

# **STATES OF JERSEY**



## **RATIFICATION OF THE AGREEMENT BETWEEN THE GOVERNMENT OF JERSEY AND THE GOVERNMENT OF THE REPUBLIC OF KOREA ON THE EXCHANGE OF INFORMATION RELATING TO TAX MATTERS**

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**Lodged au Greffe on 11th August 2015  
by the Minister for External Relations**

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**STATES GREFFE**

## **PROPOSITION**

**THE STATES are asked to decide whether they are of opinion –**

to ratify the Agreement between the Government of Jersey and the Government of the Republic of Korea on the exchange of information relating to tax matters, as set out in Appendix 1 to the report of the Chief Minister dated 31st July 2015.

**MINISTER FOR EXTERNAL RELATIONS**

## REPORT

### Background

1. In February 2002, Jersey entered into a political commitment to support the OECD tax initiative on transparency and information exchange through the negotiation of Tax Information Exchange Agreements to an agreed international standard.
2. In September 2009, the Global Forum on Transparency and Information Exchange for Tax Purposes, a body of which over 120 jurisdictions are now members, agreed a peer review process to assess compliance with the international standard. Jersey has been assessed by the Global forum and rated as “largely compliant” with the international standards on exchange of information on request, a rating that is shared with Germany, Italy, the UK and the USA.
3. Successive G20 summits have encouraged jurisdictions to make progress in agreeing, implementing and abiding by the necessary international Agreements for information exchange. In response, Jersey has maintained an active programme of negotiating Agreements with EU, OECD and G20 member jurisdictions. This has served to enhance the Island’s international personality, and generally has helped to engender a more favourable view of the Island amongst the international community.
4. The international tax information exchange standard can be met through either a Tax Information Exchange Agreement (TIEA) or a Double Tax Agreement (DTA). The advantage of a DTA is that it offers benefits to individuals and the business community through the avoidance of double taxation or reduced rates of withholding tax, in addition to providing for exchange of information to the international standard. However, the majority of jurisdictions with whom the Island has sought to negotiate an Agreement have not been prepared to consider a DTA on the grounds that they would derive little, if any, benefit from such an Agreement because Jersey is a zero-tax jurisdiction.
5. The latest position in respect of the programme of negotiating tax Agreements is attached as **Appendix 2** to this report. A total of 37 TIEAs and 10 DTAs have now been signed, of which 33 TIEAs and 8 DTAs are in force. Almost without exception, the delay in bringing Agreements into force is due to the length of time taken by the other parties to the Agreements to complete their domestic procedures for the ratification of the Agreements. In addition, since June 2014, Jersey has been party to the Multilateral Convention on Mutual Administrative Assistance in Tax Matters, and through this, information can be exchanged with 54 jurisdictions. Some jurisdictions that were negotiating a TIEA with Jersey have now decided to rely on the provisions of the Convention.
6. Jersey is an “early adopter” of the Common Reporting Standard on Automatic Exchange of Information (AEOI) and will be in a position to exchange information automatically for 2016 in 2017. It is expected that when jurisdictions receive this information it will lead to more requests for information under the provisions of the TIEAs or the Multilateral Convention. Jersey is a Vice-Chair of a Global Forum Working Group on AEOI.

## **The Agreement with the Government of the Republic of Korea**

7. The Agreement entered into with the Government of the Republic of Korea (“the Agreement”) is a continuation of the ongoing programme of entering into tax Agreements to the international standard with G20, OECD and EU member jurisdictions. Korea is a member of the G20.
8. The Agreement is attached as **Appendix 1** to this report. The Agreement is in line with the OECD Model TIEA, and provides for the exchange of information on tax matters on request. It is consistent with Agreements signed previously with other jurisdictions, which the States have ratified.
9. Great importance is attached to maintaining a good relationship with the G20 Members, and this Agreement is seen as a significant further strengthening of that relationship. It will also strengthen and enhance the existing business relationship with Korea and will help to facilitate greater market access.

## **Procedure for signing and ratifying the Agreement**

10. The Jersey signing of the Agreement was undertaken by the Minister for External Relations in Jersey on 21st July 2015. The signing was in accordance with the provisions of Article 18(2) of the States of Jersey Law 2005 and paragraph 1.8.5 of the Strategic Plan 2006 – 2011 adopted by the States on 28th June 2006. The Council of Ministers has authorised the Chief Minister, in concurrence with the Minister for External Relations, to sign on behalf of the Government of Jersey.
11. The Agreement is now being presented to the States for ratification, following which it will be published and entered into the official record. The Agreement will enter into force when the domestic procedures of both parties have been completed.
12. The States, on 29th January 2008, adopted the Taxation (Exchange of Information with Third Countries) (Jersey) Regulations 2008. The Schedule to these Regulations lists the third countries, and includes the taxes covered by the Agreements being entered into. The necessary Regulations to provide for the inclusion in the Schedule of the Republic of Korea, and the relevant taxes covered, are being separately presented to the States for adoption.

