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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	Code of Conduct Group (Business Taxation) - Overview of the preferential tax regimes and other measures examined by the Code of Conduct Group (Business Taxation) under EU listing criteria 2.1 and 2.2

Delegations will find attached an updated overview of foreign jurisdictions' preferential tax regimes and other measures examined by the Code of Conduct Group (business taxation) under EU listing criteria 2.1 and 2.2.

A similar overview for EU Member States' preferential tax regimes examined by the Code of Conduct Group (business taxation) since its creation in March 1998 can be found in document 8602/20.

OVERVIEW OF THE PREFERENTIAL TAX REGIMES AND OTHER MEASURES EXAMINED BY THE CODE OF CONDUCT GROUP (BUSINESS TAXATION) UNDER EU LISTING CRITERIA 2.1 AND 2.2

NAME OF THE JURISDICTION	PREFERENTIAL TAX REGIMES / MEASURES **Code by jurisdiction** "Name of the regime/measure"	STANDSTILL DATE[1] *(indication of whether the regime is under the monitoring of the COCG or of the OECD Forum on Harmful Tax Practices - FHTP[2])*	COCG ASSESSMENT *(doc. reference)*	ROLLBACK DATE *(doc. reference)*
Andorra	**AD001** "International Trading Companies"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	AD002 "International Intellectual Property companies" (Special regime for exploitation of certain intangible assets)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*

[1] Date of identification by the COCG

[2] 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 deemed 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.

	AD003 "Intra-Group finance companies" (Inter-company and financing regime)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	AD004 "Holding companies"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
United Arab Emirates	**AE001** "Free Zones"	2017 *(COCG)*	Not assessed[3] *(doc. 8304/1/18)*	
	AE002 "Measure under criterion 2.2"	2018 *(COCG)*	**HARMFUL** *(doc. 8304/1/18)*	2019 *(doc. 13047/19)*
	AE003 "New guidance under criterion 2.2"	2019 *(COCG)*		
Antigua and Barbuda	**AG001** "International Business Corporations (IBC)" (includes the revisions of the International Banking Act, Companies Act and Corporate Management and Trust Services Providers Act)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7461/19)*
	AG002 "Merchant Shipping Act"	2018 *(COCG)*		

[3] UAE was in the end reviewed under criterion 2.2 of the EU listing exercise: see measure AE002.

	AG003 "Free Trade Zones (Paradise Found Act, Yida Act, Free Trade Zone Act, Special Economic Zone Act)"	2018 *(COCG)*	**HARMFUL** *(doc. 14364/18)*	2020 *(doc. 7416/20)*
Anguilla[4]	**AI001** "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7219/19)*
Armenia	**AM001** "Reduced Tax Rate for Large Exporters "	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 12771/18)*
	AM002 "Governmentally approved projects outside Armenia"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 12772/18)*
Australia	**AU001** "Offshore banking unit"	2018 *(OECD FHTP)*	**HARMFUL** *(doc. 14364/18 COR 1)*	
Aruba	**AW001** (F027) "Offshore Companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2003 *(doc. 7018/1/03)*

[4] The code used by the COCG for Anguilla in 1998-1999 was F036 (no preferential tax regime had been identified). See doc. 8602/20.

	AW002 (F028) "Exempt companies (AVVs)"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99*)	2006 *(doc. 7018/1/03)*
	AW003 (F029) "Tax exemptions and holidays for new businesses"	1999 *(COCG)*	Not harmful	
	AW004 (F030) "Free zones"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 7018/1/03*
	AW005 (F031) "Rulings"	1999 *(COCG)*	Not harmful	
	AW006 (F032) "Captive insurance"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2003 *(doc. 7018/1/03)*
	AW007 (F033) "Shipping and Air Transport"	1999 *(COCG)*	Not harmful	
	AW008 "New fiscal framework" (or Imputation Payment Company (IPC) regime)	2004 *(COCG)*	Not harmful	2015: abolished 2025: end of grandfathering[5]

[5] Potentially harmful but not actually harmful: under monitoring by OECD FHTP until the end of the grandfathering period at the end of 2025.

