STATES OF JERSEY

RATIFICATION OF THE AGREEMENT BETWEEN JERSEY AND THE PRINCIPALITY OF LIECHTENSTEIN FOR THE ELIMINATION OF DOUBLE TAXATION WITH RESPECT TO TAXES ON INCOME AND ON CAPITAL AND THE PREVENTION OF TAX EVASION AND AVOIDANCE

Lodged au Greffe on 30th August 2018
by the Minister for External Relations

STATES GREFFE

PROPOSITION

THE STATES are asked to decide whether they are of opinion −

to ratify the Agreement between Jersey and the Principality of Liechtenstein for the Elimination of Double Taxation with Respect to Taxes on Income and on Capital and the Prevention of Tax Evasion and Avoidance, as set out in Appendix 1 to the report of the Minister for External Relations dated 28 August 2018.

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 ("TIEAs") to an agreed international standard.

2. 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 priority being given to 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.

3. There are occasions when an Agreement is sought with a jurisdiction that is not an EU, OECD or G20 member. In accordance with its commitment to the OECD tax initiative, Jersey is required to enter into a TIEA with any jurisdiction that can be considered to be a relevant partner. This, together with the views of the finance industry on whether a TIEA with the jurisdiction concerned would be supportive of business development, are factors taken into account when deciding whether or not the negotiation of an Agreement would be justified, and if so, what priority to attach to the negotiations.

4. The International Tax Information Exchange standard can be met through either a TIEA or a Double Taxation 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. Whenever possible, Jersey's preference is therefore to negotiate a DTA from the outset. Some jurisdictions are reluctant to enter into such an agreement with a zero-tax jurisdiction because they cannot see any obvious reciprocal benefit. Other jurisdictions, however, are more open to the idea, and one such jurisdiction is Liechtenstein.

5. The latest position in respect of the programme of negotiating Tax Agreements is attached as **Appendix 2** to this report. A total of 39 TIEAs and 15 DTAs have now been signed, of which 36 TIEAs and 12 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, there are 47 jurisdictions with whom Jersey does not have a bilateral TIEA or DTA, but where information exchange can occur through their being a party to the Multilateral Convention on Mutual Administrative Assistance in Tax Matters, to which Jersey became a party in June 2014.

The Agreement with the Principality of Liechtenstein

6. The Agreement entered into with the Principality of Liechtenstein ("the Agreement") is a continuation of the ongoing programme of entering into Tax Agreements to the international standard with relevant partners.

7. The finance industry in Jersey fully supports the negotiation of Double Taxation Agreements.

8. A copy of the signed Agreement is attached as **Appendix 1** to this report. The Agreement is in line with the OECD Model Tax Convention, and provides for the avoidance of double taxation to facilitate the exchange of goods and services; and the movement of capital, technology and people. The Agreement also makes provision for information exchange to the agreed international standard.

9. Jersey is fully committed to the OECD's Inclusive Framework on anti-Base Erosion and Profit Shifting ("BEPS"). Jersey signed the Multilateral Instrument (the "MLI") in June 2017, and was one of the first 3 jurisdictions to ratify the instrument, which is seen as a key element in implementing the OECD's anti-tax avoidance measures. In accordance with this international commitment, Jersey is expected to incorporate the MLI tax treaty provisions into all its Tax Treaties. The Agreement is consistent with the treaty-related minimum standards of the OECD's Inclusive Framework on BEPS.

10. The Principality of Liechtenstein and Jersey have many common ties. Both jurisdictions have developed as successful international finance centres, with strong connections to European neighbours and global partners. Jersey and Liechtenstein co-operate regularly as members of OECD governance bodies.

Procedure for signing and ratifying the Convention

11. The Agreement was signed by the Minister for External Relations in Jersey on 13 August 2018 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 (P.40/2006) adopted by the States (as amended) on 27 June 2006.

12. 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.

13. The States, on 15 June 2010, adopted the Taxation (Double Taxation) (Jersey) Regulations 2010. The Schedule to these Regulations lists the countries with whom Double Tax Agreements have been entered into. The necessary Order to provide for the inclusion in the Schedule of the Agreement with the Principality of Liechtenstein will be made subsequent to the ratification.

Financial and manpower implications

14. There are no financial or manpower implications expected for the States arising from the adoption of this proposition and the ratification and implementation of the Agreement.

28 August 2018

Agreement
between
Jersey
and
the Principality of Liechtenstein
for the Elimination of Double Taxation
with Respect to Taxes on Income and on Capital
and the Prevention of Tax Evasion and Avoidance

Preamble

Jersey and the Principality of Liechtenstein,

Desiring to further develop their economic relationship and to enhance their co-operation in tax matters, and

Intending to conclude an Agreement for the elimination of double taxation with respect to taxes on income and on capital without creating opportunities for non-taxation or reduced taxation through tax evasion or avoidance (including through treaty-shopping arrangements aimed at obtaining reliefs provided in this Agreement for the indirect benefit of residents of third jurisdictions),

Have agreed as follows:

Article 1
Persons covered

1. This Agreement shall apply to persons who are residents of one or both of the Contracting Parties.

2. For the purposes of this Agreement, income derived by or through an entity or arrangement that is treated as wholly or partly fiscally transparent under the tax law of either Contracting Party shall be considered to be income of a resident of a Contracting Party but only to the extent that the income is treated, for purposes of taxation by that Party, as the income of a resident of that Party.

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Article 2
Taxes covered

1. This Agreement shall apply to taxes on income and on capital imposed on behalf of a Contracting Party or of its political subdivisions or local authorities, irrespective of the manner in which they are levied.

2. There shall be regarded as taxes on income and on capital all taxes imposed on total income, on total capital, or on elements of income or of capital, including taxes on gains from the alienation of movable or immovable property, taxes on the total amounts of wages or salaries paid by enterprises, as well as taxes on capital appreciation.

3. The existing taxes to which this Agreement shall apply are in particular:

a) in Liechtenstein:
(i) the personal income tax (Erwerbssteuer);
(ii) the corporate income tax (Ertragssteuer);
(iii) the real estate capital gains tax (Grundstücksgewinnsteuer); and
(iv) the wealth tax (Vermögenssteuer)
(hereinafter referred to as "Liechtenstein tax"); and

b) in Jersey:
(i) income tax
(hereinafter referred to as "Jersey tax").

