

2. Nothing in the Convention shall be construed as preventing the application of the provisions of the domestic law of each Contracting State concerning the taxation of income of persons in respect of their participation in non-resident companies or concerning fiscal evasion.

3. The Convention shall not apply to any company that is a resident of a Contracting State and is beneficially owned or controlled directly or indirectly by one or more persons who are not residents of that State, if the amount of the tax imposed on the income of the company by that State is substantially lower than the amount that would be imposed by that State if all of the shares of the capital stock of the company were beneficially owned by one or more individuals who were residents of that State.

ARTICLE XXVII

Entry into Force

1. This Convention shall be ratified and the instruments of ratification shall be exchanged at Abidjan.

2. The Convention shall enter into force upon the exchange of instruments of ratification and its provisions shall have effect:

(a) in Canada:

(i) in respect of tax withheld at the source on amounts paid or credited to non-residents on or after the first day of January in the calendar year following that in which the Convention enters into force; and

(ii) in respect of other Canadian tax for taxation years beginning on or after the first day of January in the calendar year following that in which the Convention enters into force;

(b) in Ivory Coast:

(i) to taxes withheld at the source on income credited or payable on or after the first day of January of the year following that in which the Convention enters into force; and

(ii) to other taxes levied on income for any taxable period ending on or after the first day of January of the year following that in which the Convention enters into force.