



Council of the
European Union

Brussels, 5 December 2019
(OR. en)

9639/4/18
REV 4

FISC 243
ECOFIN 557

NOTE

From: General Secretariat of the Council
To: Delegations

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

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.

This overview also includes the measures examined by the Group under EU listing criterion 2.2 since 2017.

OVERVIEW OF THE PREFERENTIAL TAX REGIMES AND OTHER MEASURES 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)¹. 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).

¹ 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 notification² 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. notification³ 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.

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

³ 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/measure);
- iii. other jurisdictions (now covered by the EU listing exercise).

Sections ii) and iii) also include the measures examined by the Code of Conduct Group under EU listing criterion 2.2 using the same codes as above.

I. Preferential regimes of EU Member States⁴

MEMBER STATE	PREFERENTIAL TAX REGIMES Code by jurisdiction (Code by category) "Name of the regime"	STANDSTILL DATE ⁵	ASSESSMENT	ROLLBACK DATE
AUSTRIA	AT001 (AAM002b/A017) "Holdings (<i>Schachtelbegünstigung</i> - intra group relief)"	1999	HARMFUL (<i>doc. 14313/99</i>)	2002 (<i>doc. 14361/03</i>)
	AT002 (A018) "Private foundations (<i>Stiftungen</i>)"	1999	Not harmful	
	AT003 (BAM006/B014) "Certain exemptions from corporate tax"	1999	Not harmful	
	AT004 (E029) "Participation Fund Companies"	1999	Not harmful	
	AT005 (EAM004/E039) "Investment allowance"	1999	Not harmful	
	AT006 (EAM009/E040) "Tax exemptions"	1999	HARMFUL (<i>doc. 14313/99</i>)	2002 (<i>doc. 14361/03</i>)
	AT007 (CAM007/C026)	1999	Not harmful	

⁴ Including Gibraltar with regard to the UK: see below.

⁵ 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).

BELGIUM	"R&D Allowance"	1998		HARMFUL (doc. 14313/99)	2002: amended (doc. 14812/02) 2006: amended 2011: end of grandfathering (doc. 10857/11)
	BE001 (A001) "Co-ordination Centres"				
	BE002 (A002) "Distribution Centres"	1998		HARMFUL (doc. 14313/99)	2002: amended (doc. 14812/02) 2005: abolished (doc. 9655/06)
	BE003 (A003) "Service Centres"	1998		HARMFUL (doc. 14313/99)	2002: amended (doc. 14812/02) 2005: abolished (doc. 9655/06)
	BE004 (C012) "Supplementary staff assigned to scientific research and export management"	1999		Not harmful	
	BE005 (C020) "Investment Deductions"	1999		Not harmful	
	BE006 (D001)	1999		Not harmful	

"Employment and (T) Zones"					
BE007 (D002)	1999			Not harmful	
"Incentives for Investment in Certain Regions"					
BE008 (D003)	1999			Not harmful	
"Re-Conversion Zones"					
BE009 (E001)	1999			HARMFUL (doc. 14313/99)	2004 (doc. 14361/03)
"US Foreign Sales Corporations Ruling"					
BE010 (E002)	1999			HARMFUL (doc. 14313/99)	2002 (doc. 14361/03)
"Informal Capital Ruling"					
BE011 (AAM010/A019)	1999			Not harmful	
"Holdings"					
BE012 (EAM001/E041)	1999			Not harmful	
"Investment funds"					
BE013 (Z001)	1999			Not harmful	
"Measure aimed at determining the level of taxation of foreign companies operating in Belgium, without legal personality or probative accounts"					
BE014	2008			Not assessed (doc. 16084/1/08)	30/06/2021: end of grandfathering
"Patent Income Deduction (PID)" (old patent box)					
BE015	2008			Not assessed	

