

4. Prevention of Avoidance: The Parties shall implement as necessary requirements to prevent Financial Institutions from adopting practices intended to circumvent the reporting required under this Agreement.

## ARTICLE 6

### **Mutual Commitment to Continue to Enhance the Effectiveness of Information Exchange and Transparency**

1. Reciprocity: The Government of the United States acknowledges the need to achieve equivalent levels of reciprocal automatic information exchange with Canada. The Government of the United States is committed to further improve transparency and enhance the exchange relationship with Canada by pursuing the adoption of regulations and advocating and supporting relevant legislation to achieve such equivalent levels of reciprocal automatic information exchange.
2. Treatment of Passthru Payments and Gross Proceeds: The Parties are committed to work together, along with Partner Jurisdictions, to develop a practical and effective alternative approach to achieve the policy objectives of foreign passthru payment and gross proceeds withholding that minimizes burden.
3. Development of Common Reporting and Exchange Model: The Parties are committed to working with Partner Jurisdictions and the Organisation for Economic Co-operation and Development on adapting the terms of this Agreement and other agreements between the United States and Partner Jurisdictions to a common model for automatic exchange of information, including the development of reporting and due diligence standards for financial institutions.
4. Documentation of Accounts Maintained as of June 30, 2014: With respect to Reportable Accounts maintained by a Reporting Financial Institution as of June 30, 2014:
  - a) The United States commits to establish, by January 1, 2017, for reporting with respect to 2017 and subsequent years, rules requiring Reporting U.S. Financial Institutions to obtain and report the Canadian TIN of each Account Holder of a Canadian Reportable Account as required pursuant to subparagraph 2(b)(1) of Article 2 of this Agreement; and
  - b) Canada commits to establish, by January 1, 2017, for reporting with respect to 2017 and subsequent years, rules requiring Reporting Canadian Financial Institutions to obtain the U.S. TIN of each Specified U.S. Person as required pursuant to subparagraph 2(a)(1) of Article 2 of this Agreement.