

PROTOCOL

At the time of signing of this Agreement between the Government of Canada and the States of Guernsey, under Entrustment from the Government of the United Kingdom of Great Britain and Northern Ireland, for the Exchange of Information on Tax Matters, the undersigned have agreed upon the following provisions which shall be an integral part of this Agreement.

It is understood that the term "person" for the purposes of this Agreement shall be interpreted in accordance with the Commentary to the OECD Model Agreement on Exchange of Information on Tax Matters.

IN WITNESS WHEREOF, the undersigned, being duly authorised thereto by the respective Parties, have signed this Protocol.

DONE in duplicate at Guernsey, this 19th day of January 2011, in the English and French languages, each version being equally authentic.

James Wright

Lyndon Trott

**FOR THE GOVERNMENT
OF CANADA**

**FOR THE STATES
OF GUERNSEY**