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List of Signed United States Competent Authority Agreements on the Exchange of Country-by-Country

Country		Signature Date	Operative Date
0	Argentina	January 27, 2021	January 27, 2021
*	Australia	August 1, 2017	August 1, 2017
	Austria	August 16, 2018	July 20, 2017
	Belgium	July 20, 2017	July 20, 2017
	Bermuda	December 7, 2017	December 7, 2017
	Brazil	July 20, 2017	In Negotiations
	Bulgaria⁴	In Negotiations	June 7, 2017
*	Canada	June 7, 2017	March 8, 2018
	Cayman Islands	March 8, 2018	August 30, 2017
	Colombia	August 30, 2017	July 10, 2018
	Croatia	July 10, 2018	May 14, 2020
**	Curacao	May 14, 2020	In Negotiations
5	Cyprus	In Negotiations	October 25, 2017
	Czech Republic	September 28, 2017	June 21, 2017
	Denmark	June 21, 2017	April 25, 2018
	Estonia	July 26, 2017	September 27, 2017
	Finland	September 27, 2017	In Negotiations
	France ²	In Negotiations	April 4, 2023 April 4, 2023
	Germany ³	August 14, 2020 March 24, 2023	December 18, 2018
#	Gibraltar	December 18, 2018	December 18, 2018

1 Effective for periods beginning on or after January 1, 2017.

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The information herein is not intended to be "written advice concerning one or more Federal tax matters" subject to the requirements of section 10.37(a)(2) of Treasury Department Circular 230.

The information contained herein is of a general nature and based on authorities that are subject to change. Applicability of the information to specific situations should be determined through consultation with your tax adviser.

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² Country-by-Country Reports with respect to Fiscal Years beginning in 2016, 2017, 2018, 2019, 2020, 2021, 2022, and 2023 will be spontaneously exchanged. (Joint Statement) 3 Country-by-Country Reports with respect to Fiscal Years beginning in 2016, 2017, 2018, 2019, 2020 and 2021 will be spontaneously exchanged. (Joint Statement)

⁴ The Bulgarian Tax Administration is contacting Constituent Entities in Bulgaria to discuss their local filing requirements

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Country		Signature Date	Operative Date
ŧ	Greece	September 27, 2017	May 21, 2018
╺-╬╼	Guernsey	June 22, 2017	December 19, 2017
	Hungary⁵	December 6, 2018	December 21, 2018
	Iceland ¹	May 5, 2017	May 5, 2017
۲	India ⁶	April 9, 2019	April 29, 2019
	Indonesia ⁸	June 13, 2018	June 13, 2018
	Ireland	June 15, 2017	June 15, 2017
×	Isle of Man ¹	July 20, 2017	July 20, 2017
\$	Israel	August 16, 2023	August 16, 2023
	Italy	September 27, 2017	September 27, 2017
$\mathbf{\times}$	Jamaica ⁷	July 20, 2017	TBD
	Japan	October 12, 2018	October 12, 2018
\times	Jersey	December 7, 2017	December 7, 2017
	Latvia	June 21, 2017	June 21, 2017
*	Liechtenstein ¹	May 9, 2018	December 19, 2018
	Lithuania	August 30, 2017	August 30, 2017
	Luxembourg	October 18, 2017	October 18, 2017
+	Malta	July 20, 2017	December 19, 2017
	Mauritius	April 27, 2018	April 27, 2018
۲	Mexico	October 19, 2017	October 19, 2017
	Monaco	November 5, 2020	November 5, 2020

5 The intergovernmental agreement beween the US and Hungary was signed on October 25, 2018 and operative since December 21, 2018. Country-by-Country Reports with respect to Fiscal Years beginning in 2021 will be spontaneously exchanged. (Joint Statement)

6 Local filing will not be required in India.

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Country		Signature Date	Operative Date
	Netherlands	April 11, 2017	April 11, 2017
	New Zealand	May 11, 2017	May 11, 2017
	Norway	April 26, 2017	April 26, 2017
	Poland	December 28, 2017	December 28, 2017
۲	Portugal	October 2, 2017	October 2, 2017
()	Singapore	October 6, 2020	October 6, 2020
•	Slovakia	June 21, 2017	June 21, 2017
•	Slovenia	June 4, 2018	June 4, 2018
\gg	South Africa	May 26, 2017	May 26, 2017
	South Korea	June 22, 2017	June 22, 2017
<u>.</u>	Spain	December 19, 2017	December 19, 2017
	Sweden	September 28, 2017	September 28, 2017
C*	Turkey ⁹	November 24, 2021	November 24, 2021
	United Kingdom	August 16, 2017	August 16, 2017

7 Country-by-country (CbC) reporting rules not yet finalized.

8 Memorandum of Understading between Indonesia and the United States in regards to local filing

9 Turkey extended the deadline for CbC report submission (including local filing) till June 30, 2021. Additionally, U.S. constituent entities may now request additional time from the Turkish Revenue Administration in written format aimed at requesting an extension within 15 days of June 28, 2021.

Current as of December 22, 2023

Source: Country-by-Country Reporting Jurisdiction Status Table | Internal Revenue Service

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