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**NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: Code of Conduct Group (Business Taxation)  
– Overview of the preferential tax regimes examined by the Code of  
Conduct Group (Business Taxation) since its creation in March 1998

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Delegations will find attached an updated overview of the preferential tax regimes examined by the Code of Conduct Group (Business Taxation) since its creation in March 1998.

**OVERVIEW OF THE PREFERENTIAL TAX REGIMES EXAMINED BY THE  
CODE OF CONDUCT GROUP (BUSINESS TAXATION) SINCE ITS CREATION IN MARCH 1998**

In paragraph 19 of the 8 March 2016 Council conclusions on the future of the Code of Conduct (business taxation), the Council "*expresses its wish to facilitate the access to information on ongoing and past work in the Group including already public documents, e.g. through a dedicated page on the Council's website and by releasing, to the extent possible, documents related to (...) final decisions on individual measures*".

At the creation of the Code of Conduct Group in 1998, a number of preferential tax regimes were identified through its interim reports to the Council of 12 November 1998 (doc. 4748/98) and 12 May 1999 (doc. 8231/99)<sup>1</sup>. At this occasion, regimes were classified in the following categories:

A - Intra-Group Services (Co-ordination, Distribution and Service Centres; Holdings Regimes);

B - Financial Services and offshore Companies (Financial, Insurance and Offshore Companies);

C - Sector Specific Measures (e.g. Maritime Transport, Aviation, Films);

D - Regional incentives;

E- Other measures;

F - Non EU (MS dependencies and territories);

which translated into specific codes (category letter + 3-digit number) for each regime.

Those measures added in 1999 bear the letters AM - Additional Measures - in their code (AAM, BAM, CAM, DAM, EAM).

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<sup>1</sup> About 150 additional measures were notified in 1999 compared to 1998.

Since then new codes have been used using the 2-letter ISO country code and a 3-digit number reflecting the chronological order by which they had been notified.

As a reminder, the decision-making cycle on individual measures followed by the Code of Conduct Group is as follows:

- i. enactment of a new measure at national level;
- ii. identification by the group or notification<sup>2</sup> to the group by the Member State concerned at the beginning of the following year;
- iii. description agreed by the group (no broad consensus required anymore since March 2016);
- iv. assessment agreed by the group on whether the measure is harmful or not (broad consensus required, i.e. in the case of EU Member States: all Member States except the Member State concerned);
- v. abolition, or amendment of the harmful features, of the national measures deemed harmful;
- vi. notification<sup>3</sup> of the rollback to the group at the beginning of the following year;
- vii. agreement by the group that the rollback proposed is indeed sufficient;
- viii. in cases where the repeal consisted in a closure to new entrants, the end of the benefits may occur some years after ("grandfathering"), which entailed in some cases a follow-up rollback notification.

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<sup>2</sup> See COCG guidance on the notification of tax measures under paragraph E of the Code (doc. 5814/3/18, pages 84-89)

<sup>3</sup> Ibid.

The present overview is organised in three parts:

- i. preferential regimes of EU Member States (including Gibraltar with regard to the UK);
- ii. dependent or associated territories of EU Member States to which EU treaties don't apply (as of the date of notification of the regime);
- iii. other jurisdictions (now covered by the EU listing exercise).

In total, as of the date of the present document, this overview concludes that the COCG has examined 663 preferential regimes (including 280 in 1998-1999), 263 of which were deemed harmful and have been (or are being) rolled back.

## I. Preferential regimes of EU Member States<sup>4</sup>

| <b>MEMBER STATE</b> | <b>PREFERENTIAL TAX REGIMES</b><br>Code by jurisdiction (Code by category)<br>"Name of the regime" | <b>STANDSTILL DATE<sup>5</sup></b> | <b>ASSESSMENT</b>                        | <b>ROLLBACK DATE</b>           |
|---------------------|--|------------------------------------|--|--------------------------------|
| <b>AUSTRIA</b>      | <b>AT001</b> (AAM002b/A017)<br>"Holdings ( <i>Schachtelbegünstigung</i> - intra group relief)"     | 1999                               | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002<br><i>(doc. 14361/03)</i> |
|                     | <b>AT002</b> (A018)<br>"Private foundations ( <i>Stiftungen</i> )"                                 | 1999                               | Not harmful                              |                                |
|                     | <b>AT003</b> (BAM006/B014)<br>"Certain exemptions from corporate tax"                              | 1999                               | Not harmful                              |                                |
|                     | <b>AT004</b> (E029)<br>"Participation Fund Companies"  | 1999                               | Not harmful                              |                                |
|                     | <b>AT005</b> (EAM004/E039)<br>"Investment allowance"   | 1999                               | Not harmful                              |                                |
|                     | <b>AT006</b> (EAM009/E040)<br>"Tax exemptions"   | 1999                               | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002<br><i>(doc. 14361/03)</i> |

<sup>4</sup> Including Gibraltar with regard to the UK: see below.

<sup>5</sup> Date of initial identification by the COCG or later notification by the Member State concerned. Initial identifications: Annex C of doc. 14313/99; in the case of the ten Member States which acceded on 1 May 2004: the Annex to the Enlargement Group (Tax Experts) report of October 2003 (doc. 13213/03); and in the case of the two Member States which acceded on 1 January 2007: the Annex to the report from the Working Party on Enlargement of June 2006 (doc. 10879/06).

|                |   |      |  |  |
|----------------|---|------|--|--|
|                | <b>AT007</b> (CAM007/C026)<br>"R&D Allowance"   | 1999 | Not harmful                              |  |
| <b>BELGIUM</b> | <b>BE001</b> (A001)<br>"Co-ordination Centres"  | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: amended<br><i>(doc. 14812/02)</i><br>2006: amended<br>2011: end of<br>grandfathering<br><i>(doc. 10857/11)</i> |
|                | <b>BE002</b> (A002)<br>"Distribution Centres"   | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: amended<br><i>(doc. 14812/02)</i><br>2005: abolished<br><i>(doc. 9655/06)</i>                                  |
|                | <b>BE003</b> (A003)<br>"Service Centres"  | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: amended<br><i>(doc. 14812/02)</i><br>2005: abolished<br><i>(doc. 9655/06)</i>                                  |
|                | <b>BE004</b> (C012)<br>"Supplementary staff assigned to scientific research and<br>export management" | 1999 | Not harmful                              |  |
|                | <b>BE005</b> (C020)<br>"Investment Deductions"  | 1999 | Not harmful                              |  |

|  |      |  |                                      |
|--|------|--|--------------------------------------|
| <b>BE006</b> (D001)<br>"Employment and (T) Zones"  | 1999 | Not harmful                              |                                      |
| <b>BE007</b> (D002)<br>"Incentives for Investment in Certain Regions"  | 1999 | Not harmful                              |                                      |
| <b>BE008</b> (D003)<br>"Re-Conversion Zones"   | 1999 | Not harmful                              |                                      |
| <b>BE009</b> (E001)<br>"US Foreign Sales Corporations Ruling"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2004<br><i>(doc. 14361/03)</i>       |
| <b>BE010</b> (E002)<br>"Informal Capital Ruling"   | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002<br><i>(doc. 14361/03)</i>       |
| <b>BE011</b> (AAM010/A019)<br>"Holdings"   | 1999 | Not harmful                              |                                      |
| <b>BE012</b> (EAM001/E041)<br>"Investment funds"   | 1999 | Not harmful                              |                                      |
| <b>BE013</b> (Z001)<br>"Measure aimed at determining the level of taxation of foreign companies operating in Belgium, without legal personality or probative accounts" | 1999 | Not harmful                              |                                      |
| <b>BE014</b><br>"Patent Income Deduction (PID)" (old patent box)   | 2008 | Not assessed<br><i>(doc. 16084/1/08)</i> | 30/06/2021: end<br>of grandfathering |

|                 |   |      |  |  |
|-----------------|---|------|--|--|
|                 | <b>BE015</b><br>"Profit Participating Loan"   | 2008 | Not assessed<br><i>(doc. 10200/1/09)</i>   |  |
|                 | <b>BE016</b><br>"Amended Patent Income Deduction (PID) for small companies"   | 2013 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2016<br><i>(doc. 14750/16)</i>   |
|                 | <b>BE017</b><br>"Patent box" (new patent box)   | 2017 | Not harmful<br><i>(doc. 10047/17)</i>      |  |
|                 | <b>BE018</b><br>"Notional Interest Deduction"   | 2018 | Not harmful<br><i>(doc. 14364/18)</i>      |  |
| <b>BULGARIA</b> | <b>BG001</b><br>"Insurance companies"   | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>   | 2005<br><i>(doc. 10879/06)</i>   |
|                 | <b>BG002</b><br>"Gambling activities"   | 2006 | Not harmful                                |  |
|                 | <b>BG003</b><br>"Telecom companies"   | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>   | 2005<br><i>(doc. 10879/06)</i>   |
|                 | <b>BG004</b><br>"Investment Tax Credit for investors"   | 2006 | Not harmful                                |  |
|                 | <b>BG005</b><br>"Measure under the Foreign Investment Act (50% of the corporate tax due retained for a period of 10 years)" | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>   | 1998: abolished<br>2007: end of grandfathering<br><i>(doc. 10879/06)</i> |



|               |   |      |  |  |
|---------------|---|------|--|--|
|               | <b>BG006</b><br>"Tonnage tax" (Shipping Regime)   | 2006 | Not harmful                              |  |
|               | <b>BG007</b><br>"Amendments to the Investment Tax Credit"   | 2007 | Not assessed<br><i>(doc. 9047/07)</i>    |  |
|               | <b>BG008</b><br>"Introduction of Art. 189a in the Bulgarian Law on Corporate Income Tax"                                | 2009 | Not assessed (repealed in 2010)          |  |
|               | <b>BG009</b><br>"Tax measure under Art. 189b in the Bulgarian Law on Corporate Income Tax" (for agricultural producers) | 2010 | Not assessed<br><i>(doc. 10857/11)</i>   |  |
| <b>CYPRUS</b> | <b>CY001</b><br>"International Business Companies / International Branches"   | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003: abolished<br>2006: end of grandfathering<br><i>(doc. 13213/03)</i> |
|               | <b>CY002</b><br>"Insurance Companies"   | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003: abolished<br>2006: end of grandfathering<br><i>(doc. 13213/03)</i> |
|               | <b>CY003</b><br>"International Financial Services Companies"  | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003: abolished<br>2006: end of grandfathering                           |

|  |      |  |   |                        |
|--|------|--|---|------------------------|
|  |      |  |   | <i>(doc. 13213/03)</i> |
| <b>CY004</b><br>"International Banking Units"                    | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003: abolished<br>2006: end of<br>grandfathering<br><i>(doc. 13213/03)</i> |                        |
| <b>CY005</b><br>"International general and limited partnerships" | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003: abolished<br>2006: end of<br>grandfathering<br><i>(doc. 13213/03)</i> |                        |
| <b>CY006</b><br>"(International) Collective Investment Schemes"  | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003: abolished<br>2006: end of<br>grandfathering<br><i>(doc. 13213/03)</i> |                        |
| <b>CY007</b><br>"Shipping Regime"                                | 2003 | Not harmful                              |   |                        |
| <b>CY008</b><br>"Capital gains"                                  | 2003 | Not harmful                              |   |                        |
| <b>CY009</b><br>"Foreign income"                                 | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003<br><i>(doc. 13213/03)</i>  |                        |
| <b>CY010</b><br>"Export of services"                             | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2003: abolished<br>2006: end of   |                        |

|  |      |                                     |      |   |
|--|------|-------------------------------------|------|---|
|  |      |                                     |      | grandfathering<br>(doc. 13213/03)                       |
| <b>CY011</b>   | 2003 | Not harmful                         |      |   |
| "Companies listed at the Cyprus Stock Exchange (CSE)"                                      |      |                                     |      |   |
| <b>CY012</b>   | 2003 | <b>HARMFUL</b><br>(doc. 13213/03)   | 2003 | (doc. 13213/03)   |
| "Export of goods"  |      |                                     |      |   |
| <b>CY013</b>   | 2003 | Not harmful                         |      |   |
| "Co-operative societies"   |      |                                     |      |   |
| <b>CY014</b>   | 2003 | Not harmful                         |      |   |
| "Auxiliary tourist buildings or projects"  |      |                                     |      |   |
| <b>CY015</b>   | 2003 | Not harmful                         |      |   |
| "Holdings" (treatment of foreign dividend)   |      |                                     |      |   |
| <b>CY016</b>   | 2003 | Not harmful                         |      |   |
| "Foreign Branches"   |      |                                     |      |   |
| <b>CY017</b>   | 2010 | Not assessed<br>(doc. 16766/10)     |      |   |
| "Change in the legislation regarding taxation of interest and the participation exemption" |      |                                     |      |   |
| <b>CY018</b>   | 2013 | <b>HARMFUL</b><br>(doc. 16553/1/14) | 2016 | (doc. 14750/16)<br>30/06/2021: end<br>of grandfathering |
| "Intellectual Property tax" (old patent box)   |      |                                     |      |   |

|                           |  |      |  |                               |
|---------------------------|--|------|--|-------------------------------|
|                           | <b>CY019</b><br>"Patent box " (new patent box)   | 2017 | Not harmful<br><i>(doc. 10047/17)</i>    |                               |
|                           | <b>CY020</b><br>"Notional interest deduction"  | 2018 |  |                               |
| <b>CZECH<br/>REPUBLIC</b> | <b>CZ001</b><br>"Investment incentives"  | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2004<br><i>(doc. 9427/05)</i> |
| <b>GERMANY</b>            | <b>DE001 (C002)</b><br>"Shipping Regime - Tonnage Tax"   | 1999 | Not harmful                              |                               |
|                           | <b>DE002 (C021)</b><br>"Special Allowances - Agriculture and Forestry"                               | 1999 | Not harmful                              |                               |
|                           | <b>DE004 (D005)</b><br>"Special Depreciation - Business Investment in former<br>DDR and West Berlin" | 1999 | Not harmful                              |                               |
|                           | <b>DE005 (D006)</b><br>"Investment Grants - Equipment in Former DDR and West<br>Berlin"              | 1999 | Not harmful                              |                               |
|                           | <b>DE006 (D007)</b><br>"Tax Advantages - Commercial Investment in BRD/DDR<br>Border Area Germany"    | 1999 | Not harmful                              |                               |
|                           | <b>DE007 (E010)</b><br>"Special Depreciation for SMEs"   | 1999 | Not harmful                              |                               |

