

(a) in Canada:

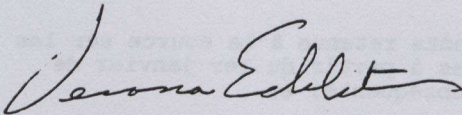
- (i) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after the first day of January of the next following calendar year; and
- (ii) in respect of other Canadian tax for taxation years beginning on or after the first day of January of the next following calendar year;

(b) in Tanzania:

- (i) in respect of taxes withheld at source, to amounts derived on or after the first day of January of the next following calendar year; and
- (ii) in respect of other taxes on income, and taxes on capital, to taxes chargeable for any taxable year beginning on or after the first day of January of the next following calendar year.

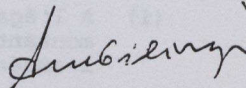
IN WITNESS WHEREOF the undersigned, duly authorized to that effect, have signed this Agreement.

DONE in duplicate at the City of Dar-Es-Salaam, United Republic of Tanzania, this 15th day of DECEMBER, 1995 in the English and French languages, each version being equally authentic.



FOR THE GOVERNMENT OF CANADA

Verona Edelstein



FOR THE GOVERNMENT OF THE
UNITED REPUBLIC OF TANZANIA

Simon Mbilinyi