

**PROTOCOL
BETWEEN
THE GOVERNMENT OF CANADA
AND
THE GOVERNMENT OF BERMUDA
UNDER ENTRUSTMENT FROM THE GOVERNMENT OF
THE UNITED KINGDOM OF GREAT BRITAIN
AND NORTHERN IRELAND
CONCERNING
THE INTERPRETATION OR APPLICATION OF THIS AGREEMENT
BETWEEN THE GOVERNMENT OF CANADA AND THE
GOVERNMENT OF BERMUDA UNDER ENTRUSTMENT FROM THE
GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN
AND NORTHERN IRELAND ON THE EXCHANGE OF
INFORMATION WITH RESPECT TO TAXES**

At the time of signing of this Agreement between the Government of Canada and the Government of Bermuda under Entrustment from the Government of the United Kingdom of Great Britain and Northern Ireland on the Exchange of Information with Respect to Taxes, the undersigned have agreed upon the following provisions which shall be an integral part of this Agreement.

It is understood that:

1. The term "relevant" as defined by this Agreement encompasses the standard for "foreseeably relevant" in accordance with the Commentary to the OECD Model Agreement on Exchange of Information on Tax Matters;
2. The term "person" for the purposes of this Agreement shall be interpreted in accordance with the Commentary to the OECD Model Agreement on Exchange of Information on Tax Matters;
3. Subparagraph 4(b) of Article 5 is to be construed widely to cover every form of entity regardless of whether such entity has legal personality;
4. In Article 5, the six-year period in subparagraph 5(b) does not limit the obtaining or provision of the information described in subparagraph 4(b);