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Current Status of U.S. Tax Treaties and International Tax Agreements

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Editor's Note: New material is indicated in bold italics and is current as of April 26, 2019.

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I. Income Tax Treaties

A. Income Tax Treaties in Force

Country	General Effective Date ¹
Armenia ⁶	01-01-1976
*Australia ⁹	12-01-1983
*Austria ⁹	01-01-1999
Azerbaijan ⁶	01-01-1976
Bangladesh ^{1, 9}	01-01-2007
*Barbados ^{5, 9}	01-01-1984
Belarus ⁶	01-01-1976
*Belgium ^{9, 10}	01-01-2008
Bermuda ²	01-01-1986
Bulgaria ^{9, 14}	01-01-2009
*Canada ^{9, 15}	01-01-1985
China, People's Republic of ^{7, 9}	01-01-1987
Cyprus ⁹	01-01-1986
Czech Republic ⁹	01-01-1993
*Denmark ^{9, 11}	01-01-2001
Egypt ⁹	01-01-1982
Estonia ⁹	01-01-2000
*Finland ^{9, 12}	01-01-1991
*France ^{9, 17}	01-01-1996
Georgia ⁶	01-01-1976
*Germany ^{4, 9, 13}	01-01-1991
Greece ⁹	01-01-1953
Hungary ⁹	01-01-1980
*Iceland ^{9, 16}	01-01-2009
India ⁹	01-01-1991
Indonesia ⁹	01-01-1990

*Ireland ⁹	01-01-1998
Israel ⁹	01-01-1995
*Italy ^{9, 18}	01-01-2010
*Jamaica ^{5, 9}	01-01-1982
*Japan ⁹	01-01-2005
*Kazakhstan ⁹	01-01-1996
Korea ⁹	01-01-1980
Kyrgyzstan ⁶	01-01-1976
Latvia ⁹	01-01-2000
Lithuania ⁹	01-01-2000
*Luxembourg ⁹	01-01-2001
Malta ^{9, 20}	01-01-2011
Mexico ⁹	01-01-1994
Moldova ⁶	01-01-1976
Morocco ⁹	01-01-1981
*Netherlands ⁹	01-01-1994
Netherlands Antilles ³	01-01-1955
*New Zealand ^{9, 19}	01-01-1984
*Norway ⁹	01-01-1971
Pakistan ⁹	01-01-1959
Philippines ⁹	01-01-1983
Poland ⁹	01-01-1974
Portugal ⁹	01-01-1996
Romania ⁹	01-01-1974
*Russia ⁹	01-01-1994
Slovak Republic ⁹	01-01-1993
Slovenia ⁹	01-01-2002
South Africa ⁹	01-01-1998
Spain ⁹	01-01-1991
Sri Lanka ⁹	01-01-2004
*Sweden ⁹	01-01-1996
*Switzerland ⁹	01-01-1998
Tajikistan ⁶	01-01-1976
Thailand ^{8, 9}	01-01-1998
*Trinidad & Tobago ^{5, 9}	01-01-1970
Tunisia ⁹	01-01-1990
Turkey ⁹	01-01-1998
Turkmenistan ⁶	01-01-1976
*Ukraine ⁹	01-01-2001
*United Kingdom ⁹	01-01-2004
Uzbekistan ⁶	01-01-1976
Venezuela ⁹	01-01-2000

* A prior income tax treaty was in force before the general effective date noted above.

¹ The general effective date indicates when the latest income tax treaty with the United States became effective. This general effective date does not necessarily apply to any protocol to the treaty. Some income tax treaties provide for different effective dates for different provisions of the treaty (e.g., taxation at source). The specific treaty and all related protocols should be examined carefully to determine the applicable effective date.

² The tax treaty between the United States and Bermuda (dealing with income of insurance companies) entered into force with certain reservations on December 2, 1988, and is effective as follows: (1) for excise taxes on insurance premiums paid to foreign insurers, for premiums paid or credited on or after January 1, 1986; (2) for income taxes on business profits derived by an insurance enterprise, for assistance. A reservation to the treaty provides that the treaty exemption from U.S. insurance excise taxes will *not* apply to premiums allocable to insurance coverage for periods after December 31, 1989.

³ In a note dated June 29, 1987, the Netherlands Antilles and Aruba governments were notified that the U.S. government was terminating the U.S.-Netherlands Antilles and the U.S.-Aruba income tax treaties. The termination of both treaties was effective as of January 1, 1988. On July 10, 1987, the U.S. government modified the June 29 notice of termination to provide that Article VIII of both treaties (which exempts interest paid by U.S. persons to corporations and residents of the Netherlands Antilles and Aruba from U.S. tax) will continue in force after December 31, 1987. A protocol to the U.S.-Netherlands Antilles Income Tax Treaty entered into force and became effective on December 30, 1996. The protocol to the limited income tax treaty terminates the current U.S. tax exemption on interest paid to: (1) Antilles companies that are not U.S.-owned (i.e., not controlled foreign corporations); (2) U.S.-owned Antilles companies on non-Eurobond debt; and (3) U.S.-owned Antilles companies on Eurobond debt issued after October 15, 1984.

⁴ The U.S.-Germany Income Tax Treaty is effective for the eastern states of Germany (the former East Germany) from January 1, 1991.

⁵ The U.S.-U.K. Income Tax Treaty previously applied.

⁶ The U.S.-U.S.S.R. Income Tax Treaty, signed June 20, 1973, applies to the countries of Armenia, Azerbaijan, Belarus, Georgia, Kyrgyzstan, Moldova, Tajikistan, Turkmenistan, and Uzbekistan.

