



No. 26/2011

The Federal Department of Finance of the Swiss Confederation presents its compliments to the Financial Services and the Treasury Bureau of the Government of the Hong Kong Special Administrative Region of the People's Republic of China ("HKSAR") and has the honour to refer to the Agreement between the Swiss Federal Council and the Government of the Hong Kong Special Administrative Region of the People's Republic of China for the Avoidance of Double Taxation with respect to Taxes on Income signed in Hong Kong on 6 December 2010 ("the 2010 Agreement").

In view of the fact that following the signature of the 2010 Agreement, it was considered that important modifications to certain provisions of the 2010 Agreement needed to be made, and as such both Signatories to the 2010 Agreement have signed today a new agreement for the avoidance of double taxation with respect to taxes on income, the Federal Department of Finance has the further honour to propose that the 2010 Agreement be abrogated as of today.

If the above is acceptable to the Government of the HKSAR, the Federal Department of Finance has the further honour to propose that this Note and a note in reply from the Financial Services and the Treasury Bureau shall confirm that the 2010 Agreement is thereby replaced and abrogated as of today.

The Federal Department of Finance of the Swiss Confederation avails itself of this opportunity to renew to the Financial Services and the Treasury Bureau of the Government of the Hong Kong Special Administrative Region of the People's Republic of China the assurance of its highest consideration.

Hong Kong, 4th October 2011

The Financial Services and the Treasury Bureau of the Government of
the Hong Kong Special Administrative Region of the People's Republic of China

財經事務及庫務局

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By hand

4 October 2011

The Financial Services and the Treasury Bureau of the Government of the Hong Kong Special Administrative Region of the People's Republic of China ("HKSAR") presents its compliments to the Federal Department of Finance of the Swiss Confederation and has the honour to refer to the Note of the Federal Department of Finance dated today which reads as follows:

"The Federal Department of Finance of the Swiss Confederation presents its compliments to the Financial Services and the Treasury Bureau of the Government of the Hong Kong Special Administrative Region of the People's Republic of China ("HKSARG") and has the honour to refer to the Agreement between the Swiss Federal Council and the Government of the Hong Kong Special Administrative Region of the People's Republic of China for the Avoidance of Double Taxation with respect to Taxes on Income signed in Hong Kong on 6 December 2010 ("the 2010 Agreement").

In view of the fact that following the signature of the 2010 Agreement, it was considered that important modifications to certain provisions of the 2010 Agreement needed to be made, and as such both Signatories to the 2010 Agreement have signed today a new agreement for the avoidance of double taxation with respect to taxes on income, the Federal Department of Finance has the further honour to propose that the 2010 Agreement be abrogated as of today.

If the above is acceptable to the Government of the HKSAR, the Federal Department of Finance has the further honour to propose that this Note and a note in reply from the Financial Services and the Treasury Bureau shall confirm that the 2010 Agreement is thereby replaced and abrogated as of today.

The Federal Department of Finance of the Swiss Confederation avails itself of this opportunity to renew to the Financial Services and the Treasury Bureau of the Government of the Hong Kong Special Administrative Region of the People's Republic of China the assurance of its highest consideration.”

The Financial Services and the Treasury Bureau has the further honour to inform that the above proposal by the Federal Department of Finance is acceptable to the Government of the HKSAR, and to confirm that the Note of the Federal Department of Finance dated today and this Note in reply shall confirm that the Agreement between the Government of the HKSAR and the Swiss Federal Council for the Avoidance of Double Taxation with respect to Taxes on Income signed in Hong Kong on 6 December 2010 is thereby replaced and abrogated as of today.

The Financial Services and the Treasury Bureau of the Government of the Hong Kong Special Administrative Region of the People's Republic of China avails itself of this opportunity to renew to the Federal Department of Finance of the Swiss Confederation the assurance of its highest consideration.

The Federal Department of Finance of the Swiss Confederation