|                |  |      |  |                                |
|----------------|--|------|--|--------------------------------|
|                | <b>DE008</b> (E022)<br>"Rollover of Capital Gains"   | 1999 | Not harmful                              |                                |
|                | <b>DE009</b> (E031)<br>"Limits on Taxes on Commercial Income"  | 1999 | Not harmful                              |                                |
|                | <b>DE010</b> (AAM019/A021)<br>"Control and coordination centres of foreign companies in Germany"             | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2001<br><i>(doc. 14812/02)</i> |
|                | <b>DE011</b> (AAM020/A022)<br>"Holding companies"  | 1999 | Not harmful                              |                                |
|                | <b>DE012</b> (B015)<br>"Schwankungsruckstellungen (provision for fluctuation in insurance and re-insurance)" | 1999 | Not harmful                              |                                |
|                | <b>DE013</b> (CAM015/D027)<br>"Investor model/film funds"  | 1999 | Not harmful                              |                                |
|                | <b>DE014</b> (CAM016/D028)<br>"Rules for self-generated intangibles"   | 1999 | Not harmful                              |                                |
| <b>DENMARK</b> | <b>DK001</b> (C001)<br>"Early depreciation for vessels"  | 1999 | Not harmful                              |                                |
|                | <b>DK002</b> (D004)<br>"Enterprise Zones"  | 1999 | Not harmful                              |                                |

|                |   |      |  |  |
|----------------|---|------|--|--|
|                | <b>DK003</b> (E005)<br>"Foreign business Operations Relief"               | 1999 | Not harmful                              |  |
|                | <b>DK004</b> (E014)<br>"Scheme for Early Depreciation of Certain Assests" | 1999 | Not harmful                              |  |
|                | <b>DK005</b> (AAM021/A023)<br>"Holding Companies"                         | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2001<br><i>(doc. 14812/02)</i>   |
| <b>ESTONIA</b> | <b>EE001</b><br>"New Investment Funds Act"                                | 2018 | Out of scope<br><i>(doc. 9637/18)</i>    |  |
| <b>GREECE</b>  | <b>EL001</b> (B011)<br>"Offices of Foreign Companies (Law 89/67 Offices)" | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: abolished<br><i>(doc. 8848/02)</i><br>2006: end of<br>grandfathering<br><i>(doc. 14812/02)</i> |
|                | <b>EL002</b> (C003)<br>"Ship management Offices"                          | 1999 | Not harmful                              |  |
|                | <b>EL003</b> (C004)<br>"Shipping Regime"                                  | 1999 | Not harmful                              |  |
|                | <b>EL004</b> (C017)<br>"Exports Incentives and Incentives for Mass Media" | 1999 | Not harmful                              |  |
|                | <b>EL005</b> (E015)<br>"Incentives for Investment (Law 2601/98)"          | 1999 | Not harmful                              |  |

|  |      |   |  |
|--|------|---|--|
| <b>EL006</b> (E024)<br>"Small Islands Income Tax Reduction"  | 1999 | Not harmful                             |  |
| <b>EL007</b> (E026)<br>"Mutual Funds/Portfolio Investment Companies"                                     | 1999 | Not harmful                             |  |
| <b>EL008</b> (E032) (duplicate entry see E026)<br>"Fixed Tax - Transferable Securities"                  | 1999 | Not harmful                             |  |
| <b>EL009</b> (BAM31/B017)<br>"Business share capital companies (Law 2367/1995, art.5)"                   | 1999 | Not harmful                             |  |
| <b>EL010</b> (BAM034/B018)<br>"Long term loans in foreign currency"                                      | 1999 | Not harmful                             |  |
| <b>EL011</b> (EAM033/E42)<br>"Large scale product-line investments financed with Greece foreign capital" | 1999 | Not harmful                             |  |
| <b>EL012</b> (EAM035/E43)<br>"National infrastructure"   | 1999 | Not harmful                             |  |
| <b>EL013</b><br>"Tax Incentives for Development"   | 2004 | Not assessed<br>(abolished before)      |  |
| <b>EL014</b><br>"Tax Incentives for Investment"  | 2005 | Not assessed<br>( <i>doc. 9427/05</i> ) |  |
| <b>EL015</b><br>"Patent tax incentive"   | 2018 | Not harmful, but<br>annual monitoring   |  |

|              |   |      |  |   |
|--------------|---|------|--|---|
|              |   |      | <i>(doc. 9637/18)</i>                    |   |
| <b>SPAIN</b> | <b>ES001</b> (A004)<br>"Basque Country - Co-ordination Centres"         | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002<br><i>(docs. 8848/02<br/>and 14812/02)</i> |
|              | <b>ES002</b> (A005)<br>"Navarra - Co-ordination Centres"                | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002<br><i>(docs. 8848/02<br/>and 14812/02)</i> |
|              | <b>ES003</b> (A011)<br>"Holding Companies (ETVE)"                       | 1998 | Not harmful                              |   |
|              | <b>ES004</b> (C022)<br>"Incentives for Mining Enterprises"              | 1999 | Not harmful                              |   |
|              | <b>ES005</b> (D008)<br>"Canary Islands - Economic and Tax Regime (REF)" | 1999 | Not harmful                              |   |
|              | <b>ES006</b> (D009)<br>"Basque Country - Start Up Relief"               | 1999 | Not harmful                              |   |
|              | <b>ES007</b> (D010)<br>"Navarra - Start Up Relief"                      | 1999 | Not harmful                              |   |
|              | <b>ES008</b> (D011)<br>"Regional Development Companies"                 | 1999 | Not harmful                              |   |
|              | <b>ES009</b> (E011)<br>"Incentives for SMEs"                            | 1999 | Not harmful                              |   |



|   |      |  |   |
|---|------|--|---|
| <b>ES010</b> (E016)<br>"Investment Tax Credits"   | 1999 | Not harmful                                |   |
| <b>ES011</b> (E027)<br>"Venture Capital Funds and Companies"  | 1999 | Not harmful                                |   |
| <b>ES012</b> (E033)<br>"Representative Office"  | 1999 | Not harmful                                |   |
| <b>ES013</b> (BAM023/B016)<br>"Banks and finance entities"  | 1999 | Not harmful                                |   |
| <b>ES014</b> (DAM022/D023)<br>"50% profit exemption in Ceuta and Melilla"                               | 1999 | Not harmful                                |   |
| <b>ES015</b> (CAM024/C028)<br>"Relief for investments in films and audio-visual productions"            | 1999 | Not harmful                                |   |
| <b>ES016</b> (CAM025/C029)<br>"Investigation and Exploitation of Hydrocarbons"                          | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2003<br><i>(doc. 7018/1/03)</i>                                       |
| <b>ES017</b> (CAM027/C030)<br>"Shipping Regime"   | 1999 | Not harmful                                |   |
| <b>ES018</b><br>"Partial exemption for income from certain intangible assets" (old national patent box) | 2008 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2016<br><i>(doc. 9912/16)</i><br>30/06/2021: end<br>of grandfathering |

|   |      |  |   |                        |
|---|------|--|---|------------------------|
|   |      |  |   | <i>(doc. 14364/18)</i> |
| <b>ES019</b><br>"Basque country (Álava, Guipúzcoa and Vizcaya) - Partial exemption for income from certain intangible assets" (old patent box)                    | 2014 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2016<br><i>(doc. 9912/16)</i><br>30/06/2021: end of grandfathering<br><i>(doc. 14364/18)</i>  |                        |
| <b>ES020</b><br>"Navarra - partial exemption for income from certain intangible assets" (old patent box)  | 2014 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2017<br><i>(doc. 14784/17)</i><br>30/06/2021: end of grandfathering<br><i>(doc. 14364/18)</i> |                        |
| <b>ES021</b><br>"Reduction of income derived from certain intangible assets" (new patent box)   | 2016 | <b>HARMFUL</b><br><i>(doc. 14784/17)</i>   | 2018<br><i>(doc. 14364/18)</i>  |                        |
| <b>ES022</b><br>"Navarra - Reduction of income derived from certain intangible assets " (new patent box)  | 2016 | <b>HARMFUL</b><br><i>(doc. 14784/17)</i>   | 2018<br><i>(doc. 14364/18)</i>  |                        |
| <b>ES023</b><br>"Basque country (Álava, Guipúzcoa and Vizcaya) - Partial reduction for the exploitation of intellectual and industrial property" (new patent box) | 2016 | <b>HARMFUL</b><br><i>(doc. 14784/17)</i>   | 2018<br><i>(doc. 14364/18)</i>  |                        |

|                |  |      |  |                                |
|----------------|--|------|--|--------------------------------|
| <b>FINLAND</b> | <b>FI001</b> (B008)<br>"Åland Islands: Captive Insurance"                            | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14812/02)</i> |
|                | <b>FI002</b> (C009)<br>"Ice-Class Investment Allowance"                              | 1999 | Not harmful                              |                                |
|                | <b>FI003</b> (D020)<br>"Accelerated Depreciation; Investments in Developing Regions" | 1999 | Not harmful                              |                                |
| <b>FRANCE</b>  | <b>FR001</b> (A006)<br>"Headquarters and Logistic Centres"                           | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14361/03)</i> |
|                | <b>FR002</b> (A012)<br>"Royalty Income - Patents"                                    | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002<br><i>(doc. 14812/02)</i> |
|                | <b>FR003</b> (C005)<br>"Shipping Regime "  | 1999 | Not harmful                              |                                |
|                | <b>FR004</b> (C013)<br>"Tax credit for research"                                     | 1998 | Not harmful                              |                                |
|                | <b>FR005</b> (D012)<br>"Corsica Incentives 1,2,3"                                    | 1999 | Not harmful                              |                                |
|                | <b>FR006</b> (D013)<br>"Tax Free Zones - ZFU"  | 1999 | Not harmful                              |                                |
|                | <b>FR007</b> (D014)<br>"Enterprise Zones"  | 1999 | Not harmful                              |                                |

|   |      |             |  |
|---|------|-------------|--|
| <b>FR008</b> (D015)<br>"Overseas Departments"                             | 1999 | Not harmful |  |
| <b>FR009</b> (D016)<br>"Nord-Pas-de-Calais - Privileged Investment Zone"  | 1999 | Not harmful |  |
| <b>FR010</b> (E006)<br>"Bénéfice Mondial and Bénéfice Consolidé"          | 1999 | Not harmful |  |
| <b>FR011</b> (E008)<br>"Newly Created Companies"                          | 1999 | Not harmful |  |
| <b>FR012</b> (E025)<br>"St Martin and St Barthélémy"                      | 1999 | Not harmful |  |
| <b>FR013</b> (E028)<br>"Venture Capital Companies"                        | 1999 | Not harmful |  |
| <b>FR014</b> (E034)<br>"Tax Credits for Job-creating Investments"         | 1999 | Not harmful |  |
| <b>FR015</b> (E035)<br>"Tax Credits for Staff Training Costs"             | 1999 | Not harmful |  |
| <b>FR016</b> (A023)<br>"Holding de participations étrangères"             | 1999 | Not harmful |  |
| <b>FR017</b> (BAM044/B019)<br>"Centrales de trésorerie / Finance centres" | 1999 | Not harmful |  |

|  |      |  |                                |
|--|------|--|--------------------------------|
| <b>FR018</b> (BAM061/B020)<br>"Provisions for risks relating to medium and long term credit operations carried out by banks and credit institutions" | 1999 | Not harmful                              |                                |
| <b>FR019</b> (BAM062/B021)<br>"Technical provisions for insurance and reinsurance undertakings"  | 1999 | Not harmful                              |                                |
| <b>FR020</b> ( AAM052/A024)<br>"Holding companies with shareholdings in foreign companies"   | 1999 | Not harmful                              |                                |
| <b>FR021</b> (CAM058/C026)<br>"Provisions for Renewal of Mineral Reserves"   | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14361/03)</i> |
| <b>FR022</b> (CAM059/C027)<br>"Provision for Renewal of Oil and Gas Reserves"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14361/03)</i> |
| <b>FR023</b> (EAM045/E044)<br>"Tax credit for membership of a 'groupement de prevention agréé'"  | 1999 | Not harmful                              |                                |
| <b>FR024</b> (EAM051/E045)<br>"Exemption from corporation tax on takeover of ailing companies"   | 1999 | Not harmful                              |                                |

|   |      |             |  |
|---|------|-------------|--|
| <b>FR025</b> (EAM053/E046)<br>"Legal persons liable for corporation tax whose objects are to transfer use and benefit of movable or immovable property to its members free of charge" | 1999 | Not harmful |  |
| <b>FR026</b> (EAM054/E047)<br>"Distribution by certain companies of capital gains arising 1999 on liquidation"  | 1999 | Not harmful |  |
| <b>FR027</b> (EAM055/E048)<br>"Provisions to cover price increases"   | 1999 | Not harmful |  |
| <b>FR028</b> (EAM056/E049)<br>"Provisions for setting up foreign branches"  | 1999 | Not harmful |  |
| <b>FR029</b> (EAM057/E050)<br>"Provision for employee start-up loans"   | 1999 | Not harmful |  |
| <b>FR030</b> (EAM060/E051)<br>"Provisions for risks relating to medium-term credit transactions by firms carrying out works or selling abroad"  | 1999 | Not harmful |  |
| <b>FR031</b> (EAM064/E052)<br>"Long-term capital gains on FCPR and SCR securities"  | 1999 | Not harmful |  |
| <b>FR032</b> (EAM066/E053)<br>"Carryover of losses on merger (consent)"   | 1999 | Not harmful |  |

