

PROTOCOL
MODIFYING THE AGREEMENT
BETWEEN
THE KINGDOM OF BELGIUM
AND
THE REPUBLIC OF SEYCHELLES
FOR THE AVOIDANCE OF DOUBLE TAXATION
AND THE PREVENTION OF FISCAL EVASION
WITH RESPECT TO TAXES ON INCOME
SIGNED AT BRUSSELS ON 27 APRIL 2006

**PROTOCOL
MODIFYING THE AGREEMENT
BETWEEN
THE KINGDOM OF BELGIUM
AND
THE REPUBLIC OF SEYCHELLES
FOR THE AVOIDANCE OF DOUBLE TAXATION
AND THE PREVENTION OF FISCAL EVASION
WITH RESPECT TO TAXES ON INCOME
SIGNED AT BRUSSELS ON 27 APRIL 2006**

THE GOVERNMENT OF THE KINGDOM OF BELGIUM

AND

THE GOVERNMENT OF THE REPUBLIC OF SEYCHELLES,

DESIRING to conclude a Protocol modifying the Agreement between the Kingdom of Belgium and the Republic of Seychelles for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, signed at Brussels on 27 April 2006 (hereinafter “the Agreement”),

HAVE AGREED as follows:

ARTICLE 1

The following paragraphs 5, 6 and 7 are inserted in Article 24 (Exchange of information) after paragraph 4:

- “ 5. In no case shall the provisions of paragraph 3 be construed to permit a Contracting State to decline to supply information requested by the other Contracting State because the information is held by a bank, other financial institution, nominee or person acting in an agency or a fiduciary capacity or because it relates to ownership interests in a person.*
- 6. Banking records will be exchanged only upon request. If the request does not identify both a specific taxpayer and a specific bank or financial institution, the competent authority of the requested State may decline to obtain any information that it does not already possess.*
- 7. The competent authorities of the Contracting States shall agree upon the mode of application of this Article.”*

ARTICLE 2

1. Each Contracting State shall notify the other Contracting State of the completion of the procedures required by its laws for the bringing into force of this Protocol.
2. This Protocol shall enter into force from the date on which the later of these notifications is received and its provisions shall have effect with respect to the taxes to which the Agreement has effect.

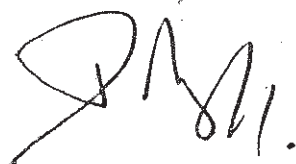
ARTICLE 3

This Protocol shall remain in force as long as the Agreement itself remains in force.

IN WITNESS WHEREOF the undersigned, being duly authorised thereto by their respective Governments, have signed this Protocol.

DONE in duplicate at Brussels, this 14th day of July 2009, in the English language.

**FOR THE GOVERNMENT OF
THE KINGDOM OF BELGIUM:**



**FOR THE GOVERNMENT OF
THE REPUBLIC OF SEYCHELLES:**