4. The Agreement shall apply also to any identical taxes or substantially similar taxes that are imposed after the date of signature of this Agreement, in addition to, or in place of, the existing taxes. The competent authorities of the Contracting Parties shall notify each other of any significant changes that have been made in their taxation laws.

Article 3
General definitions

1. For the purposes of this Agreement, unless the context otherwise requires:

a) the terms "a Contracting Party" and "the other Contracting Party" mean the Principality of Liechtenstein or Jersey as the context requires;

b) (i) the term "Liechtenstein" means the Principality of Liechtenstein, and, when used in a geographical sense, the area of the sovereign territory of the Principality of Liechtenstein in accordance with international law and its domestic laws;
(ii) the term "Jersey" means the Bailiwick of Jersey, including its territorial sea;

c) the term "person" includes an individual, a company, a Liechtenstein dormant inheritance and any other body of persons;

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

e) the term "enterprise" applies to the carrying on of any business;

f) the terms "enterprise of a Contracting Party" and "enterprise of the other Contracting Party" mean respectively an enterprise carried on by a resident of a Contracting Party and an enterprise carried on by a resident of the other Contracting Party;

g) the term "international traffic" means any transport by a ship or aircraft except when the ship or aircraft is operated solely between places in a Contracting Party and the enterprise that operates the ship or aircraft is not an enterprise of that Party;

h) the term "competent authority" means:
   (i) in Liechtenstein, the Fiscal Authority; and
   (ii) in Jersey, the Minister for Treasury and Resources or his authorised representative;

i) the term "national" means:
   (i) in the case of Liechtenstein, any individual possessing the nationality of Liechtenstein and any person other than an individual, deriving its status as such from the laws in force in Liechtenstein; and
   (ii) in the case of Jersey, any individual resident in Jersey and any person other than an individual, deriving its status as such from the laws in force in Jersey;

j) the term "business" includes the performance of professional services and of other activities of an independent character;

k) the term "recognised pension fund" of a Party means an entity or arrangement established in that Party that is treated as a separate person under the taxation laws of that Party and:
   (i) that is established and operated exclusively or almost exclusively to administer or provide retirement benefits and ancillary or incidental benefits to individuals and that is recognised as such by that Party or one of its political subdivisions or local authorities; or
   (ii) that is established and operated exclusively or almost exclusively to invest funds for the benefit of entities or arrangements referred to in subdivision (i).

2. As regards the application of the 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 for the purposes of the taxes to which the Agreement applies, 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 4
Resident

1. For the purposes of this Agreement, the term "resident of a Contracting Party" means any person who, under the laws of that Party, is liable to tax therein by reason of his domicile, residence, place of management or any other criterion of a similar nature, and also includes that Party and any political subdivision or local authority thereof as well as a recognised pension fund. This term, however, does not include any person who is liable to tax in that Party in respect only of income from sources in that Party or capital situated therein.

2. Where by reason of the provisions of paragraph 1, an individual is a resident of both Contracting Parties, then his status shall be determined as follows:

a) he shall be deemed to be a resident only of the Party in which he has a permanent home available to him; if he has a permanent home available to him in both Parties, he shall be deemed to be a resident only of the Party with which his personal and economic relations are closer (centre of vital interests);

b) if the Party in which he has his centre of vital interests cannot be determined, or if he has not a permanent home available to him in either Party, he shall be deemed to be a resident only of the Party in which he has an habitual abode;

c) if he has an habitual abode in both Parties or in neither of them, he shall be deemed to be a resident only of the Party of which he is a national;

d) if he is a national of both Parties or of neither of them, the competent authorities of the Parties shall settle the question by mutual agreement.

3. Where by reason of the provisions of paragraph 1, a person other than an individual is a resident of both Contracting Parties, then it shall be deemed to be a resident only of the Party in which its place of effective management is situated.

Article 5
Permanent establishment

1. For the purposes of this Agreement, the term "permanent establishment" means a fixed place of business through which the business of an enterprise is wholly or partly carried on.

2. The term "permanent establishment" includes especially:

a) a place of management;

b) a branch;

c) an office;

d) a factory;

e) a workshop; and

f) a mine, an oil or gas well, a quarry or any other place of extraction of natural resources.

3. A building site or construction or installation project constitutes a permanent establishment only if it lasts more than six months.

4. Notwithstanding the preceding provisions of this Article, the term "permanent establishment" shall be deemed not to include:

a) the use of facilities solely for the purpose of storage, display or delivery of goods or merchandise belonging to the enterprise;

b) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of storage, display or delivery;

c) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of processing by another enterprise;

d) the maintenance of a fixed place of business solely for the purpose of purchasing goods or merchandise or of collecting information, for the enterprise;

e) the maintenance of a fixed place of business solely for the purpose of carrying on, for the enterprise, any other activity of a preparatory or auxiliary character;

f) the maintenance of a fixed place of business solely for any combination of activities mentioned in subparagraphs a) to e), provided that the overall activity of the fixed place of business resulting from this combination is of a preparatory or auxiliary character.

5. Notwithstanding the provisions of paragraphs 1 and 2, where a person – other than an agent of an independent status to whom paragraph 6 applies – is acting on behalf of an enterprise and has, and habitually exercises, in a Contracting Party an authority to conclude contracts in the name of the enterprise, that enterprise shall be deemed to have a permanent establishment in that Party in respect of any activities which that

person undertakes for the enterprise, unless the activities of such person are limited to those mentioned in paragraph 4 which, if exercised through a fixed place of business, would not make this fixed place of business a permanent establishment under the provisions of that paragraph.

6. An enterprise shall not be deemed to have a permanent establishment in a Contracting Party merely because it carries on business in that Party through a broker, general commission agent or any other agent of an independent status, provided that such persons are acting in the ordinary course of their business.

7. The fact that a company which is a resident of a Contracting Party controls or is controlled by a company which is a resident of the other Contracting Party, or which carries on business in that other Party (whether through a permanent establishment or otherwise), shall not of itself constitute either company a permanent establishment of the other.