## **Financial and manpower implications**

13. There are no implications expected for the financial or manpower resources of the States arising from the ratification and implementation of the Agreement.

31st July 2015

**AGREEMENT  
BETWEEN  
THE GOVERNMENT OF JERSEY  
AND  
THE GOVERNMENT OF THE REPUBLIC OF KOREA  
ON THE EXCHANGE OF INFORMATION  
RELATING TO TAX MATTERS**

Whereas the Government of Jersey and the Government of the Republic of Korea (the "Contracting Parties") wish to enhance and facilitate the exchange of information relating to all tax matters;

Whereas it is acknowledged that the Government of Jersey has the right under the terms of its Entrustment from the United Kingdom to negotiate, conclude, perform and, subject to the provisions of this Agreement, terminate a tax information exchange agreement with the Government of the Republic of Korea;

Now, therefore, the Government of Jersey and the Government of the Republic of Korea, desiring to facilitate the exchange of information with respect to taxes, have agreed as follows:

#### **Article 1**

##### **Object and Scope of the Agreement**

The competent authorities of the Contracting Parties shall provide assistance through the exchange of information that is foreseeably relevant to the administration and enforcement of the domestic laws of the Contracting Parties concerning taxes covered by this Agreement. Such information shall include information that is foreseeably relevant to the determination, assessment, and collection of such taxes, the recovery and enforcement of tax claims, or the investigation or prosecution of tax matters. Information shall be exchanged in accordance with the provisions of this Agreement and shall be treated as confidential in the manner provided in Article 8. The rights and safeguards secured to persons by the laws or administrative practice of the requested Party remain applicable to the extent that they do not unduly prevent or delay the effective exchange of information.

**Article 2**  
**Jurisdiction**

A requested Party is not obligated to provide information which is neither held by its authorities nor in the possession or control of persons who are within its territorial jurisdiction.

**Article 3**  
**Taxes Covered**

1. The taxes which are the subject of this Agreement are taxes of every kind and description imposed by the laws of the Contracting Parties at the date of signature of the Agreement.

2. This Agreement shall also apply to any identical taxes imposed after the date of signature of the Agreement in addition to or in place of the existing taxes. This Agreement shall also apply to any substantially similar taxes imposed after the date of signature of the Agreement in addition to or in place of the existing taxes if the competent authorities of the Contracting Parties so agree. The competent authorities of the Contracting Party shall notify each other in writing of any substantial changes to the taxation and related information gathering measures covered by the Agreement.

**Article 4**  
**Definitions**

1. For the purposes of this Agreement unless otherwise defined:
- a) the term "Korea" means the Republic of Korea, and, when used in a geographical sense, it means the territory of the Republic of Korea including any area adjacent to

the territorial sea of the Republic of Korea which, in accordance with international law, has been or may hereafter be designated under the laws of the Republic of Korea as an area within which the sovereign rights or jurisdiction of the Republic of Korea with respect to the sea-bed and sub-soil and their natural resources may be exercised;

b) the term "Jersey" means the Bailiwick of Jersey, including the territorial sea;

c) the term "competent authority" means:

i) in the case of the Republic of Korea, the Minister of Strategy and Finance or his/her authorized representative;

ii) in the case of Jersey, the Treasury and Resources Minister or his/her authorized representative;

d) the term "person" includes an individual, a company and any other body of persons;

e) the term "company" means any body corporate or any entity that is treated as a body corporate for tax purposes;

f) the term "publicly traded company" means any company whose principal class of shares is listed on a recognised stock exchange, provided its listed shares can be readily purchased or sold by the public. Shares can be purchased or sold "by the public" if the purchase or sale of shares is not implicitly or explicitly restricted to a limited group of investors;

g) the term "principal class of shares" means the class or classes of shares representing a majority of the voting power and value of the company;

h) the term "recognised stock exchange" means any stock exchange agreed upon by the competent authorities of the Contracting Parties;

i) the term "collective investment fund or scheme" means any pooled investment vehicle, irrespective of legal form. The term "public collective investment fund or scheme" means any collective investment fund or scheme, provided the units, shares or other interests in the fund or scheme can be readily purchased, sold or redeemed by the public. Units, shares or other interests in the fund or scheme can



