(b) in respect of other taxes, for taxation years beginning after the end of that calendar year.

IN WITNESS WHEREOF the undersigned, duly authorized to that effect, have signed this Convention.

DONE in duplicate at Ottawa, this 27th day of May 2002, in the English, French and Mongolian languages, each version being equal authentic.

Pierre S. Pettigrew

Cimiddorj Ganzorig

FOR THE GOVERNMENT OF CANADA

FOR THE GOVERNMENT OF MONGOLIA