

## COMPETENT AUTHORITY ARRANGEMENT

The competent authorities of Finland and the United States of America have entered into the following Competent Authority Arrangement regarding the interpretation of the term "North American Free Trade Agreement" referred to in subparagraph c) of paragraph 2 and subparagraph g) of paragraph 7 of Article 16 (Limitation on Benefits) of the Convention between the Government of the United States of America and the Government of the Republic of Finland for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income and on Capital, signed at Helsinki on September 21, 1989 as amended by the Protocol signed at Helsinki on May 31, 2006 (the "Convention").

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 the NAFTA, is entered into by the same parties, and governs the standards for trade and investment among the parties going forward.

Pursuant to Article 25 (Mutual Agreement Procedure) of the Convention, the competent authorities of the United States and Finland agree that the references to the NAFTA in subparagraph c) of paragraph 2 and subparagraph g) of paragraph 7 of Article 16 of the Convention shall be understood as references to the USMCA upon entry into force of the USMCA.

Done at Helsinki on 19th August 2021

Done at Washington on 24 October 2021

For the Finnish Competent Authority:

For the United States Competent Authority:

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