	AW009 "Amendments to the IPC regime" (intellectual property aspects)	2016 *(COCG)*	Not assessed (Intellectual Property components were abolished before)	
	AW010 "Free Zone " (revision of the AW004 regime)	2017 *(OECD FHTP)*		
	AW011 "Shipping and aviation companies"	2017 *(COCG)*	Not harmful	
	AW012 "Special zone San Nicolas"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 7518/19)*
	AW013 "Transparency"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9646/19)*
	AW014 "Exempt companies" (revision of the AW002 regime)	2019 *(OECD FHTP)*		
	AW015 "Investment Promotion" (other geographically mobile activities than intellectual property)	2019 *(OECD FHTP)*		
Barbados	**BB001** "International Business Companies"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*

	BB002 "International Financial Services"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	BB003 "Exempt Insurance Company"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	BB004 "Qualifying Insurance Company"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	BB005 "International Societies with Restricted Liability"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	BB006 "Shipping Regime"	2017 *(COCG)*	Not harmful	
	BB007 "International Trusts"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	BB008 "Fiscal Incentives Act"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 7676/19)*
	BB009 "Foreign Currency Earnings Credit (FCEC) / Credit for overseas projects or services"	2017 *(OECD FHTP and COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*

	BB010 "Insurance regime"	2019 *(OECD FHTP)*		
	BB011 "Measure under criterion 2.2"	2019 *(COCG)*	**HARMFUL** *(doc. 5981/19)*	2020 *(doc. 7446/20 + ADDs 1-5)*
Bahrain	**BH001** "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7221/19)*
	BH002 "New guidance under criterion 2.2"	2019 *(COCG)*		
Bermuda	**BM001** (F049) "Tax exemption guarantee"	1999 *(COCG)*	Not harmful	
	BM002 "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9671/19)* 2020: CIVs *(doc. 9671/19 ADD 1)*

	BM003 "Legislative amendments and new guidance under criterion 2.2"	2019 *(COCG)*		
Brazil	**BR001** "Export Processing Zone "	2017 *(COCG)*	Not harmful[6]	
Bahamas	**BS001** "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7220/19)* 2020: CIVs *(doc. 7220/19 ADD1 + ADDs 1-6)*
Botswana	**BW001** "Botswana International Financial Services Centre Companies (BITCC)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: abolished No grandfathering *(doc. 9652/19)*
	BW002 "Foreign source income exemption"	2019 *(COCG)*		

[6] 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.

Belize	**BZ001** "International business company (IBC)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 14204/19)*
	BZ002 "Export processing zones (EPZ) enterprises"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7615/19 + ADDs 1-2)*
	BZ003 "Fiscal Incentives Act"	2019 *(COCG)*	Not harmful *(doc. 14114/19 ADD 4)*	
	BZ004 "General Income Tax Act (section 14)"	2019 *(COCG)*	Not harmful *(doc. 14114/19 ADD 5)*	
	BZ005 "Commercial free zone (CFZ)"	2019 *(COCG)*	Not harmful *(doc. 14114/19 ADD 6)*	
	BZ006 "Foreign source income exemption"	2019 *(COCG)*	**HARMFUL** *(docs. 5981/19 and 9652/19)*	2020 *(doc. 7417/20 + ADD 1)*

Canada	**CA001** "Life insurance business"	2018 *(OECD FHTP)*	Potentially harmful but not actually harmful (under monitoring) *(doc. 14364/18)*	
Switzerland	**CH001** "Cantonal administrative company status (auxiliary company regime)"	2012 *(COCG)*	**HARMFUL** *(doc. 11133/13)*	2019 *(doc. 13196/19)*
	CH002 "Cantonal mixed company status"	2012 *(COCG)*	**HARMFUL** *(doc. 11133/13)*	2019 *(doc. 13202/19)*
	CH003 "Cantonal holding company status"	2012 *(COCG)*	**HARMFUL** *(doc. 11133/13)*	2019 *(doc. 13203/19)*
	CH004 "Circular Number 8 of the Federal Tax Administration on principal structures (principal regime)"	2012 *(COCG)*	**HARMFUL** *(doc. 11133/13)*	2019 *(doc. 13205/19)*
	CH005 "Practice of the Federal Tax Administration regarding finance branches"	2012 *(COCG)*	**HARMFUL** *(doc. 11133/13)*	2019 *(doc. 13206/19)*
	CH006 "Patent box of the Canton of Nidwalden"	2019 *(OECD FHTP)*	Not harmful *(doc. 14114/19)*	

	CH007 "Notional interest deduction"	2019 *(COCG)*		
Cook Islands	**CK001** "International Companies"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2020 *(doc. 7418/20 + ADD 1)*
	CK002 "International Insurance Companies" (2008 Insurance Act class C)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2020 *(doc. 7419/20 + ADDs 1-2)*
	CK003 "Overseas insurance companies" (2008 Insurance Act class B)	2017 *(COCG)*	Does not meet the gateway criterion *(doc. 9652/19 ADD 8 REV 1)*	
	CK004 "International Captive Insurance Companies" (2013 Captive Insurance Bill)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2020 *(doc. 7420/20 + ADD 1)*
	CK005 "Encouragement of new industry or enterprise" (Development Investment Act, section 27A)	2017 *(COCG)*	**HARMFUL** (but not used and in the process of being repealed at the time of the screening)	2018

