

**ANNEX II**  
**NON-REPORTING CANADIAN FINANCIAL**  
**INSTITUTIONS AND PRODUCTS**

**I. General**

- A. This Annex may be modified by a mutual written decision entered into between the Competent Authorities of Canada and the United States:
1. To include additional Entities, accounts, and products that present a low risk of being used by U.S. Persons to evade U.S. tax and that have similar characteristics to the Entities, accounts, and products identified in this Annex as of the date of signature of the Agreement; or
  2. To remove Entities, accounts, and products that, due to changes in circumstances, no longer present a low risk of being used by U.S. Persons to evade U.S. tax.
- Any such addition or removal shall be effective on the date of signature of the mutual decision unless otherwise provided therein.
- B. Procedures for reaching a mutual decision described in paragraph A of this section may be included in the mutual agreement or arrangement described in paragraph 6 of Article 3 of the Agreement.

**II. Exempt Beneficial Owners**

The following Entities shall be treated as Non-Reporting Canadian Financial Institutions and as exempt beneficial owners for the purposes of sections 1471 and 1472 of the U.S. Internal Revenue Code:

- A. **Central Bank**
1. The Bank of Canada.
- B. **International Organizations**
1. A Canadian office of an international organization as defined under paragraph (1) of Section 2 of the *Foreign Missions and International Organizations Act*.