

United Nations

E/C.18/2017/INF/2



**Economic and Social Council**

Distr.: General  
13 February 2017

English only

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**Committee of Experts on International Cooperation  
in Tax Matters**

**Fourteenth session**  
New York, 3-6 April 2017

**Summary of expected modifications to the United Nations  
Model Double Taxation Convention between Developed and  
Developing Countries and commentaries for the 2017  
update: articles 9, 12 and 13**

**Note by the Secretariat**