



Council of the
European Union

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OUTCOME OF PROCEEDINGS

From: General Secretariat of the Council
To: Delegations
Subject: The EU list of non-cooperative jurisdictions for tax purposes

- Compilation of commitment letters received from jurisdictions

= San Marino



DIREZIONE AFFARI EUROPEI
Dipartimento Affari Esteri

Ref. 124531/2017

San Marino, 14 November 2017/1717 d.f.R

Dear Madam Chair,

I refer to your communication of 23 October 2017, with which, in taking note of my letter of 26 June 2017, you stressed San Marino's willingness to address the identified shortcomings and, at the same time, you requested a firm commitment at a high political level in addressing the deficiencies listed in Annex I so as to allow a positive assessment by the Code of Conduct Group. With reference to the above, I am pleased to inform you that the Government of San Marino undertakes to amend the provisions under consideration for the purpose of their alignment, through a precise timeline, to the international best practices.

The Government intends to include in the 2018 budget law, which will be submitted to Parliament for its first reading at the end of November, a specific article expressing the Government intention to review the regimes called "New companies Regime" and "Regime for high-tech start-up companies", with the indication that the review will be made by 30 June 2018 and will enter into force by 31 December 2018 at the latest. It will be my duty to send you copy of the article in question as soon as the budget law is approved and published.

I remain at your disposal for any further requests and avail myself of this opportunity to express to you my best regards.

DIRECTOR
(Min. Plen. **Luca Brandi**)

Ms Fabrizia Lapecorella
Chair of the Code of Conduct Group (Business
Taxation)
General Secretariat of the Council
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