

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

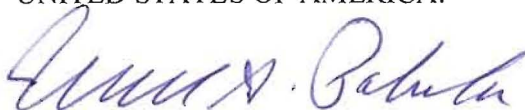
At the signing today of the Agreement Between the Government of the United States of America and the Government of Latvia to Improve International Tax Compliance and to Implement FATCA (hereinafter the "Agreement"), the representatives of the United States of America and Latvia wish to confirm their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

In reference to paragraph 1 of Article 1 (Definitions) of the Agreement, it is understood that, in the case of securities registered in a Latvian Central Securities Depository (Latvijas Centrālais deponitārijs) as defined in part E of the Latvian Securities Market Law (Finanšu instrumentu tirgus likums) 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 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 Central Securities Depository may report on behalf of such other Financial Institutions in accordance with paragraph 3 of Article 5 of the Agreement.

In reference to Section V of Annex II (Accounts Excluded from Financial Accounts), it is understood that accounts held by entities that are considered funds that qualify as exempt beneficial owners under Section II of Annex II are excluded from the definition of Financial Accounts and therefore are not treated as U.S. Reportable Accounts.

Signed at Riga, in duplicate, in the English language, this 27th day of June, 2014.

FOR THE GOVERNMENT OF THE
UNITED STATES OF AMERICA:



FOR THE GOVERNMENT OF THE
REPUBLIC OF LATVIA:

