

on or after the first day of January 1993, except that the reference in subparagraph a) of paragraph 2 of Article 10 of the Convention, as amended by this Protocol, to "5 per cent" shall be read, in its application to amounts paid after that first day, after:

- (A) 1992 and before 1994, as "9 per cent";
- (B) 1993 and before 1995, as "8 per cent";
- (C) 1994 and before 1996, as "7 per cent";
- (D) 1995 and before 1997, as "6 per cent";

(ii) for other taxes, with respect to taxable years beginning on or after the first day of January 1993, except that the reference in paragraph 7 of Article 10 of the Convention to subparagraph a) of paragraph 2 shall be read, in its application to taxable years beginning on or after that first day and ending after:

- (A) 1992 and before 1994, as "9 per cent";
- (B) 1993 and before 1995, as "8 per cent";
- (C) 1994 and before 1996, as "7 per cent";
- (D) 1995 and before 1997, as "6 per cent".

2. Where any greater relief from tax would have been afforded by any provision of the Convention than under the Convention as amended by this Protocol, any such provision shall continue to have effect up to and including the taxable year in which this Protocol enters into force.

3. It is understood that the term "paid" shall have the meaning which it has under the law of the State in which the payment arises.