	CK006 "Developing projects" (Income Tax Act, section 42)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2020 *(doc. 7422/20 + ADDs 1-3)*
Chile	**CL001** "Business platform"	2017 *(OECD FHTP)*	Potentially harmful but not actually harmful (under monitoring)	2022: end of grandfathering
China	**CN001** "Reduced rate for new/high tech enterprises"	2017 *(OECD FHTP)*	Not harmful	
	CN002 "Reduced rate for advanced technology service enterprises"	2017 *(OECD FHTP)*	Not harmful	
Colombia	**CO001** "Exempted income – income derived from software developed in Colombia" (or Software regime)	2017 *(OECD FHTP)*	**HARMFUL**	2017
Costa Rica	**CR001** "Free Zones" (or Free trade zone)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 9637/18)*	2019 *(doc. 13207/19)*
	CR002 "Manufacturing activities under the amended Free Zones regime"	2019 *(COCG)*	**HARMFUL** *(doc. 9652/19 ADD 9 REV 1)*	2019 *(doc. 13207/19)*

	CR003 "Foreign source income exemption"	2019 *(COCG)*		
Cabo Verde	**CV001** "International Business Centre (as revised)"	2017 *(COCG)*	**HARMFUL**[7]	2019 *(doc. 7462/19)*
	CV002 "International financial institutions"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7463/19)*
	CV003 "Shipping regime"	2019 *(OECD FHTP)*	Not harmful *(doc. 14114/19)*	
	CV004 "Incentives for internationalisation"	2019 *(COCG)*	Not currently harmful but annual monitoring *(doc. 14114/19 ADD 7)*	
Curacao	**CW001** "eZone"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*

[7] 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.

	CW002 "Export companies" (or Export facility)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	CW003 "Investment company (formerly: Tax Exempt Entity)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	CW004 "Innovation box"	2018 *(OECD FHTP)*	Not harmful	
	CW005 "Manufacturing activities under the eZone regime"	2018 *(COCG)*	**HARMFUL** *(doc. 14364/18 COR 1)*	2020 *(doc. 7423/20 + ADDs 1-2)*
	CW006 "Foreign source income exemption"	2019 *(COCG)*	**HARMFUL** *(docs. 5981/19 and 9652/19)*	2020 *(doc. 7424/20)*
Dominica	**DM001** "International Business Companies"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7519/19)*
	DM002 "Offshore Banking"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7520/19)*
	DM003 "General incentive under Fiscal Incentives Act (FIA)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7521/19)*

Fiji	**FJ001** "Exporting Companies"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
	FJ002 "Income Communication Technology (ICT) Incentive"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
	FJ003 "Concessionary rate of tax for regional or global headquarters"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
Grenada	**GD001** "International companies"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7464/19 + ADD 1)*
	GD002 "Offshore Banking"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7465/19)*
	GD003 "International Insurance"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7466/19)*
	GD004 "International trusts"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7467/19 + ADD 1)*

	GD005 "Fiscal incentives under various Acts"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7468/19 + ADD 1)*
	GD006 "Export processing / commercial free zones enterprises"	2017 *(COCG)*	Not harmful *(doc. 7469/19)*	
Georgia	**GE001** "International Financial Companies"	2017 *(OECD FHTP)*	Potentially harmful but not actually harmful (under monitoring)	
	GE002 "Free industrial zones (FIZ)"	2017 *(COCG)*	Not harmful[8]	
	GE003 "Special Trade Companies"	2017 *(COCG)*	Not harmful[9]	
	GE004 "Virtual Zone Person (VZP)"	2017 *(OECD FHTP)*	Potentially harmful but not actually harmful (under monitoring)	

[8] 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.

[9] 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.

Guernsey	**GG001** (F037) "Exempt companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2008 *(doc. 14812/02)*
	GG002 (F038) "International loan business"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2008 *(doc. 14812/02)*
	GG003 (F039) "Unit trusts and collective investment companies"	1999 *(COCG)*	Not harmful	
	GG004 (F040) "International Bodies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2008 *(doc. 14812/02)*
	GG005 (F041) "Captive insurance companies"	1999 *(COCG)*	Not harmful	
	GG006 (F042) "Offshore insurance companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2008 *(doc. 14812/02)*
	GG007 (F043) "Insurance companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2008 *(doc. 14812/02)*
	GG008 "Zero-ten corporate tax"	2008 *(COCG)*	**HARMFUL** *(doc. 16766/10)*	2012 *(doc. 16488/12)*

	GG009 "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7223/19)*
	GG010 "New guidance under criterion 2.2"	2019 *(COCG)*		
Greenland	**GL001** (F001) "Deduction for investment in mineral processing"	1999 *(COCG)*	Not harmful	
	GL002 (F002) "Surcharge exemption for raw materials concession holders"	1999 *(COCG)*	Not harmful	
Hong Kong SAR	**HK001** "Corporate treasury centres (CTC)" (or Profits tax concession for corporate treasury centres)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	HK002 "Offshore funds"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7470/19)*
	HK003 "Offshore Private Equity Funds"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7516/19)*