|  |      |             |  |
|--|------|-------------|--|
| <b>FR033</b> (EAM067/E054)<br>"Deferred taxation in the event of merger and practical asset transfer"                          | 1999 | Not harmful |  |
| <b>FR034</b> (EAM068/E055)<br>"Authorised Telecom financing companies"   | 1999 | Not harmful |  |
| <b>FR035</b> (EAM069/E056)<br>"Investment companies"   | 1999 | Not harmful |  |
| <b>FR036</b> (EAM074/E057)<br>"Reduced rate of 19% on reinvested SME profits"  | 1999 | Not harmful |  |
| <b>FR037</b> (DAM043/D024)<br>"Exceptional depreciation for buildings constructed under urban and rural planning arrangements" | 1999 | Not harmful |  |
| <b>FR038</b> (CAM040/C031)<br>"Accelerated depreciation for purchases of software"   | 1999 | Not harmful |  |
| <b>FR039</b> (CAM041/C032)<br>"Accelerated depreciation for energy-saving equipment"   | 1999 | Not harmful |  |
| <b>FR040</b> (CAM042/C033)<br>"Accelerated depreciation for environmental protection"  | 1999 | Not harmful |  |
| <b>FR041</b> (CAM046/C034)<br>"Deduction of cooperative dividends"   | 1999 | Not harmful |  |

|   |      |             |  |
|---|------|-------------|--|
| <b>FR042</b> (CAM048/C035)<br>"Tax exemption of capital gains on the scale of securities of companies established by special agreement to promote industry, business and agriculture" | 1999 | Not harmful |  |
| <b>FR043</b> (CAM049/C036)<br>"Exemption from corporation tax for the oil storage agency"   | 1999 | Not harmful |  |
| <b>FR044</b> (CAM050/C037)<br>"Corporation tax exemption for agricultural cooperatives"   | 1999 | Not harmful |  |
| <b>FR045</b> (CAM058/C038)<br>"Provision for renewal of mineral reserves"   | 1999 | Not harmful |  |
| <b>FR046</b> (CAM059/C039)<br>"Provision for renewal of oil and gas reserves"   | 1999 | Not harmful |  |
| <b>FR047</b> (CAM063/C040)<br>"Press"   | 1999 | Not harmful |  |
| <b>FR048</b> (CAM065/C041)<br>"Special depreciation rules for the audiovisual sector"   | 1999 | Not harmful |  |
| <b>FR049</b> (CAM070/C042)<br>"Business and industrial real estate companies"   | 1999 | Not harmful |  |
| <b>FR050</b> (CAM071/C043)<br>"Companies authorised to provide energy-saving and heat"  | 1999 | Not harmful |  |



|                |  |      |  |  |
|----------------|--|------|--|--|
|                | recovery financing (SOFERGIE)"   |      |  |  |
|                | <b>FR051</b> (CAM073/C045)<br>"Exceptional depreciation for participating interests in companies financing non-industrial fishing (SOFIPECHE)" | 1999 | Not harmful                                |  |
|                | <b>FR052</b> (CAM077/C046)<br>"Securities in innovation financing companies (SFI)"   | 1999 | Not harmful                                |  |
|                | <b>FR053</b><br>"Reduced rate for long term capital gains and profits from the licensing of Intellectual Property rights" (old patent box)     | 2014 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> |  |
| <b>CROATIA</b> | <b>HR001</b><br>"Corporate Income Tax Act"   | 2013 | Not harmful<br><i>(doc. 10608/14)</i>      |  |
|                | <b>HR002</b><br>"Hill and Mountain Areas Act"  | 2013 | Not harmful<br><i>(doc. 10608/14)</i>      |  |
|                | <b>HR003</b><br>"Areas of Special State Concern Act"   | 2013 | Not harmful<br><i>(doc. 10608/14)</i>      |  |
|                | <b>HR004</b><br>"Investment Promotion Act (2006)"  | 2013 | Not harmful<br><i>(doc. 10608/14)</i>      |  |
|                | <b>HR005</b><br>"Reconstruction and Development of the City of Vukovar Act"  | 2013 | Not harmful<br><i>(doc. 10608/14)</i>      |  |

|  |      |   |  |
|--|------|---|--|
| <b>HR006</b><br>"Free Zones Act"   | 2013 | Not harmful<br><i>(doc. 10608/14)</i>   |  |
| <b>HR007</b><br>"Maritime Code"  | 2013 | Not harmful<br><i>(doc. 10608/14)</i>   |  |
| <b>HR008</b><br>"Investment Promotion Act (2012)"  | 2013 | Not harmful<br><i>(doc. 10608/14)</i>   |  |
| <b>HR009</b><br>"Investment Promotion Act (2015)"  | 2016 | Not assessed<br>(amended in 2017: see<br>HR011)<br><i>(doc. 14784/17)</i>                           |  |
| <b>HR010</b><br>"Amendments to the Law on Corporate Income (OG, No<br>115/16)"           | 2017 | Not assessed (only the<br>advance pricing<br>agreement aspect was<br>deemed relevant: see<br>HR012) |  |
| <b>HR011</b><br>"Investment Promotion Act (2017)"  | 2018 | Out of scope<br><i>(doc. 14364/18)</i>  |  |
| <b>HR012</b><br>"Ordinance on the procedure of concluding advance<br>pricing agreements" | 2018 | Out of scope<br><i>(doc. 14364/18)</i>  |  |

|                |   |      |  |   |
|----------------|---|------|--|---|
| <b>HUNGARY</b> | <b>HU001</b><br>"Offshore companies"                                | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>   | 2003: abolished<br>2006: end of<br>grandfathering<br><i>(doc. 13213/03)</i> |
|                | <b>HU002</b><br>"10 years tax holidays"                             | 2003 | Not harmful  |   |
|                | <b>HU003</b><br>"Venture capital companies"                         | 2003 | Not harmful  |   |
|                | <b>HU004</b><br>"Holding companies"                                 | 2003 | Not harmful  |   |
|                | <b>HU005</b><br>"Investment tax relief subject to special approval" | 2003 | Not harmful  |   |
|                | <b>HU006</b><br>"Revenue from Stock Exchange Operations"            | 2003 | Not harmful  |   |
|                | <b>HU007</b><br>"Interest from affiliated companies"                | 2004 | No broad consensus<br>on whether the<br>measure is harmful<br><i>(doc. 15434/05)</i> | Abolished<br><i>(doc. 14364/18)</i>   |
|                | <b>HU008</b><br>"Royalty income"                                    | 2004 | Not harmful  |   |

|                |  |      |  |  |
|----------------|--|------|--|--|
|                | <b>HU009</b><br>"Intangible property for royalties and capital gains" (old patent box) | 2014 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i>                   | 2016<br><i>(doc. 14750/16)</i><br>30/06/2021: end of grandfathering                    |
|                | <b>HU010</b><br>"Tax Base for Interest Payments Received from Abroad"                  | 2010 | Not assessed<br>(abolished before)<br><i>(doc. 10857/11)</i> |  |
|                | <b>HU011</b><br>"Intellectual property box" (new patent box)                           | 2017 | Not harmful<br><i>(doc. 10047/17)</i>                        |  |
| <b>IRELAND</b> | <b>IE001 (B001)</b><br>"The International Financial Services Centre (Dublin)"          | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                     | 2002: phase out<br><i>(doc. 8848/02)</i><br>2003: abolished<br><i>(doc. 7018/1/03)</i> |
|                | <b>IE002 (C014)</b><br>"Research and Technical Development"                            | 1999 | Not harmful  |  |
|                | <b>IE003 (C023)</b><br>"Mining Taxation"   | 1999 | Not harmful  |  |
|                | <b>IE004 (C024)</b><br>"10% Manufacturing Rate"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                     | 2002: phase out<br><i>(doc. 8848/02)</i><br>2011: end of grandfathering                |

|  |      |  |  |                        |
|--|------|--|--|------------------------|
|  |      |  |  | <i>(doc. 10857/11)</i> |
| <b>IE005</b> (C025)<br>"Petroleum Taxation"                                    | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: tax rate<br>increased<br><i>(doc. 8848/02)</i>   |                        |
| <b>IE006</b> (D017)<br>"Shannon Airport Zone (SAZ)"                            | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: phase out<br><i>(doc. 8848/02)</i><br>2006: end of<br>grandfathering<br><i>(doc. 14812/02)</i> |                        |
| <b>IE007</b> (D018)<br>"New Investments - Buildings in Run-Down Urban Areas"   | 1999 | Not harmful                              |  |                        |
| <b>IE008</b> (E007)<br>"Foreign Income"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2001: abolished<br><i>(doc. 8842/02)</i><br>2011: end of<br>grandfathering<br><i>(doc. 10857/11)</i> |                        |
| <b>IE009</b> (BAM069/B024)<br>"Exemption of income from Government securities" | 1999 | Not harmful                              |  |                        |
| <b>IE010</b> (BAM098/B025)<br>"Non-resident companies"                         | 1999 | Not harmful                              |  |                        |

|              |  |      |  |                                |
|--------------|--|------|--|--------------------------------|
|              | <b>IE011</b> (EAM100/E065)<br>"Specified collective investment undertakings"                   | 1999 | Not harmful                              |                                |
|              | <b>IE012</b> (CAM094/C048)<br>"Film"   | 1999 | Not harmful                              |                                |
|              | <b>IE013</b> (CAM097/C049)<br>"Investment in renewable energy projects"                        | 1999 | Not harmful                              |                                |
|              | <b>IE014</b> (CAM101/C050)<br>"Tax exemption for profit/gain from the occupation of woodlands" | 1999 | Not harmful                              |                                |
|              | <b>IE015</b><br>"Holding company"  | 2005 | Not assessed<br><i>(doc. 9427/05)</i>    |                                |
|              | <b>IE016</b><br>"Knowledge Development Box" (new patent box)                                   | 2016 | Not harmful<br><i>(doc. 10047/17)</i>    |                                |
| <b>ITALY</b> | <b>IT001</b> (B002)<br>"Trieste Financial Services and Insurance centre"                       | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14812/02)</i> |
|              | <b>IT002</b> (C006)<br>"Shipping Regime"   | 1999 | Not harmful                              |                                |
|              | <b>IT003</b> (E036)<br>"Listed Companies - Reduced Rates"                                      | 1999 | Not harmful                              |                                |
|              | <b>IT004</b> (BAM082/B022)<br>"Incentives for restructuring the banking sector"                | 1999 | Not harmful                              |                                |

|  |      |             |  |
|--|------|-------------|--|
| <b>IT005</b> (BAM093/B023)<br>"Tax deduction for interest on additional capital contributions from foreign head offices to Italian PE" | 1999 | Not harmful |  |
| <b>IT006</b> (EAM078/E058)<br>"Dual income tax"  | 1999 | Not harmful |  |
| <b>IT007</b> (EAM083/E059)<br>"IRAP exemptions"  | 1999 | Not harmful |  |
| <b>IT008</b> (EAM085/E060)<br>"SMEs"   | 1999 | Not harmful |  |
| <b>IT009</b> (EAM088/E061)<br>"Special depreciation regime"  | 1999 | Not harmful |  |
| <b>IT010</b> (EAM089/E062)<br>"Special regime for investment funds"  | 1999 | Not harmful |  |
| <b>IT011</b> (EAM090/E063)<br>"Substitute tax regime for corporate reorganisations"  | 1999 | Not harmful |  |
| <b>IT012</b> (EAM091/E064)<br>"Tax advantages for certain trade and commercial activities"   | 1999 | Not harmful |  |
| <b>IT013</b> (DAM086/D025)<br>"Regional Incentives : South of Italy (Mezzogiorno)"   | 1999 | Not harmful |  |

|                  |  |      |  |   |
|------------------|--|------|--|---|
|                  | <b>IT014</b> (CAM080/C047)<br>"Incentives for scientific research" | 1999 | Not harmful                                |   |
|                  | <b>IT015</b><br>"Holdings"   | 2004 | Out of scope<br><i>(doc. 9805/04)</i>      |   |
|                  | <b>IT016</b><br>"International Tax Ruling Practice"                | 2004 | Out of scope<br><i>(doc. 9805/04)</i>      |   |
|                  | <b>IT017</b><br>"Patent box" (old patent box)                      | 2014 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2018<br><i>(doc. 9637/18)</i><br>30/06/2021: end<br>of grandfathering       |
|                  | <b>IT018</b><br>"Patent box" (new patent box)                      | 2015 | Not harmful<br><i>(doc. 10047/17)</i>      |   |
|                  | <b>IT019</b><br>"Notional Interest Deduction"                      | 2018 | Not harmful<br><i>(doc. 14364/18)</i>      |   |
| <b>LITHUANIA</b> | <b>LT001</b><br>"Free Economic Zones"                              | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>   | 2004: abolished<br>2017: end of<br>grandfathering<br><i>(doc. 13213/03)</i> |
|                  | <b>LT002</b><br>"Benefits in respect of reinvested profits"        | 2003 | Not harmful                                |   |



|                   |   |      |  |   |
|-------------------|---|------|--|---|
|                   | <b>LT003</b><br>"Enterprises with foreign invested capital"   | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>                         | 2003<br><i>(doc. 13213/03)</i>  |
|                   | <b>LT004</b><br>"Strategic investors"   | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>                         | 2003: abolished<br>2010: end of<br>grandfathering<br><i>(doc. 13213/03)</i> |
|                   | <b>LT005</b><br>"Special tax zones" (Intellectual Property components)  | 2017 | Not harmful, but<br>annual monitoring<br><i>(doc. 14784/17)</i>  |   |
|                   | <b>LT006</b><br>"Review of the corporate income tax regime for special tax zones"                                   | 2018 | Not assessed, but<br>annual monitoring<br><i>(doc. 14364/18)</i> |   |
|                   | <b>LT007</b><br>"New special corporate income tax regime for patented assets and copyrighted software" (patent box) | 2018 |  |   |
| <b>LUXEMBOURG</b> | <b>LU001 (A007)</b><br>"Co-ordination Centres"  | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                         | 1996: abolished<br>2002: end of<br>grandfathering<br><i>(doc. 14812/02)</i> |
|                   | <b>LU002 (A013)</b><br>"Tax Exempt 1929 Holding Companies"  | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                         | 2005<br><i>(doc. 9427/05)</i><br>2011: end of                               |

