## Memorandum of Understanding

At the signing today of the Agreement Between the Government of the United States of America and the Government of Chile to Improve International Tax Compliance and to Implement FATCA (hereinafter the "Agreement"), the representatives of the United States of America and Chile wish to confirm their understanding of the following:

In reference to subparagraph 2 of paragraph B of Section III of Annex II of the Agreement:

With respect to Local Banks, it is understood that Chilean credit unions that receive deposits from non-members would be included in the definition of Local Bank if such credit unions satisfy the requirements set forth in subparagraphs (B)(1) through (B)(5) of Section III of Annex II of the Agreement.

In reference to paragraph B of Section II of Annex II of the Agreement:

It is understood that any pension scheme or fund administrated by the *Instituto de Previsión Social* and the social security system created by Decree Law 3500 (D.L. 3500) would be included in the definition of a Broad Participation Retirement Fund.

In reference to paragraph A of Section V of Annex II of the Agreement:

It is understood that *Cuentas de Ahorro para el Arrendamiento de Viviendas con Promesa de Compraventa* (SAL) accounts described in Law No. 19,280 of 1993 would be excluded from the definition of Financial Accounts and therefore would not be treated as U.S. Accounts, provided that the accounts meet the requirements set forth in subparagraphs (A)(2)(a) through (c) of section V of Annex II and that annual contributions to the account do not exceed \$50,000, applying the rules set forth in Annex I for account aggregation and currency translation.

Signed at Santiags de C this 5th day of March, 2014.	Clule, in duplicate,
this 5th day of March , 2014.	
Signature	Signature
STEPHEN M. LISTON Name	Felipe Lanain B. Name
FOR THE GOVERNMENT OF THE UNITED STATES OF AMERICA:	FOR THE GOVERNMENT OF CHILE: