EXPLANATORY NOTE

(This note is not part of the Order)

The Schedule to this Order contains arrangements comprising an Exchange of Letters and an Arrangement ("the Arrangements) amending the arrangement between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the Isle of Man for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income ("the 1955 Arrangement"). This Order brings the arrangements into effect.

The 1955 Arrangement was scheduled to the Double Taxation Relief (Taxes on Income) (Isle of Man) Order 1955 (S.I. 1955/1205) and has previously been amended by the arrangements set out in the Schedules to the Double Taxation Relief (Taxes on Income) (Isle of Man) Orders of 1991 (S.I 1991/2880) and 1994 (S.I. 1994/3208) and the Double Taxation Relief and International Tax Enforcement (Taxes on Income and Capital) (Isle of Man) Order 2009 (S.I. 2009/228).

Article 2 makes a declaration that it is expedient that the Arrangements should have effect. The Arrangements relate to the exchange of information foreseeably relevant to the carrying out of the provisions of the 1955 Arrangement or to the administration and enforcement of domestic laws concerning any United Kingdom or Isle of Man tax.

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.