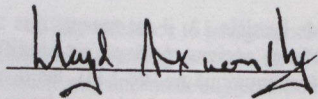


"6. Where an individual who ceases to be a resident of a Contracting State, and immediately thereafter becomes a resident of the other Contracting State, is treated for the purposes of taxation in the first-mentioned State as having alienated a property and is taxed in that State by reason thereof, the individual may elect to be treated for purposes of taxation in the other State as if the individual had, immediately before becoming a resident of that State, sold and repurchased the property for an amount equal to its fair market value at that time. However, this provision shall not apply to property any gain from which, arising immediately before the individual became a resident of that other State, may be taxed in that other State nor to immovable property situated in a third State."

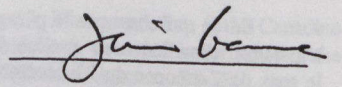
10. With reference to Article 14, paragraph 1, it is understood that the profits attributable to a fixed base in a Contracting State may be taxed in that State even though the fixed base has ceased to exist.
11. With reference to Article 16, it is understood that remuneration paid by a company to a member of its boards in respect of the exercise of a continuous activity may be taxed in accordance with the provisions of Article 15.
12. With reference to Article 17, paragraph 2, it is understood that its provisions shall not apply if it is established that neither the entertainer or the sportsperson nor persons related thereto, participate directly or indirectly in the profits of the person referred to in that paragraph.
13. With reference to subparagraph (a) of paragraph 1 of Article 22, it is understood that the existing provisions of the law of Canada regarding the taxation of income from a foreign affiliate in force at the time of signature of the Convention shall continue to apply as long as they are not amended or terminated.

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

DONE in duplicate at *Ottawa* this *14th* day of *June* 1999,
in the English, French and Portuguese languages, each version being equally authentic.


FOR THE GOVERNMENT OF
CANADA

L. Axworthy


FOR THE GOVERNMENT OF
THE PORTUGUESE REPUBLIC

Jaime Gamma