to de a col	ntergovernmental Agi	reements (IG	A)			MOORE STEPHENS
•	I January 3, 2017 tance? Contact Sandy Jose a	t jose@moorest	ephensdm.com or (2	248) 244-3082.		DOEREN MAYHEW
No.	Country	Date	Status	Effective Date of IGA	Type of Agreement	Notes
	Algeria		Signed	30-Jun-14	Model 1	
2	Angola		Signed	30-Nov-14	Model 1	
			Agreement in			
3	Anguilla		Substance	30-Jun-14	Model 1	
4	Antigua and Barbuda		Signed	30-Jun-14	Model 1	
			Agreement in			
	Armenia		Substance	30-Jun-14	Model 2	
	Australia	30-Jun-14	In Force	30-Jun-14	Model 1	Guidance Material from ATO 15 October 2015
7 8	Austria Azerbaijan	9-Dec-14 5-Nov-15	In Force	30-Jun-14 30-Jun-14	Model 2 Model 1	
	Bahamas	17-Sep-15	In Force	30-Jun-14	Model 1	
	ballallias	17-3ep-13	Agreement in	30-3411-14	Wiodel 1	
10	Bahrain		Substance	30-Jun-14	Model 1	
	Barbados	25-Sep-15	In Force	30-Jun-14	Model 1	
12	Belarus	29-Jul-15	In Force	30-Jun-14	Model 1	
13	Belgium	23-Sep-16	In Force	30-Jun-14	Model 1	
	Bermuda	19-Aug-14	In Force	30-Jun-14	Model 2	
	Brazil	26-Jun-15	In Force	30-Jun-14	Model 1	
	British Virgin Islands	13-Jul-15	In Force	30-Jun-14	Model 1	
17	Bulgaria	30-Jun-15	In Force	30-Jun-14	Model 1	
4.0	Cala a Manuala		Agreement in	20 1. 44		
	Cabo Verde	22 Dec 16	Substance	30-Jun-14 30-Nov-14	Model 1	
	Cambodia Canada	23-Dec-16 27-Jun-14	In Force	30-Nov-14 30-Jun-14	Model 1 Model 1	Guidance issued December 23, 2014
	Canada Cayman Islands	1-Jul-14	In Force	30-Jun-14 30-Jun-14	Model 1	
	Chile	1-Jul-14	Signed	30-Jun-14	Model 2	Model 1B (Non-Reciprocal)
22	Cilie		Agreement in	30-Juli-14	Widuel 2	
23	China		Substance	30-Jun-14	Model 1	
	Columbia	27-Aug-15	In Force	30-Jun-14	Model 1	
	Costa Rica		Signed	30-Jun-14	Model 1	
	Croatia		Signed	30-Jun-14	Model 1	
27	Curacao	3-Aug-16	In Force	30-Jun-14	Model 1	
28	Cyprus	21-Sep-15	In Force	30-Jun-14	Model 1	
29	Czech Republic	18-Dec-14	In Force	30-Jun-14	Model 1	
30	Denmark	30-Sep-15	In Force	30-Jun-14	Model 1	
			Agreement in			
	Dominica		Substance	30-Jun-14	Model 1	
	Dominican Republic		Signed	30-Jun-14	Model 1	
	Estonia Finland	9-Jul-14 20-Feb-15	In Force	30-Jun-14	Model 1 Model 1	
	France	14-Oct-14	In Force	30-Jun-14 30-Jun-14	Model 1	
	Georgia	18-Sep-15	In Force	30-Jun-14	Model 1	
	Germany	11-Dec-13	In Force	30-Jun-14	Model 1	
	Gibraltar	17-Sep-15	In Force	30-Jun-14	Model 1	
		2. 00p 20	Agreement in			
39	Greece		Substance	30-Nov-14	Model 1	
33						
40			Agreement in			
40	Greenland		Agreement in Substance	30-Jun-14	Model 1	
41	Grenada		Substance Signed	30-Jun-14	Model 1 Model 1	
41 42	Grenada Guernsey	26-Aug-15	Substance Signed In Force	30-Jun-14 30-Jun-14	Model 1 Model 1 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42	Grenada	26-Aug-15	Substance Signed In Force Signed	30-Jun-14	Model 1 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43	Grenada Guernsey Guyana	26-Aug-15	Substance Signed In Force Signed Agreement in	30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 1 Model 1 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44	Grenada Guernsey Guyana Haiti		Substance Signed In Force Signed Agreement in Substance	30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 1 Model 1 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45	Grenada Guernsey Guyana Haiti Holy See	10-Jun-15	Substance Signed In Force Signed Agreement in Substance In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Nov-14	Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46	Grenada Guernsey Guyana Haiti Holy See Honduras	10-Jun-15 19-Feb-15	Substance Signed In Force Signed Agreement in Substance In Force In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Nov-14 30-Jun-14	Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong	