

(Japanese Note)

Translation

London, July 22, 2015

Excellency:

I have the honour to refer to the Convention between Japan and the United Kingdom of Great Britain and Northern Ireland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital Gains, signed at London on 2 February 2006 (hereinafter referred to as "the Convention"), and to the Protocol amending the Convention which was signed at London on 17 December 2013 (hereinafter referred to as "the Protocol") and to make, on behalf of the Government of Japan, the following proposal:

With reference to paragraph 3 of Article 14 of the Protocol, the provisions of Article 7 of the Convention as amended by Article 2 of the Protocol shall be applicable:

- (a) in Japan, with respect to profits for any taxable year beginning on or after 1 April 2016; and
- (b) in the United Kingdom of Great Britain and Northern Ireland,
  - (i) in respect of profits charged to income tax or capital gains tax, for any year of assessment beginning on or after 6 April 2016; and
  - (ii) in respect of profits charged to corporation tax, for any financial year beginning on or after 1 April 2016.

His Excellency  
Mr. Hugo Swire  
Minister of State  
of the United Kingdom of Great Britain  
and Northern Ireland

If the foregoing understanding is acceptable to the Government of the United Kingdom of Great Britain and Northern Ireland, I have the honour to suggest that the present Note and Your Excellency's reply to that effect should be regarded as constituting an agreement between the two Governments, which shall enter into force on the date of Your Excellency's reply.

I avail myself of this opportunity to extend to Your Excellency the assurance of my highest consideration.

Keiichi Hayashi  
Ambassador Extraordinary and  
Plenipotentiary of Japan to  
the United Kingdom of Great Britain  
and Northern Ireland

(U.K. Note)

London, July 22, 2015

Excellency:

I have the honour to acknowledge receipt of Your Excellency's Note of today's date which reads as follows:

"(Japanese Note)"

The foregoing proposal being acceptable to the Government of the United Kingdom of Great Britain and Northern Ireland, I have the honour to confirm that Your Excellency's Note and this reply shall be regarded as constituting an agreement between the two Governments, which shall enter into force on the date of this reply.

I avail myself of this opportunity to extend to Your Excellency the assurance of my highest consideration.

Hugo Swire  
Minister of State  
of the United Kingdom of Great Britain  
and Northern Ireland

His Excellency  
Mr. Keiichi Hayashi  
Ambassador Extraordinary and  
Plenipotentiary of Japan to  
the United Kingdom of Great Britain  
and Northern Ireland