



Brussels, 28 October 2025

CM 4807/25

FISC
ECOFIN

COMMUNICATION

NOTICE OF MEETING AND PROVISIONAL AGENDA

Contact:	ecofin2b.taxpolicy@consilium.europa.eu
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Subject:	Code of Conduct Group (Business Taxation) - Subgroup on internal and external issues [Morning only]
Date:	6 November 2025
Time:	10:00
Venue:	COUNCIL JUSTUS LIPSIUS BUILDING Rue de la Loi 175, 1048 BRUSSELS

Format: 2 + 2

1. Annual monitoring of actual effects of individual measures
2. Monitoring Highly Mobile Activities (“HMA”) in the Special Economic Zones
3. Expenditure-based tax incentives and the nexus requirement in Special Economic Zones
4. Update and state of play on jurisdictions
5. Monitoring process of the implementation of specific substance requirements for collective investments vehicles (CIVs) under criterion 2.2

6. EU list and tax defensive measures
 7. Draft 6-monthly COCG report to the Council
 8. Any other business
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NB: Council documents are available on Delegates Portal.