



INTRODUCTION TO TAX INFORMATION EXCHANGE AGREEMENTS (TIEAS) There is a global concern and consensus that offshore tax evasion and avoidance need to be tackled through a co-ordinated action. Yet, information from a foreign country is unlikely to be received on the basis of just letters or a plea regarding their moral obligation to prevent tax evasion and criminal activities. There has to be a legal basis for an obligation on the requested State to part with the information as otherwise it might be challenged in their own Courts and may not have any evidentiary value. Further, in many tax havens and offshore jurisdictions, a substantial part of their economic activities depends on providing financial services to foreign companies and individuals and thus parting with the information may be against their public policy or their citizens' public opinion in absence of a legal obligation to do so. Tax tre.....