10-Jun-15 19-Feb-15 6-Jul-16	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47 48	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47 48 49	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force In Force In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1 Model 1 Model 1 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47 48 49 50	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force Agreement in Force In Force In Force In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47 48 49 50	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force In Force Agreement in	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1 Model 1 Model 1 Model 1 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47 48 49 50 51	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force In Force Agreement in Substance	30-Jun-14 30-Jun-14 30-Jun-14 30-Nov-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Nov-14 30-Jun-14	Model 1 Model 2 Model 1	Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47 48 49 50 51	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force Agreement in Substance	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1	Guidance Notes issued as of April 1, 2014. (CD) Guidance Notes issued as of April 1, 2014. (CD)
41 42 43 44 45 46 47 48 49 50 51 52 53 54 55	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia Iraq Ireland Isle of Mann Israel	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15 2-Apr-14 26-Aug-15 29-Aug-16	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force In Force Agreement in Substance Agreement in Substance Agreement in Force In Force In Force In Force In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1	
41 42 43 44 45 46 47 48 49 50 51 51 52 53 54 55 56	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia Iraq Ireland Isle of Mann Israel Italy	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15 2-Apr-14 26-Aug-15 29-Aug-16 17-Aug-15	Substance Signed In Force Signed Agreement in Substance In Force In Force In Force In Force Agreement in Substance Agreement in Substance Agreement in Substance Agreement in Force In Force In Force In Force In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1	
41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia Iraq Ireland Islee of Mann Israel Italy Jamaica	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15 2-Apr-14 26-Aug-15 29-Aug-16 17-Aug-15 24-Sep-15	Substance Signed In Force Signed Agreement in Substance In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1	
41 42 43 44 45 46 47 48 49 50 51 51 52 53 54 55 56 57 58	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia Iraq Ireland Isle of Mann Israel Italy Jamaica Japan	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15 2-Apr-14 26-Aug-15 29-Aug-16 17-Aug-15 24-Sep-15 11-Jun-13	Substance Signed In Force Signed Agreement in Substance In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1	Guidance Notes 15 December 2014
41 42 43 44 45 46 47 48 49 50 51 51 52 53 54 55 56 57 58	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia Iraq Ireland Islee of Mann Israel Italy Jamaica	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15 2-Apr-14 26-Aug-15 29-Aug-16 17-Aug-15 24-Sep-15	Substance Signed In Force Signed Agreement in Substance In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1 Model 2 Model 1	
41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia Iraq Ireland Isle of Mann Israel Italy Jamaica Japan Jersey	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15 2-Apr-14 26-Aug-15 29-Aug-16 17-Aug-15 24-Sep-15 11-Jun-13	Substance Signed In Force Signed Agreement in Substance In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1	Guidance Notes 15 December 2014