	"Profit Participating Loan"			(doc. 10200/1/09)	
BULGARIA	BE016	"Amended Patent Income Deduction (PID) for small companies"	2013	HARMFUL (doc. 16553/1/14)	2016 (doc. 14750/16)
	BE017	"Patent box" (new patent box)	2017	Not harmful (doc. 10047/17)	
	BE018	"Notional Interest Deduction"	2018	Not harmful (doc. 14364/18)	
	BG001	"Insurance companies"	2006	HARMFUL (doc. 10879/06)	2005 (doc. 10879/06)
	BG002	"Gambling activities"	2006	Not harmful	
	BG003	"Telecom companies"	2006	HARMFUL (doc. 10879/06)	2005 (doc. 10879/06)
	BG004	"Investment Tax Credit for investors"	2006	Not harmful	
	BG005	"Measure under the Foreign Investment Act (50% of the corporate tax due retained for a period of 10 years)"	2006	HARMFUL (doc. 10879/06)	1998: abolished 2007: end of grandfathering (doc. 10879/06)
	BG006		2006	Not harmful	

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

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

					(doc. 13213/03)
CY011	"Companies listed at the Cyprus Stock Exchange (CSE)"	2003		Not harmful	
CY012	"Export of goods"	2003		HARMFUL (doc. 13213/03)	2003 (doc. 13213/03)
CY013	"Co-operative societies"	2003		Not harmful	
CY014	"Auxiliary tourist buildings or projects"	2003		Not harmful	
CY015	"Holdings" (treatment of foreign dividend)	2003		Not harmful	
CY016	"Foreign Branches"	2003		Not harmful	
CY017	"Change in the legislation regarding taxation of interest and the participation exemption"	2010		Not assessed (doc. 16766/10)	
CY018	"Intellectual Property tax" (old patent box)	2013		HARMFUL (doc. 16553/1/14)	2016 (doc. 14750/16) 30/06/2021 : end of grandfathering
CY019		2017		Not harmful	

	"Patent box " (new patent box)			(doc. 10047/17)	
CY020	"Notional interest deduction"	2018		In the process of being amended (doc. 9652/19 ADD I + doc. 14114/19)	
CZECH REPUBLIC	CZ001 "Investment incentives"	2003		HARMFUL (doc. 13213/03)	2004 (doc. 9427/05)
GERMANY	DE001 (C002) "Shipping Regime - Tonnage Tax"	1999		Not harmful	
	DE002 (C021) "Special Allowances - Agriculture and Forestry"	1999		Not harmful	
	DE004 (D005) "Special Depreciation - Business Investment in former DDR and West Berlin"	1999		Not harmful	
	DE005 (D006) "Investment Grants - Equipment in Former DDR and West Berlin"	1999		Not harmful	
	DE006 (D007) "Tax Advantages - Commercial Investment in BRD/DDR Border Area Germany"	1999		Not harmful	
	DE007 (E010)	1999		Not harmful	

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

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

	"Incentives for Investment (Law 2601/98)"			
	EL006 (E024)	1999		Not harmful
	"Small Islands Income Tax Reduction"			
	EL007 (E026)	1999		Not harmful
	"Mutual Funds/Portfolio Investment Companies"			
	EL008 (E032) (duplicate entry see E026)	1999		Not harmful
	"Fixed Tax - Transferable Securities"			
	EL009 (BAM31/B017)	1999		Not harmful
	"Business share capital companies (Law 2367/1995, art.5)"			
	EL010 (BAM034/B018)	1999		Not harmful
	"Long term loans in foreign currency"			
	EL011 (EAM033/E42)	1999		Not harmful
	"Large scale product-line investments financed with Greece foreign capital"			
	EL012 (EAM035/E43)	1999		Not harmful
	"National infrastructure"			
	EL013	2004		Not assessed
	"Tax Incentives for Development"			(abolished before)
	EL014	2005		Not assessed
	"Tax Incentives for Investment"			(doc. 9427/05)
	EL015	2018		Not harmful, but

