

Republic of the Philippines  
Congress of the Philippines  
**Senate**

Manila City

Fourteenth Congress

Second Regular Session



RESOLUTION No. 119

RESOLUTION CONCURRING IN THE  
RATIFICATION OF THE AGREEMENT  
BETWEEN THE GOVERNMENT OF THE  
REPUBLIC OF THE PHILIPPINES AND THE  
GOVERNMENT OF UNITED ARAB EMIRATES  
FOR THE AVOIDANCE OF DOUBLE  
TAXATION AND THE PREVENTION OF  
FISCAL EVASION WITH RESPECT TO TAXES  
ON INCOME AND ON CAPITAL AND ITS  
PROTOCOL

WHEREAS, the Agreement Between the Government of the Republic of the Philippines and the Government of United Arab Emirates for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income and on Capital and its Protocol were signed on 21 September 2003 in Dubai;

WHEREAS, the objective of the Agreement and its Protocol is to eliminate double taxation and tax evasion and covers income taxes on individuals, corporations, estates and trusts, withholding taxes, and stock transaction taxes;

WHEREAS, under the Agreement, double taxation will be eliminated by allowing, subject to limitations in the laws of both Parties, the amount of taxes paid in one of the Parties, as a deduction or credit against the taxes payable in the other Party, in respect to the same income;

WHEREAS, the Agreement is expected to promote international trade investment through the systematic allocation of taxing jurisdiction between the Contracting States and promote technology transfer, and international academic, cultural and sports exchanges by granting favorable tax treatments to professionals, artists, athletes, students, and teachers of the Contracting States;

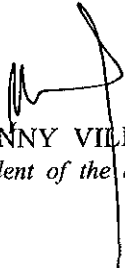
WHEREAS, Article 28 of the Agreement provides that each of the Contracting States shall notify the other, through diplomatic channels of the completion of the procedures required by laws for the entry into force of the Agreement;

WHEREAS, in a hearing conducted by the Committee on Foreign Relations on 8 May 2008, representatives of the Department of Foreign Affairs (DFA), Bureau of Internal Revenue (BIR), Philippine Association of Service Importers (PASEI), and Overseas Workers Welfare Administration (OWWA) endorsed the concurrence in the ratification of the Agreement and its Protocol;

WHEREAS, pursuant to the Constitution, Article 7, Section 21, "No treaty or international agreement shall be valid and effective unless concurred in by at least two-thirds of all the Members of the Senate": Now, therefore, be it

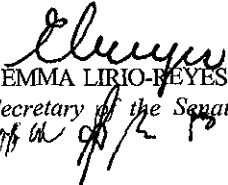
*Resolved*, That the Senate of the Philippines concur, as it hereby concurs, in the ratification of the "Agreement Between the Government of the Republic of the Philippines and the Government of United Arab Emirates for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion With Respect to Taxes on Income and on Capital and its Protocol".

Adopted,



MANNY VILLAR  
*President of the Senate*

This Resolution was adopted by the Senate on September 15, 2008.



EMMA LIRIO-EYES  
*Secretary of the Senate*

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