	HK004 "Offshore Reinsurance" (or Profits tax concession for professional reinsurers)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	HK005 "Offshore captive insurance" (or Profits tax concession for captive insurers)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	HK006 "Shipping Regime" (or Profits tax exemptions for ship operators)	2017 *(OECD FHTP)*	Not harmful	
	HK007 "Qualifying debt instruments"	2017 *(COCG)*	Not harmful	
	HK008 "Profits tax concessions for aircraft lessors and aircraft leasing managers"	2017 *(OECD FHTP)*	Not harmful	
	HK009 "foreign source income exemption"	2019 *(COCG)*		
Indonesia	**ID001** "Investment allowance"	2017 *(OECD FHTP)*	Not harmful	

	ID002 "Special economic zone"	2017 *(OECD FHTP)*	Not harmful	
	ID003 "Tax reduction" (formerly Tax holiday)	2017 *(OECD FHTP)*	Not harmful	
	ID004 "Public / listed company"	2017 *(OECD FHTP)*	Not harmful	
Israel	**IL001** "Preferred company" (Amended preferred enterprise and Preferred technological enterprise regimes)	2017 *(OECD FHTP)*	Not harmful	
Isle of Man	**IM001** (F059) "Free Depreciation and balancing charges on ships"	1999 *(COCG)*	Not harmful	
	IM002 (F060) "Special depreciation for tourist premises"	1999 *(COCG)*	Not harmful	
	IM003 (F061) "International Business companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*
	IM004 (F062) "Exemption for non-residents companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*

	IM005 (F063) "Exempt insurance companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*
	IM006 (F064) "Tax holidays for industrial undertakings"	1999 *(COCG)*	Not harmful	
	IM007 (F065) "International loan business"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*
	IM008 (F066) "Offshore banking business"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*
	IM009 (F067) "Fund management"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*
	IM010 (F068) "Exempt Public Companies"	1999 *(COCG)*	Not harmful	
	IM011 (F069) "Film industry tax credits"	1999 *(COCG)*	Not harmful	
	IM012 "General and non-discriminatory corporate taxation system" (abolishing F061-F062-F063-F065-F066-F067)	2007 *(COCG)*	Not harmful	

	IM013 "Distributable Profits Charge (DPC)"	2007 *(COCG)*	**HARMFUL** *(doc. 15545/1/07)*	2008 *(doc. 9633/08)*
	IM014 "New tax legislation"	2013 *(COCG)*	Not assessed *(doc. 16656/13)*	
	IM015 "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7223/19)*
	IM016 "New guidance under criterion 2.2"	2019 *(COCG)*		
India	**IN001** "Special Economic Zones (SEZS)"	2017 *(OECD FHTP)*	Not harmful	
Jersey	**JE001** (F045) "Tax exempt companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2008 *(doc. 14812/02)*
	JE002 (F046) "International Treasury operations"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*
	JE003 (F047) "International Business companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006: abolished 2012: end of grandfathering *(doc. 14812/02)*

	JE004 (F048) "Captive insurance companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2006 *(doc. 14812/02)*
	JE005 "Zero-ten corporate tax"	2008 *(COCG)*	**HARMFUL** *(doc. 16766/10)*	2011 *(doc.17081/11)*
	JE006 "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7223/19)*
	JE007 "New guidance under criterion 2.2"	2019 *(COCG)*		
Jamaica	**JM001** "Industrial (Export Related) Incentives"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2014: abolished 2017: end of grandfathering
	JM002 "Special Economic Zones"	2017 *(COCG)*	Not harmful	
Jordan	**JO001** "Free Zone"	2017 *(OECD FHTP + COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(docs. 7517/19 and 9652/19)*
	JO002 "Development Zone"	2018 *(OECD FHTP)*	**HARMFUL** *(doc. 9652/19)*	

	JO003 "Least Developed Zones"	2018 *(COCG)*	Out of scope	
	JO004 "Aqaba Special Economic Zone"	2018 *(OECD FHTP)*		
Saint Kitts and Nevis	**KN001** "Offshore companies" (including the Nevis Limited Liability Company (LLC) ordinance, Nevis business corporation ordinance, and Companies act)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7522/19)*
	KN002 "Fiscal Incentives Act"	2018 *(COCG)*	**HARMFUL** *(doc. 14364/18)*	2020 *(doc. 7425/20)*
Korea	**KR001** "Foreign investment Zone (FIZ)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7523/19)*
	KR002 "Free Trade / Economic Zones (FTEZ)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7524/19)*
Caymans Islands	**KY001** (F057) "Tax Exemption Guarantee"	1999 *(COCG)*	Not harmful	