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

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

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

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

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

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

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

	"Companies authorised to provide energy-saving and heat recovery financing (SOFERGIE)"				
	FR051 (CAM073/C045)	1999		Not harmful	
	"Exceptional depreciation for participating interests in companies financing non-industrial fishing (SOFIPECHE)"				
	FR052 (CAM077/C046)	1999		Not harmful	
	"Securities in innovation financing companies (SFI)"				
	FR053	2014		HARMFUL (doc. 16553/1/14)	2019 (doc. 9652/19 ADD 7 REV 1)
	"Reduced rate for long term capital gains and profits from the licensing of Intellectual Property rights" (old patent box)				
	FR054	2019		Not harmful (doc. 9652/19 ADD 2)	
	"New IP regime"				
CROATIA	HR001	2013		Not harmful (doc. 10608/14)	
	"Corporate Income Tax Act"				
	HR002	2013		Not harmful (doc. 10608/14)	
	"Hill and Mountain Areas Act"				
	HR003	2013		Not harmful (doc. 10608/14)	
	"Areas of Special State Concern Act"				
	HR004	2013		Not harmful (doc. 10608/14)	
	"Investment Promotion Act (2006)"				

HR005 "Reconstruction and Development of the City of Vukovar Act"	2013	Not harmful (doc. 10608/14)	
HR006 "Free Zones Act"	2013	Not harmful (doc. 10608/14)	
HR007 "Maritime Code"	2013	Not harmful (doc. 10608/14)	
HR008 "Investment Promotion Act (2012)"	2013	Not harmful (doc. 10608/14)	
HR009 "Investment Promotion Act (2015)"	2016	Not assessed (amended in 2017: see HR011) (doc. 14784/17)	
HR010 "Amendments to the Law on Corporate Income (OG, No 115/16)"	2017	Not assessed (only the advance pricing agreement aspect was deemed relevant: see HR012)	
HR011 "Investment Promotion Act (2017)"	2018	Out of scope (doc. 14364/18)	
HR012	2018	Out of scope	

	"Ordinance on the procedure of concluding advance pricing agreements"			(doc. 14364/18)	
HUNGARY	HR013 "Incentive measures for research and development projects"	2019		Not assessed (doc. 9652/19 ADD 6 REV 1)	2003: abolished 2006: end of grandfathering (doc. 13213/03)
	HU001 "Offshore companies"	2003		HARMFUL (doc. 13213/03)	
	HU002 "10 years tax holidays"	2003		Not harmful	
	HU003 "Venture capital companies"	2003		Not harmful	
	HU004 "Holding companies"	2003		Not harmful	
	HU005 "Investment tax relief subject to special approval"	2003		Not harmful	
	HU006 "Revenue from Stock Exchange Operations"	2003		Not harmful	
HU007 "Interest from affiliated companies"	2004		No broad consensus on whether the	Abolished (doc. 14364/18)	

				measure is harmful (doc. 15434/05)	
	HU008	"Royalty income"	2004	Not harmful	
	HU009	"Intangible property for royalties and capital gains" (old patent box)	2014	HARMFUL (doc. 16553/1/14)	2016 (doc. 14750/16) 30/06/2021: end of grandfathering
	HU010	"Tax Base for Interest Payments Received from Abroad"	2010	Not assessed (abolished before) (doc. 10857/11)	
	HU011	"Intellectual property box" (new patent box)	2017	Not harmful (doc. 10047/17)	
IRELAND	IE001 (B001)	"The International Financial Services Centre (Dublin)"	1998	HARMFUL (doc. 14313/99)	2002: phase out (doc. 8848/02) 2003: abolished (doc. 7018/1/03)
	IE002 (C014)	"Research and Technical Development"	1999	Not harmful	
	IE003 (C023)	"Mining Taxation"	1999	Not harmful	

IE004 (C024) "10% Manufacturing Rate"	1999	HARMFUL (doc. 14313/99)	2002: phase out (doc. 8848/02) 2011: end of grandfathering (doc. 10857/11))
IE005 (C025) "Petroleum Taxation"	1999	HARMFUL (doc. 14313/99)	2002: tax rate increased (doc. 8848/02)
IE006 (D017) "Shannon Airport Zone (SAZ)"	1999	HARMFUL (doc. 14313/99)	2002: phase out (doc. 8848/02) 2006: end of grandfathering (doc. 14812/02)
IE007 (D018) "New Investments - Buildings in Run-Down Urban Areas"	1999	Not harmful	
IE008 (E007) "Foreign Income"	1999	HARMFUL (doc. 14313/99)	2001: abolished (doc. 8842/02) 2011: end of grandfathering (doc. 10857/11)
IE009 (BAM069/B024)	1999	Not harmful	

