Switzerland

2-14-2013

Agreement subject to domestic ratification procedures of Switzerland.

United 09/14/2012

Kingdom

O9/14/2012

Agreement subject to domestic ratification procedures of the United Kingdom.

## C. FATCA IGAs Under Negotiation

Argentina

FATCA IGA.

On November 8, 2012, the U.S. Treasury
Department announced it is actively
engaged in a dialogue toward concluding a
FATCA IGA.

Belgium On November 8, 2012, the U.S. Treasury
Department announced it is actively
engaged in a dialogue toward concluding a

FATCA IGA.

Canada On November 8, 2012, the U.S. Treasury
Department announced it is in the process

of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

Cayman Islands On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Cyprus On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Estonia On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Finland On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude pentiations by 2012 year end.

conclude negotiations by 2012 year end.

On November 8, 2012, the U.S. Treasury Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

Guernsey On November 8, 2012, the U.S. Treasury Department announced it is in the process

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

Hungary On November 8, 2012, the U.S. Treasury Department announced it is actively

engaged in a dialogue toward concluding a

FATCA IGA.

IV. FATCA Intergovernmental Agreements (FATCA IGAs)

A. FATCA IGAs in Force

Country Effective Date

None

Ireland

Mexico

**B. FATCA IGAs Signed, Awaiting Final** 

12-21-2012

Country Date Signed Action Required

Denmark 11-15-2012 Agreement subject to domestic ratification procedures of

Denmark.

Agreement subject to domestic ratification procedures of

Ireland.

11-19-2012 Agreement subject to domestic

ratification procedures of

Mexico.



France

Germany

## TAX TREATIES

Isle of Man On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

Israel On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Italy On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end. An agreement was initialed on January

24, 2013.

Japan On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

Jersey On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

Korea On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Liechtenstein On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Malaysia On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Malta On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Netherlands On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end.

New Zealand On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Norway On November 8, 2012, the U.S. Treasury

Department announced it is in the process of finalizing a FATCA IGA and hopes to conclude negotiations by 2012 year end. An agreement was initialed on January 7, 2013.

Singapore On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.

Slovak Republic On November 8, 2012, the U.S. Treasury

Department announced it is actively engaged in a dialogue toward concluding a

FATCA IGA.