

**AGREEMENT
BETWEEN
THE GOVERNMENT OF CANADA
AND
THE GOVERNMENT OF BERMUDA
UNDER ENTRUSTMENT FROM THE GOVERNMENT OF
THE UNITED KINGDOM OF GREAT BRITAIN
AND NORTHERN IRELAND
ON THE EXCHANGE OF INFORMATION
WITH RESPECT TO TAXES**

WHEREAS the Government of the United Kingdom has issued a letter of entrustment to the Government of Bermuda (hereinafter "Bermuda") to negotiate, and conclude an agreement for the exchange of information on tax matters with the Government of Canada (hereinafter "Canada"):

THE GOVERNMENT OF CANADA and **THE GOVERNMENT OF BERMUDA**, desiring to facilitate the exchange of information with respect to taxes, have agreed as follows:

ARTICLE 1

Object and Scope of this Agreement

The competent authorities of the Parties shall provide assistance through exchange of information that is relevant to the administration or enforcement of the domestic laws of the Parties concerning taxes covered by this Agreement. Such information shall include information that is relevant to the determination, assessment and collection of such taxes, the recovery and enforcement of tax claims, or the investigation or prosecution of tax matters. Information shall be exchanged in accordance with the provisions of this Agreement and shall be treated as confidential in the manner provided in Article 8.

ARTICLE 2

Jurisdiction

A requested Party is not obligated to provide information which is neither held by its authorities nor in the possession or control of persons who are within its territorial jurisdiction.