⁷ The IRS announced in Notice 97-40 that the United States will continue to treat Hong Kong and China as separate countries for tax treaty purposes and that this U.S.-China Income Tax Treaty will not apply to Hong Kong.

⁸ The U.S. Treasury announced on December 18, 2001, that the U.S.-Thailand Income Tax Treaty will not terminate because Thailand and the United States have exchanged diplomatic notes providing for the implementation of the treaty's exchange of information provisions. The treaty would have automatically terminated from January 1, 2004, if the exchange of information issue had not been resolved. Thailand and the United States had until June 30, 2003, to exchange the diplomatic notes.

⁹ Designated as a "comprehensive income tax treaty . . . which includes an exchange of information program" for purposes of Code §1(h)(11)(C)(i)(II), thereby allowing certain dividends paid by qualified corporations of that country to U.S. citizens and U.S. resident individuals to be taxed for U.S. tax purposes at rates limited to 5%, 15%, and 20%, as the case may be. (See IRS Notice 2011-64.)

¹⁰ A new income tax treaty with Belgium was signed on November 27, 2006, and entered into force on December 28, 2007. The provisions of the tax treaty relating to taxes withheld at source are generally effective for amounts paid or credited on or after February 1, 2008. All other provisions of the tax treaty are generally effective for taxable periods beginning on or after January 1, 2008. However, subparagraph (f) of paragraph 5 of Article 21 (Limitation on Benefits), dealing with the requirement that a “headquarters company” must be subject to the same income tax rules in its country of residence as a company actively engaged in a trade or business in that country, will not have effect until January 1, 2011. A person that would have been entitled to greater benefits under the old U.S.-Belgium Income Tax Treaty may elect to apply the old treaty in its entirety for an additional 12-month period from the date the new treaty would otherwise have been effective under the withholding and general effective dates.

¹¹ A new protocol to the U.S.-Denmark Income Tax Treaty was signed on May 2, 2006, and entered into force on December 28, 2007. The provisions of the protocol relating to taxes withheld at source are effective for amounts derived on or after February 1, 2008. All other provisions of the protocol are effective for taxable periods beginning on or after January 1, 2008.

¹² A new protocol to the U.S.-Finland Income Tax Treaty was signed on May 31, 2006, and entered into force on December 28, 2007. The provisions of the protocol relating to taxes withheld at source are generally effective for amounts paid or credited on or after February 1, 2008. However, the provision providing for a tax exemption for certain corporate dividends is effective retroactively for income derived on or after January 1, 2007. All other provisions of the protocol are effective for taxable periods beginning on or after January 1, 2008.

¹³ A new protocol to the U.S.-Germany Income Tax Treaty was signed on June 1, 2006, and entered into force on December 28, 2007. The provisions of the protocol relating to taxes withheld at source are effective retroactively for amounts paid or credited on or after January 1, 2007. All other provisions of the protocol are generally effective for taxable years beginning on or after January 1, 2008.

¹⁴ An income tax treaty with Bulgaria signed on February 23, 2007, and a related protocol signed on February 26, 2008, entered into force on December 15, 2008. The provisions of the tax treaty and protocol relating to taxes withheld at source are effective for income paid or credited on or after January 1, 2009. All other provisions of the tax treaty and protocol are effective for taxable periods beginning on or after January 1, 2009.

¹⁵ A 5th protocol to the U.S.-Canada Income Tax Treaty was signed on September 21, 2007, and entered into force on December 15, 2008. The provisions of the protocol become effective on various dates in accordance with Article 27 of the protocol. The provisions of the protocol relating to taxes withheld at source are generally effective for amounts paid or credited on or after February 1, 2009. However, the provision providing for the reduction of the tax rate on related party interest from 10% to 7% is effective retroactively for interest derived on or after January 1, 2008. Article 27 should be reviewed to determine other applicable effective dates.

¹⁶ A new income tax treaty and protocol with Iceland were signed on October 23, 2007, and entered into force on December 15, 2008. The provisions of the tax treaty and protocol relating to taxes withheld at source are generally effective for amounts derived on or after January 1, 2009. All other provisions of the tax treaty and protocol are generally effective for any taxable year beginning on or after January 1, 2009.

A person that would have been entitled to greater benefits under the old U.S.-Iceland Income Tax Treaty may elect to apply the old treaty in its entirety for an additional 12-month period from the date the new treaty would otherwise have been effective under the withholding and general effective dates. In addition, an individual who was entitled to benefits under Article 21 (Teachers) of the old treaty at the time of the entry into force of the new treaty shall continue to be entitled to benefits under Article 21 of the old treaty until such time as the individual would cease to be entitled to benefits had the old treaty remained in force.

¹⁷ A new protocol to the U.S.-France Income Tax Treaty was signed on January 13, 2009, and entered into force on December 24, 2009. The provisions of the protocol relating to taxes withheld at source are effective retroactively for amounts paid or credited on or after January 1, 2009. All other provisions of the protocol are generally effective for taxable years beginning on or after January 1, 2010.

¹⁸ A new income tax treaty with Italy was signed on August 25, 1999, and entered into force on December 16, 2009. The provisions of the new tax treaty relating to taxes withheld at source are effective for amounts paid or credited on or after February 1, 2010. All other provisions of the new tax treaty are effective for taxable years beginning on or after January 1, 2010. A person that would have been entitled to greater benefits under the old U.S.-Italy Income Tax Treaty may elect to apply the old treaty in its entirety for an additional 12-month period from the date the new treaty would otherwise have been effective under the withholding and general effective dates.

