a resident of that State according to the laws of that State;

c) a trust, company or other organization that is operated exclusively for religious, charitable, scientific, educational, or public purposes and that is generally exempt from tax in one of the States and that is a resident of that State according to the laws of that State.

*Article XV*

The following new Article shall be inserted immediately after Article V of the Protocol:

*VA. With reference to Articles 5, 6, 7, 14 and 23*

It is understood that exploration and exploitation rights of natural resources shall be regarded as immovable property situated in the State the seabed and subsoil of which they are related to, and that these rights shall be deemed to pertain to the property of a permanent establishment in that State. Furthermore, it is understood that the aforementioned rights include rights to