	"Exemption of income from Government securities"				
	IE010 (BAM098/B025) "Non-resident companies"	1999		Not harmful	
	IE011 (EAM100/E065) "Specified collective investment undertakings"	1999		Not harmful	
	IE012 (CAM094/C048) "Film"	1999		Not harmful	
	IE013 (CAM097/C049) "Investment in renewable energy projects"	1999		Not harmful	
	IE014 (CAM101/C050) "Tax exemption for profit/gain from the occupation of woodlands"	1999		Not harmful	
	IE015 "Holding company"	2005		Not assessed (doc. 9427/05)	
	IE016 "Knowledge Development Box" (new patent box)	2016		Not harmful (doc. 10047/17)	
ITALY	IT001 (B002) "Trieste Financial Services and Insurance centre"	1998		HARMFUL (doc. 14313/99)	2003 (doc. 14812/02)
	IT002 (C006) "Shipping Regime"	1999		Not harmful	

IT003 (E036) "Listed Companies - Reduced Rates"	1999	Not harmful	
IT004 (BAM082/B022) "Incentives for restructuring the banking sector"	1999	Not harmful	
IT005 (BAM093/B023) "Tax deduction for interest on additional capital contributions from foreign head offices to Italian PE"	1999	Not harmful	
IT006 (EAM078/E058) "Dual income tax"	1999	Not harmful	
IT007 (EAM083/E059) "IRAP exemptions"	1999	Not harmful	
IT008 (EAM085/E060) "SMEs"	1999	Not harmful	
IT009 (EAM088/E061) "Special depreciation regime"	1999	Not harmful	
IT010 (EAM089/E062) "Special regime for investment funds"	1999	Not harmful	
IT011 (EAM090/E063) "Substitute tax regime for corporate reorganisations"	1999	Not harmful	
IT012 (EAM091/E064) "Tax advantages for certain trade and commercial"	1999	Not harmful	

	activities"				
	IT013 (DAM086/D025) "Regional Incentives : South of Italy (Mezzogiorno)"	1999		Not harmful	
	IT014 (CAM080/C047) "Incentives for scientific research"	1999		Not harmful	
	IT015 "Holdings"	2004		Out of scope (doc. 9805/04)	
	IT016 "International Tax Ruling Practice"	2004		Out of scope (doc. 9805/04)	
	IT017 "Patent box" (old patent box)	2014		HARMFUL (doc. 16553/1/14)	2018, but annual monitoring (doc. 9637/18) 30/06/2021: end of grandfathering
	IT018 "Patent box" (new patent box)	2015		Not harmful (doc. 10047/17)	
	IT019 "Notional Interest Deduction"	2018		Not harmful (doc. 14364/18)	
LITHUANIA	LT001 "Free Economic Zones"	2003		HARMFUL (doc. 13213/03)	2004: abolished 2017: end of

					grandfathering (doc. 13213/03)
LT002	"Benefits in respect of reinvested profits"	2003		Not harmful	
LT003	"Enterprises with foreign invested capital"	2003		HARMFUL (doc. 13213/03)	2003 (doc. 13213/03)
LT004	"Strategic investors"	2003		HARMFUL (doc. 13213/03)	2003: abolished 2010: end of grandfathering (doc. 13213/03)
LT005	"Special tax zones" (Intellectual Property components)	2017		Not harmful, but annual monitoring (doc. 14784/17)	
LT006	"Review of the corporate income tax regime for special tax zones"	2018		Not assessed, but annual monitoring (doc. 14364/18)	
LT007	"New special corporate income tax regime for patented assets and copyrighted software" (patent box)	2018		Not harmful (doc. 9652/19 ADD 3)	
LT008		2019		HARMFUL	