¹⁹ A new protocol to the U.S.-New Zealand Income Tax Treaty was signed on December 1, 2008, and entered into force on November 12, 2010. The provisions of the protocol relating to taxes withheld at source are effective for amounts paid or credited on or after January 1, 2011. All other provisions of the protocol are generally effective in the United States for taxable years beginning on or after January 1, 2011, and in New Zealand for taxable years beginning on or after April 1, 2011.

²⁰ A new income tax treaty with Malta was signed on August 8, 2008, and entered into force on November 23, 2010. The provisions of the new tax treaty relating to taxes withheld at source are effective for amounts paid or credited on or after January 1, 2011. All other provisions of the new tax treaty are effective for taxable years beginning on or after January 1, 2011.

B. Income Tax Treaties Approved by U.S. Senate, Awaiting Exchange of Instruments of Ratification or Formal Notice To Be Given

Country	Date Signed	Status
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None

C. Income Tax Treaties Signed, Awaiting U.S. Senate Approval

Country	Date Signed	Status
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Chile (Treaty)	02-04-2010	Treaty signed at Washington, D.C., on February 4, 2010. Sent to the U.S. Senate on May 17, 2012, for advice and consent to ratification. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on April 1, 2014, and again on November 10, 2015, and February 8, 2016.
Hungary (Treaty)	02-04-2010	Treaty signed at Budapest, Hungary, on February 4, 2010. Sent to the U.S. Senate on November 15, 2010, for advice and consent to ratification. Considered by the Senate Foreign Relations Committee at a hearing held on June 7, 2011. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on July 26, 2011, and again on April 1, 2014, November 10, 2015, and February 8, 2016.
Japan (Protocol)	01-24-2013	Protocol signed at Washington, D.C., on January 24, 2013. Sent to the U.S. Senate on April 13, 2015, for advice and consent to ratification. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on November 10, 2015, and again on February 8, 2016.
Luxembourg (Protocol)	05-20-2009	Protocol signed in Luxembourg on May 20, 2009. Sent to the U.S. Senate on November 15, 2010, for advice and consent to ratification. Considered by the Senate Foreign Relations Committee at a hearing held on June 7, 2011. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on July 26, 2011, and again on April 1, 2014, November 10, 2015, and February 9, 2016.

Poland (Treaty)	02-13-2013	Treaty signed in Poland on February 13, 2013. Sent to the U.S. Senate on May 20, 2014, for advice and consent to ratification. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on July 16, 2014, and again on November 10, 2015, and February 8, 2016.
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Spain (Protocol)	01-14-2013	Protocol signed in Spain on January 14, 2013. Sent to the U.S. Senate on May 7, 2014, for advice and consent to ratification. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on July 16, 2014, and again on November 10, 2015, and February 8, 2016.
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Switzerland (Protocol)	09-23-2009	Protocol signed at Washington, D.C., on September 23, 2009. Sent to the U.S. Senate on January 26, 2011, for advice and consent to ratification. Considered by the Senate Foreign Relations Committee at a hearing held on June 7, 2011. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on July 26, 2011, and again on April 1, 2014, November 10, 2015, and February 9, 2016.
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Vietnam (Treaty and Protocol)	07-07-2015	Treaty and accompanying protocol signed in Washington, D.C., on July 7, 2015.
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D. Income Tax Treaties Under Negotiation