- be readily purchased, sold or redeemed "by the public" if the purchase, sale or redemption is not implicitly or explicitly restricted to a limited group of investors;
- j) the term "tax" means any tax to which this Agreement applies;
  - k) the term "requesting Party" means the Contracting Party requesting information;
  - l) the term "requested Party" means the Contracting Party requested to provide information;
  - m) the term "information gathering measures" means laws and administrative or judicial procedures that enable a Contracting Party to obtain and provide the requested information;
  - n) the term "information" means any fact, statement, document or record in any form whatever;
  - o) the term "criminal tax matters" means tax matters involving intentional conduct whether before or after the entry into force of this Agreement which is liable to prosecution under the criminal laws of the requesting Party;
  - p) the term "criminal laws" means all criminal laws designated as such under domestic law irrespective of whether contained in the tax laws, the criminal code or other statutes.

2. As regards the application of this Agreement at any time by a Contracting Party, any term not defined therein shall, unless the context otherwise requires, have the meaning that it has at that time under the law of that Party, any meaning under the applicable tax laws of that Party prevailing over a meaning given to the term under other laws of that Party.

#### **Article 5**

##### **Exchange of Information upon Request**

1. The competent authority of the requested Party shall provide, upon request, information for the purposes referred to in Article 1. Such information shall be exchanged without regard to whether the requested Party needs such information for its own tax purposes or the conduct

being investigated would constitute a crime under the laws of the requested Party if such conduct occurred in the territory of the requested Party. The competent authority of the requesting Party shall only make a request for information pursuant to this Article when it is unable to obtain the requested information by other means, except where recourse to such means would give rise to disproportionate difficulty.

2. If the information in the possession of the competent authority of the requested Party is not sufficient to enable it to comply with the request for information, the requested Party shall use all relevant information gathering measures to provide the requesting Party with the information requested, notwithstanding that the requested Party may not need such information for its own tax purposes.

3. If specifically requested by the competent authority of the requesting Party, the competent authority of the requested Party shall provide information under this Article, to the extent allowable under its domestic laws, in the form of depositions of witnesses and authenticated copies of original records.

4. Each Contracting Party shall ensure that its competent authorities, for the purposes specified in Article 1 and in accordance with Article 2 of this Agreement, have the authority to obtain and provide upon request:

- a) information held by banks, other financial institutions, and any person acting in an agency or fiduciary capacity including nominees and trustees;
  - b) information regarding the legal and beneficial ownership of companies, partnerships, and other persons, including ownership information on all such persons in an ownership chain; in the case of trusts, information on settlors, trustees, protectors and beneficiaries; in the case of foundations, information on founders, members of the foundation council and beneficiaries; and in the case of collective investment schemes, information on shares, units and other interests.
- Further, this Agreement does not create an obligation on either Contracting Party to obtain or provide ownership information with respect to publicly traded

companies or public collective investment funds or schemes unless such information can be obtained without giving rise to disproportionate difficulties.

5. Any request for information shall be formulated with as much detail as possible and shall specify in writing:

- a) the identity of the person under examination or investigation;
- b) the period for which the information is requested;
- c) the nature of the information requested and the form in which the requesting Party would prefer to receive it;
- d) the tax purpose for which the information is sought;
- e) the reasons for believing that the information requested is foreseeably relevant to tax administration and enforcement of the requesting Party, with respect to the person identified in subparagraph (a) of this paragraph;
- f) the grounds for believing that the information requested is held by the requested Party or is in the possession of or in the control of or obtainable by a person within the territorial jurisdiction of the requested Party;
- g) to the extent known, the name and address of any person believed to be in the possession of or in the control of or able to obtain the requested information;
- h) a statement that the request is in conformity with the laws and administrative practice of the requesting Party, that if the requested information was within the jurisdiction of the requesting Party, then the competent authority of the requesting Party would be able to obtain the information under the laws of the requesting Party or in the normal course of administrative practice, and that it is in conformity with this Agreement;
- i) a statement that the requesting Party has pursued all means available in its own territory to obtain the information, except those that would give rise to disproportionate difficulties.

6. The competent authority of the requested Party shall acknowledge receipt of the request to the competent authority of the requesting Party and shall use its best endeavours to forward the requested information to the requesting Party with the least reasonable delay.