	KY002 "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019: except CIVs[10] *(doc. 7222/19)*
	KY003 "Legislative amendments under criterion 2.2"	2019 *(COCG)*	**HARMFUL** *(doc. 12284/1/19 REV 1)*	2019 *(doc. 7222/19 ADD 1)*
Saint Lucia	**LC001** "International Business Companies (IBC)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7525/19)*
	LC002 "International Trusts"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7545/19)*
	LC003 "Free trade Zones"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7546/19 + ADD 1)*
	LC004 "International Partnership Act"	2018 *(OECD FHTP)*	**HARMFUL**	2018: abolished

[10] Cayman Islands does not have appropriate measures in place relating to economic substance in the area of collective investment vehicles (CIVs): see Annex 1 of the Council conclusions of 18 February 2020 (doc. 6129/20).

	LC005 "Foreign source income exemption"	2019 *(COCG)*	**HARMFUL** *(docs. 5981/19 and 9652/19)*	
Liechtenstein	**LI001** "Tax Exempt Corporate Income - dividends and capital gains"	2011 *(COCG)* *(doc. 17081/11)*	**HARMFUL** *(doc. 14784/17)*	2018 *(doc. 12773/18)*
	LI002 "The special regime for Private Asset Structures (PAS)"	2011 *(COCG)* *(doc. 17081/11)*	Out of scope *(doc. 14784/17)*	
	LI003 "Interest deduction on equity (Allowance for Corporate Equity - ACE)"	2016 *(COCG)*	**HARMFUL** *(doc. 14784/17)*	2018 *(doc. 12774/18)*
	LI004 "Royalty box" (or IP box)	2016 *(COCG)*	Not assessed (abolished before)	
Morocco	**MA001** "Coordination Centres"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7547/19)*
	MA002 "Export Enterprises" (or Export Societies)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2020 *(doc. 7426/20 + ADDs 1-10)*

	MA003 "Export Free Zones (EFZ) or Free Trade Zones (FTZ)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2020 *(doc. 7427/20 + ADD 1)*
	MA004 "Offshore Banks" (Banks in offshore zones)	2017 *(COCG)*	Potentially harmful but not actually harmful (under monitoring)	2019 *(doc. 7548/19)*
	MA005 "Offshore Holding Companies" (Holding companies in offshore zones)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7549/19)*
	MA006 "Casablanca Finance City" (previously named as "Regional or International Headquarters")	2018 *(OECD FHTP)*	**HARMFUL** *(doc. 14364/18)*	
Marshall Islands	**MH001** "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 13049/19)*
	MH002 "New guidance under criterion 2.2" (dated 17 October 2019)	2020 *(COCG)*		
Republic of North Macedonia	**MK001** "Technological industrial development zone"	2019 *(OECD FHTP)*		

Mongolia	**MN001** "Free trade zone"	2018 *(OECD FHTP)*	Abolished *(doc. 14114/19)*	
	MN002 "90% tax credit regime for companies residing in isolated province (500 km)"	2018 *(COCG)*	Not harmful *(doc. 14114/19 ADD 8)*	
Macao *(changed status in 1999)*	**MO001** (F035) "Offshore Banking"	1999 *(COCG)*	Not harmful	
	MO002 "Offshore companies" (or Macau offshore institutions)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: abolished 2021: end of grandfathering
Montserrat	**MS001** (F070) "Reduced rate for industrial and offshore companies"	1999 *(COCG)*	Not harmful	
	MS002 (F071) "International business companies"	1999 *(COCG)*	Not harmful	
	MS003 (F072) "Tax holidays for approved enterprises"	1999 *(COCG)*	Not harmful	

	MS004 (F073) "Exemption for newly constructed or enlarged hotels"	1999 *(COCG)*	Not harmful	
	MS005 "International Business Companies"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 14364/18)*	2019 *(doc. 9652/19)*
Mauritius	**MU001** "Global Business Licence 1 (GBL 1)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	MU002 "Global Business Licence 2 (GBL 2)"	201 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	MU003 "Freeport Zone"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	MU004 "Shipping Regime"	2017 *(OECD FHTP)*	Not Harmful	
	MU005 "Captive Insurance"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	MU006 "Banks Holding a Banking Licence under the Banking Act 2004 (segment B banking)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*

