

## COMPETENT AUTHORITY ARRANGEMENT

The competent authorities of the United Kingdom and the United States enter into this arrangement (the "Arrangement") regarding the interpretation of the term "North American Free Trade Agreement" referred to in subparagraph d) of paragraph 7 of Article 23 (Limitation on Benefits) of the Convention between the United States of America and the United Kingdom of Great Britain and Northern Ireland for the Avoidance of Double Taxation and Prevention of Fiscal Evasion with Respect to Taxes on Income and on Capital Gains signed at London on July 24, 2001, as amended by the Protocol signed on July 19, 2002 (the "Treaty").

Pursuant to paragraph 1 of the Protocol Replacing the North American Free Trade Agreement with the Agreement between the United States of America, the United Mexican States, and Canada, done at Buenos Aires on November 30, 2018 (the "Agreement"), as amended by the Protocol of Amendment to that Agreement, done at Mexico City on December 10, 2019 (the "Protocol of Amendment" and collectively with the Agreement, the "USMCA"), the USMCA will supersede the North American Free Trade Agreement (the "NAFTA"). The USMCA modernizes NAFTA, is entered into by the same parties, and governs the standards for trade and investment among the parties going forward.

Pursuant to paragraph 3 of Article 26 (Mutual Agreement Procedure) of the Treaty, the competent authorities of the United Kingdom and the United States agree that the references to the NAFTA in subparagraph d) of paragraph 7 of Article 23 of the Treaty shall be understood as references to the USMCA upon entry into force of the USMCA.

Agreed to by the undersigned competent authorities:

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U.S. Competent Authority  
Nikole C. Flax  
Internal Revenue Service

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U.K. Competent Authority  
Daniel Berry  
HM Revenue and Customs