**Article 6**  
**Tax Examinations Abroad**

1. By reasonable notice given in advance, a Contracting Party may request that the other Contracting Party allow representatives of the competent authority of the first-mentioned Party to enter the territory of the second-mentioned Party, to the extent permitted under its laws, to interview individuals and examine records with the prior written consent of the individuals or other persons concerned. The competent authority of the first-mentioned Party shall notify the competent authority of the second-mentioned Party of the time and place of the intended meeting with the individuals concerned.

2. At the request of the competent authority of one Contracting Party, the competent authority of the other Contracting Party may allow representatives of the competent authority of the first-mentioned Party to be present at the appropriate part of a tax examination in the second-mentioned Party.

3. If the request referred to in paragraph 2 is acceded to, the competent authority of the Contracting Party conducting the examination shall, as soon as possible, notify the competent authority of the other Contracting Party about the time and place of the examination, the authority or official designated to carry out the examination and the procedures and conditions required by the first-mentioned Party for the conduct of the examination. All decisions with respect to the conduct of the tax examination shall be made by the Party conducting the examination.

**Article 7**  
**Possibility of Declining a Request**

1. The competent authority of the requested Party may decline to assist:

- a) where the request is not made in conformity with this Agreement;
- b) where the requesting Party has not pursued all means available in its own territory to obtain the information, except where recourse to such means would give rise to disproportionate difficulty; or
- c) where the disclosure of the information requested would be contrary to the public policy of the requested Party.

2. The provisions of this Agreement shall not impose on a Contracting Party any obligation to provide information subject to legal privilege as provided for under the domestic laws of the relevant Party, or any trade, business, industrial, commercial or professional secret or trade process, provided that information described in Article 5, paragraph 4 shall not be treated as such a secret or trade process merely because it meets the criteria in that paragraph.

3. A request for information shall not be refused on the ground that the tax claim giving rise to the request is disputed.

4. The requested Party shall not be required to obtain and provide information which the requesting Party would be unable to obtain under its own laws for the purpose of the administration or enforcement of its own tax laws or in response to a valid request made in similar circumstances from the requested Party under this Agreement.

5. The requested Party may decline a request for information if the information is requested by the requesting Party to administer or enforce a provision of the tax law of the requesting Party, or any requirement connected therewith, which discriminates against a national of the requested Party as compared with a national of the requesting Party in the same circumstances.

**Article 8**  
**Confidentiality**

1. Unless otherwise required by the domestic laws of a Contracting Party, all information provided and received by the competent authorities of the Contracting Parties shall be kept confidential.

2. Information provided to the competent authority of the requesting Party may not be used for any purpose other than the purposes stated in Article 1 without the prior express written consent of the requested Party.

3. Information provided shall be disclosed only to persons or authorities (including judicial and administrative authorities) concerned with the purposes specified in Article 1 and used by such persons or authorities only for such purposes including the determination of any appeal. For these purposes, information may be disclosed in public court proceedings or in judicial decisions.

4. The information provided to the requesting Party under this Agreement may not be disclosed to any other jurisdiction.

**Article 9**  
**Costs**

Unless the competent authorities of the Contracting Parties otherwise agree, ordinary costs incurred in providing assistance shall be borne by the requested Party, and extraordinary costs in providing assistance (including reasonable costs of engaging external advisers in connection with litigation or otherwise) shall be borne by the requesting Party. The respective competent authorities shall consult as necessary with regard to this Article, and in particular

the competent authority of the requested Party shall consult with the competent authority of the requesting Party in advance if the costs of providing information with respect to a specific request are expected to be significant.

#### **Article 10**

##### **Mutual Agreement Procedure**

1. Where difficulties or doubts arise between the Contracting Parties regarding the implementation or interpretation of this Agreement, the respective competent authorities shall endeavour to resolve the matter by mutual agreement.
2. In addition to the agreements referred to in paragraph 1, the competent authorities of the Contracting Parties may mutually agree on the procedures to be used under Articles 5, 6 and 9.
3. The competent authorities of the Contracting Parties may communicate with each other directly for the purposes of reaching agreement under this Article.
4. The Contracting Parties may also agree on other forms of dispute resolution.

#### **Article 11**

##### **Implementation**

The Contracting Parties shall take all necessary steps to give effect to the provisions of this Agreement.