	MU007 "Global treasury activities"	2017 *(OECD FHTP)*	Not Harmful	
	MU008 "Global headquarters administration"	2017 *(OECD FHTP)*	Not Harmful	
	MU009 "Investment Banking"	2017 *(OECD FHTP)*	Not Harmful	
	MU010 "Partial exemption system" (replaces the MU001 and MU002 regimes)	2018 *(COCG)*	**HARMFUL** *(docs. 5981/19 and 9652/19)*	2019 *(doc. 13208/19)*
	MU011 "Banks Holding a Banking Licence under the Banking Act 2004" (replaces the MU006 regime)	2018 *(OECD FHTP)*		
	MU012 "Manufacturing activities under the Freeport zone regime"	2018 *(COCG)*	**HARMFUL** *(doc. 14364/18)*	2019 *(doc. 13209/19)*
	MU013 "Intellectual Property" (patent box)	2019 *(OECD FHTP)*	Not harmful *(doc. 14114/19)*	

Maldives	**MV001** "Reduced tax" (or Reduced tax rates on profits sourced outside Maldives)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2020 *(doc. 7428/20 + ADDs 1-5)*
	MV002 "Foreign source income exemption"	2019 *(COCG)*		
Malaysia and Labuan Island	**MY001** "Labuan Island - International Business and Financial Centre (IBFC)" (or Labuan financial services)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended No grandfathering *(doc. 9652/19)*
	MY002 "Labuan Island - Financing and Leasing" (or Labuan leasing)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	MY003 "International trading company"	2017 *(COCG)*	Not Harmful	
	MY004 "Foreign fund management"	2017 *(OECD FHTP)*	Not Harmful	
	MY005 "Special economic regions"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended *(doc. 9652/19)*

	MY006 "Treasury management centre (TMC)"	2017 *(OECD FHTP)*	**HARMFUL**	2017
	MY007 "Pioneer Status"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended *(doc. 9652/19)*
	MY008 "Biotechnology industry"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: IP part abolished, non IP part amended *(doc. 9652/19)*
	MY009 "Approved Service Projects"	2017 *(COCG)*	Not Harmful	
	MY010 "Green technology services"	2017 *(OECD FHTP)*	Not Harmful	
	MY011 "MSC Malaysia Status"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: IP part abolished (grandfathering until 30/06/2021), non IP part amended *(doc. 9652/19)*
	MY012 "Headquarters" (or Principal hub)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 10267/19)*

	MY013 "Inward re-insurance and offshore insurance "	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended 30/06/2021: end of grandfathering *(doc. 9652/19)*
	MY014 "International currency business units"	2018 *(OECD FHTP)*		
	MY015 "Foreign source income exemption"	2019 *(COCG)*		
	MY016 "Manufacturing activities under the Pioneer status regime (high technology)"	2019 *(COCG)*	Not harmful *(doc. 9652/19 ADD 10)*	
Namibia	**NA001** "Export Processing Zones (EPZ)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
	NA002 "Exporters"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
	NA003 "Foreign source income exemption"	2019 *(COCG)*		

New Caledonia	**NC001** (F004) "Exemption for 8 years for certain activities in specified communes"	1999 *(COCG)*	Not harmful	
	NC002 (F005) "Metallurgical companies"	1999 *(COCG)*	Not harmful	
	NC003 (F006) "Exemption or reduced rate base for rental income in specified communes"	1999 *(COCG)*	Not harmful	
	NC004 (F007) "10-15 year exemption in hotel and tourist industry"	1999 *(COCG)*	Not harmful	
	NC005 (F008) "Deductions for investment in certain industries"	1999 *(COCG)*	Not harmful	
	NC006 (F009) "Deduction for capital investment"	1999 *(COCG)*	Not harmful	
Nauru	**NR001** "Foreign source income exemption"	2019 *(COCG)*		

Niue	**NU001** "International Business Companies Act of 1994 (IBC)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2006[11]
Panama	**PA001** "Multinational Headquarters"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended 30/06/2021: end of grandfathering *(doc. 9652/19)*
	PA002 "Free Zones Act"	2017 *(COCG)*	Out of scope	
	PA003 "Colon Free Zone"	2017 *(COCG)*	Not harmful	
	PA004 "Panama-Pacifico Special Economic Area"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended 30/06/2021: end of grandfathering *(doc. 9652/19)*
	PA005 "Foreign Owned Call Centres "	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 15117/18)*

[11] 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).