	"Holding company regime"			(doc. 9652/19)	
LUXEMBOURG	LU001 (A007) "Co-ordination Centres"	1998		HARMFUL (doc. 14313/99)	1996: abolished 2002: end of grandfathering (doc. 14812/02)
	LU002 (A013) "Tax Exempt 1929 Holding Companies"	1998		HARMFUL (doc. 14313/99)	2005 (doc. 9427/05) 2011: end of grandfathering (doc. 10857/11)
	LU003 (B003) "Finance Companies"	1998		HARMFUL (doc. 14313/99)	1996: abolished 2002: end of grandfathering (doc. 14812/02)
	LU004 (B007) "Provisions for Fluctuations in Reinsurance"	1998		HARMFUL (doc. 14313/99)	2002: abolished 2007: end of grandfathering (doc. 14812/02)
	LU005 (C018) "Audiovisual Investment Certificates"	1999		Not harmful	
	LU006 (E009) "Tax holidays for New Businesses"	1999		Not harmful	

LU007 (E017) "Special depreciation arrangement for assets intended for environmental protection and energy saving, and for assets adjusting work places for disabled workers"	1999	Not harmful	
LU008 (AAM108/A024) "Application of the parent company/subsidiary system to resident companies with share capital (SOPARFI)"	1999	Not harmful	
LU009 (CAM106/C050) "Depreciation of equipment and tools used solely for scientific or technical research operation"	1999	Not harmful	
LU010 (CAM107/C051) "Shipping Regime"	1999	Not harmful	
LU011 (EAM103/E066) "Investment funds"	1999	Not harmful	
LU012 (EAM109/E067) "Venture Capital investment certificates"	1999	Not harmful	
LU013 (Z002) "Finance Branches"	1999	HARMFUL (doc. 14313/99)	2001 (doc. 14812/02)
LU014 "Intellectual property" (old patent box)	2008	HARMFUL (doc. 16553/1/14)	2016 (doc. 14750/16) 30/06/2021: end

					of grandfathering	
LATVIA	LU015	"Group Financing Companies - Advance Confirmation of Margin (Circular n° 164/2 of 28 January 2011)"	2010	Not assessed (doc. 10857/11)		
	LU016	"Intra-group financing - safe harbour rule"	2017	Not assessed, but annual monitoring (doc. 10047/17 and doc. 14114/19)		
	LU017	"Draft law relating to the tax regime for intellectual property" (new patent box)	2018	Not harmful (doc. 9637/18)		
	LV001	"Special Economic Zones and Free Ports"	2003	HARMFUL (doc. 13213/03)	2004 (doc. 13213/03)	
	LV002	"High-tech companies"	2003	Not harmful		
	LV003	"Big investment schemes"	2003	Not harmful		
	LV004	"Shipping Regime"	2003	Not harmful		
	LV005	"Start-up tax reliefs"	2017	Not assessed (de minimis)		

MALTA			<i>(doc. 10047/17)</i>	
MT001 "Offshore trading and non trading companies"	2003		HARMFUL <i>(doc. 13213/03)</i>	1996: abolished 2004: end of grandfathering <i>(doc. 13213/03)</i>
MT002 "Offshore insurance companies / Insurance companies"	2003		HARMFUL <i>(doc. 13213/03)</i>	1996: abolished 2004: end of grandfathering <i>(doc. 13213/03)</i>
MT003 "Offshore banking companies / Banking companies"	2003		HARMFUL <i>(doc. 13213/03)</i>	1996: abolished 2004: end of grandfathering <i>(doc. 13213/03)</i>
MT004 "International Trading companies "	2003		HARMFUL <i>(doc. 13213/03)</i>	2007
MT005 "Dividends from (other) Maltese companies with foreign income"	2003		HARMFUL <i>(doc. 13213/03)</i>	2007: abolished <i>(doc. 9047/07)</i> 2011: end of grandfathering <i>(doc. 10857/11)</i>
MT006	2003		Not harmful	

