

COMPETENT AUTHORITY MUTUAL AGREEMENT

The competent authorities of the United States and Belgium hereby enter into the following agreement (“the Agreement”) regarding the taxes on income imposed on behalf of the political subdivisions or local authorities of either Contracting State covered under Article 2 (Taxes Covered) of the Convention Between the Government of the United States of America and of the Kingdom of Belgium for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income signed at Brussels on November 27, 2006 (the “Convention”). The Agreement is entered into under paragraph 3 of Article 24 (Mutual Agreement Procedure).

Paragraph 3 of Article 2 (Taxes Covered) of the Convention provides:

The existing taxes to which this Convention shall apply are:

- a) in the case of Belgium:
 - i) the individual income tax;
 - ii) the corporate income tax;
 - iii) the income tax on legal entities; and
 - iv) the income tax on non-residents;
including the prepayments and the surcharges on these taxes and prepayments;
- b) in the case of the United States:
 - i) the Federal income taxes imposed by the Internal Revenue Code (but excluding social security taxes); and
 - ii) the Federal excise taxes imposed with respect to private foundations.

The competent authorities agree that, in the case of Belgium, the taxes covered under subparagraph 3(a) of Article 2 (Taxes Covered) of the Convention include the additional taxes established by Belgian municipalities and conurbations on the income tax.

Agreed to by the undersigned competent authorities on:

Michael Danilack
United States Competent Authority
Date: April 28, 2011

Sandra Knaepen
Belgian Competent Authority
Date: May 2, 2011