**Article 12**  
**Entry into Force**

1. The Government of the Contracting Parties shall notify each other in writing of the completion of the procedures required by their respective laws for the entry into force of this Agreement.
2. This Agreement shall enter into force on the date of the later of the notifications referred to in paragraph 1 of this Article and shall thereupon have effect:
  - a) for criminal tax matters on that date; and
  - b) for all other matters covered in Article 1 on that date, but only in respect of taxable periods beginning on or after that date or, where there is no taxable period, all charges to tax arising on or after that date.

**Article 13**  
**Termination**

1. The Government of either Contracting Party may terminate the Agreement by serving a written notice of termination either through diplomatic channels or by letter to the Government of the other Contracting Party.
2. Such termination shall become effective on the first day of the month following the expiration of a period of six months after the date of receipt of the notice of termination by the other Contracting Party.
3. If this Agreement is terminated for any reason, the Contracting Parties shall remain bound by the provisions of Article 8 with respect to any information obtained under this Agreement.



IN WITNESS WHEREOF, the undersigned, being duly authorised thereto by their respective Governments, have signed this Agreement.

DONE in duplicate at SAINT HELENS on this 21<sup>st</sup> day of JULY, 20 15, in the Korean and English languages, both texts being equally authentic.



For the Government of Jersey



For the Government of  
the Republic of Korea

**STATES OF JERSEY****A. TAX INFORMATION EXCHANGE AGREEMENTS (TIEAs)****1. TIEAs signed (Note: dates in brackets are current best estimates)**

<b><u>Countries</u></b>	<b><u>Date Signed</u></b>	<b><u>Ratified by Jersey</u></b>	<b><u>Ratified by other Party</u></b>	<b><u>Entry into Force</u></b>
U.S.A.	Nov. 2002	May 2006	Nov. 2002	23rd May 2006
Netherlands	June 2007	Feb. 2008	Dec. 2007	1st March 2008
Germany	July 2008	January 2009	July 2009	28th August 2009
Sweden	October 2008	March 2009	Nov. 2009	23rd Dec. 2009
Norway	October 2008	March 2009	Sep. 2009	7th October 2009
Iceland	October 2008	March 2009	October 2009	3rd Dec. 2009
Finland	October 2008	March 2009	Dec. 2008	3rd August 2009
Denmark	October 2008	March 2009	March 2009	6th June 2009
Greenland	October 2008	March 2009	March 2009	6th June 2009
Faroes	October 2008	March 2009	June 2009	21st August 2009
U.K.	March 2009	July 2009	Nov. 2009	27th Nov. 2009
France	March 2009	July 2009	July 2010	11th October 2010
Ireland	March 2009	July 2009	April 2010	5th May 2010
Australia	June 2009	Nov. 2009	January 2010	5th January 2010
New Zealand	July 2009	Nov. 2009	Sep. 2010	27th October 2010
Portugal	July 2010	Sep. 2010	March 2011	9th Nov. 2011
People's Republic of China	October 2010	January 2011	October 2011	10th Nov. 2011
Turkey	Nov. 2010	Feb. 2011	August 2013	11th Sep. 2013
Mexico	Nov. 2010	Feb. 2011	Feb. 2012	22nd March 2012
Canada	January 2011	March 2011	Dec. 2011	19th Dec. 2011
Indonesia	April 2011	July 2011	Sep. 2014	22nd Sep. 2014
Czech Republic	July 2011	Nov. 2011	March 2012	14th March 2012
South Africa	July 2011	Nov. 2011	January 2012	29th Feb. 2012
Argentina	July 2011	Sep. 2011	July 2011	9th Dec. 2011
India	Nov. 2011	April 2012	January 2012	8th May 2012
Japan	Dec. 2011	April 2012	June 2013	30th August 2013
Poland	Dec. 2011	April 2012	August 2012	1st Nov. 2012
Italy	March 2012	May 2012	January 2015	26th January 2015
Austria	Sep. 2012	Nov. 2012	March 2013	1st June 2013
Latvia	January 2013	March 2013	Dec. 2013	1st March 2014
Brazil	January 2013	March 2013	(2nd half 2015)	(2nd half 2015)
Switzerland	Sep. 2013	Dec. 2013	October 2014	14th October 2014
Slovenia	Nov. 2013	Feb. 2014	June 2014	24th June 2014
Hungary	January 2014	March 2014	October 2014	13th Feb. 2015
Belgium	March 2014	June 2014	(2nd half 2015)	(2nd half 2015)
Romania	Dec. 2014	Feb. 2015	(2nd half 2015)	(2nd half 2015)
Korea	July 2015	(Sep. 2015)	(1st half 2016)	(1st half 2016)

