

The example below is being presented only for illustrative purposes to provide capacity-building support to developing countries and is not necessarily being endorsed by the PCT, the four partner organizations, their respective managements, or the organizations' member countries.

Example of a fictional agreed minute between Country X and Country Y

AGREED MINUTE

Delegations from [Country X] and [Country Y] met in [city name] from [date] to [date] for a first round of negotiations for a tax treaty between the two countries. The names of members of the delegations are included in Annex I. The draft text is attached as Annex II.

The meeting was held in a very friendly atmosphere and different views were expressed on the various issues involved in this type of treaty.

The delegations reviewed all the provisions of their corresponding [opening texts] [models] and there was substantial agreement on many provisions. However, some issues would need further consideration and they were left in square brackets in the text in Annex II. In particular:

[Examples]:

- The rate limitations with regard to interest and royalties are still to be discussed
- The question whether to include a services permanent establishment provision in Article 5 remains open

Before the next meeting it was agreed that:

[Examples]

- Country X will provide Country Y with a description of its tax treatment of trusts
- Country Y will provide Country X with additional details of its defined contribution pension system]

Done in [city name] on [date].

For the delegation of [Country X]

For the delegation of [Country Y]

[Team leader's name and signature]

[Team leader's name and signature]