

- (b) no later than five years after this Agreement enters into force, Korea shall allow Canadian certified tax accountants registered in Canada to invest in any *se-mu-beop-in* (Korean tax agency corporations), subject to certain requirements consistent with this Agreement, provided that:
 - (i) *se-mu-sa* (Korean-certified tax accountants) shall own more than 50 percent of the voting shares or equity interests of the *se-mu-beop-in*; and
 - (ii) any single Canadian certified tax accountant registered in Canada owns less than 10 percent of the voting shares or equity interests of the *se-mu-beop-in*.
- 3. Korea shall maintain, at a minimum, the measures adopted to implement its commitments in paragraph 2.
- 4. For the purposes of this entry, a “Canadian tax agency corporation” means a tax agency corporation or partnership organised under Canadian law and headquartered in Canada.