

**PROTOCOL BETWEEN THE STATES OF GUERNSEY AND THE REPUBLIC OF SAN MARINO TO AMEND THE AGREEMENT FOR THE EXCHANGE OF INFORMATION RELATING TO TAX MATTERS, SIGNED ON 29<sup>TH</sup> SEPTEMBER 2010.**

The States of Guernsey and the Republic of San Marino and (hereinafter referred to as "the Parties");

Desiring to conclude a Protocol to amend the Agreement between the States of Guernsey and the Republic of San Marino for the Exchange of Information Relating to Tax Matters, signed on 29<sup>th</sup> September 2010 (hereinafter referred to as "the Agreement");

Have agreed as follows:

**Article 1**

Paragraph 1 of Article 12 of the Agreement ("No Prejudicial or Restrictive Measures") shall be replaced with the following:

"A Party shall not apply prejudicial or restrictive measures based on harmful tax practices to residents, nationals or citizens of the other Party so long as this Agreement, and any other agreement between the Parties or the competent authorities of the Parties, relating to the exchange of information for tax purposes, is in force and effective."

**Article 2**

The Parties shall notify one another, in writing, of the completion of the procedures required by their laws for the bringing into force of this Protocol. This Protocol shall enter into force on the date of the receipt of the later of these notifications and shall have effect as from that date.

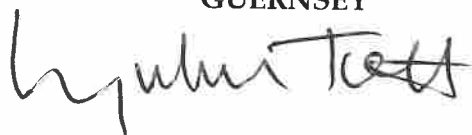
**Article 3**

This Protocol shall remain in force as long as the Agreement remains in force.

**IN WITNESS WHEREOF** the undersigned, being duly authorized thereto by their respective Governments, have signed this Protocol.

Done in duplicate at San Marino, this 14<sup>th</sup> day of December, 2017  
and at Guernsey, this 19<sup>th</sup> day of December, 2017, in the English language.

**FOR THE STATES OF  
GUERNSEY**



**FOR THE REPUBLIC OF  
SAN MARINO**