|  |   |      |                                   |  |
|--|---|------|-----------------------------------|--|
|  |   |      |                                   | grandfathering<br>(doc. 10857/11)                                    |
|  | <b>LU003</b> (B003)<br>"Finance Companies"  | 1998 | <b>HARMFUL</b><br>(doc. 14313/99) | 1996: abolished<br>2002: end of<br>grandfathering<br>(doc. 14812/02) |
|  | <b>LU004</b> (B007)<br>"Provisions for Fluctuations in Reinsurance"   | 1998 | <b>HARMFUL</b><br>(doc. 14313/99) | 2002: abolished<br>2007: end of<br>grandfathering<br>(doc. 14812/02) |
|  | <b>LU005</b> (C018)<br>"Audiovisual Investment Certificates"  | 1999 | Not harmful                       |  |
|  | <b>LU006</b> (E009)<br>"Tax holidays for New Businesses"  | 1999 | Not harmful                       |  |
|  | <b>LU007</b> (E017)<br>"Special depreciation arrangement for assets intended for environmental protection and energy saving, and for assets adjusting work places for disabled workers" | 1999 | Not harmful                       |  |
|  | <b>LU008</b> (AAM108/A024)<br>"Application of the parent company/subsidiary system to resident companies with share capital (SOPARFI)"  | 1999 | Not harmful                       |  |

|  |      |  |  |
|--|------|--|--|
| <b>LU009</b> (CAM106/C050)<br>"Depreciation of equipment and tools used solely for scientific or technical research operation"     | 1999 | Not harmful                                |  |
| <b>LU010</b> (CAM107/C051)<br>"Shipping Regime"  | 1999 | Not harmful                                |  |
| <b>LU011</b> (EAM103/E066)<br>"Investment funds"   | 1999 | Not harmful                                |  |
| <b>LU012</b> (EAM109/E067)<br>"Venture Capital investment certificates"  | 1999 | Not harmful                                |  |
| <b>LU013</b> (Z002)<br>"Finance Branches"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2001<br><i>(doc. 14812/02)</i>   |
| <b>LU014</b><br>"Intellectual property" (old patent box)   | 2008 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2016<br><i>(doc. 14750/16)</i><br>30/06/2021: end<br>of grandfathering |
| <b>LU015</b><br>"Group Financing Companies - Advance Confirmation of Margin (Circular n°164/2 of 28 January 2011)"                 | 2010 | Not assessed<br><i>(doc. 10857/11)</i>     |  |
| <b>LU016</b><br>"Administrative circulaire – Traitement fiscal des sociétés exerçant des transactions de financement intra-groupe" | 2017 | Not assessed<br><i>(doc. 10047/17)</i>     |  |

|               |   |      |   |  |
|---------------|---|------|---|--|
|               | <b>LU017</b><br>"Draft law relating to the tax regime for intellectual property" (new patent box) | 2018 | Not harmful<br><i>(doc. 9637/18)</i>                |  |
| <b>LATVIA</b> | <b>LV001</b><br>"Special Economic Zones and Free Ports"   | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>            | 2004<br><i>(doc. 13213/03)</i>   |
|               | <b>LV002</b><br>"High-tech companies"   | 2003 | Not harmful   |  |
|               | <b>LV003</b><br>"Big investment schemes"  | 2003 | Not harmful   |  |
|               | <b>LV004</b><br>"Shipping Regime"   | 2003 | Not harmful   |  |
|               | <b>LV005</b><br>"Start-up tax reliefs"  | 2017 | Not assessed (de minimis)<br><i>(doc. 10047/17)</i> |  |
| <b>MALTA</b>  | <b>MT001</b><br>"Offshore trading and non trading companies"                                      | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>            | 1996: abolished<br>2004: end of grandfathering<br><i>(doc. 13213/03)</i> |
|               | <b>MT002</b><br>"Offshore insurance companies / Insurance companies"                              | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>            | 1996: abolished<br>2004: end of grandfathering                           |

|   |      |  |  |                        |
|---|------|--|--|------------------------|
|   |      |  |  | <i>(doc. 13213/03)</i> |
| <b>MT003</b><br>"Offshore banking companies / Banking companies"                  | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 1996: abolished<br>2004: end of<br>grandfathering<br><i>(doc. 13213/03)</i>                          |                        |
| <b>MT004</b><br>"International Trading companies "                                | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2007   |                        |
| <b>MT005</b><br>"Dividends from (other) Maltese companies with foreign<br>income" | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2007: abolished<br><i>(doc. 9047/07)</i><br>2011: end of<br>grandfathering<br><i>(doc. 10857/11)</i> |                        |
| <b>MT006</b><br>"Shipping Regime"   | 2003 | Not harmful                              |  |                        |
| <b>MT007</b><br>"Investment Service Companies"                                    | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2011: end of<br>grandfathering<br><i>(doc. 10857/11)</i>   |                        |
| <b>MT008</b><br>"Business Promotion Act"  | 2003 | Not harmful                              |  |                        |
| <b>MT009</b><br>"Onshore free port"   | 2003 | Not harmful                              |  |                        |

|                    |  |      |  |  |
|--------------------|--|------|--|--|
|                    | <b>MT010</b><br>"Business Promotion Regulations"                             | 2003 | Not harmful                                |  |
|                    | <b>MT011</b><br>"Non-resident companies"                                     | 2003 | Not assessed                               |  |
|                    | <b>MT012</b><br>"Special granted tax exemption"                              | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>   | 2004<br><i>(doc. 13213/03)</i>   |
|                    | <b>MT013</b><br>"Exemption for royalty income from patents" (old patent box) | 2014 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2016<br><i>(doc. 14750/16)</i><br>30/06/2021: end of grandfathering      |
|                    | <b>MT014</b><br>"Notional Interest Deduction"                                | 2018 | Not harmful<br><i>(doc. 14364/18)</i>      |  |
| <b>NETHERLANDS</b> | <b>NL001 (A008)</b><br>"Cost Plus Ruling"                                    | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2001: abolished<br>2006: end of grandfathering<br><i>(doc. 14812/02)</i> |
|                    | <b>NL002 (A009)</b><br>"Resale Minus Ruling"                                 | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2001: abolished<br>2006: end of grandfathering<br><i>(doc. 14812/02)</i> |

|   |      |  |   |
|---|------|--|---|
| <b>NL003</b> (A010)<br>"Intra-Group Finance Activities" | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2001: abolished<br>2006: end of<br>grandfathering<br><i>(doc. 14812/02)</i>               |
| <b>NL004</b> (A014)<br>"Holding Companies"              | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14812/02)</i>  |
| <b>NL005</b> (A015)<br>"Royalties"                      | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2001: abolished<br>2006: end of<br>grandfathering<br><i>(doc. 14812/02)</i>               |
| <b>NL006</b> (B004)<br>"International Group Financing"  | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2004<br><i>(doc. 9655/06)</i><br>2011: end of<br>grandfathering<br><i>(doc. 10857/11)</i> |
| <b>NL007</b> (B005)<br>"Finance Branch"                 | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2001: abolished<br>2006: end of<br>grandfathering<br><i>(doc. 14812/02)</i>               |
| <b>NL008</b> (C007)<br>"Shipping Regime"                | 1999 | Not harmful                              |   |

|   |      |  |  |
|---|------|--|--|
| <b>NL009</b> (C015)<br>"Tax credits for investments in energy saving equipment"       | 1999 | Not harmful                                |  |
| <b>NL010</b> (D019)<br>"Accelerated Depreciation of new buildings in certain regions" | 1999 | Not harmful                                |  |
| <b>NL011</b> (E003)<br>"US Foreign Sales Corporations Ruling"                         | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2001: abolished<br>2006: end of grandfathering<br><i>(doc. 14812/02)</i> |
| <b>NL012</b> (E004)<br>"Informal Capital Ruling"                                      | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2003<br><i>(doc. 14812/02)</i>   |
| <b>NL013</b> (E018)<br>"Investment Allowance"   | 1999 | Not harmful                                |  |
| <b>NL014</b> (Z003)<br>"Non Standard Rulings (including Greenfield-rulings)"          | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2001: abolished<br>2006: end of grandfathering<br><i>(doc. 14812/02)</i> |
| <b>NL015</b> (CAM110/C053)<br>"Film industry"   | 1999 | Not harmful                                |  |
| <b>NL016</b><br>"Innovation box" (old patent box)                                     | 2007 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2017: abolished<br>30/06/2021: end                                       |



|               |   |      |  |   |
|---------------|---|------|--|---|
|               |   |      |  | of grandfathering                                     |
|               | <b>NL017</b><br>"Interest box"                                      | 2007 | Not assessed (measure abandoned)<br><i>(doc. 10033/10)</i> |   |
|               | <b>NL018</b><br>"Patent box" (new patent box)                       | 2017 | Not harmful<br><i>(doc. 10047/17)</i>                      |   |
| <b>POLAND</b> | <b>PL001</b><br>"Special Economic Zones (original rules)"           | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>                   | 2011: end of grandfathering<br><i>(doc. 10857/11)</i> |
|               | <b>PL002</b><br>"Special Economic Zones (amended rules)"            | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>                   | 2006  |
|               | <b>PL003</b><br>"Special Economic Zones (amended rules)"            | 2006 | Not assessed<br><i>(doc. 15472/06)</i>                     |   |
|               | <b>PL004</b><br>"Shipbuilding and complementary industries"         | 2017 | Out of scope<br><i>(doc. 10047/17)</i>                     |   |
|               | <b>PL005</b><br>"GAAR and rulings"                                  | 2017 | Not assessed   |   |
|               | <b>PL006</b><br>"15% corporate income tax rate for small taxpayers" | 2018 | Not harmful<br><i>(doc. 14364/18)</i>                      |   |
|               | <b>PL007</b><br>"One-time depreciation of factory new fixed assets" | 2018 | Not assessed (minor importance: does not                   |   |

|                 |   |      |   |   |
|-----------------|---|------|---|---|
|                 |   |      | affect business location)<br><i>(doc. 9637/18)</i>  |   |
|                 | <b>PL008</b><br>"Increased tax incentives for R&D activities" (with relevance also for companies operating in SEZ)                            | 2018 | Out of scope<br><i>(doc. 9637/18)</i>   |   |
|                 | <b>PL009</b><br>"Increase of the one-time depreciation limit for fixed assets and intangible assets" (both for companies and natural persons) | 2018 | Not assessed (minor importance: does not affect business location)<br><i>(doc. 9637/18)</i> |   |
| <b>PORTUGAL</b> | <b>PT001 (B006)</b><br>"Madeira and Sta Maria (Azores) Free Zones"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>  | 2003: abolished<br><i>(doc. 7018/1/03)</i><br>2012: end of grandfathering<br><i>(doc. 10903/12)</i> |
|                 | <b>PT002 (C008)</b><br>"Shipping Regime"  | 1999 | Not harmful   |   |
|                 | <b>PT003 (C016)</b><br>"Research and Development Expenses"  | 1999 | Not harmful   |   |

|  |  |      |             |  |
|--|--|------|-------------|--|
|  | <b>PT004</b> (E012)<br>"Micro and Small Enterprises"               | 1999 | Not harmful |  |
|  | <b>PT005</b> (E019)<br>"Tax Incentives for Contractual Investment" | 1999 | Not harmful |  |
|  | <b>PT006</b> (E020)<br>"Tax Credit for Investment"                 | 1999 | Not harmful |  |
|  | <b>PT007</b> (E023)<br>"Reinvested Capital Gains"                  | 1999 | Not harmful |  |
|  | <b>PT008</b> (E037)<br>"SGII Companies"                            | 1999 | Not harmful |  |
|  | <b>PT009</b> (E038)<br>"SCR, SDR and SFE Companies"                | 1999 | Not harmful |  |
|  | <b>PT010</b> (A025)<br>"Holding companies (SGPS)"                  | 1999 | Not harmful |  |
|  | <b>PT011</b> (BAM118/B026)<br>"Reinsurance companies"              | 1999 | Not harmful |  |
|  | <b>PT012</b> (EAM112/E068)<br>"Accelerated depreciation"           | 1999 | Not harmful |  |
|  | <b>PT013</b> (EAM116/E069)<br>"Investment funds"                   | 1999 | Not harmful |  |

|                |   |      |  |  |
|----------------|---|------|--|--|
|                | <b>PT014</b> (DAM115/D026)<br>"Industrial Free Zones"   | 1999 | Not harmful                                |  |
|                | <b>PT015</b><br>"Madeira Free Zones"  | 2008 | Not assessed<br><i>(doc. 16084/1/08)</i>   |  |
|                | <b>PT016</b><br>"Partial exemption for income from patents and other industrial property rights" (old patent box) | 2014 | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i> | 2018<br><i>(doc. 9637/18)</i><br>30/06/2021: end of grandfathering |
|                | <b>PT017</b><br>"Patent box" (new patent box)   | 2017 | Not harmful<br><i>(doc. 10047/17)</i>      |  |
|                | <b>PT018</b><br>"Notional Interest Deduction"   | 2018 | Out of scope<br><i>(doc. 14364/18)</i>     |  |
| <b>ROMANIA</b> | <b>RO001</b><br>"Free zones"  | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>   | 2002: abolished<br>2012: end of grandfathering                     |
|                | <b>RO002</b><br>"Disadvantaged zones"   | 2006 | Not harmful                                |  |
|                | <b>RO003</b><br>"Large investment deduction"  | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>   | 2007   |
|                | <b>RO004</b><br>"Export activities"   | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>   | 2004   |

|                 |  |      |  |  |
|-----------------|--|------|--|--|
|                 | <b>RO005</b><br>"Special tax exemptions"   | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>                           | 2000: abolished<br>2007: end of grandfathering                                   |
|                 | <b>RO006</b><br>"Patent profits exemption"   | 2006 | <b>HARMFUL</b><br><i>(doc. 10879/06)</i>                           | 2003: abolished<br>2007: end of grandfathering                                   |
|                 | <b>RO007</b><br>"Industrial parks"   | 2006 | Not harmful  | <i>(expired in 2007)</i>   |
|                 | <b>RO008</b><br>"Profit tax exemption for companies with innovation and research & development activities" | 2018 |  |  |
| <b>SLOVAKIA</b> | <b>SK001</b><br>"10-years tax holiday for foreign owned companies"   | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i><br><i>(doc. 15317/04)</i> | 2003: already abolished<br>2009: end of grandfathering<br><i>(doc. 13213/03)</i> |
|                 | <b>SK002</b><br>"Tax exemption for newly started companies"  | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>                           | 2003: already abolished<br><i>(doc. 13213/03)</i>                                |
|                 | <b>SK003</b><br>"100% corporate income tax credits for foreign investors"                                  | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i>                           | 2003: already abolished  |