	PA006 "Shipping Regime"	2017 *(OECD FHTP)*	Not harmful	
	PA007 "Intellectual Property - City of Knowledge"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended No grandfathering *(doc. 9652/19)*
	PA008 "Foreign source income exemption"	2019 *(COCG)*		
Peru	**PE001** "CETICOS special economic zone"	2017 *(COCG)*	Not Harmful	
	PE002 "Zofratacna special economic zone"	2017 *(OECD FHTP)*	Not Harmful	
Qatar	**QA001** "Qatar Science and Technology Park (QSTP)" (Free zone at science and technology park)	2019 *(OECD FHTP)*		
	QA002 "Qatar Financial Centre (QFC)"	2019 *(OECD FHTP)*		

	QA003 "Free zone areas"	2019 *(OECD FHTP)*		
	QA004 "Foreign source income exemption"	2019 *(COCG)*		
Seychelles	**SC001** "International Business Companies"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: abolished No grandfathering *(doc. 9652/19)*
	SC002 "International Trade Zone (ITZ)" (or Free Zones)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: IP part abolished 30/06/2021: end of grandfathering *(doc. 9652/19)*
	SC003 "Offshore banks (OB)" (Segment 1 banking license)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: abolished No grandfathering *(doc. 9652/19)*
	SC004 "Offshore insurance" (or Non-domestic insurance business, Insurance of offshore risks)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: abolished 30/06/2021: end of grandfathering *(doc. 9652/19)*

	SC005 "Companies special license (CSL)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: abolished No grandfathering *(doc. 9652/19)*
	SC006 "Intellectual Property"	2017 *(OECD FHTP)*	Non existent	
	SC007 "Securities Business under the Securities act"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended 30/06/2021: end of grandfathering *(doc. 9652/19)*
	SC008 "Fund Administration Business"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended 30/06/2021: end of grandfathering *(doc. 9652/19)*
	SC009 "Reinsurance Business"	2017 *(OECD FHTP)*	Potentially harmful but not actually harmful (under monitoring)	2019: abolished No grandfathering *(doc. 9652/19)*

	SC010 "Manufacturing activities in the International Trade Zone"	2018 *(COCG)*	**HARMFUL** *(doc. 14364/18)*	
	SC011 "Foreign source income exemption"	2019 *(COCG)*	**HARMFUL** *(docs. 5981/19 and 9652/19)*	
Singapore	**SG001** "Export of services incentive" (or Global trader programme)	2017 *(OECD FHTP)*	Not harmful	
	SG002 "Offshore insurance incentive" (or Insurance business development)	2017 *(OECD FHTP)*	**HARMFUL** *(2017 screening)*	2017
	SG003 "Development and Expansion Incentive (DEI) - Legal service"	2017 *(OECD FHTP)*	**HARMFUL** *(2017 screening)*	2017
	SG004 "Financial services sector incentives"	2017 *(OECD FHTP)*	Not harmful	
	SG005 "Enhanced headquarters incentive package" (or Development and Expansion Incentive - Services)	2017 *(OECD FHTP)*	**HARMFUL** (IP components) *(2017 screening)*	2017

	SG006 "Double Tax Deduction for Internationalisation (DTDI)"	2017 *(COCG)*	Out of scope	
	SG007 "International Growth Scheme"	2017 *(OECD FHTP)*	**HARMFUL** *(2017 screening)*	2017
	SG008 "Maritime sector incentive" (shipping)	201 *(OECD FHTP)*	Not harmful	
	SG009 "R&D / IP deductions"	2017 *(COCG)*	Out of scope	
	SG010 "Pioneer Service Companies (PSC) for HQ activities" (or Pioneer incentive)	2017 *(OECD FHTP)*	**HARMFUL** (IP components) *(2017 screening)*	2017
	SG011 "Aircraft Leasing Scheme (ALS)"	2017 *(OECD FHTP)*	Not harmful	
	SG012 "Finance and Treasury Centre (FTC)"	2017 *(OECD FHTP)*	Not harmful	
	SG013 "Foreign source income exemption"	2019 *(COCG)*		

San Marino	**SM001** "Financing"	2017 *(OECD FHTP)*	**HARMFUL** *(2017 screening)*	2017
	SM002 "Intellectual Property"	2017 *(OECD FHTP)*	**HARMFUL** *(2017 screening)*	2017
	SM003 "New companies"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	SM004 "High-tech start-up companies"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	SM005 "Intellectual Property regime"	2018 *(OECD FHTP)*		
Eswatini	**SZ001** "Special economic zones"	2019 *(COCG)*	Not currently harmful (not yet operational), but annual monitoring *(doc. 14114/19)*	
	SZ002 "Foreign source income exemption"	2019 *(COCG)*		

Turks and Caicos Islands	**TC001** (F078) "Tax Exemption Guarantee"	1999 *(COCG)*	Not harmful	
	TC002 "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7225/19)*
	TC003 "Legislative amendments under criterion 2.2"	2019 *(COCG)*		
Thailand	**TH001** "International Headquarters (IHQ)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	TH002 "International Trading Centre (ITC)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	TH003 "Regional Operating Headquarters (ROH)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	TH004 "Treasury Centre (TC)"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 9652/19)*
	TH005 "International banking facilities"	2018 *(OECD FHTP)*	**HARMFUL**	2019: abolished 2021: end of grandfathering *(doc. 9652/19)*

