Protocol

to the Agreement between the Government of the Italian Republic and the Government of the Principality of Liechtenstein on the exchange of information on tax matters

At the signing today of the Agreement between the Government of the Italian Republic and the Government of the Principality of Liechtenstein (the "Contracting Parties") for the Exchange of Information in Tax Matters ("the Agreement"), the undersigned have agreed that the following provisions shall form an integral part of the Agreement.

- 1. With reference to Article 6, paragraph 1 of the Agreement, it is understood that the provisions thereunder shall have effect as of the date when Liechtenstein notifies in writing the entry into force of domestic provisions allowing representatives of the Italian competent authority to enter Liechtenstein's territory for the purposes of the tax examinations abroad.
- 2. With reference to Article 12, the Contracting Parties agree that the language in paragraph 2 is intended to include, but is not limited to, the provision of information on account balances (or values) generated as from the date of signature of the Agreement and maintained at a financial institution located in one of the Contracting Parties.
- 3. Formal communications, including requests for information, made in connection with or pursuant to the provisions of this Agreement entered into will be in writing directly to the competent authority of the other Contracting Party at the addresses given below, or such other address as may be notified by one Contracting Party to the other from time to time. Any subsequent communications regarding requests for information will be in writing between the earlier mentioned competent authorities or their authorised entities, whereas the possibility of direct consultation is being given.

Competent Authority for the Principality of Liechtenstein: Fiscal Authority
Heiligkreuz 8
P.O. Box 684
9490 Vaduz
Liechtenstein

Competent Authority for Italy: Ministry of Economy and Finance Director General of Finance Department of Finance Via dei Normanni 5 00184 Roma (Italy)

In witness whereof the undersigned, being duly authorised thereto by their respective Governments, have signed this Protocol.

Done at Rome this 26th day of February 2015, in duplicate, in the Italian, German and English languages, each text being equally authentic. In case of diversion of interpretation the English text shall prevail.

For the Government of the Italian Republic

For the Government of the Principality of Liechtenstein