|                 |  |      |  |                                |
|-----------------|--|------|--|--------------------------------|
|                 |  |      |  | <i>(doc. 13213/03)</i>         |
|                 | <b>SK004</b><br>"100% corporate income tax credits for foreign investors (first amendment)"          | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2004<br><i>(doc. 13213/03)</i> |
|                 | <b>SK005</b><br>"100% corporate income tax credits for foreign investors (second amendment)"         | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2004<br><i>(doc. 13213/03)</i> |
|                 | <b>SK006</b><br>"Investment Aid Tax Credit" (Section 30a of Act No. 595/2003 of Coll. on Income Tax) | 2008 | Not assessed<br><i>(doc. 10200/1/09)</i> |                                |
|                 | <b>SK007</b><br>"Patent box" (new patent box)  | 2018 | Not harmful<br><i>(doc. 14364/18)</i>    |                                |
|                 | <b>SK008</b><br>"Exemption of gains from the sale of shares and business shares"                     | 2018 | Not assessed<br><i>(doc. 14364/18)</i>   |                                |
| <b>SLOVENIA</b> | <b>SI001</b><br>"Special Economic Zones"   | 2003 | Not harmful                              |                                |
|                 | <b>SI002</b><br>"Foreign income"   | 2003 | <b>HARMFUL</b><br><i>(doc. 13213/03)</i> | 2004                           |
|                 | <b>SI003</b><br>"Newly established companies"  | 2003 | Not harmful                              |                                |

|  |      |  |  |
|--|------|--|--|
| <b>SI004</b><br>"Exemption of revenues from profit participation"          | 2005 | Not assessed<br><i>(doc. 9427/05)</i>  |  |
| <b>SI005</b><br>"Investment incentives allowance"                          | 2005 | Not assessed<br><i>(doc. 9427/05)</i>  |  |
| <b>SI006</b><br>"Taxation of interest and royalties"                       | 2005 | Not assessed<br><i>(doc. 9427/05)</i>  |  |
| <b>SI007</b><br>"Implementation of PSD, IRD and Merger Directive"          | 2005 | Not assessed<br><i>(doc. 9427/05)</i>  |  |
| <b>SI008</b><br>"Enlargement of the period for a loss carry-over"          | 2006 | Not assessed<br><i>(doc. 15472/06)</i> |  |
| <b>SI009</b><br>"Relief for investment in research and development"        | 2006 | Not assessed<br><i>(doc. 15472/06)</i> |  |
| <b>SI010</b><br>"Harmonisation of the amendments to the Mergers Directive" | 2006 | Not assessed<br><i>(doc. 15472/06)</i> |  |
| <b>SI011</b><br>"Exemption of Dividends and Capital Gains"                 | 2007 | Not assessed<br><i>(doc. 9047/07)</i>  |  |
| <b>SI012</b><br>"Venture Capital Scheme"                                   | 2007 | Not assessed<br><i>(doc. 9047/07)</i>  |  |
| <b>SI013</b><br>"Amendments to the Economic Zones Act"                     | 2007 | Not assessed<br><i>(doc. 9047/07)</i>  |  |

|                                   |   |      |  |                                |
|-----------------------------------|---|------|--|--------------------------------|
|                                   | <b>SI014</b><br>"Tax reliefs for Pomurje region"              | 2010 | Not assessed<br><i>(doc. 16766/10)</i>   |                                |
|                                   | <b>SI015</b><br>"Amendments to the Economic Zones Act"        | 2010 | Not assessed<br><i>(doc. 16766/10)</i>   |                                |
| <b>SWEDEN</b>                     | <b>SE001</b> (B009)<br>"Foreign Insurance Companies"          | 1999 | Not harmful                              |                                |
|                                   | <b>SE002</b> (E030)<br>"Investment Companies"                 | 1999 | Not harmful                              |                                |
|                                   | <b>SE003</b> (EAM121/E070)<br>"Tax allocation reserve of 20%" | 1999 | Not harmful                              |                                |
|                                   | <b>SE004</b><br>"Holdings"                                    | 2004 | Not assessed<br><i>(doc. 15317/04)</i>   |                                |
| <b>UNITED KINGDOM<sup>6</sup></b> | <b>UK001</b> (A016)<br>"International Headquarters Companies" | 1998 | Not harmful                              |                                |
|                                   | <b>UK002</b> (A017)<br>"Gibraltar 1992 Companies"             | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14812/02)</i> |

<sup>6</sup> Including Gibraltar, for whose external relations the UK is responsible under the EU treaties.



|  |      |  |   |
|--|------|--|---|
| <b>UK003</b> (B010)<br>"Gibraltar - Captive Insurance Companies"     | 1998 | Not harmful                              |   |
| <b>UK004</b> (B012)<br>"Gibraltar - Exempt Companies"                | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2006: abolished<br>2010: end of<br>grandfathering<br><i>(doc. 10200/1/09)</i> |
| <b>UK005</b> (B013)<br>"Gibraltar - Qualifying Companies"            | 1998 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2003<br><i>(doc. 14812/02)</i>  |
| <b>UK006</b> (C010)<br>"Rollover Relief on Disposal of Ships"        | 1999 | Not harmful                              |   |
| <b>UK007</b> (C011)<br>"Gibraltar - Shipping and aviation"           | 1999 | Not harmful                              |   |
| <b>UK008</b> (C019)<br>"Film industry"                               | 1999 | Not harmful                              |   |
| <b>UK009</b> (D021)<br>"Enterprises Zones"                           | 1999 | Not harmful                              |   |
| <b>UK010</b> (D022)<br>"SMEs in Northern Ireland"                    | 1999 | Not harmful                              |   |
| <b>UK011</b> (E013)<br>"Special Scheme for Accelerated Depreciation" | 1999 | Not harmful                              |   |

|   |           |   |   |
|---|-----------|---|---|
| <b>UK012</b> (E021)<br>"Gibraltar - Development Incentives"                             | 1999      | Not harmful   |   |
| <b>UK013</b> (B027)<br>"Non taxation of financial activities of non resident companies" | 1999      | Not harmful   |   |
| <b>UK014</b> (EAM122/E071)<br>"Scientific research allowances"                          | 1999      | Not harmful   |   |
| <b>UK015</b> (BAM123/B027)<br>"Independent investment managers"                         | 1999      | Not harmful   |   |
| <b>UK016</b> (Z004)<br>"Cost plus rulings"  | 1999      | Not harmful   |   |
| <b>UK017</b><br>"Gibraltar - Proposals for a new corporate tax regime"                  | 2002-2009 | Suspended following ECJ case (measure annulled in 2011) |   |
| <b>UK018</b><br>"Gibraltar - Income Tax Act (ITA) 2010"                                 | 2011      | <b>HARMFUL</b><br><i>(doc. 16488/12)</i>                | 2013<br><i>(doc. 11465/13)</i>                                      |
| <b>UK019</b><br>"Patent box" (old patent box)   | 2013      | <b>HARMFUL</b><br><i>(doc. 16553/1/14)</i>              | 2016<br><i>(doc. 14750/16)</i><br>30/06/2021: end of grandfathering |

|  |  |                                |   |                                |
|--|--|--------------------------------|---|--------------------------------|
|  | <b>UK020</b><br>"Gibraltar - treatment of asset holding companies" | 2014<br><i>(doc. 10608/14)</i> | <b>HARMFUL</b><br><i>(doc. 9912/16)</i> | 2018<br><i>(doc. 14364/18)</i> |
|  | <b>UK021</b><br>"Patent box" (new patent box)                      | 2017                           | Not harmful<br><i>(doc. 10047/17)</i>   |                                |

## II. Dependent or associated territories of Member States<sup>7</sup>

| <b>NAME OF THE JURISDICTION</b>                           | <b>PREFERENTIAL TAX REGIMES</b><br>Code by jurisdiction (Code by category <sup>8</sup> )<br>"Name of the regime" | <b>STANDSTILL DATE<sup>9</sup></b> | <b>ASSESSMENT</b>                        | <b>ROLLBACK DATE</b>   |
|---|--|------------------------------------|--|--|
| <b>Netherlands</b><br><b>Antilles</b> (dissolved in 2010) | <b>AN001</b> (F020)<br>"Offshore companies"  | 1999                               | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: abolished<br>2019: end of grandfathering<br><i>(doc. 14812/02)</i> |
|   | <b>AN002</b> (F021)<br>"New businesses"  | 1999                               | Not harmful                              |  |
|   | <b>AN003</b> (F022)<br>"Mutual funds"  | 1999                               | Not harmful                              |  |
|   | <b>AN004</b> (F023)<br>"Captive Insurance"   | 1999                               | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2002: abolished<br><i>(doc. 14812/02)</i><br>2019: end of grandfathering |

<sup>7</sup> As of the date of notification/identification.

<sup>8</sup> Missing codes refer to dependent/associated territories for which no preferential measure was identified in 1999: Faroe Islands (F003), French Southern & Antarctic Territories (F012), East Timor (F034), Anguilla (F036), Sark (F044), British Antarctic Territory (F050), British Indian Ocean Territory (F051), Pitcairn Island (F074), Saint Georgia and South Sandwich Islands (F077), and UK Sovereign Base Areas of Akrotiri and Dhekelia in Cyprus (F079).

<sup>9</sup> Date of identification by the COCG or notification by the MS concerned

|   |      |  |  |                        |
|---|------|--|--|------------------------|
|   |      |  |  | <i>(doc. 14812/12)</i> |
| <b>AN005</b> (F024)<br>"Free zones"   | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2006<br><i>(doc. 9655/06)</i>  |                        |
| <b>AN006</b> (F025)<br>"Rulings"  | 1999 | Not harmful                              |  |                        |
| <b>AN007</b> (F026)<br>"Shipping and Air transport"                             | 1999 | Not harmful                              |  |                        |
| <b>AN008</b><br>"Ruling Practice"   | 2004 | <b>HARMFUL</b><br><i>(doc. 9805/04)</i>  | 2004<br><i>(doc. 9805/04)</i>  |                        |
| <b>AN009</b><br>"Tax treatment of exempt companies under the NFF" <sup>10</sup> | 2004 | <b>HARMFUL</b><br><i>(doc. 9805/04)</i>  | 2006: amended<br>2011: end of<br>grandfathering<br><i>(doc. 9805/04)</i> |                        |
| <b>AN010</b><br>"Tax treatment of holding companies under the NFF"              | 2004 | <b>HARMFUL</b><br><i>(doc. 9805/04)</i>  | 2006: amended<br>2011: end of<br>grandfathering<br><i>(doc. 9805/04)</i> |                        |

<sup>10</sup> The regime is still in place in Sint Maarten ("Tax exempt company" regime)

|              |  |      |   |                                 |
|--------------|--|------|---|---------------------------------|
| <b>Aruba</b> | <b>AW001</b> (F027)<br>"Offshore Companies"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                  | 2003<br><i>(doc. 7018/1/03)</i> |
|              | <b>AW002</b> (F028)<br>"Exempt companies (AVVs)"                                       | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                  | 2006<br><i>(doc. 7018/1/03)</i> |
|              | <b>AW003</b> (F029)<br>"Tax exemptions and holidays for new businesses"                | 1999 | Not harmful   |                                 |
|              | <b>AW004</b> (F030)<br>"Free zones"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                  | 2006<br><i>(doc. 7018/1/03)</i> |
|              | <b>AW005</b> (F031)<br>"Rulings"   | 1999 | Not harmful   |                                 |
|              | <b>AW006</b> (F032)<br>"Captive insurance"   | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>                  | 2003<br><i>(doc. 7018/1/03)</i> |
|              | <b>AW007</b> (F033)<br>"Shipping and Air Transport"                                    | 1999 | Not harmful   |                                 |
|              | <b>AW008</b><br>"New fiscal framework" (or Imputation Payment<br>Company (IPC) regime) | 2004 | Not harmful   |                                 |
|              | <b>AW009</b><br>"Investment Promotion" (or Amendments to the IPC<br>regime)            | 2016 | Not assessed<br>(Intellectual Property<br>components were |                                 |

|                |  |                     |                                      |                         |
|----------------|--|---------------------|--------------------------------------|-------------------------|
|                |  |                     | abolished before)                    |                         |
|                | <b>AW010</b><br>"Free Zone Company" (revision of the AW004 regime) | 2017<br>(COCG)      | Not harmful                          |                         |
|                | <b>AW011</b><br>"Shipping and aviation companies"                  | 2017<br>(COCG)      | Not harmful                          |                         |
|                | <b>AW012</b><br>"Special zone San Nicolas"                         | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)     |                         |
|                | <b>AW013</b><br>"Transparency" (or Exempt Company regime)          | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)     |                         |
| <b>Bermuda</b> | <b>BM001</b> (F049)<br>"Tax exemption guarantee"                   | 1999                | Not harmful                          |                         |
| <b>Curacao</b> | <b>CW001</b><br>"eZone"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)     | 2018<br>(doc. 14364/18) |
|                | <b>CW002</b><br>"Export companies" (or Export facility)            | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)     | 2018<br>(doc. 14364/18) |
|                | <b>CW003</b><br>"Investment company (formerly: Tax Exempt Entity)" | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)     |                         |
|                | <b>CW004</b><br>"Innovation box"                                   | 2018<br>(OECD FHTP) |                                      |                         |
|                | <b>CW005</b><br>"Manufacturing activities under the eZone regime"  | 2018<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 14364/18 COR |                         |

|                         |  |      |  |                                |
|-------------------------|--|------|--|--------------------------------|
|                         |  |      | <i>l)</i>                                |                                |
| <b>Falkland Islands</b> | <b>FK001</b> (F058)<br>"Tax Holidays"                                    | 1999 | Not harmful                              |                                |
| <b>Guernsey</b>         | <b>GG001</b> (F037)<br>"Exempt companies"                                | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2008<br><i>(doc. 14812/02)</i> |
|                         | <b>GG002</b> (F038)<br>"International loan business"                     | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2008<br><i>(doc. 14812/02)</i> |
|                         | <b>GG003</b> (F039)<br>"Unit trusts and collective investment companies" | 1999 | Not harmful                              |                                |
|                         | <b>GG004</b> (F040)<br>"International Bodies"                            | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2008<br><i>(doc. 14812/02)</i> |
|                         | <b>GG005</b> (F041)<br>"Captive insurance companies"                     | 1999 | Not harmful                              |                                |
|                         | <b>GG006</b> (F042)<br>"Offshore insurance companies"                    | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2008<br><i>(doc. 14812/02)</i> |
|                         | <b>GG007</b> (F043)<br>"Insurance companies"                             | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2008<br><i>(doc. 14812/02)</i> |
|                         | <b>GG008</b><br>"Zero-ten corporate tax"                                 | 2008 | <b>HARMFUL</b><br><i>(doc. 16766/10)</i> | 2012<br><i>(doc. 16488/12)</i> |



