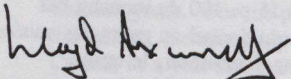


4. In the event that pursuant to an Agreement or Convention concluded after the date of signature of this Agreement, Kyrgyzstan agrees to a rate of tax on inter-company dividends or on interest that is lower than 15 per cent, then such lower rate (but not in any event a rate below 5 per cent in the case of inter-company dividends or 10 per cent in the case of interest) shall apply for the purpose of paragraph 2 of Article 10 and paragraph 3 of this Protocol with respect to dividends received by a company that is the beneficial owner of the dividends and that controls directly or indirectly at least 10 per cent of the voting power in the company paying the dividends or that holds at least 25 per cent of the capital of the company paying the dividends, or of paragraph 2 of Article 11 with respect to interest, as the case may be.

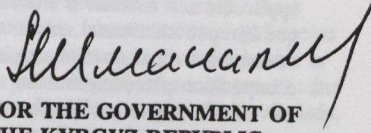
IN WITNESS WHEREOF the undersigned, duly authorized to that effect, have signed this Protocol.

DONE in duplicate at *Ottawa*, this *4th* day of *June* 1998, in the English, French and Russian languages, each version being equally authentic.



FOR THE GOVERNMENT
OF CANADA

Lloyd Axworthy



FOR THE GOVERNMENT OF
THE KYRGYZ REPUBLIC

Muratbek Imanaliyev