	TH006 "International business centre (IBC)"	2019 *(OECD FHTP)*	Not harmful *(doc. 14114/19)*	
Tunisia	**TN001** "Export promotion incentives"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7550/19)*
	TN002 "Offshore financial services"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7560/19)*
Turkey	**TR001** "Technology Development Zones"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*
	TR002 "Corporate Tax Law Provision 5/B (new IP regime)"	2017 *(OECD FHTP)*	Not harmful	
	TR003 "Free zones"	2017 *(OECD FHTP)*	Not harmful	
	TR004 "Regional Headquarters" (or Regional management centres)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7561/19)*
Trinidad and Tobago	**TT001** "Free trade zone" (or Free zones)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	

Taiwan	**TW001** "Free Trade Zone" (including the International Airport Park Development regime)	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7562/19)*
United States of America	**US001** "Delaware - Exemption of Investment Holding Companies, Firms managing Intangible Investments of Mutual Funds"	2017 *(COCG)*	Not harmful	
	US002 "Delaware - Deduction of interest from affiliated companies"	2017 *(COCG)*	Not harmful	
	US003 "Foreign Derived Intangible Income (FDII)"	2018 *(OECD FHTP)*		
Uruguay	**UY001** "Free zones"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended 30/06/2021: end of grandfathering *(doc. 9652/19)*
	UY002 "Shared service centre"	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2018 *(doc. 14364/18)*

	UY003 "Financial company reorganisation"	2017 *(OECD FHTP)*	Not assessed (abolished before)	2016
	UY004 "General powers under Law 16,906" (or Investment law incentives under law 16.906)	2017 *(COCG)*	Not harmful	
	UY005 "Holding company regime / source principle taxation"	2017 *(COCG)*	Out of scope	
	UY006 "Software and biotechnology industry incentives" (benefits under lit. S art. 52)	2017 *(OECD FHTP)*	**HARMFUL** *(doc. 6671/18)*	2019: amended 30/06/2021: end of grandfathering *(doc. 9652/19)*
	UY007 "Benefits under law 16,906 for biotechnology"	2018 *(OECD FHTP)*	**HARMFUL**	2019: IP part abolished, non-IP part amended No grandfathering *(doc. 9652/19)*
	UY008 "Foreign source income exemption"	2019 *(COCG)*		

Saint Vincent and the Grenadines	**VC001** "International Business Companies (IBC)"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7563/19 + ADDs 1-2)*
	VC002 "International trusts"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7564/19)*
British Virgin Islands	**VG001** (F052) "Arising and remittance basis"	1999 *(COCG)*	Not harmful	
	VG002 (F053) "1% rate"	1999 *(COCG)*	Not harmful	
	VG003 (F054) "Pioneer industry exemption"	1999 *(COCG)*	Not harmful	
	VG004 (F055) "Exemption for newly constructed hotels	1999 *(COCG)*	Not harmful	
	VG005 (F056) "International Business companies"	1999 *(COCG)*	**HARMFUL** *(doc. 14313/99)*	2005 *(doc. 15434/05)*

	VG006 "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	2019 *(doc. 7226/19 + ADD 1)* 2020: CIVs *(doc. 7220/19* *ADD 3)*
	VG007 "New guidance under criterion 2.2"	2019 *(COCG)*	**HARMFUL** *(doc. 7220/19* *ADD 2)*	2020 *(doc. 7220/19* *ADD 2)*
US Virgin Islands	**VI001** "Economic Development Programme"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
	VI002 "Exempt companies"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
	VI003 "International Banking Centre Regulatory Act"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
Viet Nam	**VN001** "Export processing zones"	2017 *(COCG)*	Not harmful *(doc.12775/18)*	

	VN002 "Industrial Parks/Zones"	2018 *(COCG)*	Not harmful *(doc. 14364/18)*	
	VN003 "IP Benefits"	2018 *(OECD FHTP)*		
	VN004 "Economic Zones"	2018 *(COCG)*	Not harmful *(doc. 14114/19 ADD 9)*	
	VN005 "Disadvantaged Areas"	2018 *(COCG)*	Not harmful *(doc. 14114/19 ADD 10)*	
Vanuatu	**VU001** "Measure under criterion 2.2"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
Samoa	**WS001** "Offshore Business"	2017 *(COCG)*	**HARMFUL** *(doc. 6671/18)*	
	WS002 "Foreign source income exemption"	2019 *(COCG)*		

South Africa	**ZA001** "Special Economic Zones"	2017 *(COCG)*	Not harmful	
	ZA002 "Headquarter companies"	2018 *(OECD FHTP)*	Potentially harmful but not actually harmful (under monitoring)	

Note: No preferential tax regime was identified since 1998 in the Faroe Islands (the 1999 reference code used by the COCG was 'F003').