Ha Noi, April 15, 2014

Excellency,

I have the honour to acknowledge the receipt of Your Excellency's Note of today's date which reads as follows:

"I have the honour to refer to the Agreement between the Government of Japan and the Government of the Socialist Republic of Viet Nam for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income signed at Ha Noi on the twenty-fourth day of October 1995 (hereinafter referred to as "the Agreement") and to confirm, on behalf of the Government of Japan, the following understanding reached between the two Governments:

With reference to paragraph 4 of Article 11 of the Agreement, it is understood that the Japan Finance Corporation (hereinafter referred to as "the JFC") and the Japan Bank for International Cooperation (hereinafter referred to as "the JBIC") shall be regarded as a financial institution referred to in paragraph 4(b)(v) of Article 11 of the Agreement.

I have further the honour to propose that the present Note and your Note in reply confirming on behalf of the Government of the Socialist Republic of Viet Nam the foregoing understanding shall constitute an agreement between the two Governments, which shall enter into force on the date of your Note in reply and shall be applicable for amounts taxable, with respect to the JFC, from the first day of October 2008 until the thirty-first day of March 2012 and, with respect to the JBIC, on or after the first day of April 2012. "

His Excellency
Mr. Hiroshi Fukada
Ambassador Extraordinary
and Plenipotentiary of Japan
to the Socialist Republic of Viet Nam

The foregoing understanding being acceptable to the Government of the Socialist Republic of Viet Nam, I have further the honour to confirm that Your Excellency's Note and this Note in reply shall constitute an agreement between the two Governments, which shall enter into force on the date of this Note in reply and shall be applicable for amounts taxable, with respect to the Japan Finance Corporation, from the first day of October 2008 until the thirty-first day of March 2012 and, with respect to the Japan Bank for International Cooperation, on or after the first day of April 2012.

I avail myself of this opportunity to extend to Your Excellency the assurance of my highest consideration.

Ho Xuan Son
First Vice Minister of Foreign Affairs
of the Socialist Republic of Viet Nam

EMBASSY OF JAPAN
HANOI

Hanoi, April 15, 2014

Sir,

I have the honour to refer to the Agreement between the Government of Japan and the Government of the Socialist Republic of Viet Nam for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income signed at Hanoi on the twenty-fourth day of October 1995 (hereinafter referred to as "the Agreement") and to confirm, on behalf of the Government of Japan, the following understanding reached between the two Governments:

With reference to paragraph 4 of Article 11 of the Agreement, it is understood that the Japan Finance Corporation (hereinafter referred to as "the JFC") and the Japan Bank for International Cooperation (hereinafter referred to as "the JBIC") shall be regarded as a financial institution referred to in paragraph 4(b)(v) of Article 11 of the Agreement.

I have further the honour to propose that the present Note and your Note in reply confirming on behalf of the Government of the Socialist Republic of Viet Nam the foregoing understanding shall constitute an agreement between the two Governments, which shall enter into force on the date of your Note in reply and shall be applicable for amounts taxable, with respect to the JFC, from the first day of October 2008 until the thirty-first day of March 2012 and, with respect to the JBIC, on or after the first day of April 2012.

I avail myself of this opportunity to extend to you the assurance of my high consideration.

深田博史

Hiroshi Fukada
Ambassador Extraordinary
and Plenipotentiary of Japan
to the Socialist Republic of Viet Nam

Mr. Ho Xuan Son
First Vice Minister of Foreign Affairs
of the Socialist Republic of Viet Nam