"Shipping Regime"					
MT007	"Investment Service Companies"	2003		HARMFUL (doc. 13213/03)	2011: end of grandfathering (doc. 10857/11)
MT008	"Business Promotion Act"	2003		Not harmful	
MT009	"Onshore free port"	2003		Not harmful	
MT010	"Business Promotion Regulations"	2003		Not harmful	
MT011	"Non-resident companies"	2003		Not assessed	
MT012	"Special granted tax exemption"	2003		HARMFUL (doc. 13213/03)	2004 (doc. 13213/03)
MT013	"Exemption for royalty income from patents" (old patent box)	2014		HARMFUL (doc. 16553/1/14)	2016 (doc. 14750/16) 30/06/2021: end of grandfathering
MT014	"Notional Interest Deduction"	2018		Not harmful (doc. 14364/18)	
MT015		2019		Not harmful	

	"New patent box"			(doc. 14114/19 ADD 1)	
NETHERLANDS	NL001 (A008) "Cost Plus Ruling"	1998		HARMFUL (doc. 14313/99)	2001: abolished 2006: end of grandfathering (doc. 14812/02)
	NL002 (A009) "Resale Minus Ruling"	1998		HARMFUL (doc. 14313/99)	2001: abolished 2006: end of grandfathering (doc. 14812/02)
	NL003 (A010) "Intra-Group Finance Activities"	1998		HARMFUL (doc. 14313/99)	2001: abolished 2006: end of grandfathering (doc. 14812/02)
	NL004 (A014) "Holding Companies"	1998		HARMFUL (doc. 14313/99)	2003 (doc. 14812/02)
	NL005 (A015) "Royalties"	1998		HARMFUL (doc. 14313/99)	2001: abolished 2006: end of grandfathering (doc. 14812/02)

NL006 (B004) "International Group Financing"	1998	HARMFUL (doc. 14313/99)	2004 (doc. 9655/06) 2011: end of grandfathering (doc. 10857/11)
NL007 (B005) "Finance Branch"	1998	HARMFUL (doc. 14313/99)	2001: abolished 2006: end of grandfathering (doc. 14812/02)
NL008 (C007) "Shipping Regime"	1999	Not harmful	
NL009 (C015) "Tax credits for investments in energy saving equipment"	1999	Not harmful	
NL010 (D019) "Accelerated Depreciation of new buildings in certain regions"	1999	Not harmful	
NL011 (E003) "US Foreign Sales Corporations Ruling"	1999	HARMFUL (doc. 14313/99)	2001: abolished 2006: end of grandfathering (doc. 14812/02)
NL012 (E004)	1999	HARMFUL	2003

	"Informal Capital Ruling"			(doc. 14313/99)	(doc. 14812/02)
	NL013 (E018) "Investment Allowance"	1999		Not harmful	
	NL014 (Z003) "Non Standard Rulings (including Greenfield-rulings)"	1999		HARMFUL (doc. 14313/99)	2001: abolished 2006: end of grandfathering (doc. 14812/02)
	NL015 (CAM110/C053) "Film industry"	1999		Not harmful	
	NL016 "Innovation box" (old patent box)	2007		HARMFUL (doc. 16553/1/14)	2017: abolished 30/06/2021: end of grandfathering
	NL017 "Interest box"	2007		Not assessed (measure abandoned) (doc. 10033/10)	
	NL018 "Patent box" (new patent box)	2017		Not harmful (doc. 10047/17)	
POLAND	PL001 "Special Economic Zones (original rules)"	2003		HARMFUL (doc. 13213/03)	2011: end of grandfathering (doc. 10857/11)
	PL002	2003		HARMFUL	2006

	"Special Economic Zones (amended rules)"			(doc. 13213/03)	
PL003	"Special Economic Zones (amended rules)"	2006		Not assessed (doc. 15472/06)	
PL004	"Shipbuilding and complementary industries"	2017		Out of scope (doc. 10047/17)	
PL005	"GAAR and rulings"	2017		Not assessed	
PL006	"15% corporate income tax rate for small taxpayers"	2018		Not harmful (doc. 14364/18)	
PL007	"One-time depreciation of factory new fixed assets"	2018		Not assessed (minor importance: does not affect business location) (doc. 9637/18)	
PL008	"Increased tax incentives for R&D activities" (with relevance also for companies operating in SEZ)	2018		Out of scope (doc. 9637/18)	
PL009	"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)	

