ARTICLE III

Article 8 of the Agreement shall be amended by deleting the last sentence and replacing it with the following sentence:

"The information may not be disclosed to any other person or authority, including those in non-Contracting Parties, without the express written consent of the competent authority of the Contracting Party providing the information."

ARTICLE IV

The following new paragraph shall be inserted immediately after paragraph 3 of Article 18 of the Agreement:

"4. Notwithstanding paragraph 2, Article 5A shall be applicable:

(a) with respect to taxes levied on the basis of a taxable year, for taxes for any taxable years beginning on or after 1 January 2017; and

(b) with respect to taxes not levied on the basis of a taxable year, for taxes levied on or after 1 January 2017."

ARTICLE V

1. This Protocol shall be approved in accordance with the legal procedures of each of the Contracting Parties and shall enter into force on the thirtieth day after the date of exchange of diplomatic notes indicating such approval.

2. This Protocol, which shall form an integral part of the Agreement, shall remain in force as long as the Agreement remains in force.

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

DONE in duplicate at Nassau this ninth day of February, 2017, in the Japanese and English languages, each text being equally authentic.

FOR THE GOVERNMENT OF JAPAN:

中野正則

FOR THE GOVERNMENT OF THE COMMONWEALTH OF THE BAHAMAS:

Michael Halkitis