

Deputy Lyndon Trott
Chief Minister
Sir Charles Frossard House
La Charroterie
St Peter Port
Guernsey
GY1 2NH

23 November 2009

Dear Chief Minister,

On behalf of the Lord Chancellor, I hereby entrust the Government Guernsey to negotiate and conclude Tax Information Exchange Agreements, other Agreements relating to taxation that provide for exchange of information on tax matters to the OECD standard (as set out in Article 26 of the Model Tax Convention on Income and Capital) and agreements relating to taxation that are ancillary to (or concluded after the signature of) a Tax Information Exchange Agreement entered into with the same contracting party, with the following:

- Member States of the OECD, EU and G20
- Jurisdictions that have been assessed by the OECD as having substantially implemented the internationally agreed tax standard.

This entrustment replaces the entrustment relating to Tax information Exchange Agreements dated 1 December 2003, but does not affect Agreements the final text of which has been agreed by the Ministry of Justice under the terms of that entrustment which still await signature.

This entrustment is given on the understanding that the United Kingdom remains responsible for the international relations of Guernsey; and on the conditions that the Guernsey Government supplies evidence to the Ministry of Justice that the Government with whom the Guernsey Government is negotiating is content to conclude the Agreement directly with the Guernsey Government, and that the proposed final text of the Agreement is submitted to the Ministry of Justice in London for approval in good time before signature.

Yours sincerely,

WILLY BACH

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