Article 6
Income from immovable property

1. Income derived by a resident of a Contracting Party from immovable property (including income from agriculture or forestry) situated in the other Contracting Party may be taxed in that other Party.

2. The term "immovable property" shall have the meaning which it has under the law of the Contracting Party in which the property in question is situated. The term shall in any case include property accessory to immovable property, livestock and equipment used in agriculture and forestry, rights to which the provisions of general law respecting landed property apply, usufruct of immovable property and rights to variable or fixed payments as consideration for the working of, or the right to work, mineral deposits, sources and other natural resources; ships and aircraft shall not be regarded as immovable property.

3. The provisions of paragraph 1 shall apply to income derived from the direct use, letting, or use in any other form of immovable property.

4. The provisions of paragraphs 1 and 3 shall also apply to the income from immovable property of an enterprise.

Article 7
Business profits

1. Profits of an enterprise of a Contracting Party shall be taxable only in that Party unless the enterprise carries on business in the other Contracting Party through a permanent establishment situated therein. If the enterprise carries on business as

aforesaid, the profits that are attributable to the permanent establishment in accordance with the provisions of paragraph 2 may be taxed in that other Party.

2. For the purposes of this Article and Article 22, the profits that are attributable in each Contracting Party to the permanent establishment referred to in paragraph 1 are the profits it might be expected to make, in particular in its dealings with other parts of the enterprise, if it were a separate and independent enterprise engaged in the same or similar activities under the same or similar conditions, taking into account the functions performed, assets used and risks assumed by the enterprise through the permanent establishment and through the other parts of the enterprise.

3. Where, in accordance with paragraph 2, a Contracting Party adjusts the profits that are attributable to a permanent establishment of an enterprise of one of the Contracting Parties and taxes accordingly profits of the enterprise that have been charged to tax in the other Party, the other Party shall, to the extent necessary to eliminate double taxation on these profits, make an appropriate adjustment to the amount of the tax charged on those profits. In determining such adjustment, the competent authorities of the Parties shall if necessary consult each other.

4. Where profits include items of income which are dealt with separately in other Articles of this Agreement, then the provisions of those Articles shall not be affected by the provisions of this Article.

Article 8
International shipping and air transport

1. Profits of an enterprise of a Contracting Party from the operation of ships or aircraft in international traffic shall be taxable only in that Party.

2. The provisions of paragraph 1 shall also apply to profits from the participation in a pool, a joint business or an international operating agency.

Article 9
Associated enterprises

1. Where

   a) an enterprise of a Contracting Party participates directly or indirectly in the management, control or capital of an enterprise of the other Contracting Party, or

   b) the same persons participate directly or indirectly in the management, control or capital of an enterprise of a Contracting Party and an enterprise of the other Contracting Party, and in either case conditions are made or imposed between the two enterprises in their commercial or financial relations which differ from those which would be made between independent enterprises, then any profits which would, but for those conditions, have accrued to one of the enterprises, but, by reason of those conditions, have not so accrued, may be included in the profits of that enterprise and taxed accordingly.

2. Where a Contracting Party includes in the profits of an enterprise of that Party – and taxes accordingly – profits on which an enterprise of the other Contracting Party has been charged to tax in that other Party and the profits so included are profits which would have accrued to the enterprise of the first-mentioned Party if the conditions made between the two enterprises had been those which would have been made between independent enterprises, then that other Party shall make an appropriate adjustment to the amount of the tax charged therein on those profits. In determining such adjustment, due regard shall be had to the other provisions of this Agreement and the competent authorities of the Parties shall if necessary consult each other.

Article 10
Dividends

1. Dividends paid by a company which is a resident of a Contracting Party to a resident of the other Contracting Party shall be taxable only in that other Party, provided that the beneficial owner of the dividends is a resident of the other Party.

2. The term "dividends" as used in this Article means income from shares, "jouissance" shares or "jouissance" rights, mining shares, founders' shares or other rights, not being debt-claims, participating in profits, as well as income from other corporate rights which is subjected to the same taxation treatment as income from shares by the laws of the Party of which the company making the distribution is a resident.

3. The provisions of paragraph 1 shall not apply if the beneficial owner of the dividends, being a resident of a Contracting Party, carries on business in the other Contracting Party of which the company paying the dividends is a resident through a permanent establishment situated therein and the holding in respect of which the dividends are paid is effectively connected with such permanent establishment. In such case the provisions of Article 7 shall apply.

4. Where a company which is a resident of a Contracting Party derives profits or income from the other Contracting Party, that other Party may not impose any tax on the dividends paid by the company, except insofar as such dividends are paid to a resident of that other Party or insofar as the holding in respect of which the dividends are paid is effectively connected with a permanent establishment situated in that other Party, nor subject the company's undistributed profits to a tax on the company's

undistributed profits, even if the dividends paid or the undistributed profits consist wholly or partly of profits or income arising in such other Party.

Article 11
Interest

1. Interest arising in a Contracting Party and paid to a resident of the other Contracting Party shall be taxable only in that other Party, provided that the beneficial owner of the interest is a resident of the other Party.

2. The term "interest" as used in this Article means income from debt-claims of every kind, whether or not secured by mortgage and whether or not carrying a right to participate in the debtor's profits, and in particular, income from government securities and income from bonds or debentures, including premiums and prizes attaching to such securities, bonds or debentures. Penalty charges for late payment shall not be regarded as interest for the purpose of this Article.

3. The provisions of paragraph 1 shall not apply if the beneficial owner of the interest, being a resident of a Contracting Party, carries on business in the other Contracting Party in which the interest arises through a permanent establishment situated therein and the debt-claim in respect of which the interest is paid is effectively connected with such permanent establishment. In such case the provisions of Article 7 shall apply.

4. Where, by reason of a special relationship between the payer and the beneficial owner or between both of them and some other person, the amount of the interest, having regard to the debt-claim for which it is paid, exceeds the amount which would have been agreed upon by the payer and the beneficial owner in the absence of such relationship, the provisions of this Article shall apply only to the last-mentioned amount. In such case, the excess part of the payments shall remain taxable according to the laws of each Contracting Party, due regard being had to the other provisions of this Agreement.

