

ARTICLE 27

ENTRY INTO FORCE

1. The Parties shall notify each other in writing that the legal requirements for the entry into force of this Agreement have been complied with.

2. The Agreement shall enter into force thirty days after the date of the later of the notifications referred to in paragraph 1 and its provisions shall have effect in respect of taxes on income derived or accrued during any taxable period or accounting period, as the case may be, beginning on or after the first day of January immediately following the date on which the Agreement enters into force.

3. The provisions of Article 25 of this Agreement shall be applicable in respect of tax years beginning on or after the first day of January immediately following the date on which this Agreement enters into force.