

EXPLANATORY NOTE

(This note is not part of the Order)

The Schedule to this Order contains arrangements (“the Arrangements”) which amend an agreement between the Government of the United Kingdom of Great Britain and Northern Ireland and the States of Guernsey for the exchange of information relating to tax matters (“the Agreement”). The Agreement was scheduled to the Double Taxation Relief and International Tax Enforcement (Guernsey) Order 2009 (S.I. 2009/3011). This Order brings the Arrangements into effect.

The Agreement provides for the exchange of information relevant to the administration or enforcement or recovery of the taxes covered by the Agreement, by the revenue authorities of the two territories. Information will be exchanged in accordance with the provisions of the Agreement.

The Arrangements amend the Agreement to provide for the automatic and spontaneous exchange of such information.

Article 1 provides for citation.

Article 2 makes a declaration as to the effect and content of the Arrangements.

The Arrangements will enter into force on the date of the later of the notifications by each territory of the completion of its legislative procedures and take effect for information exchanged on or after that date.

The date of entry into force will, in due course, be published in the *London*, *Edinburgh* and *Belfast Gazettes*.

A Tax Information and Impact Note has not been produced for this Order as it gives effect to a previously announced policy to enact a double taxation agreement.