|                    |   |      |  |                                |
|--------------------|---|------|--|--------------------------------|
| <b>Greenland</b>   | <b>GL001</b> (F001)<br>"Deduction for investment in mineral processing"           | 1999 | Not harmful                              |                                |
|                    | <b>GL002</b> (F002)<br>"Surcharge exemption for raw materials concession holders" | 1999 | Not harmful                              |                                |
| <b>Isle of Man</b> | <b>IM001</b> (F059)<br>"Free Depreciation and balancing charges on ships"         | 1999 | Not harmful                              |                                |
|                    | <b>IM002</b> (F060)<br>"Special depreciation for tourist premises"                | 1999 | Not harmful                              |                                |
|                    | <b>IM003</b> (F061)<br>"International Business companies"                         | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2006<br><i>(doc. 14812/02)</i> |
|                    | <b>IM004</b> (F062)<br>"Exemption for non-residents companies"                    | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2006<br><i>(doc. 14812/02)</i> |
|                    | <b>IM005</b> (F063)<br>"Exempt insurance companies"                               | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2006<br><i>(doc. 14812/02)</i> |
|                    | <b>IM006</b> (F064)<br>"Tax holidays for industrial undertakings"                 | 1999 | Not harmful                              |                                |
|                    | <b>IM007</b> (F065)<br>"International loan business"                              | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2006<br><i>(doc. 14812/02)</i> |
|                    | <b>IM008</b> (F066)   | 1999 | <b>HARMFUL</b>                           | 2006                           |

|               |   |      |  |  |
|---------------|---|------|--|--|
|               | "Offshore banking business"   |      | <i>(doc. 14313/99)</i>                     | <i>(doc. 14812/02)</i>                         |
|               | <b>IM009</b> (F067)<br>"Fund management"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2006<br><i>(doc. 14812/02)</i>                 |
|               | <b>IM010</b> (F068)<br>"Exempt Public Companies"  | 1999 | Not harmful                                |  |
|               | <b>IM011</b> (F069)<br>"Film industry tax credits"  | 1999 | Not harmful                                |  |
|               | <b>IM012</b><br>"General and non-discriminatory corporate taxation system" (abolishing F061-F062-F063-F065-F066-F067) | 2007 | Not harmful                                |  |
|               | <b>IM013</b><br>"Distributable Profits Charge (DPC)"  | 2007 | <b>HARMFUL</b><br><i>(doc. 15545/1/07)</i> | 2008<br><i>(doc. 9633/08)</i>                  |
|               | <b>IM014</b><br>"New tax legislation"   | 2013 | Not assessed<br><i>(doc. 16656/13)</i>     |  |
| <b>Jersey</b> | <b>JE001</b> (F045)<br>"Tax exempt companies"   | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2008<br><i>(doc. 14812/02)</i>                 |
|               | <b>JE002</b> (F046)<br>"International Treasury operations"  | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2006<br><i>(doc. 14812/02)</i>                 |
|               | <b>JE003</b> (F047)<br>"International Business companies"   | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i>   | 2006: abolished<br>2012: end of grandfathering |

|                        |   |                            |  |                                |
|------------------------|---|----------------------------|--|--------------------------------|
|                        |   |                            |  | <i>(doc. 14812/02)</i>         |
|                        | <b>JE004</b> (F048)<br>"Captive insurance companies"                        | 1999                       | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2006<br><i>(doc. 14812/02)</i> |
|                        | <b>JE005</b><br>"Zero-ten corporate tax"                                    | 2008                       | <b>HARMFUL</b><br><i>(doc. 16766/10)</i> | 2011<br><i>(doc.17081/11)</i>  |
| <b>Caymans Islands</b> | <b>KY001</b> (F057)<br>"Tax Exemption Guarantee"                            | 1999                       | Not harmful                              |                                |
| <b>Macao</b>           | <b>MO001</b> (F035)<br>"Offshore Banking"                                   | 1999                       | Not harmful                              |                                |
| <b>Montserrat</b>      | <b>MS001</b> (F070)<br>"Reduced rate for industrial and offshore companies" | 1999                       | Not harmful                              |                                |
|                        | <b>MS002</b> (F071)<br>"International business companies"                   | 1999                       | Not harmful                              |                                |
|                        | <b>MS003</b> (F072)<br>"Tax holidays for approved enterprises"              | 1999                       | Not harmful                              |                                |
|                        | <b>MS004</b> (F073)<br>"Exemption for newly constructed or enlarged hotels" | 1999                       | Not harmful                              |                                |
|                        | <b>MS005</b><br>"International Business Companies"                          | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 14364/18)</i> |                                |

|                         |  |      |             |  |
|-------------------------|--|------|-------------|--|
| <b>New Caledonia</b>    | <b>NC001</b> (F004)<br>"Exemption for 8 years for certain activities in specified communes"  | 1999 | Not harmful |  |
|                         | <b>NC002</b> (F005)<br>"Metallurgical companies"   | 1999 | Not harmful |  |
|                         | <b>NC003</b> (F006)<br>"Exemption or reduced rate base for rental income in specified communes"  | 1999 | Not harmful |  |
|                         | <b>NC004</b> (F007)<br>"10-15 year exemption in hotel and tourist industry"  | 1999 | Not harmful |  |
|                         | <b>NC005</b> (F008)<br>"Deductions for investment in certain industries"   | 1999 | Not harmful |  |
|                         | <b>NC006</b> (F009)<br>"Deduction for capital investment"  | 1999 | Not harmful |  |
| <b>French Polynesia</b> | <b>PF001</b> (F010)<br>"Investment and job incentives (tax exemptions) in certain sectors (tourism, maritime, etc. but excluding banking and insurance)" | 1999 | Not harmful |  |

|                                   |   |      |             |  |
|-----------------------------------|---|------|-------------|--|
| <b>Saint-Pierre and Miquelon</b>  | <b>PM001</b> (F016)<br>"Temporary exemptions for certain sectors"             | 1999 | Not harmful |  |
|                                   | <b>PM002</b> (F017)<br>"Partial exemption from distribution tax"              | 1999 | Not harmful |  |
|                                   | <b>PM003</b> (F018)<br>"Deduction for productive investment"                  | 1999 | Not harmful |  |
|                                   | <b>PM004</b> (F019)<br>"Share in the subscribed capital of certain companies" | 1999 | Not harmful |  |
| <b>St Helena and Dependencies</b> | <b>SH001</b> (F075)<br>"Tax holidays"   | 1999 | Not harmful |  |
|                                   | <b>SH002</b> (F076)<br>"150% deductions"                                      | 1999 | Not harmful |  |
| <b>Turks and Caicos Islands</b>   | <b>TC001</b> (F078)<br>"Tax Exemption Guarantee"                              | 1999 | Not harmful |  |
| <b>British Virgin Islands</b>     | <b>VG001</b> (F052)<br>"Arising and remittance basis"                         | 1999 | Not harmful |  |
|                                   | <b>VG002</b> (F053)<br>"1% rate"  | 1999 | Not harmful |  |
|                                   | <b>VG003</b> (F054)<br>"Pioneer industry exemption"                           | 1999 | Not harmful |  |

|                                  |   |      |  |                                |
|----------------------------------|---|------|--|--------------------------------|
|                                  | <b>VG004</b> (F055)<br>"Exemption for newly constructed hotels"     | 1999 | Not harmful                              |                                |
|                                  | <b>VG005</b> (F056)<br>"International Business companies"           | 1999 | <b>HARMFUL</b><br><i>(doc. 14313/99)</i> | 2005<br><i>(doc. 15434/05)</i> |
| <b>Wallis and Futuna Islands</b> | <b>WF001</b> (F011)<br>"Investment and Job Incentives"              | 1999 | Not harmful                              |                                |
| <b>Mayotte</b>                   | <b>YT001</b> (F013)<br>"Temporary tax exemptions for companies"     | 1999 | Not harmful                              |                                |
|                                  | <b>YT002</b> (F014)<br>"Tax deductions for productive investments"  | 1999 | Not harmful                              |                                |
|                                  | <b>YT003</b> (F015)<br>"Capital contributions to certain companies" | 1999 | Not harmful                              |                                |

### III. Other jurisdictions

| <b>NAME OF THE JURISDICTION</b> | <b>PREFERENTIAL TAX REGIMES</b><br>Code by jurisdiction<br>"Name of the regime"  | <b>STANDSTILL DATE<sup>11</sup></b><br><i>(+ Indication whether under monitoring by the COCG or by the OECD Forum on Harmful Tax Practices - FHTP<sup>12</sup>)</i> | <b>ASSESSMENT</b>                       | <b>ROLLBACK DATE</b>           |
|---------------------------------|--|---|---|--------------------------------|
| <b>Andorra</b>                  | <b>AD001</b><br>"International Trading Companies"  | 2017<br><i>(OECD FHTP)</i>  | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> | 2018<br><i>(doc. 14364/18)</i> |
|                                 | <b>AD002</b><br>"International Intellectual Property companies" (Special regime for exploitation of certain intangible assets) | 2017<br><i>(OECD FHTP)</i>  | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> | 2018<br><i>(doc. 14364/18)</i> |
|                                 | <b>AD003</b><br>"Intra-Group finance companies" (Inter-company and financing regime)   | 2017<br><i>(OECD FHTP)</i>  | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> | 2018<br><i>(doc. 14364/18)</i> |

<sup>11</sup> Date of identification by the COCG

<sup>12</sup> For jurisdictions that are members of the Inclusive Framework on BEPS or that are found of relevance by the FHTP, the Council has agreed to take stock of the conclusions reached by the OECD (see doc. 15429/17, Annex IV, point 2.5). Regimes found out of scope by the FHTP and regimes of other jurisdictions are assessed by the COCG. As for jurisdictions that have recently joined the Inclusive Framework on BEPS: see doc. 14364/18, paragraph 62.

|                             |  |                            |   |                                |
|-----------------------------|--|----------------------------|---|--------------------------------|
|                             | <b>AD004</b><br>"Holding companies"  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   | 2018<br><i>(doc. 14364/18)</i> |
| <b>United Arab Emirates</b> | <b>AE001</b><br>"Free Zones"   | 2017                       | UAE was in the end reviewed under criterion 2.2 of the EU listing exercise<br><i>(doc. 8304/1/18)</i> |                                |
| <b>Antigua and Barbuda</b>  | <b>AG001</b><br>"International Business Corporations (IBC)" (includes the revisions of the International Banking Act, Companies Act and Corporate Management and Trust Services Providers Act) | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |                                |
|                             | <b>AG002</b><br>"Merchant Shipping Act"  | 2018<br><i>(COCG)</i>      |   |                                |
|                             | <b>AG003</b><br>"Free Trade Zones (Paradise Found Act, Yida Act, Free Trade Zone Act, Special Economic Zone Act)"  | 2018<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 14364/18)</i>  |                                |
| <b>Armenia</b>              | <b>AM001</b><br>"Reduced Tax Rate for Large Exporters "  | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   | 2018<br><i>(doc. 12771/18)</i> |



|                  |   |                     |  |                         |
|------------------|---|---------------------|--|-------------------------|
|                  | <b>AM002</b><br>"Governmentally approved projects outside Armenia"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)           | 2018<br>(doc. 12772/18) |
| <b>Australia</b> | <b>AU001</b><br>"Offshore banking unit"                             | 2018<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 14364/18 COR<br>1) |                         |
| <b>Barbados</b>  | <b>BB001</b><br>"International Business Companies"                  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)           |                         |
|                  | <b>BB002</b><br>"International Financial Services"                  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)           |                         |
|                  | <b>BB003</b><br>"Exempt Insurance Company"                          | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)           |                         |
|                  | <b>BB004</b><br>"Qualifying Insurance Company"                      | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)           |                         |
|                  | <b>BB005</b><br>"International Societies with Restricted Liability" | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)           |                         |
|                  | <b>BB006</b><br>"Shipping Regime"                                   | 2017<br>(COCG)      | Not harmful                                |                         |
|                  | <b>BB007</b><br>"International Trusts"                              | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)           |                         |
|                  | <b>BB008</b>  | 2017                | <b>HARMFUL</b>                             |                         |

|                    |  |                            |   |  |
|--------------------|--|----------------------------|---|--|
|                    | "Fiscal Incentives Act"  | <i>(COCG)</i>              | <i>(doc. 6671/18)</i>   |  |
|                    | <b>BB009</b><br>"Foreign Currency Earnings Credit (FCEC) / Credit for overseas projects or services" | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |  |
| <b>Belize</b>      | <b>BZ001</b><br>"International business company (IBC)"   | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |  |
|                    | <b>BZ002</b><br>"Export processing zones (EPZ) enterprises"  | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |  |
| <b>Brazil</b>      | <b>BR001</b><br>"Export Processing Zone "  | 2017<br><i>(COCG)</i>      | Not harmful <sup>13</sup>   |  |
| <b>Botswana</b>    | <b>BW001</b><br>"Botswana International Financial Services Centre Companies (BITCC)"                 | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |  |
| <b>Canada</b>      | <b>CA001</b><br>"Life insurance business"  | 2018<br><i>(OECD FHTP)</i> | Potentially harmful but not actually harmful (under monitoring)<br><i>(doc. 14364/18)</i> |  |
| <b>Switzerland</b> | <b>CH001</b>   | 2012                       | <b>HARMFUL</b>  |  |

<sup>13</sup> Following new information received from Brazil on this regime in November 2017 after sending the letter seeking commitment (doc. 6671/18): authorities made clear that the tax regime concerned has been designed to only benefit the most underdeveloped regions of Brazil.