				(doc. 9637/18)	
PL010	"9% corporate income tax for taxpayers with revenues not exceeding EUR 1.2 million"	2019		Not assessed (doc. 9652/19 ADD 4)	
PL011	"Notional interest deduction regime"	2019		Not harmful (doc. 14114/19 ADD 2)	
PL012	"IP regime"	2019		Not harmful (doc. 9652/19 ADD 5)	
PL013	"Polish Investment Zone (PIZ)"	2019		HARMFUL (doc. 14114/19 ADD 3)	
PT001 (B006)	"Madeira and Sta Maria (Azores) Free Zones"	1999		HARMFUL (doc. 14313/99)	2003: abolished (doc. 7018/1/03) 2012: end of grandfathering (doc. 10903/12)
PT002 (C008)	"Shipping Regime"	1999		Not harmful	
PT003 (C016)	"Research and Development Expenses"	1999		Not harmful	

		1999		Not harmful	
	PT014 (DAM115/D026) "Industrial Free Zones"				
	PT015 "Madeira Free Zones"	2008		Not assessed (doc. 16084/1/08)	
	PT016 "Partial exemption for income from patents and other industrial property rights" (old patent box)	2014		HARMFUL (doc. 16553/1/14)	2018 (doc. 9637/18) 30/06/2021: end of grandfathering
	PT017 "Patent box" (new patent box)	2017		Not harmful (doc. 10047/17)	
	PT018 "Notional Interest Deduction"	2018		Out of scope, but annual monitoring (doc. 14364/18 and doc. 14114/19)	
	RO001 "Free zones"	2006		HARMFUL (doc. 10879/06)	2002: abolished 2012: end of grandfathering
	RO002 "Disadvantaged zones"	2006		Not harmful	
	RO003	2006		HARMFUL	2007
ROMANIA					

	"Large investment deduction"			(doc. 10879/06)	
	RO004 "Export activities"	2006		HARMFUL (doc. 10879/06)	2004
	RO005 "Special tax exemptions"	2006		HARMFUL (doc. 10879/06)	2000: abolished 2007: end of grandfathering
	RO006 "Patent profits exemption"	2006		HARMFUL (doc. 10879/06)	2003: abolished 2007: end of grandfathering
	RO007 "Industrial parks"	2006		Not harmful	(expired in 2007)
	RO008 "Profit tax exemption for companies with innovation and research & development activities"	2018		Review on hold until the relevant national legislation is adopted (doc. 9652/19)	
SLOVAKIA	SK001 "10-years tax holiday for foreign owned companies"	2003		HARMFUL (doc. 13213/03) (doc. 15317/04)	2003: already abolished 2009: end of grandfathering (doc. 13213/03)
	SK002	2003		HARMFUL	2003: already

	"Tax exemption for newly started companies"			(doc. 13213/03)	abolished (doc. 13213/03)
SK003	"100% corporate income tax credits for foreign investors"	2003		HARMFUL (doc. 13213/03)	2003: already abolished (doc. 13213/03)
SK004	"100% corporate income tax credits for foreign investors (first amendment)"	2003		HARMFUL (doc. 13213/03)	2004 (doc. 13213/03)
SK005	"100% corporate income tax credits for foreign investors (second amendment)"	2003		HARMFUL (doc. 13213/03)	2004 (doc. 13213/03)
SK006	"Investment Aid Tax Credit" (Section 30a of Act No. 595/2003 of Coll. on Income Tax)	2008		Not assessed (doc. 10200/1/09)	
SK007	"Patent box" (new patent box)	2018		Not harmful (doc. 14364/18)	
SK008	"Exemption of gains from the sale of shares and business shares"	2018		Not assessed (doc. 14364/18)	
SLOVENIA	SI001 "Special Economic Zones"	2003		Not harmful	

