(c) a Party may only request information relating to taxable periods for which the Agreement has effect for that Party.

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

DONE in duplicate at Hong Kong, this 11th day of November 2012, in the English, French and Chinese languages, each version being equally authentic.

Edward Fast

K C Chan

FOR THE GOVERNMENT OF CANADA

FOR THE GOVERNMENT OF THE HONG KONG SPECIAL ADMINISTRATIVE REGION OF THE PEOPLE'S REPUBLIC OF CHINA