Article 12
Royalties

1. Royalties arising in a Contracting Party and beneficially owned by a resident of the other Contracting Party shall be taxable only in that other Party.

2. The term "royalties" as used in this Article means payments of any kind received as a consideration for the use of, or the right to use, any copyright of literary, artistic or scientific work including cinematograph films, any patent, trade mark, design or model, plan, secret formula or process, or for information concerning industrial, commercial or scientific experience.

3. The provisions of paragraph 1 shall not apply if the beneficial owner of the royalties, being a resident of a Contracting Party, carries on business in the other Contracting Party in which the royalties arise through a permanent establishment situated therein and the right or property in respect of which the royalties are paid is effectively connected with such permanent establishment. In such case the provisions of Article 7 shall apply.

4. Where, by reason of a special relationship between the payer and the beneficial owner or between both of them and some other person, the amount of the royalties, having regard to the use, right or information for which they are paid, exceeds the amount which would have been agreed upon by the payer and the beneficial owner in the absence of such relationship, the provisions of this Article shall apply only to the last-mentioned amount. In such case, the excess part of the payments shall remain taxable according to the laws of each Contracting Party, due regard being had to the other provisions of this Agreement.

Article 13
Capital gains

1. Gains derived by a resident of a Contracting Party from the alienation of immovable property referred to in Article 6 and situated in the other Contracting Party may be taxed in that other Party.

2. Gains from the alienation of movable property forming part of the business property of a permanent establishment which an enterprise of a Contracting Party has in the other Contracting Party, including such gains from the alienation of such a permanent establishment (alone or with the whole enterprise), may be taxed in that other Party.

3. Gains that an enterprise of a Contracting Party that operates ships or aircraft in international traffic derives from the alienation of such ships or aircraft, or of movable property pertaining to the operation of such ships or aircraft, shall be taxable only in that Party.

4. Gains derived by a resident of a Contracting Party from the alienation of shares deriving more than 50 per cent of their value directly or indirectly from immovable property situated in the other Contracting Party may be taxed in that other Party.

5. Gains from the alienation of any property, other than that referred to in paragraphs 1, 2, 3 and 4, shall be taxable only in the Contracting Party of which the alienator is a resident.

Article 14
Income from employment

1. Subject to the provisions of Articles 15, 17 and 18, salaries, wages and other similar remuneration derived by a resident of a Contracting Party in respect of an employment shall be taxable only in that Party unless the employment is exercised in the other Contracting Party. If the employment is so exercised, such remuneration as is derived therefrom may be taxed in that other Party.

2. Notwithstanding the provisions of paragraph 1, remuneration derived by a resident of a Contracting Party in respect of an employment exercised in the other Contracting Party shall be taxable only in the first-mentioned Party if:

a) the recipient is present in the other Party for a period or periods not exceeding in the aggregate 183 days in any twelve month period commencing or ending in the fiscal year concerned; and

b) the remuneration is paid by, or on behalf of, an employer who is not a resident of the other Party; and

c) the remuneration is not borne by a permanent establishment which the employer has in the other Party.

3. Notwithstanding the preceding provisions of this Article, remuneration derived by a resident of a Contracting Party in respect of an employment, as a member of the regular complement of a ship or aircraft, that is exercised aboard a ship or aircraft operated in international traffic, other than aboard a ship or aircraft operated solely within the other Contracting Party, shall be taxable only in the first-mentioned Party.

Article 15
Directors' fees

Directors' fees and other similar payments derived by a resident of a Contracting Party in his capacity as a member of the board of directors or any similar organ of a company which is a resident of the other Contracting Party may be taxed in that other Party.

Article 16
Entertainers and sportspersons

1. Notwithstanding the provisions of Article 14, income derived by a resident of a Contracting Party as an entertainer, such as a theatre, motion picture, radio or television artiste, or a musician, or as a sportsperson, from that resident's personal activities as such exercised in the other Contracting Party, may be taxed in that other Party.

2. Where income in respect of personal activities exercised by an entertainer or a sportsperson acting as such accrues not to the entertainer or sportsperson but to another person, that income may, notwithstanding the provisions of Article 14, be taxed in the Contracting Party in which the activities of the entertainer or sportsperson are exercised.

3. The provisions of paragraphs 1 and 2 shall not apply to income derived from activities exercised in a Contracting Party by an entertainer or a sportsperson if the visit to that Party is wholly or mainly supported by public funds of one or both of the Contracting Parties, or their political subdivisions or local authorities, or another legal entity under public law of either Party. In such a case, the income shall be taxable only in the Contracting Party of which the entertainer or the sportsperson is a resident.

Article 17
Pensions

1. Subject to the provisions of paragraph 2 of Article 18, pensions and other similar remuneration (including lump-sum payments) paid to a resident of a Contracting Party in consideration of past employment or self-employment shall be taxable only in that Party.

2. Notwithstanding the provisions of paragraph 1, pensions and other payments made under the social security legislation of a Contracting Party shall be taxable only in that Party.

3. Notwithstanding the provisions of paragraph 1, pensions and other similar remuneration (including lump-sum payments) arising in a Contracting Party shall be taxable only in that Party, provided that such payments derive from contributions paid to, or from provisions made under, a pension scheme by the recipient or on his behalf or from contributions made by an employer to a pension scheme and to the extent that such contributions, provisions or the pensions or other similar remuneration (including lump-sum payments) have been subjected to tax or have been tax deductible in that Party under the ordinary rules of its tax laws.

Article 18
Government service

1. a) Salaries, wages and other similar remuneration paid by a Contracting Party, a political subdivision or a local authority thereof or another legal entity under public law of that Party to an individual in respect of services rendered to that Party, subdivision or authority or other legal entity under public law of that Party shall be taxable only in that Party.

b) However, such salaries, wages and other similar remuneration shall be taxable only in the other Contracting Party if the services are rendered in that Party and the individual is a resident of that Party who:
   (i) is a national of that Party; or
   (ii) did not become a resident of that Party solely for the purpose of rendering the services.

