

3. Notwithstanding the provisions of paragraph 2,

- (a) interest arising in a Contracting State and paid in respect of a bond, debenture or other similar obligation of the government of that Contracting State or of a political subdivision or local authority thereof shall, provided that the interest is beneficially owned by a resident of the other Contracting State, be taxable only in that other State;
- (b) interest arising in the Republic of Hungary and paid to a resident of Canada shall be taxable only in Canada if it is paid in respect of a loan made, guaranteed or insured, or a credit extended, guaranteed or insured by the Export Development Corporation;
- (c) interest arising in Canada and paid to a resident of the Republic of Hungary shall be taxable only in the Republic of Hungary if it is paid in respect of a loan made, guaranteed or insured, or a credit extended, guaranteed or insured by the Hungarian National Bank or any other entity as may be specified and mutually agreed in letters exchanged between the competent authorities of the Contracting States; and
- (d) interest arising in a Contracting State and paid to a resident of the other Contracting State who was constituted and is operated exclusively to administer or provide benefits under one or more pension, retirement or other employee benefits plans shall not be taxable in the first-mentioned State provided that
 - (i) the resident is the beneficial owner of the interest and is generally exempt from tax in the other State, and
 - (ii) the interest is not derived from carrying on a trade or a business or from a related person.

4. The term "interest" as used in this Article means income from debt-claims of every kind, whether or not secured by mortgage, and in particular, income from government securities and income from bonds or debentures, including premiums and prizes attaching to such securities, bonds or debentures, as well as income which is subjected to the same taxation treatment as income from money lent by the laws of the State in which the income arises. However, the term "interest" does not include income dealt with in Article 10.