

**MEMORANDUM OF UNDERSTANDING REGARDING THE AGREEMENT  
BETWEEN THE GOVERNMENT OF THE UNITED STATES OF AMERICA  
AND THE GOVERNMENT OF THE HELLENIC REPUBLIC TO IMPROVE  
INTERNATIONAL TAX COMPLIANCE AND TO IMPLEMENT FATCA**

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

It is understood that, in the case of securities registered in the Bank of Greece (acting as a Central Securities Depository) or in the Central Securities Depository (Dematerialized Securities System Administrator) as defined in article 1 of the law 3756/2009, that are held by or through one or more other Financial Institutions that are not Nonparticipating Financial Institutions, the relevant Financial Accounts would be treated as being held by such other Financial Institutions, and such other Financial Institutions would be responsible for any reporting required with respect to such Financial Accounts. It is understood that the Bank of Greece or the Central Securities Depository may report on behalf of such other Financial Institutions in accordance with paragraph 3 of Article 5 of the Agreement.

Signed at Athens, in duplicate, in the English and Greek languages, this 19 day of January, 2012.

For the Government of the  
United States of America:

For the Government of the  
Hellenic Republic:

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