

DECLARATION

I, Selby Thembile HLATI, on behalf of the Competent Authority of the Republic of South Africa, declare that the:

Memorandum of Understanding on the
Exchange of Financial Account Information by the Government of the
State of Qatar for the calendar year 2017
("Memorandum of Understanding")

attached to this Declaration, shall be applicable to the Specified Double Taxation Agreement between the Government of the Republic of South Africa and the Government of the State of Qatar.

By means of the present Declaration, the Competent Authority of the Republic of South Africa is to be considered a signatory of the Memorandum of Understanding with respect to the Competent Authority of the State of Qatar as of

The Memorandum of Understanding will become applicable in respect of the Government of the State of Qatar and the Government of the Republic of South Africa in accordance with paragraph 1 of Section IV of the Memorandum of Understanding.

Signed in on

Memorandum of Understanding
On the Exchange of Financial Account Information
By the Government of the State of Qatar
For the calendar year 2017

Whereas the Government of the State of Qatar (“Qatar”) has Specified Double Taxation Agreements which are or will be in force and effect with the Governments of the jurisdictions listed in Annex 1 to this Memorandum of Understanding (the “Other Jurisdictions”) that permit the exchange of financial account information collected by Qatar pursuant to the OECD/G20 Common Reporting Standard (“CRS”);

Whereas Qatar requires its Financial Institutions to provide CRS information on all non-resident Account Holders and Controlling Persons with respect to the calendar year 2017 and intends to exchange such CRS information with the Other Jurisdictions;

Whereas Qatar and the Other Jurisdictions acknowledge that the international legal framework pursuant to the Convention on Mutual Administrative Assistance in Tax Matters and the Multilateral Competent Authority on Automatic Exchange of Financial Account Information (“CRS MCAA”) is not yet in force for Qatar until early 2019 and that therefore the exchanges of 2017 CRS information by Qatar is to take place under the relevant Specified Double Taxation Agreements, in order for such exchanges to be carried out in 2018;

Now, therefore, the Competent Authority of Qatar and the Competent Authorities of the Other Jurisdictions have agreed as follows:

I. Definitions

1. For the purposes of this Memorandum of Understanding, capitalised terms not otherwise defined in this Memorandum of Understanding shall have the meaning given to them in paragraph Section 1 of the CRS MCAA. Paragraph 2 of Section 1 of the CRS shall apply mutatis mutandis to this Memorandum of Understanding.
2. Specified Double Taxation Agreements shall mean the Double Taxation Agreements concluded by the Government of Qatar with the Governments of the Other Jurisdictions listed in Annex 1 to this Memorandum of Understanding.

II. Exchange of CRS information for the calendar year 2017

1. Pursuant to the exchange of information provisions of the Specified Double Taxation Agreements, the Competent Authority of Qatar will exchange with the Competent Authorities of the Other Jurisdictions, the CRS information for the calendar year 2017, as specified in paragraph 2 of Section 2 of the CRS MCAA. When transmitting the information, the Competent Authority of Qatar will ensure that paragraphs 1 and 2 of Section 3 of the CRS MCAA are observed
2. The Competent Authority of Qatar will exchange the CRS information in relation to the calendar year 2017 through the OECD Common Transmission System using the CRS XML Schema.

3. The Competent Authority of each Other Jurisdiction will notify the Competent Authority of Qatar when the first-mentioned Competent Authority has reason to believe that an error may have led to incorrect or incomplete information reporting or there is non-compliance by a Reporting Financial Institution with the applicable reporting requirements and due diligence procedures consistent with the CRS. The Competent Authority of Qatar will take all appropriate measures available under its domestic law to address the errors or non-compliance described in the notice.

III. Confidentiality and Data Safeguards

1. All information exchanged by the Competent Authority of Qatar is subject to the confidentiality rules and other safeguards provided for in the relevant Specified Double Taxation Agreement, including the provisions limiting the use of the information exchanged.
2. To the extent permitted under applicable law, the Competent Authority of an Other Jurisdiction will immediately notify the Competent Authority of Qatar regarding any cases of non-compliance with the rules set out in paragraph 1 of this Section, including any remedial actions, as well as any measures taken in respect of non-compliance with the above-mentioned paragraph.

IV. Term

1. This Memorandum of Understanding will be in effect between the Competent Authority of Qatar and the Competent Authority of the Other Jurisdiction concerned on the later of the following dates: (a) the date on which the second of the two Competent Authorities has notified the other Competent Authority by a written and signed declaration to confirm that this Memorandum of Understanding is to apply to the relevant Specified Double Taxation Agreement; and (b) the date on which the relevant Specified Double Taxation Agreement has entered into force and is in effect.
2. The Competent Authority of Qatar will notify its declaration pursuant to paragraph 1 of this Section to the Competent Authority of each of the Other Jurisdictions with respect to which it has signed such a declaration.
3. The Competent Authority of each of the Other Jurisdictions will notify its declaration pursuant to paragraph 1 of this Section to the Competent Authority of Qatar.
4. In any case, the applicability of this Memorandum of Understanding will cease with respect to all Specified Double Taxation Agreements on 1 February 2019.

ANNEX 1

SPECIFIED DOUBLE TAXATION AGREEMENTS

1. Austria
2. Bulgaria
3. China
4. France
5. Greece
6. Greenland
7. Guernsey
8. Hong Kong (China)
9. Hungary
10. India
11. Indonesia
12. Ireland
13. Isle of Man
14. Italy
15. Japan
16. Jersey
17. South Korea
18. Latvia
19. Luxembourg
20. Malaysia
21. Malta
22. Mauritius
23. Mexico
24. Monaco
25. The Netherlands
26. Norway
27. Poland
28. Portugal
29. Russia
30. San Marino
31. Seychelles
32. Singapore
33. Slovenia
34. South Africa
35. Spain
36. Sweden
37. Switzerland
38. Turkey
39. United Kingdom