2. Notwithstanding the provisions of paragraph 1, pensions and other similar remuneration (including lump-sum payments) paid by, or out of funds created by, a Contracting Party or a political subdivision or a local authority thereof or another legal entity under public law of that Party to an individual in respect of services rendered to that Party, subdivision or authority or other legal entity under public law of that Party shall be taxable only in that Party.

3. The provisions of Articles 14, 15, 16, and 17 shall apply to salaries, wages, pensions, and other similar remuneration (including lump-sum payments) in respect of services rendered in connection with a business carried on by a Contracting Party, a political subdivision or a local authority thereof or another legal entity under public law of that Party.

Article 19
Students

Payments which a student or business apprentice who is or was immediately before visiting a Contracting Party a resident of the other Contracting Party and who is present in the first-mentioned Party solely for the purpose of his education or training receives for the purpose of his maintenance, education or training shall not be taxed in that Party, provided that such payments arise from sources outside that Party.

Article 20
Other income

1. Items of income of a resident of a Contracting Party, wherever arising, not dealt with in the foregoing Articles of this Agreement shall be taxable only in that Party.

2. The provisions of paragraph 1 shall not apply to income, other than income from immovable property as defined in paragraph 2 of Article 6, if the recipient of such income, being a resident of a Contracting Party, carries on business in the other Contracting Party through a permanent establishment situated therein and the right or property in respect of which the income is paid is effectively connected with such permanent establishment. In such case the provisions of Article 7 shall apply.

Article 21
Capital

1. Capital represented by immovable property referred to in Article 6, owned by a resident of a Contracting Party and situated in the other Contracting Party, may be taxed in that other Party.

2. Capital represented by movable property forming part of the business property of a permanent establishment which an enterprise of a Contracting Party has in the other Contracting Party may be taxed in that other Party.

3. Capital of an enterprise of a Contracting Party that operates ships or aircraft in international traffic represented by such ships or aircraft, and by movable property pertaining to the operation of such ships or aircraft, shall be taxable only in that Party.

4. All other elements of capital of a resident of a Contracting Party shall be taxable only in that Party.

Article 22
Elimination of double taxation

1. Subject to the provisions of the laws of Liechtenstein regarding the elimination of double taxation, which shall not affect the general principle hereof, double taxation shall be eliminated as follows:

a) Where a resident of Liechtenstein derives income or owns capital which, in accordance with the provisions of this Agreement, may be taxed in Jersey, Liechtenstein shall, subject to the provisions of subparagraph b), exempt such income or capital from tax, but may nevertheless, in calculating the amount of tax on the remaining income or capital of such resident, take into account the exempted income or capital.

b) Where a resident of Liechtenstein derives items of income which, in accordance with the provisions of Articles 14, 15, and 16, may be taxed in Jersey, Liechtenstein shall credit against Liechtenstein tax on this income the tax paid in accordance with the law of Jersey and with the provisions of this Agreement. The amount of tax to be credited shall not, however, exceed the Liechtenstein tax due on the income derived from Jersey.

c) Where a resident of Liechtenstein derives items of income or owns capital which, in accordance with the provisions of this Agreement, shall be taxable only in Jersey, Liechtenstein shall exempt that income or capital from tax, but may nevertheless, in calculating the amount of tax on the remaining income or capital of such resident, take into account the exempted income or capital.

d) The provisions of subparagraphs a) of paragraph 1 shall not apply to income derived or capital owned by a resident of Liechtenstein where Jersey applies the provisions of this Agreement to exempt such income or capital from tax.

2. Subject to the provisions of the law of Jersey regarding the elimination of double taxation, which shall not affect the general principle hereof, double taxation shall be eliminated as follows:

a) when imposing tax on its residents Jersey may include in the basis upon which such taxes are imposed the items of income, which, according to the provisions of this Agreement, may be taxed in Liechtenstein;

b) where a resident of Jersey derives income which, in accordance with the provisions of this Agreement, may be taxed in Liechtenstein, Jersey shall allow as a deduction from the tax on the income of that resident, an amount equal to the income tax paid in Liechtenstein. Such deduction in either case shall not, however, exceed that part of the income tax, as computed before the deduction is given, which is attributable to the income which may be taxed in Liechtenstein.

Article 23
Non-discrimination

1. Nationals of a Contracting Party shall not be subjected in the other Contracting Party to any taxation or any requirement connected therewith, which is other or more burdensome than the taxation and connected requirements to which nationals of that other Party in the same circumstances, in particular with respect to residence, are or may be subjected. This provision shall, notwithstanding the provisions of Article 1, also apply to persons who are not residents of one or both of the Contracting Parties.

2. The taxation on a permanent establishment which an enterprise of a Contracting Party has in the other Contracting Party shall not be less favourably levied in that other Party than the taxation levied on enterprises of that other Party carrying on the same activities. This provision shall not be construed as obliging a Contracting Party to grant to residents of the other Contracting Party any personal allowances, reliefs and reductions for taxation purposes on account of civil status or family responsibilities which it grants to its own residents.

3. Except where the provisions of paragraph 1 of Article 9, paragraph 4 of Article 11, or paragraph 4 of Article 12, apply, interest, royalties and other disbursements paid by an enterprise of a Contracting Party to a resident of the other Contracting Party shall, for the purpose of determining the taxable profits of such enterprise, be deductible under the same conditions as if they had been paid to a resident of the first-mentioned Party. Similarly, any debts of an enterprise of a Contracting Party to a resident of the other Contracting Party shall, for the purpose of determining the taxable capital of such

enterprise, be deductible under the same conditions as if they had been contracted to a resident of the first-mentioned Party.

4. Enterprises of a Contracting Party, the capital of which is wholly or partly owned or controlled, directly or indirectly, by one or more residents of the other Contracting Party, shall not be subjected in the first-mentioned Party to any taxation or any requirement connected therewith which is other or more burdensome than the taxation and connected requirements to which other similar enterprises of the first-mentioned Party are or may be subjected.

5. The provisions of this Article shall, notwithstanding the provisions of Article 2, apply to taxes of every kind and description.

