

PROTOCOL
Amending the Agreement between
the States of Guernsey and the Government of the Cayman Islands for the
Exchange of Information Relating to Tax Matters,
signed on 29th July 2011

The States of Guernsey and the Government of the Cayman Islands (hereinafter “the Parties”),

Desiring to amend the Agreement between the States of Guernsey and the Government of the Cayman Islands for the Exchange of Information Relating to Tax Matters, signed on 29th July 2011,

Have agreed as follows:

ARTICLE I

The following shall be added after Article 5 (Exchange of Information Upon Request):

**“ARTICLE 5A
Automatic Exchange of Information**

1. The competent authorities of the Parties may automatically transmit information to each other for the purposes referred to in Article 1 (Object and Scope of the Agreement). The competent authorities shall determine the items of information to be exchanged pursuant to this Article and the procedures to be used to exchange such items of information.
2. The competent authorities of the Parties may mutually agree on additional procedures to be used for the purposes of this Article.

**ARTICLE 5B
Spontaneous Exchange of Information**

The competent authority of a Party may spontaneously transmit to the competent authority of the other Party information that has come to the attention of the first-mentioned competent authority and that the first-mentioned competent

authority supposes to be foreseeably relevant to the accomplishment of the purposes referred to in Article 1 (Object and Scope of the Agreement). The competent authorities shall determine the procedures to be used to exchange such information.

ARTICLE II

Paragraph 2 of Article 10 (Mutual agreement procedure) is revised as follows:

"In addition to the agreements referred to in paragraph 1, the competent authorities of the Parties may mutually agree on the procedures to be used under Articles 5, 5A, 5B, 6 and 8."

ARTICLE III

The Parties shall notify each other in writing when their necessary internal procedures for entry into force of this Protocol have been completed. This Protocol shall enter into force on the date of the later of such written notifications.

In witness whereof, the undersigned being duly authorized thereto have signed this Protocol.

Done at George Town, Grand Cayman, Cayman Islands on this 10th day of September 2015, and at St. Peter Port, Guernsey this 8th day of October 2015, in duplicate, in the English language.

FOR THE STATES
OF GUERNSEY

FOR THE GOVERNMENT OF
THE CAYMAN ISLANDS