|                     |  |                |   |  |
|---------------------|--|----------------|---|--|
|                     | "Cantonal administrative company status (auxiliary company regime)"  | (COCG)         | (doc. 11133/13)   |  |
|                     | <b>CH002</b><br>"Cantonal mixed company status"  | 2012<br>(COCG) | <b>HARMFUL</b><br>(doc. 11133/13)                           |  |
|                     | <b>CH003</b><br>"Cantonal holding company status"  | 2012<br>(COCG) | <b>HARMFUL</b><br>(doc. 11133/13)                           |  |
|                     | <b>CH004</b><br>"Circular Number 8 of the Federal Tax Administration on principal structures (principal regime)" | 2012<br>(COCG) | <b>HARMFUL</b><br>(doc. 11133/13)                           |  |
|                     | <b>CH005</b><br>"Practice of the Federal Tax Administration regarding finance branches"                          | 2012<br>(COCG) | <b>HARMFUL</b><br>(doc. 11133/13)                           |  |
| <b>Cook Islands</b> | <b>CK001</b><br>"International Companies"  | 2017<br>(COCG) | <b>HARMFUL</b><br>(doc. 6671/18)                            |  |
|                     | <b>CK002</b><br>"International Insurance Companies" (2008 Insurance Act class C)                                 | 2017<br>(COCG) | <b>HARMFUL</b><br>(doc. 6671/18)                            |  |
|                     | <b>CK003</b><br>"Overseas insurance companies" (2008 Insurance Act class B)                                      | 2017<br>(COCG) | Assessment not finalised (unclear if gateway criterion met) |  |

|                 |  |                     |  |                             |
|-----------------|--|---------------------|--|-----------------------------|
|                 | <b>CK004</b><br>"International Captive Insurance Companies" (2013 Captive Insurance Bill)                  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |                             |
|                 | <b>CK005</b><br>"Encouragement of new industry or enterprise"<br>(Development Investment Act, section 27A) | 2017<br>(COCG)      | <b>HARMFUL</b><br>(but not used and in the process of being repealed at the time of the screening) | 2018                        |
|                 | <b>CK006</b><br>"Developing projects" (Income Tax Act, section 42)   | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |                             |
| <b>Chile</b>    | <b>CL001</b><br>"Business platform"  | 2017<br>(OECD FHTP) | Potentially harmful but not actually harmful (under monitoring)                                    | 2022: end of grandfathering |
| <b>China</b>    | <b>CN001</b><br>"Reduced rate for new/high tech enterprises"   | 2017<br>(OECD FHTP) | Not harmful  |                             |
|                 | <b>CN002</b><br>"Reduced rate for advanced technology service enterprises"                                 | 2017<br>(OECD FHTP) | Not harmful  |                             |
| <b>Colombia</b> | <b>CO001</b><br>"Exempted income – income derived from software"   | 2017<br>(OECD FHTP) | <b>HARMFUL</b>   | 2017                        |

|                   |   |                     |                                  |  |
|-------------------|---|---------------------|----------------------------------|--|
|                   | developed in Colombia" (or Software regime)                           |                     |                                  |  |
| <b>Costa Rica</b> | <b>CR001</b><br>"Free Zones"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b> <sup>14</sup>     |  |
| <b>Cabo Verde</b> | <b>CV001</b><br>"International Business Centre (as revised)"          | 2017<br>(COCG)      | <b>HARMFUL</b> <sup>15</sup>     |  |
|                   | <b>CV002</b><br>"International financial institutions"                | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |  |
| <b>Dominica</b>   | <b>DM001</b><br>"International Business Companies"                    | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |  |
|                   | <b>DM002</b><br>"Offshore Banking"                                    | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |  |
|                   | <b>DM003</b><br>"General incentive under Fiscal Incentives Act (FIA)" | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |  |
| <b>Fiji</b>       | <b>FJ001</b><br>"Exporting Companies"                                 | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |  |
|                   | <b>FJ002</b><br>"Income Communication Technology (ICT) Incentive"     | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |  |

<sup>14</sup> Under *de facto* monitoring by the COCG following Costa Rica's commitment made to the OECD FHTP (see doc. 9637/18).

<sup>15</sup> The Council concluded in December 2017 that this regime is not harmful as long as the complementary legislation is not in force and for this reason no commitment was sought, but this legislation has in the meantime come into force.

|                |   |                     |  |  |
|----------------|---|---------------------|--|--|
|                | <b>FJ003</b><br>"Concessionary rate of tax for regional or global headquarters" | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
| <b>Grenada</b> | <b>GD001</b><br>"International companies"                                       | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                | <b>GD002</b><br>"Offshore Banking"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                | <b>GD003</b><br>"International Insurance"                                       | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                | <b>GD004</b><br>"International trusts"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                | <b>GD005</b><br>"Fiscal incentives under various Acts"                          | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                | <b>GD006</b><br>"Export processing / commercial free zones enterprises"         | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
| <b>Georgia</b> | <b>GE001</b><br>"International Financial Companies"                             | 2017<br>(OECD FHTP) | Potentially harmful<br>but not actually<br>harmful (under<br>monitoring) |  |

|                      |  |                     |  |                         |
|----------------------|--|---------------------|--|-------------------------|
|                      | <b>GE002</b><br>"Free industrial zones (FIZ)"  | 2017<br>(COCG)      | Not harmful <sup>16</sup>  |                         |
|                      | <b>GE003</b><br>"Special Trade Companies"  | 2017<br>(COCG)      | Not harmful <sup>17</sup>  |                         |
|                      | <b>GE004</b><br>"Virtual Zone Person (VZP)"  | 2017<br>(OECD FHTP) | Potentially harmful<br>but not actually<br>harmful (under<br>monitoring) |                         |
| <b>Hong Kong SAR</b> | <b>HK001</b><br>"Corporate treasury centres (CTC)" (or Profits tax<br>concession for corporate treasury centres) | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)   | 2018<br>(doc. 14364/18) |
|                      | <b>HK002</b><br>"Offshore funds"   | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |                         |
|                      | <b>HK003</b><br>"Offshore Private Equity Funds"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |                         |
|                      | <b>HK004</b><br>"Offshore Reinsurance" (or Profits tax concession for<br>professional reinsurers)                | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)   | 2018<br>(doc. 14364/18) |

<sup>16</sup> Following new information received from Georgia on this regime in November 2017 after sending the letter seeking commitment (doc. 6671/18): Georgia clarified the reasons why the regime is not ring-fenced.

<sup>17</sup> Following new information received from Georgia on this regime in November 2017 after sending the letter seeking commitment (doc. 6671/18): Georgia clarified the reasons why the regime is not ring-fenced.

|                  |   |                              |   |                                  |
|------------------|---|------------------------------|---|----------------------------------|
|                  | <b>HK005</b><br>"Offshore captive insurance" (or Profits tax concession for captive insurers) | 2017<br>( <i>OECD FHTP</i> ) | <b>HARMFUL</b><br>( <i>doc. 6671/18</i> ) | 2018<br>( <i>doc. 14364/18</i> ) |
|                  | <b>HK006</b><br>"Shipping Regime" (or Profits tax exemptions for ship operators)              | 2017<br>( <i>OECD FHTP</i> ) | Not harmful                               |                                  |
|                  | <b>HK007</b><br>"Qualifying debt instruments"   | 2017<br>( <i>COCG</i> )      | Not harmful                               |                                  |
|                  | <b>HK008</b><br>"Profits tax concessions for aircraft lessors and aircraft leasing managers"  | 2017<br>( <i>OECD FHTP</i> ) | Not harmful                               |                                  |
| <b>Indonesia</b> | <b>ID001</b><br>"Investment allowance"  | 2017<br>( <i>OECD FHTP</i> ) | Not harmful                               |                                  |
|                  | <b>ID002</b><br>"Special economic zone"   | 2017<br>( <i>OECD FHTP</i> ) | Not harmful                               |                                  |
|                  | <b>ID003</b><br>"Tax reduction" (formerly Tax holiday)  | 2017<br>( <i>OECD FHTP</i> ) | Not harmful                               |                                  |
|                  | <b>ID004</b><br>"Public / listed company"   | 2017<br>( <i>OECD FHTP</i> ) | Not harmful                               |                                  |
| <b>Israel</b>    | <b>IL001</b><br>"Preferred company" (Amended preferred enterprise and                         | 2017<br>( <i>OECD FHTP</i> ) | Not harmful                               |                                  |



|                              |   |                            |   |   |
|------------------------------|---|----------------------------|---|---|
|                              | Preferred technological enterprise regimes)   |                            |   |   |
| <b>India</b>                 | <b>IN001</b><br>"Special Economic Zones (SEZS)"   | 2017<br><i>(OECD FHTP)</i> | Not harmful                             |   |
| <b>Jamaica</b>               | <b>JM001</b><br>"Industrial (Export Related) Incentives"  | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> | 2014: abolished<br>2017: end of<br>grandfathering |
|                              | <b>JM002</b><br>"Special Economic Zones"  | 2017<br><i>(COCG)</i>      | Not harmful                             |   |
| <b>Jordan</b>                | <b>JO001</b><br>"Free Zone"   | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |   |
|                              | <b>JO002</b><br>"Development Zone"  | 2018<br><i>(OECD FHTP)</i> |   |   |
|                              | <b>JO003</b><br>"Least Developed Zones"   | 2018<br><i>(COCG)</i>      | Out of scope                            |   |
|                              | <b>JO004</b><br>"Aqaba Special Economic Zone"   | 2018<br><i>(OECD FHTP)</i> |   |   |
| <b>Saint Kitts and Nevis</b> | <b>KN001</b><br>"Offshore companies" (including the Nevis Limited Liability Company (LLC) ordinance, Nevis business corporation ordinance, and Companies act) | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |   |

|                      |   |                                   |                                   |                         |
|----------------------|---|-----------------------------------|-----------------------------------|-------------------------|
|                      | <b>KN002</b><br>"Fiscal Incentives Act"                                     | 2018<br>(COCG)                    | <b>HARMFUL</b><br>(doc. 14364/18) |                         |
| <b>Korea</b>         | <b>KR001</b><br>"Foreign investment Zone (FIZ)"                             | 2017<br>(COCG)                    | <b>HARMFUL</b><br>(doc. 6671/18)  |                         |
|                      | <b>KR002</b><br>"Free Trade / Economic Zones (FTEZ)"                        | 2017<br>(COCG)                    | <b>HARMFUL</b><br>(doc. 6671/18)  |                         |
| <b>Saint Lucia</b>   | <b>LC001</b><br>"International Business Companies (IBC)"                    | 2017<br>(COCG)                    | <b>HARMFUL</b><br>(doc. 6671/18)  |                         |
|                      | <b>LC002</b><br>"International Trusts"                                      | 2017<br>(COCG)                    | <b>HARMFUL</b><br>(doc. 6671/18)  |                         |
|                      | <b>LC003</b><br>"Free trade Zones"  | 2017<br>(COCG)                    | <b>HARMFUL</b><br>(doc. 6671/18)  |                         |
|                      | <b>LC004</b><br>"International Partnership Act"                             | 2018<br>(OECD FHTP)               |                                   |                         |
| <b>Liechtenstein</b> | <b>LI001</b><br>"Tax Exempt Corporate Income - dividends and capital gains" | 2011<br>(COCG)<br>(doc. 17081/11) | <b>HARMFUL</b><br>(doc. 14784/17) | 2018<br>(doc. 12773/18) |
|                      | <b>LI002</b><br>"The special regime for Private Asset Structures (PAS)"     | 2011<br>(doc. 17081/11)           | Out of scope<br>(doc. 14784/17)   |                         |
|                      | <b>LI003</b><br>"Interest deduction on equity (Allowance for Corporate      | 2016<br>(COCG)                    | <b>HARMFUL</b><br>(doc. 14784/17) | 2018<br>(doc. 12774/18) |

|                 |   |                     |  |  |
|-----------------|---|---------------------|--|--|
|                 | Equity - ACE)"  |                     |  |  |
|                 | <b>LI004</b><br>"Royalty box" (or IP box)   | 2016<br>(COCG)      | Not assessed<br>(abolished before)                                       |  |
| <b>Morocco</b>  | <b>MA001</b><br>"Coordination Centres"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                 | <b>MA002</b><br>"Export Enterprises"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                 | <b>MA003</b><br>"Export Free Zones (EFZ) or Free Trade Zones (FTZ)"   | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                 | <b>MA004</b><br>"Offshore Banks"  | 2017<br>(COCG)      | Potentially harmful<br>but not actually<br>harmful (under<br>monitoring) |  |
|                 | <b>MA005</b><br>"Offshore Holding Companies"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18)   |  |
|                 | <b>MA006</b><br>"Casablanca Finance City" (previously named as<br>"Regional or International Headquarters") | 2018<br>(COCG)      | <b>HARMFUL</b><br>(doc. 14364/18)  |  |
| <b>Mongolia</b> | <b>MN001</b><br>"Free trade zone"   | 2018<br>(OECD FHTP) |  |  |

|  |  |                     |   |                         |
|--|--|---------------------|---|-------------------------|
|  | <b>MN002</b><br>"90% tax credit regime for companies residing in isolated province (500 km)"     | 2018<br>(COCG)      | Not assessed<br>(due to be abolished by end 2018) |                         |
| <b>Macau SAR</b><br>(changed status in 1999) | <b>MO001</b><br>"Offshore companies" (or Macau offshore institution)                             | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)                  |                         |
| <b>Mauritius</b>                             | <b>MU001</b><br>"Global Business Licence 1 (GBL 1)"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)                  |                         |
|  | <b>MU002</b><br>"Global Business Licence 2 (GBL 2)"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)                  |                         |
|  | <b>MU003</b><br>"Freeport Zone"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)                  | 2018<br>(doc. 14364/18) |
|  | <b>MU004</b><br>"Shipping Regime"  | 2017<br>(OECD FHTP) | Not Harmful                                       |                         |
|  | <b>MU005</b><br>"Captive Insurance"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)                  | 2018<br>(doc. 14364/18) |
|  | <b>MU006</b><br>"Banks Holding a Banking Licence under the Banking Act 2004 (segment B banking)" | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18)                  |                         |
|  | <b>MU007</b><br>"Global treasury activities"   | 2017<br>(OECD FHTP) | Not Harmful                                       |                         |

