

**AGREEMENT
BETWEEN
THE GOVERNMENT OF CANADA
AND
THE STATES OF GUERNSEY,
UNDER ENTRUSTMENT FROM THE GOVERNMENT
OF THE UNITED KINGDOM OF GREAT BRITAIN
AND NORTHERN IRELAND,
FOR THE EXCHANGE OF INFORMATION ON TAX MATTERS**

WHEREAS the Government of the United Kingdom has issued a letter of entrustment to the States of Guernsey to negotiate, and conclude an agreement for the exchange of information on tax matters with the Government of Canada:

NOW, THEREFORE, THE GOVERNMENT OF CANADA and THE STATES OF GUERNSEY ("the Parties") wishing to enhance and facilitate the terms and conditions governing the exchange of information relating to taxes, have agreed as follows:

ARTICLE 1

Object and Scope of this Agreement

The Parties shall provide assistance through exchange of information that is foreseeably relevant to the administration and enforcement of the domestic laws of the Parties concerning taxes covered by this Agreement, including information that is foreseeably relevant to the determination, assessment, enforcement and collection of tax with respect to persons subject to such taxes, the investigation of tax matters or the prosecution of tax matters in relation to such persons. A requested Party is not obliged to provide information which is neither held by its authorities nor in possession of nor obtainable by persons who are within its territorial jurisdiction. The rights and safeguards secured to persons by the laws or administrative practice of the requested Party remain applicable. The requested Party shall use its best endeavours to ensure that the effective exchange of information is not unduly prevented or delayed.