

Exchange of Notes between the Government of the United Kingdom and the Government of Alderney in respect of the Sharing of Beneficial Ownership Information

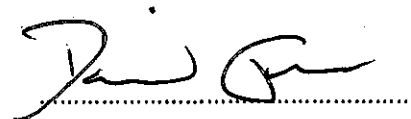
1. This commitment between the Government of the United Kingdom and the Government of Alderney ("the Participants") is an important demonstration of our partnership to enhance the effectiveness of the long-standing law enforcement cooperation between the Participants in respect of the on-going sharing of beneficial ownership information.
2. The Participants recognise the importance of the provision of beneficial ownership information for the prevention and detection of corruption, money laundering, terrorism financing, financing of the proliferation of weapons of mass destruction and other serious and organised crime. It also recognises the importance of facilitating timely and secure access for law enforcement agencies to such information whilst ensuring individuals concerned are not informed that a request has been made.
3. This commitment is made in the context of a number of international initiatives to improve access to beneficial ownership information, including the Fourth Money Laundering Directive of the European Union, Financial Action Task Force (FATF) Recommendations and Guidance on Transparency and Beneficial Ownership, the G20 High Level Principles on Beneficial Ownership Transparency and the UK Government's decision to establish a public central register of beneficial ownership information.
4. It also recognises the commitment of Alderney to international standards for the exchange of information for tax and other purposes as evidenced by the range of instruments and protocols that are already in effect. For example, in addition to ratifying the Multilateral Convention on Mutual Administrative Assistance in Tax Matters, and enacting legislation implementing US FATCA, UK FATCA and the OECD's Common Reporting Standard, Alderney (by virtue of the Government of Guernsey acting on its behalf) has signed 60 Tax Information Exchange Agreements and 12 Double Tax Arrangements, all of which include relevant provisions which meet OECD standards in respect of the exchange of information for tax matters. Alderney is also committed to and adheres to the Egmont principles of information exchange. In addition, Alderney's AML/CFT standards already allow access to adequate, accurate and current beneficial ownership information from trust and company service providers, regulated in Alderney since 2001, and resident agents appointed under company law. Implementation towards a register has already begun. Alderney sees this Exchange of Notes as part of a series of steps towards a public register with appropriate access, checks and balances.
5. Through this Exchange of Notes, each Participant commits to providing the law enforcement authorities (including tax authorities for the purposes of this Exchange of Notes) of the other Participant with beneficial ownership information for corporate and legal entities incorporated in their respective jurisdiction and will implement this

commitment as set out in the attached Technical Protocol, which is to be read as part of the commitment of both Participants.

6. The Participants will hold adequate, accurate and current beneficial ownership information for corporate and legal entities incorporated in their own jurisdictions. This information will be held in a secure central electronic database.
7. The law enforcement authorities of the Participants will have the automatic right to the unrestricted and timely (where urgently required, within one hour) provision of beneficial ownership information held in the other jurisdiction for the law enforcement purposes set out in Paragraph 2 above.
8. The Participant in whose jurisdiction the requested beneficial ownership information is held will be responsible for ensuring that searches are carried out securely; in particular ensuring that those interested in or otherwise connected to the corporate and legal entities concerned are not informed that a search is in progress or has been conducted and ensuring that the information that a search has been requested or conducted is not made known publicly, in accordance with the terms of the attached Technical Protocol.
9. Furthermore, the Participants will monitor the practical application of this commitment so that action can be taken to ensure it is implemented effectively and efficiently.



Signed on behalf of the
Government of Alderney



Signed on behalf of the
Government of the UK

Date: 10th October 2016