|                                   |   |                            |  |                                |
|-----------------------------------|---|----------------------------|--|--------------------------------|
|                                   | <b>MU008</b><br>"Global headquarters administration"  | 2017<br><i>(OECD FHTP)</i> | Not Harmful                              |                                |
|                                   | <b>MU009</b><br>"Investment Banking"  | 2017<br><i>(OECD FHTP)</i> | Not Harmful                              |                                |
|                                   | <b>MU010</b><br>"Partial exemption system" (replaces the MU001 and MU002 regimes)                                   | 2018<br><i>(OECD FHTP)</i> |  |                                |
|                                   | <b>MU011</b><br>"Banks Holding a Banking Licence under the Banking Act 2004" (replaces the MU006 regime)            | 2018<br><i>(OECD FHTP)</i> |  |                                |
|                                   | <b>MU012</b><br>"Manufacturing activities under the Freeport zone regime"   | 2018<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 14364/18)</i> |                                |
| <b>Maldives</b>                   | <b>MV001</b><br>"Reduced tax" (or Reduced tax rates on profits sourced outside Maldives)                            | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>  |                                |
| <b>Malaysia and Labuan Island</b> | <b>MY001</b><br>"Labuan Island - International Business and Financial Centre (IBFC)" (or Labuan financial services) | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>  |                                |
|                                   | <b>MY002</b><br>"Labuan Island - Financing and Leasing" (or Labuan  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>  | 2018<br><i>(doc. 14364/18)</i> |

|              |                                    |                            |   |      |
|--------------|------------------------------------|----------------------------|---|------|
|              | leasing)                           |                            |   |      |
| <b>MY003</b> | "International trading company"    | 2017<br><i>(COCG)</i>      | Not Harmful                             |      |
| <b>MY004</b> | "Foreign fund management"          | 2017<br><i>(OECD FHTP)</i> | Not Harmful                             |      |
| <b>MY005</b> | "Special economic regions"         | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |      |
| <b>MY006</b> | "Treasury management centre (TMC)" | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b>                          | 2017 |
| <b>MY007</b> | "Pioneer Status"                   | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |      |
| <b>MY008</b> | "Biotechnology industry"           | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |      |
| <b>MY009</b> | "Approved Service Projects"        | 2017<br><i>(COCG)</i>      | Not Harmful                             |      |
| <b>MY010</b> | "Green technology services"        | 2017<br><i>(OECD FHTP)</i> | Not Harmful                             |      |
| <b>MY011</b> | "MSC Malaysia Status"              | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |      |
| <b>MY012</b> | "Headquarters" (or Principal hub)  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |      |

|                |  |                     |                                  |                         |
|----------------|--|---------------------|----------------------------------|-------------------------|
|                | <b>MY013</b><br>"Inward re-insurance and offshore insurance "        | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
|                | <b>MY014</b><br>"International currency business units"              | 2018<br>(OECD FHTP) |                                  |                         |
| <b>Namibia</b> | <b>NA001</b><br>"Export Processing Zones (EPZ)"                      | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
|                | <b>NA002</b><br>"Exporters"  | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
| <b>Niue</b>    | <b>NU001</b><br>"International Business Companies Act of 1994 (IBC)" | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) | 2006 <sup>18</sup>      |
| <b>Panama</b>  | <b>PA001</b><br>"Multinational Headquarters"                         | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
|                | <b>PA002</b><br>"Free Zones Act"                                     | 2017<br>(COCG)      | Out of scope                     |                         |
|                | <b>PA003</b><br>"Colon Free Zone"                                    | 2017<br>(COCG)      | Not harmful                      |                         |
|                | <b>PA004</b><br>"Panama-Pacifico Special Economic Area"              | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
|                | <b>PA005</b><br>"Foreign Owned Call Centres "                        | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) | 2018<br>(doc. 15117/18) |

<sup>18</sup> This information about the abolition of this regime in 2006 was received from Niue after the COCG sent them a letter seeking commitment (doc. 6671/18).

|                   |   |                            |   |  |
|-------------------|---|----------------------------|---|--|
|                   | <b>PA006</b><br>"Shipping Regime"   | 2017<br><i>(OECD FHTP)</i> | Not harmful                             |  |
|                   | <b>PA007</b><br>"Intellectual Property - City of Knowledge"   | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
| <b>Peru</b>       | <b>PE001</b><br>"CETICOS special economic zone"   | 2017<br><i>(COCG)</i>      | Not Harmful                             |  |
|                   | <b>PE002</b><br>"Zofratacna special economic zone"  | 2017<br><i>(OECD FHTP)</i> | Not Harmful                             |  |
| <b>Seychelles</b> | <b>SC001</b><br>"International Business Companies"  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|                   | <b>SC002</b><br>"International Trade Zone (ITZ)" (or Free Zones)  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|                   | <b>SC003</b><br>"Offshore banks (OB)" (Segment 1 banking license)   | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|                   | <b>SC004</b><br>"Offshore insurance" (or Non-domestic insurance<br>business, Insurance of offshore risks) | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|                   | <b>SC005</b><br>"Companies special license (CSL)"   | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|                   | <b>SC006</b><br>"Intellectual Property"   | 2017<br><i>(OECD FHTP)</i> | Non existent                            |  |



|                  |   |                            |  |      |
|------------------|---|----------------------------|--|------|
|                  | <b>SC007</b><br>"Securities Business under the Securities act"                        | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>                                  |      |
|                  | <b>SC008</b><br>"Fund Administration Business"  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>                                  |      |
|                  | <b>SC009</b><br>"Reinsurance Business"  | 2017<br><i>(OECD FHTP)</i> | Potentially harmful<br>but not actually<br>harmful (under<br>monitoring) |      |
|                  | <b>SC010</b><br>"Manufacturing activities in the International Trade<br>Zone"         | 2018<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 14364/18)</i>                                 |      |
| <b>Singapore</b> | <b>SG001</b><br>"Export of services incentive" (or Global trader<br>programme)        | 2017<br><i>(OECD FHTP)</i> | Not Harmful  |      |
|                  | <b>SG002</b><br>"Offshore insurance incentive" (or Insurance business<br>development) | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(2017 screening)</i>                                | 2017 |
|                  | <b>SG003</b><br>"DEI - Legal service"   | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(2017 screening)</i>                                | 2017 |
|                  | <b>SG004</b><br>"Financial services sector incentives"                                | 2017<br><i>(OECD FHTP)</i> | Not Harmful  |      |

|                   |  |                            |  |      |
|-------------------|--|----------------------------|--|------|
|                   | <b>SG005</b><br>"Enhanced headquarters incentive package" (or<br>Development and Expansion Incentive - Services) | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b> (IP<br>components)<br><i>(2017 screening)</i> | 2017 |
|                   | <b>SG006</b><br>"Double Tax Deduction for Internationalisation<br>(DTDI)"  | 2017<br><i>(COCG)</i>      | Out of scope   |      |
|                   | <b>SG007</b><br>"International Growth Scheme"  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(2017 screening)</i>                    | 2017 |
|                   | <b>SG008</b><br>"Maritime sector incentive" (shipping)   | 2017<br><i>(OECD FHTP)</i> | Not Harmful  |      |
|                   | <b>SG009</b><br>"R&D / IP deductions"  | 2017<br><i>(COCG)</i>      | Out of scope   |      |
|                   | <b>SG010</b><br>"Pioneer Service Companies (PSC) for HQ activities"<br>(or Pioneer incentive)                    | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b> (IP<br>components)<br><i>(2017 screening)</i> | 2017 |
|                   | <b>SG011</b><br>"Aircraft Leasing Scheme (ALS)"  | 2017<br><i>(OECD FHTP)</i> | Not Harmful  |      |
|                   | <b>SG012</b><br>"Finance and Treasury Centre (FTC)"  | 2017<br><i>(OECD FHTP)</i> | Not Harmful  |      |
| <b>San Marino</b> | <b>SM001</b><br>"Financing"  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(2017 screening)</i>                    | 2017 |

|                 |   |                            |   |                                |
|-----------------|---|----------------------------|---|--------------------------------|
|                 | <b>SM002</b><br>"Intellectual Property"                 | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(2017 screening)</i> | 2017                           |
|                 | <b>SM003</b><br>"New companies"                         | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   | 2018<br><i>(doc. 14364/18)</i> |
|                 | <b>SM004</b><br>"High-tech start-up companies"          | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   | 2018<br><i>(doc. 14364/18)</i> |
|                 | <b>SM005</b><br>"Intellectual Property regime"          | 2018<br><i>(OECD FHTP)</i> |   |                                |
| <b>Thailand</b> | <b>TH001</b><br>"International Headquarters (IHQ)"      | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |                                |
|                 | <b>TH002</b><br>"International Trading Centre (ITC)"    | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |                                |
|                 | <b>TH003</b><br>"Regional Operating Headquarters (ROH)" | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |                                |
|                 | <b>TH004</b><br>"Treasury Centre (TC)"                  | 2017<br><i>(OECD FHTP)</i> | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |                                |
|                 | <b>TH005</b><br>"International banking facilities"      | 2018<br><i>(OECD FHTP)</i> | <b>HARMFUL</b> <sup>19</sup>              |                                |
| <b>Tunisia</b>  | <b>TN001</b><br>"Export promotion incentives"           | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>   |                                |

<sup>19</sup> This newly identified regime is due to be amended/abolished by end 2018.

|                            |   |                     |                                  |                         |
|----------------------------|---|---------------------|----------------------------------|-------------------------|
|                            | <b>TN002</b><br>"Offshore financial services"   | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
| <b>Turkey</b>              | <b>TR001</b><br>"Technology Development Zones"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18) | 2018<br>(doc. 14364/18) |
|                            | <b>TR002</b><br>"Corporate Tax Law Provision 5/B (new IP regime)"                               | 2017<br>(OECD FHTP) | Not harmful                      |                         |
|                            | <b>TR003</b><br>"Free zones"  | 2017<br>(OECD FHTP) | Not harmful                      |                         |
|                            | <b>TR004</b><br>"Regional Headquarters" (or Regional management centres)                        | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
| <b>Trinidad and Tobago</b> | <b>TT001</b><br>"Free trade zone" (or Free zones)   | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
| <b>Taiwan</b>              | <b>TW001</b><br>"Free Trade Zone" (including the International Airport Park Development regime) | 2017<br>(COCG)      | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
| <b>Uruguay</b>             | <b>UY001</b><br>"Free zones"  | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18) |                         |
|                            | <b>UY002</b><br>"Shared service centre"   | 2017<br>(OECD FHTP) | <b>HARMFUL</b><br>(doc. 6671/18) | 2018<br>(doc. 14364/18) |

|                                 |   |                              |   |      |
|---------------------------------|---|------------------------------|---|------|
|                                 | <b>UY003</b><br>"Financial company reorganisation"  | 2017<br>( <i>OECD FHTP</i> ) | Not assessed<br>(abolished before)        | 2016 |
|                                 | <b>UY004</b><br>"General powers under Law 16,906" (or Investment law incentives under law 16.906)                             | 2017<br>( <i>COCG</i> )      | Not harmful                               |      |
|                                 | <b>UY005</b><br>"Holding company regime / source principle taxation"  | 2017<br>( <i>COCG</i> )      | Out of scope                              |      |
|                                 | <b>UY006</b><br>"Software and biotechnology industry incentives"<br>(benefits under lit. S art. 52)                           | 2017<br>( <i>OECD FHTP</i> ) | <b>HARMFUL</b><br>( <i>doc. 6671/18</i> ) |      |
|                                 | <b>UY007</b><br>"Benefits under law 16,906 for biotechnology"   | 2018<br>( <i>OECD FHTP</i> ) | <b>HARMFUL</b> <sup>20</sup>              |      |
| <b>United States of America</b> | <b>US001</b><br>"Delaware - Exemption of Investment Holding Companies, Firms managing Intangible Investments of Mutual Funds" | 2017<br>( <i>COCG</i> )      | Not Harmful                               |      |
|                                 | <b>US002</b><br>"Delaware - Deduction of interest from affiliated companies"  | 2017<br>( <i>COCG</i> )      | Not Harmful                               |      |

<sup>20</sup> This newly identified regime is due to be amended/abolished by end 2018.

|   |   |                            |   |  |
|---|---|----------------------------|---|--|
|   | <b>US003</b><br>"Foreign Derived Intangible Income (FDII)"    | 2018<br><i>(OECD FHTP)</i> |   |  |
| <b>Saint Vincent<br/>and the<br/>Grenadines</b> | <b>VC001</b><br>"International Business Companies (IBC)"      | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|   | <b>VC002</b><br>"International trusts"                        | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
| <b>US Virgin<br/>Islands</b>                    | <b>VI001</b><br>"Economic Development Programme"              | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|   | <b>VI002</b><br>"Exempt companies"                            | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
|   | <b>VI003</b><br>"International Banking Center Regulatory Act" | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i> |  |
| <b>Viet Nam</b>                                 | <b>VN001</b><br>"Export processing zones"                     | 2017<br><i>(COCG)</i>      | Not harmful<br><i>(doc.12775/18)</i>    |  |
|   | <b>VN002</b><br>"Industrial Parks/Zones"                      | 2018<br><i>(COCG)</i>      | Not harmful<br><i>(doc. 14364/18)</i>   |  |
|   | <b>VN003</b><br>"IP Benefits"                                 | 2018<br><i>(OECD FHTP)</i> |   |  |
|   | <b>VN004</b><br>"Economic Zones"                              | 2018<br><i>(OECD FHTP)</i> |   |  |

|                     |  |                            |  |  |
|---------------------|--|----------------------------|--|--|
|                     | <b>VN005</b><br>"Disadvantaged Areas"    | 2018<br><i>(OECD FHTP)</i> |  |  |
| <b>Samoa</b>        | <b>WS001</b><br>"Offshore Business"      | 2017<br><i>(COCG)</i>      | <b>HARMFUL</b><br><i>(doc. 6671/18)</i>                                  |  |
| <b>South Africa</b> | <b>ZA001</b><br>"Special Economic Zones" | 2017<br><i>(COCG)</i>      | Not Harmful  |  |
|                     | <b>ZA002</b><br>"Headquarter companies"  | 2018<br><i>(OECD FHTP)</i> | Potentially harmful<br>but not actually<br>harmful (under<br>monitoring) |  |