

WORKING AGREEMENT

BETWEEN THE STATE REVENUE SERVICE OF THE REPUBLIC OF LATVIA, THE DIRECTORATE-GENERAL OF THE TAX AND CUSTOMS ADMINISTRATION OF THE NETHERLANDS AND THE DIRECTORATE-GENERAL FOR TAX AND CUSTOMS POLICY AND LEGISLATION OF THE NETHERLANDS ON SPONTANEOUS EXCHANGE OF INFORMATION

The Convention between the Republic of Latvia and the Kingdom of the Netherlands for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and on capital was signed on the 14th of March, 1994, in The Hague and entered into force on the 29th of January, 1995. Article 28 of the Convention provides for the following: the competent authorities of the Contracting States shall exchange such information as is necessary for carrying out the provisions of this Convention or of the domestic laws of the Contracting States concerning taxes covered by the Convention insofar as the taxation thereunder is not contrary to the Convention. The exchange of information is not restricted by Article 1.

In order to achieve more efficiency in the exchange of information and to reach the objective of the prevention of the evasion in the field of taxes provided for in the abovementioned Convention, the State Revenue Service of the Republic of Latvia, the Directorate-General of the Tax and Customs Administration of the Netherlands and the Directorate-General for Tax and Customs Policy and Legislation of the Netherlands have agreed as follows:

1. The competent authority of each Contracting State shall supply, without any specific request, the competent authority of the other Contracting State with information concerning residents of the other Contracting State, which could be of interest for the correct assessment of taxes on income of said residents. The provisions of Articles 28 and 30 of the Convention between Latvia and the Netherlands, shall especially apply with respect to secrecy, reciprocity and the limits to the exchange of information.
2. The information shall include the payments made, directly or indirectly, by a resident of one Contracting State to a resident of the other Contracting State, consisting of dividends, interests, royalties, directors' fees, independent personal services, commissions and similar payments.
3. The competent authorities of the Contracting States shall inform each other about their methods of collecting, utilization and information exchange in order to use this Agreement appropriately.
4. The information shall be provided in English.
5. If the information provided is found to be incorrect or incomplete, the competent authority shall make this known as soon as possible.
6. Any information spontaneously exchanged between Latvia and the Netherlands shall be routed between the persons designated as competent authorities by Latvia and the Netherlands.
7. For the purpose of this Working Agreement the competent authorities are:
 - In Latvia: the State Revenue Service of the Republic of Latvia, 1 Smilšu Street, Riga, LV-1978, Latvia;
 - In the Netherlands: the Fiscal Information and Investigation Service/Economic Investigation Service. Postal address: FIOD-ECD/Haarlem/Internationaal, Postbus 1603, 2003 BR Haarlem, the Netherlands.
8. This Working Agreement will come into effect on the date of its signature.
9. This Working Agreement may be modified at any time by mutual written arrangement between the signatories. All such modifications shall be introduced as special protocols that will form an integral part of the Working Agreement.
10. This Working Agreement is concluded for an indefinite period of time. It may be terminated by written notification by either signatory and shall cease to be operative immediately after such notice has been received.

Valsts ieņēmumu dienests
Juridiskā pārvalde

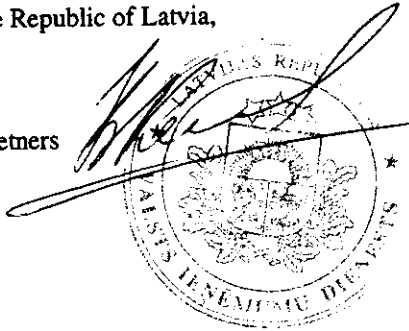
"Sanemts"
2005.12.29. ar quisto

Done in duplicate in the English language.

Riga, *15 august 2003*

For the State Revenue Service
of the Republic of Latvia,

K. Ketners



The Hague, **30 JULI 2003**

For the Directorate-General of the
Tax and Customs Administration of the Netherlands,

H. Neppérus

A handwritten signature in black ink, consisting of a stylized 'H' followed by a long horizontal line that curves upwards at the end.

For the Directorate-General for Tax
and Customs Policy and Legislation of the Netherlands,

P. Vlaanderen

A handwritten signature in black ink, starting with a large loop and ending in a long horizontal line.