Algeria	First round of negotiations was held the week of September 21, 1992. No recent activities.
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Argentina	Argentina has expressed interest in beginning income tax treaty negotiations. Preliminary talks held on August 10, 1992. The preliminary round of talks planned for the week of August 15, 1994, was postponed. Correspondence sent to Argentina in January 1996. On September 26, 2016, Treasury announced it invited Argentina's representatives to consult with it on the negotiation of an income tax treaty. On December 15, 2016, a U.S. Treasury official indicated that the first round of negotiations on an income tax treaty had taken place.
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Armenia	Armenia expressed an interest in beginning income tax treaty negotiations. Correspondence was exchanged. On December 3, 2015, Treasury issued a letter indicating it has no plans to initiate negotiations with Armenia at this time. On February 6, 2018, Treasury announced it will commit resources to negotiating an income tax treaty with Armenia.	Kuwait	First round of negotiations held the week of November 27, 1989. No recent activities.
		Kyrgyzstan	Former Soviet Republic has expressed interest in beginning income tax treaty negotiations. Correspondence has been exchanged. No recent activities.
Azerbaijan	Azerbaijan has expressed an interest in beginning income tax treaty negotiations. Correspondence has been exchanged. No recent activities.	Luxembourg	Two rounds of negotiations were held in 2015, with a third round held in early 2016. On June 22, 2016, the U.S. Treasury Department released a statement confirming the two States are in the process of negotiating a protocol that would amend a number of the current treaty's provisions and add the expanded triangular/exempt permanent establishment provision introduced in the 2016 U.S. Model Income Tax Treaty.
Belarus	Belarus has expressed an interest in beginning income tax treaty negotiations. Correspondence has been exchanged. No recent activities.		
Brazil	Discussions held the weeks of November 13, 1990, and May 18, 1992. Brazil has expressed the need for a tax sparing provision. It is the U.S. Treasury's position that the United States will not enter into a tax treaty with a tax sparing provision, nor will the United States continue negotiations with a country that insists on including such a provision in a tax treaty. On March 17, 2011, Senator Richard Lugar (R-Ind.) introduced a resolution (S. Res. 108) that encourages President Obama to negotiate an income tax treaty with Brazil.	Malaysia	Negotiations were held the week of March 30, 1992. Another round was held during the week of February 28, 1994. Open issues remain on bank secrecy and the offshore sector. No recent activities.
		Moldova	Moldova has expressed an interest in beginning income tax treaty negotiations. No recent activities.
		Netherlands	On December 15, 2016, a U.S. Treasury official stated that negotiations on a new treaty were scheduled to begin in 2017.
Colombia	Initial meetings were held the week of December 8, 2008. The round of negotiations that had been scheduled for the week of December 14, 2009, did not occur. On May 9, 2014, a U.S. Treasury official confirmed a second round of negotiations is underway. On December 15, 2016, a U.S. Treasury official indicated that the U.S. and Colombia were close to initialing a treaty.	Norway	U.S. government officials stated on April 5, 2006, that negotiations "have been completed." On May 11, 2012, a U.S. Treasury official stated that a new income tax treaty with Norway had been initialed and is awaiting signature. On January 24, 2014, a U.S. Treasury official stated that a new income tax treaty with Norway is being prepared for signature.
Croatia	Correspondence exchanged. No recent activities.	Pakistan	The United States has sent correspondence to Pakistan to resume negotiations. Negotiations were held the week of March 11, 1991. Correspondence has been exchanged. However, no recent movement on these discussions.
Ireland	The Irish Department of Finance announced in a press release dated August 25, 2016, that negotiations to amend the existing treaty are underway. On December 15, 2016, a U.S. Treasury official stated that two rounds of negotiations had been completed.	Romania	U.S. government officials stated on November 29, 2005, that preliminary treaty discussions have begun with Romania. On November 6, 2012, a U.S. Treasury official stated that a first round of negotiations was held in March 2012 and a second round of negotiations was held in October 2012. On January 24, 2014, a U.S. Treasury official stated that a new income tax treaty with Romania is being prepared for signature.
Israel	Discussions held the week of November 16, 2009. In July 2017, officials from the United States and Israel expressed an interest in exploring treaty update negotiations.	Singapore	A first round of negotiations was held the week of December 14, 1987. No recent activities.
Korea	Negotiations to discuss a new income tax treaty were held the weeks of March 15, 1999 and March 20, 2000. Rounds were also held the weeks of March 19, 2001 and on June 28 and 29, 2001. Negotiations were held in Washington, D.C., the week of June 1, 2009. The round of negotiations that had been planned for October 2009 did not occur. Negotiations seemed to have "stalled."	Taiwan	Preliminary negotiations were held the week of July 9, 1990. A second round was held the week of March 23, 1992.
		Trinidad and Tobago	There has been correspondence on open issues. No recent activities.

United Kingdom	A second round of negotiations was held at the end of May 2011. On January 15, 2013, a U.S. Treasury official stated that an agreement had been reached on the text of a protocol.
Uzbekistan	Has expressed an interest in beginning income tax treaty negotiations. No recent activities.

E. Income Tax Treaties Terminated

Country	Date Terminated	Effective Date
Anguilla	06-30-1983	01-01-1984
Antigua and Barbuda	02-26-1983	08-26-1983
Aruba ¹	06-29-1987	01-01-1988
Barbados ²	06-30-1983	01-01-1984
Belize	06-30-1983	01-01-1984
British Virgin Islands	06-30-1982	01-01-1983
Burundi	06-30-1983	01-01-1984
Dominica	06-30-1983	01-01-1984
Falkland Islands	06-30-1983	01-01-1984
The Gambia	06-30-1983	01-01-1984
Grenada	06-30-1983	01-01-1984
Malawi	06-30-1983	01-01-1984
Malta	11-16-1995	01-01-1997
Montserrat	06-30-1983	01-01-1984
Netherlands Antilles ¹	06-29-1987	01-01-1988
Rwanda	06-30-1983	01-01-1984
St. Christopher-Nevis	06-30-1983	01-01-1984
St. Lucia	06-30-1983	01-01-1984
St. Vincent and the Grenadines	06-30-1983	01-01-1984
Seychelles	06-30-1983	01-01-1984
Sierra Leone	06-30-1983	01-01-1984
South Africa ³	10-15-1986	07-01-1987
Zaire	06-30-1983	01-01-1984
Zambia	06-30-1983	01-01-1984

¹ Under a modification of the termination notice, Article VIII will remain in force after December 31, 1987. Treasury announced on September 15, 1995, that Article VIII of the treaty with the Antilles would be limited, applying only to interest paid to U.S.-owned Antilles companies on Eurobond debt issued on or before October 15, 1984. The limitation is contained in a protocol that became effective on December 30, 1996. Treasury also announced the complete termination, as of January 1, 1997, of the remaining provision of the income tax treaty with Aruba.

² A new Barbados Income Tax Treaty entered into force on March 28, 1986.

³ A new income tax treaty between the United States and South Africa was entered into and became generally effective as of January 1, 1998.

