

## ARTICLE 25.

The taxation authorities of the Contracting Governments shall exchange such information (being information which is at their disposal under their respective taxation laws in the normal course of administration) as is necessary for carrying out the provisions of this Agreement or for the prevention of fraud or for the administration of statutory provisions against legal avoidance in relation to the taxes which are the subject of this Agreement. Any information so exchanged shall be treated as secret and shall not be disclosed to persons other than persons (including a court or administrative tribunal) concerned with the assessment, collection, enforcement or prosecution in respect of the taxes which are the subject of this Agreement. No information as aforesaid shall be exchanged which would disclose any trade, business, industrial or professional secret or trade process.

## ARTICLE 26.

(1) This Agreement may be extended, either in its entirety or with modifications to any territory for whose international relations either of the Contracting Governments is responsible, and which imposes taxes substantially similar in character to those which are the subject of this Agreement, and any such extension shall take effect from such date and subject to such modifications and conditions (including conditions as to termination) as may be specified and agreed between the Contracting Governments in Letters to be exchanged for this purpose.

(2) The termination of this Agreement under Article 28 shall, unless otherwise expressly agreed by both Contracting Governments, terminate the application of this Agreement to any territory to which it has been extended under this Article.

## ARTICLE 27.

(1) This Agreement shall come into force on the date when the last of all such things shall have been done in the United Kingdom and Canada as are necessary to give the Agreement the force of law in the United Kingdom and Canada respectively, and shall thereupon have effect —

(a) in the United Kingdom —

- (i) in respect of income tax for any year of assessment beginning on or after 6 April, 1965;
- (ii) in respect of surtax, for any year of assessment beginning on or after 6 April, 1964;
- (iii) in respect of profits tax, for any chargeable accounting period beginning on or after 1 January, 1965 and for the unexpired portion of any chargeable accounting period current at that date;
- (iv) in respect of capital gains tax for any year of assessment beginning on or after 6 April, 1965; and
- (v) in respect of corporation tax for any financial year beginning on or after 1 April, 1964;

(b) in Canada —

- (i) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after 1 January, 1965;