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### *Reservation*

Pursuant to Article 26(4) of the Convention, Curaçao reserves the right for Part VI not to apply with respect all of its Covered Tax Agreements that already provides for mandatory binding arbitration of unresolved issues arising from a mutual agreement procedure case. The article and paragraph number of each such provision is identified below.

Listed Agreement Number	Other Contracting Jurisdiction	Provision
1	Malta	Article 24(5)