II. Estate/Gift Tax Treaties

A. Estate/Gift Tax Treaties in Force

The United States has estate, gift, or combined estate and gift, tax treaties in force with the following countries:

Country	General Effective Date
Australia (estate)	01-07-1954
Australia (gift)	12-14-1953
Austria (combined estate and gift)	07-01-1983
Canada (estate) — Terminated	This treaty ceased to have effect with respect to estates of persons dying on or after January 1, 1985; however, see the U.S.-Canada Income Tax Treaty regarding the application of estate and gift taxes.
Denmark (combined estate and gift)	11-07-1984
Finland (estate)	12-18-1952
France (combined estate and gift) ¹	10-01-1980
Germany (combined estate and gift)	01-01-1979
Greece (estate)	12-30-1953
Ireland (estate)	12-20-1951 (or, upon election, estates of persons dying in 1951 prior to December 20)
Italy (estate)	10-26-1956
Japan (combined estate and gift)	04-01-1955
Netherlands (estate)	02-03-1971
Norway (estate) ³	12-11-1951
South Africa (estate)	07-15-1952 (or upon election, 06-30-1944)
Sweden (combined estate and gift) — Notice of Termination given ²	09-05-1984; ceased to have effect as of January 1, 2008 ²
Switzerland (estate)	09-17-1952
United Kingdom (combined estate and gift)	11-11-1979

¹ A protocol to the U.S.-France Estate and Gift Tax Treaty was signed on December 8, 2004, and entered into force on December 21, 2006. It is generally effective with respect to gifts made and deaths occurring after entry into force; however, relief provided with respect to surviving non-citizen spouses and the pro rata unified credit is effective with respect to gifts made and deaths occurring after November 10, 1988.

² The U.S. Treasury announced that on June 7, 2007, the United States delivered to the Government of Sweden a Notice of Termination of the Estates, Inheritances, and Gifts Tax Treaty between the two countries. In accordance with Article 15 (Termination) of the treaty, the treaty ceased to have effect as of January 1, 2008. The U.S. Treasury announcement states that since Sweden has abolished its tax on inheritances and gifts, the treaty is no longer needed to prevent double taxation with respect to taxes on estates, inheritances, and gifts.

³ The Norwegian government terminated this agreement on June 6, 2014. This agreement will not be in effect after December 31, 2014.

B. Estate/Gift Tax Treaties Signed, Awaiting Final Action

Country	Date Signed	Status
None	—	—

C. Estate/Gift Tax Treaties Under Negotiation

United Kingdom	Meetings were held in April 2000 to negotiate revisions to the current estate and gift tax treaty.
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III. Tax Information Exchange Agreements (TIEAs)

A. TIEAs in Force

Multilateral	Effective Date
OECD / Council of Europe Convention on Mutual Administrative Assistance on Tax Matters	01-04-1995
Country	Effective Date
Antigua & Barbuda	02-10-2003
Argentina	01-01-2018
Aruba	09-13-2004
Bahamas	01-01-2004 - Criminal Tax 01-01-2006 - Civil Tax
Barbados	11-03-1984
Bermuda	12-02-1988
Brazil	03-19-2013
British Virgin Islands ¹	03-10-2006
Cayman Islands ^{1, 4}	03-10-2006
Colombia	04-30-2014
Costa Rica	02-12-1991
Dominica	05-08-1988
Dominican Republic	10-12-1989

Gibraltar ⁷	12-22-2009 - Criminal Tax 01-01-2010 - Civil Tax
Grenada	07-13-1987
*Guernsey ⁶	03-30-2006
Guyana	08-27-1992
Honduras	10-11-1991
Hong Kong	06-20-2014
*Isle of Man ³	06-26-2006
Jamaica	12-18-1986
*Jersey ⁸	06-26-2006
Liechtenstein ⁵	01-01-2010
Marshall Islands	03-14-1991
Mauritius	08-29-2014
Mexico	01-18-1990
Monaco	03-11-2010
Netherlands Antilles	03-22-2007
Panama	04-18-2011
*Peru	03-31-1993
*St. Lucia ²	04-22-1991
Trinidad & Tobago	02-09-1990

* Countries that are not included in the “North American area” for purposes of §274(h) relating to the deductibility of certain convention expenses. (See Rev. Rul. 2007-28, issued April 4, 2007.)

¹ Rev. Rul. 2007-28 states that the British Virgin Islands and the Cayman Islands have entered into tax information exchange agreements with the United States that are not of the type described in Code §274(h)(6)(C)(i) because of certain limitations on the scope of those agreements.

² Rev. Rul. 2007-28 states that it has come to the attention of the IRS that the tax information exchange agreement signed by the United States and Saint Lucia on January 30, 1987, is not in effect within the meaning of §274(h)(6)(A)(i) because the government of Saint Lucia has not enacted legislation to implement the agreement. The IRS will treat Saint Lucia as not included in the North American area under Code §274(h)(6) with respect to conventions that begin after April 4, 2007, except with respect to expenses for which the taxpayer demonstrates a nonrefundable contractual obligation existing as of April 4, 2007. Representatives of the State Department confirm that the TIEA with Saint Lucia is otherwise in force.

³ On February 21, 2014, the Isle of Man ratified a protocol, signed on December 13, 2013, that amends this TIEA. This protocol entered into force on August 26, 2015.

⁴ A new TIEA with the Cayman Islands entered into force on April 14, 2014.

⁵ On May 16, 2014, the United States and Liechtenstein signed a protocol amending the current TIEA. The protocol entered into force on January 22, 2015.

⁶ On June 25, 2014, Guernsey ratified a protocol (signed on December 13, 2013) amending the current TIEA. The protocol entered into force on August 26, 2015.

⁷ A protocol (signed on May 8, 2014) that amends the current TIEA governing criminal tax matters entered into force on June 29, 2014.

⁸ A protocol (signed on December 13, 2013) that amends the current TIEA entered into force on October 28, 2015.

