JOINT DECLARATION

BY THE ISLE OF MAN AND THE CZECH REPUBLIC

Following today's signing of an Agreement for the Exchange of Information relating to Tax Matters, negotiations will continue between the Isle of Man and the Czech Republic on measures to alleviate undesired tax barriers and other obstacles of a discriminatory nature that may be included in the domestic tax legislation of the Parties. In particular, it is the intention of the Parties to commence negotiations to conclude a comprehensive double taxation agreement as soon as possible after today's agreement enters into force.

Done in duplicate at London this 18th day of July 2011 in the English and Czech languages, each text being equally authentic.

FOR THE CZECH REPUBLIC:

FOR THE ISLE OF MAN: