

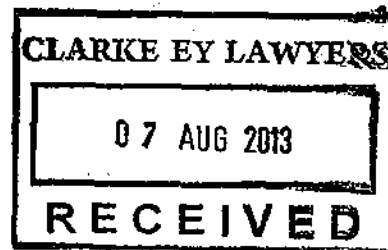


Samoa International Finance Authority

Please address correspondence to
THE CHIEF EXECUTIVE OFFICER

5 August 2013

Ms Fiona Ey
Clarke Ey Lawyers
Lotemau Centre
APIA



Dear Fiona,

**Re : International Swaps and Derivatives Association (ISDA) Request for Advice Regarding
Disclosure Prohibitions**

Reference is made to your letter dated 31 July 2013 attaching a letter from the ISDA dated 29 July regarding the above matter.

The Samoa International Authority (SIFA) is the Authority responsible with the regulation of all international entities in Samoa. International entities include; International Companies, International Trusts, International Insurance Companies, International Banks, International Mutual Funds, Segregated Fund International Companies and International Partnerships and Limited Partnerships. A range of confidentiality and secrecy provisions apply to such entities and arrangements.

Under the International Companies Act 1988 (ICA) certain information regarding international and foreign companies must be kept confidential. This includes ownership and identity information concerning any members, or the legal beneficial interest of any members as well as the company's business, financial or other affairs or transactions, assets or liabilities, or contents of any register maintained by such a company.

With regard to international banks sections 37-39 of the International Banking Act 2005 (IBA) forbids every person who, in its capacity as an officer, employee, authorised agent, or auditor has become aware of information related to international banking business to divulge such information, except when as required by or provided for under the laws of Samoa.

The International Trusts Act 1988 (ITA) and the International Partnership and Limited Partnership Act 1988 (IPLPA) establish secrecy provisions for information concerning the establishment, constitution business undertaking or affairs of an international trust, international partnership or limited partnership unless allowed by these Acts.

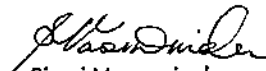
The International Mutual Funds Act 2008 (IMFA) and the International Insurance Act 1988 establish provisions prohibiting any person to disclose information except for purposes of exercising their duties under these Acts or when required to do so by any court of Samoa.

Whilst the legislations referred to contain very specific confidentiality provisions; such confidentiality is not absolute and in the same legislations provisions do exist outlining the specific cases in which information may be disclosed.

We trust that the information provided is of assistance and we request that the information provided is to be used only for the purpose in which it was sought.

Please do not hesitate to contact our Office should we be of further assistance.

Yours sincerely,



Sieni Voorwinden

ACTING CHIEF EXECUTIVE OFFICER