B. TIEAs Signed, Awaiting Final Action

Country	Date Signed	Action Required		
Gibraltar	05-08-2014	To be determined upon release of the agreement.	Bahrain	03-05-2018
Singapore	11-13-2018	Will enter into force one month from the date of Singapore's written notification to the United States that Singapore has completed its necessary internal procedures for entry into force of this Agreement.	Barbados	09-25-2015
Protocol to the OECD / Council of Europe Convention on Mutual Administrative Assistance on Tax Matters	05-27-2010	Will enter into force three months after five parties ratify the Protocol. If a party ratifies the Protocol after it has entered into force, then the Protocol binds that party beginning three months from the date of that party's ratification. Sent to the U.S. Senate on May 17, 2012, for advice and consent to ratification. Approved by the Senate Foreign Relations Committee and reported to the full U.S. Senate on April 1, 2014, and again on February 8, 2016.	Belarus	07-29-2015
			Belgium	12-23-2016
			Bermuda	08-19-2014
			Brazil	06-26-2015
			British Virgin Islands	07-13-2015
			Bulgaria	06-30-2015
			Cambodia	12-23-2016
			Canada	06-27-2014
			Cayman Islands	07-01-2014
			Colombia	08-27-2015
			Croatia	12-27-2016
			Curaçao	08-03-2016
			Cyprus	09-21-2015
			Czech Republic	12-18-2014
			Denmark	09-30-2015
			Estonia	07-09-2014
			Finland	02-20-2015
			France	10-14-2014

C. TIEAs Under Negotiation

Belize	Preliminary discussions held the week of April 13, 1992. No recent activities.	Germany	12-11-2013
El Salvador	An agreement initialed July 29, 1993. No recent activities.	Gibraltar	09-17-2015
Nicaragua	An agreement initialed June 14, 1991. No recent activities.	Guernsey	08-26-2015
		Greece	12-13-2017
		Greenland	11-30-2018
		Grenada	04-06-2018
		Guyana	09-29-2017
		The Holy See	06-10-2015
		Honduras	02-19-2015
		Hong Kong	07-06-2016
		Hungary	07-16-2014
		Iceland	09-22-2015
		India	08-31-2015
		Ireland	04-02-2014
		Isle of Man	08-26-2015

IV. FATCA Intergovernmental Agreements (FATCA IGAs)

A. FATCA IGAs in Force

Country	Effective Date		
Algeria	01-18-2017		
Angola	10-02-2017		
Antigua and Barbuda	06-07-2017		
Australia	06-30-2014		
Austria	12-09-2014		
Azerbaijan	11-05-2015		
Bahamas	09-17-2015		

Israel	08-29-2016
Italy	08-17-2015
Jamaica	09-24-2015
Jersey	10-28-2015
Korea	09-08-2016
Kosovo	11-04-2015
Kuwait	01-28-2016
Latvia	12-15-2014
Liechtenstein	01-22-2015
Lithuania	10-07-2014
Luxembourg	07-29-2015
Malta	06-26-2014
Mauritius	08-29-2014
Mexico	04-10-2014 ¹
Moldova	01-21-2016
Montenegro	03-28-2018
Netherlands	04-09-2015
New Zealand	07-03-2014
Norway	01-27-2014
Panama	10-25-2016
Poland	07-01-2015
Portugal	08-10-2016
Qatar	06-23-2015
Romania	11-03-2015
San Marino	08-30-2016
Saudi Arabia	02-28-2017
Singapore	03-28-2015 ²
Slovak Republic	11-09-2015
Slovenia	07-01-2014
South Africa	10-28-2014
Spain	12-09-2013
St. Kitts and Nevis	04-28-2016
St. Lucia	09-01-2016
St. Vincent and the Grenadines	05-13-2016

Sweden	03-01-2015
Switzerland	06-02-2014
Trinidad and Tobago	09-22-2017
Turkmenistan	11-06-2017
Turks and Caicos Islands	07-25-2016
United Kingdom	08-11-2014
Uzbekistan	07-07-2017
Vietnam	07-07-2016

¹ The FATCA IGA signed with Mexico on April 9, 2014, replaces the FATCA IGA signed on November 19, 2012.

² Upon entry into force, a FATCA IGA signed with Singapore on November 13, 2018, will replace the FATCA IGA signed on December 9, 2014.

B. FATCA IGAs Signed and in Effect, Awaiting Final Action

Country	Date Signed	Action Required
Anguilla	01-15-2017	Agreement subject to domestic ratification procedures of Anguilla.
Armenia	02-12-2018	Agreement subject to domestic ratification procedures of Armenia.
Chile	03-05-2014	Agreement subject to domestic ratification procedures of Chile.
Costa Rica	11-26-2013	Agreement subject to domestic ratification procedures of Costa Rica.
Dominica	11-15-2018	Agreement subject to domestic ratification procedures of Dominica.
Dominican Republic	09-15-2016	Agreement subject to domestic ratification procedures of the Dominican Republic.
Georgia	07-10-2015	Georgia ratified the agreement on September 18, 2015.
Greece	01-19-2017	Agreement subject to domestic ratification procedures of Greece.
Guyana	10-17-2016	Agreement subject to domestic ratification procedures of Guyana.
Japan	06-11-2013	Agreement subject to domestic ratification procedures of Japan.
Kazakhstan	09-11-2017	Agreement subject to domestic ratification procedures of Kazakhstan.