Article 24
Mutual agreement procedure

1. Where a person considers that the actions of one or both of the Contracting Parties result or will result for him in taxation not in accordance with the provisions of this Agreement, he may, irrespective of the remedies provided by the domestic law of those Parties, present his case to the competent authority of either Contracting Party. The case must be presented within three years from the first notification of the action resulting in taxation not in accordance with the provisions of the Agreement.

2. The competent authority shall endeavour, if the objection appears to it to be justified and if it is not itself able to arrive at a satisfactory solution, to resolve the case by mutual agreement with the competent authority of the other Contracting Party, with a view to the avoidance of taxation which is not in accordance with the Agreement. Any agreement reached shall be implemented notwithstanding any time limits in the domestic law of the Contracting Parties.

3. The competent authorities of the Contracting Parties shall endeavour to resolve by mutual agreement any difficulties or doubts arising as to the interpretation or application of the Agreement. They may also consult together for the elimination of double taxation in cases not provided for in the Agreement.

4. The competent authorities of the Contracting Parties may communicate with each other directly, including through a joint commission consisting of themselves or their representatives, for the purpose of reaching an agreement in the sense of the preceding paragraphs.

5. Where,

   a) under paragraph 1, a person has presented a case to the competent authority of a Contracting Party on the basis that the actions of one or both of the Contracting Parties have resulted for that person in taxation not in accordance with the provisions of this Agreement, and

b) the competent authorities are unable to reach an agreement to resolve that case pursuant to paragraph 2 within two years from the date when all the information required by the competent authorities in order to address the case has been provided to both competent authorities,

any unresolved issues arising from the case shall be submitted to arbitration if the person so requests in writing. These unresolved issues shall not, however, be submitted to arbitration if a decision on these issues has already been rendered by a court or administrative tribunal of either Party. Unless a person directly affected by the case does not accept the mutual agreement that implements the arbitration decision, that decision shall be binding on both Contracting Parties and shall be implemented notwithstanding any time limits in the domestic laws of these Parties. The competent authorities of the Contracting Parties shall by mutual agreement settle the mode of application of this paragraph.

Article 25
Exchange of information

1. The competent authorities of the Contracting Parties shall exchange such information as is foreseeably relevant for carrying out the provisions of this Agreement or to the administration or enforcement of the domestic laws concerning taxes of every kind and description imposed on behalf of the Contracting Parties, or of their political subdivisions or local authorities, insofar as the taxation thereunder is not contrary to the Agreement. The exchange of information is not restricted by Articles 1 and 2.

2. Any information received under paragraph 1 by a Contracting Party shall be treated as secret in the same manner as information obtained under the domestic laws of that Party and shall be disclosed only to persons or authorities (including courts and administrative bodies) concerned with the assessment or collection of, the enforcement or prosecution in respect of, the determination of appeals in relation to the taxes referred to in paragraph 1, or the oversight of the above. Such persons or authorities shall use the information only for such purposes. They may disclose the information in public court proceedings or in judicial decisions. Notwithstanding the foregoing, information received by a Contracting Party may be used for other purposes when such information may be used for such other purposes under the laws of both Parties and the competent authority of the supplying Party authorises such use.

3. In no case shall the provisions of paragraphs 1 and 2 be construed so as to impose on a Contracting Party the obligation:

a) to carry out administrative measures at variance with the laws and administrative practice of that or of the other Contracting Party;

b) to supply information which is not obtainable under the laws or in the normal course of the administration of that or of the other Contracting Party; or

c) to supply information which would disclose any trade, business, industrial, commercial or professional secret or trade process, or information the disclosure of which would be contrary to public policy *(ordre public)*.

4. If information is requested by a Contracting Party in accordance with this Article, the other Contracting Party shall use its information gathering measures to obtain the requested information, even though that other Party may not need such information for its own tax purposes. The obligation contained in the preceding sentence is subject to the limitations of paragraph 3 but in no case shall such limitations be construed to permit a Contracting Party to decline to supply information solely because it has no domestic interest in such information.

5. In no case shall the provisions of paragraph 3 be construed to permit a Contracting Party to decline to supply information solely because the information is held by a bank, other financial institution, nominee or person acting in an agency or a fiduciary capacity or because it relates to ownership interests in a person.

Article 26
Members of diplomatic missions and consular posts

Nothing in this Agreement shall affect the fiscal privileges of members of diplomatic missions or consular posts under the general rules of international law or under the provisions of special agreements.

Article 27
Entitlement to benefits

1. Notwithstanding the other provisions of this Agreement, a benefit under this Agreement shall not be granted in respect of an item of income or capital if it is reasonable to conclude, having regard to all relevant facts and circumstances, that obtaining that benefit was one of the principal purposes of any arrangement or transaction that resulted directly or indirectly in that benefit, unless it is established that granting that benefit in these circumstances would be in accordance with the object and purpose of the relevant provisions of this Agreement.

2. Where a benefit under Agreement is denied to a person under paragraph 1, the competent authority of the Contracting Party that would otherwise have granted this benefit shall nevertheless treat that person as being entitled to this benefit, or to different benefits with respect to a specific item of income or capital, if such competent authority, upon request from that person and after consideration of the relevant facts and circumstances, determines that such benefits would have been granted to that person in the absence of the transaction or arrangement referred to in paragraph 1. The competent authority of the Contracting Party to which the request has been made will consult with the competent authority of that other Contracting Party before rejecting a request made under this paragraph by a resident of that other Party.

3. The competent authorities of the Contracting Parties may consult each other with regard to the application of this Article.

Article 28
Protocol

The attached Protocol shall be an integral part of this Agreement.

Article 29
Entry into force

1. Each of the Contracting Parties shall formally notify the other Contracting Party in writing that the procedures required by its law for the bringing into force of this Agreement have been satisfied. The Agreement shall enter into force on the date of the later of these notifications.

2. The provisions of this Agreement shall have effect:

a) in respect of taxes withheld at source, to income derived on or after 1 January of the calendar year next following the year in which the Agreement enters into force;

b) in respect of other taxes on income and taxes on capital, to taxes chargeable for any taxable year beginning on or after 1 January of the calendar year next following the year in which the Agreement enters into force;

c) in respect of Article 25 to requests made on or after 1 January of the calendar year next following the year in which the Agreement enters into force and only in respect of taxable periods beginning on or after 1 January of the calendar year next following the year in which the Agreement enters into force.

