

**Memorandum of Understanding Regarding the Agreement between the Government of the United States of America and the Government of the Republic of Colombia to Improve International Tax Compliance and to Implement the Automatic Exchange of Information with respect to FATCA**


At the signing today of the Agreement between the Government of the United States of America and the Government of the Republic of Colombia to Improve International Tax Compliance and to Implement the Automatic Exchange of Information with respect to FATCA (hereafter referred to as "the Agreement"), representatives of the Government of the United States of America and the Government of the Republic of Colombia wish to confirm their understanding of the following:

It is understood that, in the case of securities registered in a Colombian Central Securities Depository that are held by or through one or more other Financial Institutions, the relevant Financial Accounts are to be treated as held by such other Financial Institutions, and such other Financial Institutions are to be responsible for any reporting required with respect to such Financial Accounts. Nonetheless, in accordance with paragraph 3 of Article 5 of the Agreement, the Colombian Central Securities Depository may report on behalf of such other Financial Institutions.

Signed at Bogotá D.C., in duplicate, in the English and Spanish languages, this 20 day of May, 2015.

For the Government of the United States  
of America:

For the Government of  
the Republic of Colombia:



**Kevin Whitaker**  
Ambassador of the United States to  
Colombia



**Mauricio Cárdenas Santamaría**  
Minister of Finance and Public Credit