Macau	12-14-2016	Agreement subject to domestic ratification procedures of Macau.
Montserrat	09-08-2015	Agreement subject to domestic ratification procedures of Montserrat.
Philippines	07-13-2015	Agreement subject to domestic ratification procedures of the Philippines.
Serbia	04-10-2019	Agreement subject to domestic ratification procedures of the Serbia.
Taiwan	12-22-2016	Agreement subject to domestic ratification procedures of Taiwan.
Thailand	03-04-2016	Agreement subject to domestic ratification procedures of Thailand.
Turkey	07-29-2015	The Turkish Council of Ministers ratified the agreement on October 5, 2016.
Ukraine	02-07-2017	Agreement subject to domestic ratification procedures of Ukraine.
United Arab Emirates	06-17-2015	Agreement subject to domestic ratification procedures of the United Arab Emirates.

C. FATCA IGAs Not Yet Signed But Treated as in Effect*

Country	Date Identified as Being Treated as in Effect
Cabo Verde	06-30-2014
China	06-26-2014
Dominica	06-19-2014
Haiti	06-30-2014
Indonesia	05-04-2014
Iraq	06-30-2014
Malaysia	06-30-2014
Nicaragua	06-30-2014
Paraguay	06-06-2014
Peru	05-01-2014
Seychelles	05-28-2014
Tunisia	11-30-2014

* On April 2, 2014, the Internal Revenue Service released Announcement 2014-17 indicating that a jurisdiction that has reached a FATCA IGA in substance can be treated as having a FATCA IGA in effect until December 31, 2014, if: (1) such FATCA IGA is reached in substance prior to July 1, 2014; and (2) such jurisdiction consents to having the status of such FATCA IGA disclosed. On December 1, 2014, the Internal Revenue Service released Announcement 2014-38 indicating that a jurisdiction that has reached a FATCA IGA in substance will be treated beyond December 31, 2014, as having a FATCA IGA in effect, provided the jurisdiction demonstrates firm resolve to sign the FATCA IGA as soon as possible. On

August 1, 2016, the IRS released an advance version of Announcement 2016-27. This announcement provides that each jurisdiction that is treated as if it had an IGA in effect and that wishes to continue this treatment must provide the Treasury Department, by December 31, 2016, with a detailed explanation of why the jurisdiction has not yet brought the IGA into force and provide a step-by-step plan that the jurisdiction intends to follow in order to sign the IGA (if it has not been signed) and bring the IGA into force.

D. FATCA IGAs Signed But Not Yet Treated as in Effect

Country	Date Signed	Action Required
None		

E. FATCA IGAs Under Negotiation

Argentina	FATCA IGA negotiations are underway.
Lebanon	The U.S. Treasury Department is working to explore options for a FATCA IGA.
Pakistan	In a press release dated June 24, 2014, the Pakistani government noted FATCA IGA negotiations are underway.
Russia	According to a Russian press release published in April 2014, FATCA IGA negotiations with Russia have been suspended.
Saint Maarten	The U.S. Treasury Department is working to explore options for a FATCA IGA.
Singapore	On August 2, 2016, the United States and Singapore jointly announced that negotiations are ongoing for an IGA that provides for reciprocal automatic exchange of information with respect to financial accounts under FATCA. On October 24, 2017, the United States and Singapore jointly announced that these negotiations have concluded.
Sri Lanka	Sri Lankan banks have been directed to comply with the FATCA regime by entering into foreign financial institution agreements with the IRS.
Swaziland	FATCA IGA negotiations are underway.

V. Reciprocal Shipping/Aviation Agreements

A. Reciprocal Shipping/Aviation Agreements in Force

Country	Effective Date
Angola	01-01-2006
Argentina	01-01-1987
Bahamas	01-01-1987
Bahrain	01-01-1999
Belgium	01-01-1987
Bolivia	03-31-1999
Cape Verde	01-01-2005
Chile (aviation only)	01-01-1987
China ^{3, 6}	01-01-1981
Colombia	01-01-1987
Cyprus	01-01-1987
Denmark	01-01-1987
El Salvador (aviation only)	01-01-1987
Ethiopia	01-01-1998
Fiji	01-01-1996
Finland	01-01-1987
Ghana	01-01-2001
Greece	01-01-1987
Greenland	01-01-2011
Hong Kong (shipping only) ³	01-01-1987
India	01-01-1987
Isle of Man (shipping only)	01-01-1987
Japan	01-01-1987
Jersey	01-01-1997
Jordan	01-01-1987
Liberia	01-01-1987
Luxembourg	01-01-1987
Malaysia	01-01-1987
Malta	01-01-1997
Marshall Islands (shipping only)	01-01-1987
Mexico ⁴	01-01-1987
Norway	01-01-1987
Pakistan (shipping only)	01-01-1987
Panama	01-01-1987
Peru (shipping only)	01-01-1987
Russia ²	01-01-1991

St. Vincent & the Grenadines	01-01-1987
Saudi Arabia	01-01-1999
Singapore	01-01-1987
Sweden	01-01-1987
Taiwan	01-01-1987
United Arab Emirates	01-01-1994
Venezuela	01-01-1987

Rev. Rul. 2008-17, issued March 7, 2008, modifying and superseding Rev. Rul. 2001-48, which had modified and superseded Rev. Rul. 89-42, as supplemented by Rev. Rul. 97-31 and corrected by Announcement 97-75, provides that the following countries qualify for the reciprocal exemption by virtue of their domestic law: Antigua and Barbuda (shipping only), Aruba, Barbados, Bermuda, Brazil,¹ British Virgin Islands, Bulgaria, Cayman Islands, Chile (shipping only), Croatia, Ecuador (shipping only),⁵ Gibraltar, Israel, Kuwait (shipping only), Monaco, The Netherlands, The Netherlands Antilles, Peru (aviation only), Portugal,¹ Qatar (aviation only), Spain,¹ Surinam, Turkey, Turks & Caicos, Uruguay, Vanuatu and the U.S. Virgin Islands.

