

ARTICLE XXVII

Miscellaneous Rules

1. The provisions of this Convention shall not be construed to restrict in any manner any exclusion, exemption, deduction, credit, or other allowance now or hereafter accorded

(a) by the laws of a Contracting State in the determination of the tax imposed by that State, or

(b) by any other agreement entered into by a Contracting State.

2. Nothing in the Convention shall be construed as preventing Canada from imposing a tax on amounts included in the income of a resident of Canada according to section 91 of the Canadian Income Tax Act.

3. The competent authorities of the Contracting States may communicate with each other directly for the purpose of applying the Convention.

CHAPTER VI

FINAL PROVISIONS

ARTICLE XXVIII

Entry into Force

1. This Convention shall be ratified and the instruments of ratification shall be exchanged as soon as possible.

2. The Convention shall enter into force upon the exchange of instruments of ratification and its provisions shall have effect:

(a) in Canada:

(i) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after the first day of January in the calendar year in which the exchange of instruments of ratification takes place; and

(ii) in respect of other Canadian tax for taxation years beginning on or after the first day of January in the calendar year in which the exchange of instruments of ratification takes place;

(b) in Thailand:

(i) in respect of withholding taxes, on amounts payable on or after the first day of January in the calendar year in which the exchange of instruments of ratification takes place; and

(ii) in respect of other taxes, for tax years or accounting periods beginning on or after the first day of January in the calendar year in which the exchange of instruments of ratification takes place.