

PROTOCOL AMENDING THE CONVENTION BETWEEN CANADA AND
THE KINGDOM OF THE NETHERLANDS FOR THE AVOIDANCE OF
DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION
WITH RESPECT TO TAXES ON INCOME, WITH PROTOCOL,
SIGNED AT THE HAGUE ON 27 MAY 1986, AS AMENDED BY THE
PROTOCOL SIGNED AT THE HAGUE ON 4 MARCH 1993

The Government of Canada and the Government of the Kingdom of the Netherlands,

Desiring to amend the Convention between Canada and the Kingdom of the Netherlands for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, with Protocol, signed at The Hague on 27 May 1986, as amended by the Protocol signed at The Hague on 4 March 1993 (hereinafter referred to as "the Convention"),

Have agreed as follows:

Article I

Subparagraphs (a) and (b) of paragraph 2 of Article 10 of the Convention shall be deleted and replaced by the following:

"(a) 5 per cent of the gross amount of the dividends if the beneficial owner is a company (other than a partnership) that owns at least 25 per cent of the capital of, or that controls directly or indirectly at least 10 per cent of the voting power in, the company paying the dividends;

(b) notwithstanding subparagraph (a), 10 per cent of the gross amount of the dividends if the dividends are paid by a non-resident-owned investment corporation that is a resident of Canada to a beneficial owner that is a company (other than a partnership) that is a resident of the