¹ Local law exempts corporations only.

² The Russian Federation entered into a diplomatic note effective retroactively to January 1, 1991. This note was terminated on January 1, 1994, the general effective date of the new U.S.-Russia Income Tax Treaty.

³ The IRS announced in Notice 97-40 that the United States will continue to treat Hong Kong and China as separate countries for purposes of the Reciprocal Shipping Exemption and that the Shipping Agreement with Hong Kong will continue to apply.

⁴ Mexico entered into a diplomatic note with the United States. This note was terminated on January 1, 1994, the general effective date of the new U.S.-Mexico Income Tax Treaty.

⁵ The exemption is generally effective for all open years beginning on or after January 1, 1987.

⁶ A shipping and aircraft agreement between the United States and China was signed on March 5, 1982, and became effective retroactively to January 1, 1981. Note that, unlike other shipping and aircraft agreements, this agreement was ratified by the President on September 6, 1983, after receiving the advice and consent of the U.S. Senate (as required for treaties). This agreement is considered a "limited treaty" and in Rev. Rul. 2008-17 the IRS includes China in its list of countries (Table II) currently granting equivalent exemptions by income tax treaty. The U.S.-China Income Tax Treaty (with Protocols) does not include a provision relating to the international operation of ships and aircraft.

B. Reciprocal Shipping/Aviation Agreements Under Negotiation

Costa Rica	Negotiations suspended.
Honduras	Expressed interest in exchange of notes relating to airlines only.
Hong Kong	Discussions on airlines only.
Kenya	Expressed interest in exchange of notes relating to airlines only.
Kuwait	On May 28, 2014, the United States and Kuwait signed a Memorandum of Understanding (MOU) evidencing a reciprocal tax exemption for income derived from the international operation of aircraft. The MOU enters into force on the date of the later of the notifications by each party and is to have effect with respect to taxable years beginning on or after January 1 following such later notification.
Latvia	Draft texts of agreement relating to both shipping and airlines have been exchanged and are being reviewed.
Mauritius	Negotiations suspended.
Tonga	Negotiations suspended.

VI. Social Security Totalization Agreements

A. Social Security Totalization Agreements in Force

Country	Effective Date
Australia	10-01-2002
Austria	11-01-1991
(Austria—Supplementary Agreement)	01-01-1997
Belgium	07-01-1984
Brazil	10-01-2018
Canada with Supplementary Agreement	08-01-1984
(Canada—2nd Supplementary Agreement)	10-01-1997
Chile	12-01-2001
Czech Republic ³	01-01-2009
Denmark	10-01-2008
Finland	11-01-1992
France	07-01-1988
Germany ¹	12-01-1979
(Germany—Supplementary Agreement)	03-01-1988
(Germany—2nd Supplementary Agreement)	05-01-1996
Greece	09-01-1994
Hungary	09-01-2016
Iceland	03-01-2019
Ireland	09-01-1993
Italy	11-01-1978
(Italy—Supplementary Agreement)	01-01-1986
Japan	10-01-2005
Luxembourg	11-01-1993

Netherlands (with protocol)	11-01-1990
(Netherlands—Supplementary Protocol)	05-01-2003
Norway	07-01-1984
(Norway—Supplementary Agreement)	09-01-2003
Poland	03-01-2009
Portugal	08-01-1989
Slovak Republic	05-01-2014
Slovenia	02-01-2019
South Korea	04-01-2001
Spain	04-01-1988
(Spain—Supplementary Agreement)	08-26-2014
Sweden	01-01-1987
(Sweden—Supplementary Agreement)	11-01-2007
Switzerland ²	08-01-2014
United Kingdom	01-01-1985
(United Kingdom—Benefits based on combined periods of coverage)	01-01-1988
(United Kingdom—Supplementary Agreement)	09-01-1997
Uruguay	11-01-2018

¹ Reunification has extended application of the agreement to former East German territory effective October 3, 1990.

² This social security agreement with Switzerland (signed on December 3, 2012) replaces the social security agreement signed in 1979, as amended by a 1988 protocol.

³ A protocol signed on September 23, 2013, to the social security totalization agreement with the Czech Republic entered into force on May 1, 2016. The protocol's provisions are generally effective May 1, 2016.

B. Social Security Totalization Agreements Signed, Awaiting Final Action

Country	Date Signed	Status
Mexico	06-29-2004	The Agreement must be submitted to the U.S. Congress and the Mexican Senate for review.

C. Social Security Totalization Agreements Under Negotiation

Albania	Negotiations are underway.
Argentina	Meetings for preliminary discussions held during the week of June 9, 1997. No recent activity reported.
Bulgaria	Meeting held on January 6, 2015.
India	Meeting held on January 25, 2015.
Israel	Initial inquires made. No recent interest expressed by Israel.
Italy	U.S. negotiators have proposed a supplementary agreement. No recent activity reported.
Latvia	Negotiations are underway.
New Zealand	Initial inquiries made. Meetings held June 6 and 7, 1991. Discussions held the week of April 27, 1998. No recent activity reported.

Paraguay	Paraguay has expressed an interest in beginning negotiations.
Romania	Romania has expressed an interest in beginning negotiations.
San Marino	Negotiations are underway.

The information contained herein is general in nature and based on authorities that are subject to change. Applicability to specific situations is to be determined through consultation with your tax adviser. The views and opinions are those of the authors and do not necessarily represent the views and opinions of KPMG LLP.