# COMPETENT AUTHORITY AGREEMENT

The competent authorities of Norway and the Netherlands have reached the following mutual agreement regarding the application of the Convention between the Kingdom of the Netherlands and the Kingdom of Norway for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and on Capital signed on January 12$^{th}$,1990 and the related Protocol (hereinafter also referred as: "Norwegian-Netherlands Tax Convention") to investors in closed funds for mutual account ("besloten fonds voor gemene rekening", hereinafter: "closed FGR" or "fund"). This agreement is entered into under Article 26 ("Mutual agreement procedure") of the Norwegian-Netherlands Tax Convention.

This Agreement applies to closed FGRs and umbrella funds consisting of several closed FGRs formed in conformity with the Decree of 11 January 2007, CPP2006/1870M, Dutch. Gov. Gaz. No 15, 2007 or any decree that it replaces.

A closed FGR can act as a pooled investment vehicle for the assets of pension funds and other investors.

The competent authorities of the Netherlands and Norway agree that a closed FGR1 and an umbrella fund consisting of several closed FGRs is transparent for tax purposes.

Since a closed FGR is transparent for tax purposes, all income and gains derived through the fund from the fund assets are allocated to the investors in the closed FGR in proportion to their participations in the fund.

This Competent Authority Agreement will be published in the Dutch Government Gazette (in Dutch: "Staatscourant"). This Agreement will enter into force from the date of signing the Agreement by the competent authorities of Norway and the Netherlands and shall be subject to regular review.

Agreed by the undersigned competent authorities in The Hague on 19 January 2012:


Stig Sollund
Norwegian Competent Authority

Harry Roodbeen
Dutch Competent Authority

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[1] Various translations of 'Fonds voor Gemene Rekening' are possible, such as 'fund for mutual account' or 'fund for joint account'.