Article 30
Termination

1. This Agreement shall remain in force until terminated by a Contracting Party. Either Contracting Party may terminate the Agreement by giving formal written notice of termination at least six months before the end of any calendar year following the fifth year after the entry into force. In such event, the Agreement shall cease to have effect:

a) in respect of taxes withheld at source, to income derived on or after 1 January of the calendar year next following the year in which the notice is given;

b) in respect of other taxes on income and taxes on capital, to taxes chargeable for any taxable year beginning on or after 1 January of the calendar year next following the year in which the notice is given.

2. The Contracting Parties shall remain bound by the confidentiality provisions as outlined in paragraph 2 of Article 25 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, in Saint Helier, Jersey, on ...13...... day of ...August........, 2018, and in Vaduz, Liechtenstein, on ...17...... day of ...August....., in the English language.

For the Government of Jersey

For the Government of the Principality of Liechtenstein

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Protocol

At the signing of the Agreement between Jersey and the Principality of Liechtenstein for the elimination of double taxation with respect to taxes on income and on capital and the prevention of tax evasion and avoidance, the undersigned have agreed that the following provisions shall form an integral part of the Agreement.

1. With reference to Article 2 (Taxes covered) and Article 22 (Elimination of double taxation):
It is understood that if a person who is a resident of a Contracting Party is in accordance with this Agreement subject to Liechtenstein wealth tax on capital, the taxation of the notional income on such capital ("Sollertrag") is considered as personal income tax.

2. With reference to subparagraph c of paragraph 1 of Article 3 (General definitions):
It is understood that a Liechtenstein dormant inheritance is the wealth of a deceased person during the period between the time of death and the transfer of ownership to the successor(s) as taxable under Article 7 paragraph 3 of the Liechtenstein Tax Act.

3. With reference to subparagraph k of paragraph 1 of Article 3 (General definitions):
It is understood that the term "recognised pension fund" includes the following:

(i) in Liechtenstein, any pension fund or scheme covered by the Law on Old Age and Survivors' Insurance, the Law on Disability Insurance, the Law on Occupational Pension Funds, and the Pension Fund Act;

(ii) in Jersey, any pension fund, scheme or arrangement exempted from Jersey Tax under the Income Tax (Jersey) Law 1961, as amended, or established under the social security legislation of Jersey, or any government pension fund.

4. With reference to paragraph 1 of Article 4 (Residence):
It is understood that

a) investment funds of a Contracting Party are considered to be residents of that Party;

b) the term "investment fund" means a collective investment undertaking, including investment compartments thereof, established under the laws of either Contracting Party, irrespective of legal form;

c) Liechtenstein foundations (Stiftungen), establishments (Anstalten), and trust enterprises (Treuunternehmen) taxable in Liechtenstein by virtue of paragraph 1 of Article 44 of the Liechtenstein Tax Act are considered as companies resident in Liechtenstein;

d) Jersey foundations created under the Foundations (Jersey) Law 2009 and taxable in Jersey by virtue of the Income Tax (Jersey) Law 1961, as amended, are considered as companies resident in Jersey;

e) an entity or organisation that is established and is operated exclusively for charitable, religious, humanitarian, scientific, cultural, or similar purposes (or for more than one of those purposes) and that is resident of that Contracting Party according to its laws is considered as resident of that Party, notwithstanding that all or part of its income or gains may be exempt from tax under the domestic law of that Party.

5. With reference to Article 25 (Exchange of information):
It is understood that for the purposes of the Agreement that:

a) the information exchanged must not be disclosed to any other state or jurisdiction not party to this Agreement;

b) personal data may be processed and transmitted to the extent necessary for the exchange of information according to Article 25;

c) any request for information shall be in writing;

d) the competent authorities may agree on the mode of application of the article as required.

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

DONE in duplicate, in Saint Helier, Jersey, on ....13..... day of ....August........, 2018, and in Vaduz, Liechtenstein, on ....17.... day of ......August......, in the English language.

For the Government of Jersey

For the Government of the Principality of Liechtenstein

APPENDIX 2

STATES OF JERSEY

A. TAX INFORMATION EXCHANGE AGREEMENTS (“TIEAs”)

1. TIEAs signed (Note: dates in brackets are current best estimates)

Countries	Date Signed	Ratified by Jersey	Ratified by other Party	Entry into Force
U.S.A.	Nov. 2002	May 2006	Nov. 2002	23 May 2006
Netherlands	June 2007	Feb. 2008	Dec. 2007	1 March 2008
Germany	July 2008	Jan. 2009	July 2009	28 Aug. 2009
Sweden	Oct. 2008	March 2009	Nov. 2009	23 Dec. 2009
Norway	Oct. 2008	March 2009	Sep. 2009	7 Oct. 2009
Iceland	Oct. 2008	March 2009	Oct. 2009	3 Dec. 2009
Finland	Oct. 2008	March 2009	Dec. 2008	3 Aug. 2009
Denmark	Oct. 2008	March 2009	March 2009	6 June 2009
Greenland	Oct. 2008	March 2009	March 2009	6 June 2009
Faroes	Oct. 2008	March 2009	June 2009	21 Aug. 2009
U.K.	March 2009	July 2009	Nov. 2009	27 Nov. 2009
France	March 2009	July 2009	July 2010	11 Oct. 2010
Ireland	March 2009	July 2009	April 2010	5 May 2010
Australia	June 2009	Nov. 2009	Jan. 2010	5 Jan. 2010
New Zealand	July 2009	Nov. 2009	Sep. 2010	27 Oct. 2010
Portugal	July 2010	Sep. 2010	March 2011	9 Nov. 2011
People’s Republic of China	Oct. 2010	Jan. 2011	Oct. 2011	10 Nov. 2011
Turkey	Nov. 2010	Feb. 2011	August 2013	11 Sep. 2013
Mexico	Nov. 2010	Feb. 2011	Feb. 2012	22 March 2012
Canada	Jan. 2011	March 2011	Dec. 2011	19 Dec. 2011
Indonesia	April 2011	July 2011	Sep. 2014	22 Sept 2014
Czech Republic	July 2011	Nov. 2011	March 2012	14 March 2012
South Africa	July 2011	Nov. 2011	Jan. 2012	29 Feb. 2012
Argentina	July 2011	Sep. 2011	July 2011	9 Dec. 2011
India	Nov. 2011	April 2012	Jan. 2012	8 May 2012
Japan	Dec. 2011	April 2012	June 2013	30 Aug. 2013
Poland	Dec. 2011	April 2012	August 2012	1 Dec. 2012
Italy	March 2012	May 2012	Jan. 2015	26 Jan. 2015
Austria	Sep. 2012	Nov. 2012	March 2013	1 June 2013
Latvia	Jan. 2013	March 2013	Dec. 2013	1 March 2014
Brazil	Jan. 2013	March 2013	(2nd half 2018)	(2nd half 2018)
Switzerland	Sep. 2013	Dec. 2013	Oct. 2014	14 Oct. 2014
Slovenia	Nov. 2013	Feb. 2014	June 2014	23 June 2014
Hungary	Jan. 2014	March 2014	Oct. 2014	13 Feb. 2015
Belgium	March 2014	June 2014	July 2017	26 July 2017
Romania	Dec. 2014	Feb. 2015	Dec. 2015	5 Feb. 2016
Korea	July 2015	Nov. 2015	Nov. 2016	21 Nov. 2016
Spain +	Nov. 2015	June 2018	(2nd half 2018)	(2nd half 2018)
Chile	July 2016	Oct. 2016	(2nd half 2018)	(2nd half 2018)

+ Note: the delay in ratification arose because, subsequent to the TIEA being signed with Spain, an amendment was required to insert a missing word. This has now been agreed through an exchange of letters with the Spanish authorities, and ratification is proceeding.

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

- Bulgaria
- Kenya
- Lithuania
- Slovakia.

Note: Bulgaria, Lithuania and Slovakia have signed and entered into force the Multilateral Convention on Mutual Administrative Assistance in Tax Matters. Kenya is a signatory to the Convention and it should enter into force shortly. As the Convention provides for the equivalent exchange of information on request with immediate effect, it is expected that all the jurisdictions mentioned will rely on the Convention and will not proceed further with the negotiation of a TIEA.

3. Jurisdiction with which there has been some contact, but on which no further action has been taken to-date:

- Russia.

Note: Russia has signed and entered into force the Multilateral Convention on Mutual Administrative Assistance in Tax Matters and therefore does not need a TIEA to make requests for information.

B. DOUBLE TAXATION AGREEMENTS ("DTAs")[1]

1. DTAs signed:

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

[1] The DTAs listed are those that are to the standard of the OECD Model Convention. In addition, there is a DTA with the United Kingdom which was 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 A new DTA is in the process of being negotiated with the United Kingdom which will meet the standard of the OECD Model Convention.

- Qatar – signed March 2012
ratified by Jersey May 2012
ratified by Qatar November 2012
in force – 22 November 2012

- Singapore – signed October 2012
ratified by Jersey January 2013
ratified by Singapore May 2013
in force – 2 May 2013

- Guernsey – signed January 2013
ratified by Jersey June 2013
ratified by Guernsey May 2013
in force – 9 July 2013

- Isle of Man – signed January 2013
ratified by Jersey June 2013
ratified by the Isle of Man May 2013
in force – 10 July 2013

- Luxembourg – signed April 2013
ratified by Jersey July 2013
ratified by Luxembourg July 2014
in force – 5 August 2014

- Rwanda – signed June 2015
ratified by Jersey October 2015
ratified by Rwanda April 2016
in force – 27 June 2016

- Seychelles – signed July 2015
ratified by Jersey October 2015
ratified by Seychelles December 2016
in force – 5 January 2017

- United Arab Emirates – signed April 2016
ratified by Jersey September 2016
ratified by UAE February 2017
in force – 15 February 2017

- Cyprus – signed July 2016
ratified by Cyprus August 2016
ratified by Jersey October 2016
in force – 17 February 2017

- Mauritius – signed March 2017
ratified by Mauritius February 2018

- United Kingdom – signed July 2018

2. DTAs ready for signing:

None.

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

- Bahrain
- Botswana
- China (People's Republic)
- Ghana
- India
- Kenya
- Lesotho
- Liechtenstein
- Malawi
- Nigeria
- Saudi Arabia
- South Africa
- Swaziland
- Uganda
- Zambia.

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

- Albania
- Andorra
- Azerbaijan
- Bahamas (01-08-18)
- Bahrain (01-09-18)
- Barbados
- Belize
- Bulgaria
- Cameroon
- Colombia
- Cook Islands
- Costa Rica
- Croatia
- Georgia
- Ghana
- Greece
- Grenada (01-09-18)
- Guatemala
- Israel
- Kazakhstan

- Lebanon
- Liechtenstein
- Lithuania
- Macau (01-09-18)
- Malaysia
- Marshall Islands
- Moldova
- Monaco
- Nauru
- Nigeria
- Niue
- Pakistan
- Panama
- Peru (01-09-18)
- Russia
- Saint Kitts and Nevis
- Saint Lucia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- Saudi Arabia
- Senegal
- Slovak Republic
- Tunisia
- Uganda
- Ukraine
- Uruguay.

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.

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
- Brazil
- Canada
- Chile
- China (People's Republic)
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France

- Germany
- Hong Kong (01-09-18)
- Hungary
- Iceland
- India
- Indonesia
- Ireland
- Italy
- Republic of Korea
- Japan
- Latvia
- Luxembourg
- Malta
- Mauritius
- Mexico
- Netherlands
- New Zealand
- Norway
- Poland
- Portugal
- Romania
- Seychelles
- Singapore
- Slovenia
- South Africa
- Spain
- Sweden
- Switzerland
- Turkey
- United Arab Emirates (01-09-18)
- United Kingdom.

Enquiries concerning the above should be directed in the first instance to – Mr. C. Powell, Adviser – International Affairs, Chief Minister's Department, telephone: 44(0)1534 440414; e-mail: c.powell@gov.je.

Colin Powell
Adviser – International Affairs **27 July 2018**