

Canada, its Additional Tax On Corporations Other Than Canadian Corporations provided that the rate of such tax shall not exceed 15 per cent;

- (b) as affecting any provision in the law of Pakistan which grants rebates of tax to companies which are residents of Pakistan and fulfill specific requirements regarding the declaration and payment of dividends.

7. In this Article, the term "taxation" means taxes which are the subject of this Convention.

ARTICLE XXIV

Mutual Agreement Procedure

1. Where a resident of a Contracting State considers that the actions of one or both of the Contracting States result or will result for him in taxation not in accordance with this Convention, he may, without prejudice to the remedies provided by the national laws of those States, address to the competent authority of the Contracting State of which he is a resident an application in writing stating the grounds for claiming the revision of such taxation. To be admissible, the said application must be submitted within two years from the first notification of the action which gives rise to taxation not in accordance with the Convention.

2. The competent authority referred to in paragraph 1 shall endeavour, if the objection appears to it to be justified and if it is not itself able to arrive at an appropriate solution, to resolve the case by mutual agreement with the competent authority of the other Contracting State, with a view to the avoidance of taxation not in accordance with the Convention.

3. The competent authorities of the Contracting States shall endeavour to resolve by mutual agreement any difficulties or doubts arising as to the interpretation or application of the Convention and may also consult together with respect to the allocation of profits to a resident of a Contracting State and its permanent establishment situated in the other Contracting State, or to the allocation of income between a resident of a Contracting State and any associated person provided for in Article IX.

ARTICLE XXV

Exchange of Information

1. The competent authorities of the Contracting States shall upon request exchange such information as is necessary for the carrying out of this Convention and of the domestic laws of the Contracting States concerning taxes covered by this Convention insofar as the