41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60	Grenada Guernsey Guyana Haiti Holy See Honduras Hong Kong Hungary Iceland India Indonesia Iraq Ireland Isle of Mann Israel Italy Jamaica Japan	10-Jun-15 19-Feb-15 6-Jul-16 16-Jul-14 26-May-15 31-Aug-15 2-Apr-14 26-Aug-15 29-Aug-16 17-Aug-15 24-Sep-15 11-Jun-13	Substance Signed In Force Signed Agreement in Substance In Force	30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14 30-Jun-14	Model 1	Guidance Notes 15 December 2014

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•	stance? Contact Sandy Jose	at jose@moorest	ephensdm.com or (2	248) 244-3082.		DOEREN MAYHEW	
No.	Country	Date	Status	Effective Date of IGA	Type of Agreement	Notes	
63	Latvia	15-Dec-14	In Force	30-Jun-14	Model 1		
64	Lichtenstein	22-Jan-15	In Force	30-Jun-14	Model 1		
65	Lithuania	7-Oct-14	In Force	30-Jun-14	Model 1		
66	Luxembourg	29-Jul-15	In Force	30-Jun-14	Model 1		
67	Macao		Signed	30-Nov-14	Model 2		
			Agreement in				
68 69	Malaysia Malta	26 lun 14	Substance In Force	30-Jun-14 30-Jun-14	Model 1		
70	Mauritius	26-Jun-14 29-Aug-14	In Force	30-Jun-14	Model 1 Model 1		
71	Mexico	10-Apr-14	In Force	30-Jun-14	Model 1		
72	Moldova	21-Jan-16	In Force	30-Jun-14	Model 2		
,,			Agreement in				
73	Montenegro		Substance	30-Jun-14	Model 1		
74	Montserrat		Signed	30-Nov-14	Model 1		
75	Netherlands	9-Apr-15	In Force	30-Jun-14	Model 1		
76	New Zealand	3-Jul-14	In Force	30-Jun-14	Model 1		
			Agreement in				
77	Nicaragua		Substance	30-Jun-14	Model 2		
78	Norway	27-Jan-14	In Force	30-Jun-14	Model 1		
79	Panama	25-Oct-16	In Force	30-Jun-14	Model 1		
00	Davasausu		Agreement in	20 1 14	Madal 2		
80	Paraguay	+	Substance	30-Jun-14	Model 2		
81	Peru		Agreement in Substance	30-Jun-14	Model 1		
82	Philippines		Signed	30-Nov-14	Model 1		
83	Poland	1-Jul-15	In Force	30-Jun-14	Model 1		
84	Portugal	?	Signed	30-Jun-14	Model 1		
85	Qatar	23-Jun-15	In Force	30-Jun-14	Model 1		
86	Romania	3-Nov-15	In Force	30-Jun-14	Model 1		
87	San Marino	30-Aug-16	In Force	30-Jun-14	Model 2		
88	Saudi Arabia		Signed	30-Jun-14	Model 1		
			Agreement in				
89	Serbia		Substance	30-Jun-14	Model 1		
			Agreement in				
90	Seychelles		Substance	30-Jun-14	Model 1		
91	Singapore	28-Mar-15	In Force	30-Jun-14	Model 1	Guidance Notes 18 November 2015	
92 93	Slovak Republic Slovenia	9-Nov-15 1-Jul-14	In Force	30-Jun-14 30-Jun-14	Model 1		
93	South Africa	28-Oct-14	In Force	30-Jun-14 30-Jun-14	Model 1 Model 1		
95	South Korea	8-Sep-16	In Force	30-Jun-14	Model 1		
96	Spain	9-Dec-13	In Force	30-Jun-14	Model 1	<u> </u>	
97	St. Kitts and Nevis	28-Apr-16	In Force	30-Jun-14	Model 1		
98	St. Lucia	1-Sep-16	In Force	30-Jun-14	Model 1		
	St. Vincent and the	1					
99	Grenadines	13-May-16	In Force	30-Jun-14	Model 1		
100	Sweden	1-Mar-15	In Force	30-Jun-14	Model 1		
101	Switzerland	2-Jun-14	In Force	30-Jun-14	Model 2		
102	Taiwan		Signed	30-Jun-14	Model 2		
103	Thailand		Signed	30-Jun-14	Model 1		
104	Trinidad and Tobago	1	Signed	30-Nov-14	Model 1	<u> </u>	
105	Tunicia		Agreement in	20 Nov. 14	Modela		
105	Turkov	+	Substance	30-Nov-14 30-Jun-14	Model 1		
106	Turkey	+	Signed	30-Jun-14	Model 1		
107	Turkmenistan		Agreement in Substance	30-Jun-14	Model 1		
107	Turks and Caicos Islands	25-Jul-16	In Force	30-Jun-14	Model 1		
της	. a. ks and calcos islands	25 Jul-10	Agreement in	30 Juli-14	HOUELT	†	
109	Ukraine		Substance	30-Jun-14	Model 1		
110	United Arab Emirates		Signed	30-Jun-14	Model 1	1	
111	United Kingdom	11-Aug-14	In Force	30-Jun-14	Model 1	Guidance Notes (Revised) September 14, 2015.	
112	Uzbekistan		Signed	30-Jun-14	Model 1		
113	Vietnam	7-Jul-16	In Force	7-Jul-16	Model 1		