**2. TIEAs initialled or agreed ready for signing:**

- Chile
- Spain

**3. TIEAs where negotiations are well advanced with a draft Agreement exchanged:**

**[Note, however, that Lithuania and Slovakia are party to the Multilateral Convention on Mutual Administrative Assistance in Tax Matters, with which Jersey is also joined. As this provides for the equivalent exchange of information on request with immediate effect, it is not expected that they will proceed with the TIEA.]**

- Bulgaria
- Kenya
- Lithuania
- Slovakia

**4. Jurisdiction approached on which no further action has been taken to date:**

- Russia

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**B. DOUBLE TAXATION AGREEMENTS (DTAs)<sup>1</sup>**

**1. DTAs signed:**

- Malta –  
signed January 2010  
ratified by Malta February 2010  
ratified by Jersey June 2010  
in force – 19th July 2010
- Estonia –  
signed December 2010  
ratified by Jersey March 2011  
ratified by Estonia December 2011  
in force – 30th December 2011
- Hong Kong China –  
signed February 2012  
ratified by Jersey May 2012  
ratified by Hong Kong June 2013  
in force – July 2013

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<sup>1</sup> The DTAs listed are those that are to the standard of the OECD Model Convention. In addition there is a DTA with the UK, entered into in 1952, and a number of partial DTAs, details of which can be found on the Taxes Office website – <http://www.gov.je/TaxesMoney/InternationalTaxAgreements/DoubleTaxation/Pages/PartialDoubleTaxation.aspx>

- Qatar –  
signed March 2012  
ratified by Jersey May 2012  
ratified by Qatar November 2012  
in force – 22nd November 2012
- Singapore –  
signed October 2012  
ratified by Jersey January 2013  
ratified by Singapore May 2013  
in force – 2nd May 2013
- Guernsey –  
signed January 2013  
ratified by Jersey June 2013  
ratified by Guernsey May 2013  
in force – 9th July 2013
- Isle of Man –  
signed January 2013  
ratified by Jersey June 2013  
ratified by the Isle of Man May 2013  
in force – 10th July 2013
- Luxembourg  
signed April 2013  
ratified by Jersey July 2013  
ratified by Luxembourg July 2014  
in force – 5th August 2014
- Rwanda  
signed June 2015
- Seychelles  
signed July 2015

**2. DTAs initialled or agreed ready for signing:**

- Mauritius

**3. Jurisdictions where DTA negotiations have been requested/initiated/draft Agreements have been exchanged:**

- Bahrain
- Botswana
- Cyprus
- Ghana
- Lesotho
- Liechtenstein
- Malawi

- Nigeria
- Saudi Arabia
- Swaziland
- UAE
- Zambia

**4. Jurisdictions with whom Jersey does not have a bilateral TIEA or DTA, but who are party (i.e. have signed and entered into force) to the OECD/ Council of Europe Multilateral Convention on Mutual Administrative Assistance in Tax Matters, which provides for exchange of information on request on the same basis as the bilateral TIEAs:**

- Albania
- Azerbaijan (01-10-2015)
- Belize
- Cameroon (01-10-2015)
- Colombia
- Costa Rica
- Croatia
- Cyprus
- Georgia
- Ghana
- Greece
- Kazakhstan (01-08-2015)
- Lithuania
- Moldova
- Nigeria (01-09-2015)
- Russia
- Slovak Republic
- Spain
- Tunisia
- Ukraine

**Jersey became a party to the Convention on 1st June 2014. Some jurisdictions with whom TIEA negotiations have been engaged may decide not to progress the latter and rely on the Multilateral Convention. One such jurisdiction is Greece.**

**5. Jurisdictions with whom Jersey has signed a TIEA or DTA who are also party to the Multilateral Convention (i.e. it is signed and in force):**

- Argentina
- Australia
- Austria
- Belgium
- Canada
- Czech Republic
- Denmark
- Estonia
- Finland

- France
- Hungary
- Iceland
- India
- Indonesia
- Ireland
- Italy
- Republic of Korea
- Japan
- Latvia
- Luxembourg
- Malta
- Mexico
- Netherlands
- New Zealand
- Norway
- Poland
- Portugal
- Romania
- Seychelles (01-10-2015)
- Slovenia
- South Africa
- Sweden
- United Kingdom

**Enquiries concerning the above should be directed in the first instance to the Adviser – International Affairs, in the Chief Minister’s Department; tel. 44(0)1534 440414; e-mail: [c.powell@gov.je](mailto:c.powell@gov.je).**

**Adviser – International Affairs**

**29th July 2015**