

The information presented in this visualisation comes from the published agreements – both bilateral and multilateral – which during the periods covered by the dataset have been in force between governments around the world. These are agreements for governments to send or exchange, automatically (without having to be asked), information about money owned by another country's nationals in their financial institutions such as banks.

There are five sets of such agreements. They cover different types of information about assets and/or income held overseas by a country's nationals, and different modalities of information exchange. The dataset includes all five sets of agreements, as of 4 July 2017. In chronological order, they are:

1. **The EU Savings Tax Directive** (Directive 2003/48/EC of 3 June 2013), and a body of associated agreements with third countries and jurisdictions dependent on EU member states;
2. **The EU Directive on Administrative Cooperation in the Field of Taxation** (Directive 2014/107/EU amending Directive 2011/16/EU), and subsequent amendments, which effectively replaced the EU Savings Tax Directive;
3. **The U.S. Foreign Account Tax Compliance Act (FATCA)**, under which many governments have signed Intergovernmental Agreements (IGAs) since 2013 to provide information to the U.S. (and in some cases to receive some information in return);
4. The so-called '**son of FATCA**': IGA's agreed between the UK and various UK-linked jurisdictions (Crown Dependencies and Overseas Territories) since 2014;
5. **The Common Reporting Standard (CRS)**: a standard for information exchange designed by the OECD, and the basis for bilateral agreements between a range of different countries since 2015 to exchange information on the basis of a 2014 agreement between state parties to the Convention on Mutual Administrative Assistance in Tax Matters.

The political reality of these agreements is stark. Three of the five sets of agreements involve only European or European-linked jurisdictions. Agreements signed under FATCA involve a range of developing countries, but in many cases they require the U.S. to provide no or little information in return for the counterpart country providing a large scope of information.

Finally: the CRS agreements bring together wealthy countries, most large developing economies like India and Brazil, and some smaller developing economies. Under the CRS, however, participants can pick and choose which other countries in the arrangement they will exchange information with. Several major secrecy jurisdictions with significant foreign assets in their banks have only picked wealthy countries with which to exchange information. Poorer and less politically powerful countries are often left out in the cold.

For instance, over 100 jurisdictions are in the CRS framework, including 22 middle-income countries (though no low-income countries as yet). Switzerland, whose banks have historically held significant amounts of undeclared assets from wealthy individuals in the developing world, has agreed to exchange information so far with just 9 high-income jurisdictions under the CRS (plus the members of the European Union under a separate but comparable EU agreement). **So far Switzerland has**

agreed to exchange information with not a single one of the 22 middle-income countries participating in the framework.<sup>1</sup>

Countries within the CRS framework with which Switzerland has agreed to exchange information	Countries within the CRS framework with which Switzerland has NOT agreed to exchange information
Australia, Canada, Guernsey, Iceland, Isle of Man, Japan, Jersey, Norway, South Korea  + European Union members	Albania, Andorra, Anguilla, Antigua and Barbuda, Argentina, Aruba, Bahrain, Barbados, Belize, Bermuda, Brazil, BVI, Cayman Islands, Chile, China, Colombia, Cook Islands, Costa Rica, Curacao, Faroe Islands, Ghana, Greenland, Grenada, India, Indonesia, Israel, Kuwait, Lebanon, Liechtenstein, Malaysia, Marshall Islands, Mauritius, Mexico, Monaco, Montserrat, Nauru, New Zealand, Nigeria, Niue, Pakistan, Russian Federation, Saint Kitts & Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, San Marino, Saudi Arabia, Seychelles, Sint Maarten, South Africa, Turkey, Turks & Caicos Islands, UAE, Uruguay

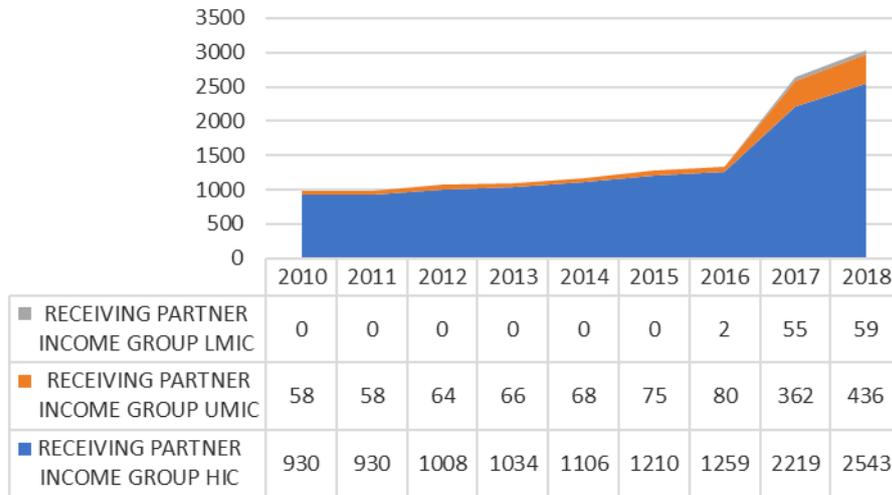
Source: OECD, list of signatories to MCAA and 'activated exchange agreements' under the MCAA, <http://www.oecd.org/tax/automatic-exchange/international-framework-for-the-crs/>

Globally this information apartheid is replicated. None of the world's 31 low-income economies is the recipient of any automatic information exchange; and just 21 of the world's 109 middle-income economies. 55 of the world's 78 high-income economies receive such information. Numerically, the number of bilateral exchange relationships involving developing economies is growing, but still dramatically smaller than those involving high-income economies:

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<sup>1</sup> Switzerland has agreed to exchange information with two upper-middle income countries – Bulgaria, Croatia and Romania – but only in their capacity as members of the EU, with which Switzerland has signed a multilateral agreement.

Number of AEOI exchange relationships by income group of the data-receiving country



The United States is the overwhelming winner from global tax information exchange, being on the receiving end of more than twice as many information-exchange arrangements as the next-best-informed country, Belgium. European countries come next, with some larger developing economies towards the lower end of the rankings:

### Number of exchange relationships by receiving country, 2017

