

- to arise in the Netherlands, and
- (b) the taxes referred to in paragraphs 3(b) and 4 of Article 2 shall be considered income taxes and in determining the amount of these taxes the investment premiums and bonuses and disinvestment payments as meant in the Netherlands Investment Account Law ("Wet investeringsrekening"), and the investment levies as meant in the Netherlands Industrial Deconcentration Act ("Wet selectieve investeringsrekening") shall not be taken into account."

*Article VI*

Paragraphs 1 and 2 of Article 26 of the Convention shall be deleted and replaced by the following:

"The competent authorities of the States shall exchange such information as is necessary for carrying out the provisions of this Convention or of the domestic laws of the States concerning taxes covered by the Convention insofar as the taxation thereunder is not contrary to the Convention. The exchange of information is not restricted by Article 1. Any information received by one of the States shall be treated as secret in the same manner as information obtained under the domestic laws of that State and shall be disclosed only to persons or authorities (including courts and administrative bodies) involved in the assessment or collection of, the enforcement or prosecution in respect of, or the determination of appeals in relation to, taxes. Such persons or authorities shall use the information only for such purposes. They may disclose the information in public court proceedings or in judicial decisions."

*Article VII*

The following new Articles shall be inserted immediately after Article 26 of the Convention: