

**MEMORANDUM OF UNDERSTANDING
BETWEEN
THE COMPETENT AUTHORITY OF THE ARGENTINE REPUBLIC
AND
OF THE REPUBLIC OF ESTONIA
ON AUTOMATIC EXCHANGE OF INFORMATION FOR TAX PURPOSES**

PREAMBLE

The Competent Authorities of the Argentine Republic and the Republic of Estonia desiring to foster mutual assistance, hereby declare as follows:

GENERAL

Article 1

On the basis of Articles 6 and 24.1 of the Convention on Mutual Administrative Assistance in Tax Matters of 25 January 1988, developed by the Organisation for Economic Co-operation and Development (OECD) and the Council of Europe as amended by the Protocol opened for signature on 27 May 2010 (hereinafter referred to as “the Convention”), and in accordance with this Memorandum of Understanding, the Competent Authorities of the Argentine Republic and the Republic of Estonia shall endeavour to automatically provide each other with the information referred to in Article 3 regarding persons resident in one or both States.

Article 2

This Memorandum of Understanding shall apply to taxes as provided for under the terms of the Convention.

EXCHANGE OF INFORMATION

Article 3

1. The Competent Authority of each State shall, to the extent possible on the basis of the information available, supply automatically to the Competent Authority of the other State information in respect of the following types of income:

- a) income from immovable property;
- b) international transport;
- c) dividends;
- d) interest;
- e) royalties;
- f) capital gains;
- g) income from independent personal services;
- h) wages, salaries and other similar remuneration in respect of employment;

- i) directors' fees and other similar payments;
- j) income derived by artists and sportspersons;
- k) pensions, including public pensions;
- l) other income.

The categories referred to in the preceding items shall be interpreted according to the meaning given to those categories in the OECD Model Tax Convention on Income and on Capital.

2. The Competent Authorities may agree by an exchange of letters to add other categories to the list of information to be automatically exchanged, and will, in any case, review the information being provided no less than every two years.

TERMS AND CONDITIONS

Article 4

With respect to the automatic exchange of information provided in this Memorandum of Understanding, the provisions of the Convention regarding protection of personal data and limits to the obligation to provide assistance, as well as secrecy, are fully applicable.

Article 5

1. The information referred to in Article 3 of this Memorandum of Understanding shall, as much as possible, be presented in a format according to the OECD standard format of transmission. This information shall be provided electronically using AES 256 bit encryption.

2. This information shall include, as much as possible, the Name, the Date and Place of Birth, the Address in the residence country and the Tax Identification Numbers (TINs) in the residence and source country of the non-resident recipients of income and/or any other information which allows to properly identify the person to whom it relates.

Article 6

1. If the information provided by the Competent Authority as part of the automatic exchange of information is found to be incorrect or incomplete, the Competent Authority shall make this known as quickly as possible to the other Competent Authority. Feedback should be provided whenever useful to the sending Competent Authority. The same procedure shall apply to technical problems or difficulties in the conversion of the data provided.

2. The Competent Authorities will consult each other and endeavour to resolve any difficulties in the implementation of this Memorandum of Understanding.

Article 7

1. The information referred to in Article 3 shall be provided periodically, at least once per calendar year, to:

- in the Argentine Republic: the Federal Administration of Public Revenue (Administración Federal de Ingresos Públicos).
- in the Republic of Estonia: Estonian Tax and Customs Board.

For the purposes set forth in paragraph 1 of this Article, information related to the identification and contact details of the Competent Authorities indicated in this Article will be the one available on the OECD Competent Authorities secure website.

2. The information related to a particular calendar year shall be forwarded as soon as possible within the year following the calendar year at issue.

3. Any communication between the Competent Authorities shall be carried out with a courtesy translation in English language.

AMENDMENTS

Article 8

This Memorandum of Understanding may be modified at any time by mutual written agreement between the Competent Authorities.

ENTRY INTO FORCE AND TERMINATION

Article 9

1. This Memorandum of Understanding shall enter into force on the later of the two signature dates and apply to the administrative assistance related to fiscal years commencing on or after January 1st, 2021.

2. This Memorandum of Understanding may be terminated by either of the Competent Authorities by means of a written notification to the other Competent Authority. This termination shall take effect on the first day of the month following the date of notification written by either Competent Authority.

Article 10

This Memorandum of Understanding may be cited as the "Memorandum of Understanding between the Competent Authorities of the Argentine Republic and the Republic of Estonia on Automatic Exchange of Information for Tax Purposes".

Done in duplicate, in the Spanish and English languages, each version being equally authentic. In case of any divergence of interpretation of this Memorandum of Understanding, the English text shall prevail.

Raigo Uukkivi

Director General

Estonian Tax and Customs Board

Competent Authority of the
Republic of Estonia

Tallinn, Estonia

Carlos Daniel Castagneto

Federal Administrator

Federal Administration of Public
Revenue

Competent Authority of the
Argentine Republic

Buenos Aires, Argentina