SI002 "Foreign income"	2003	HARMFUL (doc. 13213/03)	2004
SI003 "Newly established companies"	2003	Not harmful	
SI004 "Exemption of revenues from profit participation"	2005	Not assessed (doc. 9427/05)	
SI005 "Investment incentives allowance"	2005	Not assessed (doc. 9427/05)	
SI006 "Taxation of interest and royalties"	2005	Not assessed (doc. 9427/05)	
SI007 "Implementation of PSD, IRD and Merger Directive"	2005	Not assessed (doc. 9427/05)	
SI008 "Enlargement of the period for a loss carry-over"	2006	Not assessed (doc. 15472/06)	
SI009 "Relief for investment in research and development"	2006	Not assessed (doc. 15472/06)	
SI010 "Harmonisation of the amendments to the Mergers Directive"	2006	Not assessed (doc. 15472/06)	
SI011 "Exemption of Dividends and Capital Gains"	2007	Not assessed (doc. 9047/07)	

SWEDEN	SI012 "Venture Capital Scheme"	2007	Not assessed (doc. 9047/07)	
	SI013 "Amendments to the Economic Zones Act"	2007	Not assessed (doc. 9047/07)	
	SI014 "Tax reliefs for Pomurje region"	2010	Not assessed (doc. 16766/10)	
	SI015 "Amendments to the Economic Zones Act"	2010	Not assessed (doc. 16766/10)	
	SE001 (B009) "Foreign Insurance Companies"	1999	Not harmful	
	SE002 (E030) "Investment Companies"	1999	Not harmful	
	SE003 (EAM121/E070) "Tax allocation reserve of 20%"	1999	Not harmful	
	SE004 "Holdings"	2004	Not assessed (doc. 15317/04)	

UNITED KINGDOM⁶	UK001 (A016) "International Headquarters Companies"	1998	Not harmful	
	UK002 (A017) "Gibraltar 1992 Companies"	1998	HARMFUL (doc. 14313/99)	2003 (doc. 14812/02)
	UK003 (B010) "Gibraltar - Captive Insurance Companies"	1998	Not harmful	
	UK004 (B012) "Gibraltar - Exempt Companies"	1998	HARMFUL (doc. 14313/99)	2006: abolished 2010: end of grandfathering (doc. 10200/1/09)
	UK005 (B013) "Gibraltar - Qualifying Companies"	1998	HARMFUL (doc. 14313/99)	2003 (doc. 14812/02)
	UK006 (C010) "Rollover Relief on Disposal of Ships"	1999	Not harmful	
	UK007 (C011) "Gibraltar - Shipping and aviation"	1999	Not harmful	
	UK008 (C019) "Film industry"	1999	Not harmful	
	UK009 (D021)	1999	Not harmful	

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

"Enterprises Zones"					
UK010 (D022)	1999			Not harmful	
"SMEs in Northern Ireland"					
UK011 (E013)	1999			Not harmful	
"Special Scheme for Accelerated Depreciation"					
UK012 (E021)	1999			Not harmful	
"Gibraltar - Development Incentives"					
UK013 (B027)	1999			Not harmful	
"Non taxation of financial activities of non resident companies"					
UK014 (EAM122/E071)	1999			Not harmful	
"Scientific research allowances"					
UK015 (BAM123/B027)	1999			Not harmful	
"Independent investment managers"					
UK016 (Z004)	1999			Not harmful	
"Cost plus rulings"					
UK017	2002-2009			Suspended following ECJ case (measure annulled in 2011)	
"Gibraltar - Proposals for a new corporate tax regime"					
UK018	2011			HARMFUL	2013

	"Gibraltar - Income Tax Act (ITA) 2010"		(doc. 16488/12)	(doc. 11465/13)
UK019	"Patent box" (old patent box)	2013	HARMFUL (doc. 16553/11/14)	2016 (doc. 14750/16) 30/06/2021: end of grandfathering
UK020	"Gibraltar - treatment of asset holding companies"	2014 (doc. 10608/14)	HARMFUL (doc. 9912/16)	2018 (doc. 14364/18 ADD 13)
UK021	"Patent box" (new patent box)	2017	Not harmful (doc. 10047/17)	

II. Dependent or associated territories of Member States⁷

NAME OF THE JURISDICTION	PREFERENTIAL TAX REGIMES Code by jurisdiction (Code by category ⁸) "Name of the regime"	STANDSTILL DATE ⁹	ASSESSMENT	ROLLBACK DATE
Anguilla	AI001 "Measure under criterion 2.2"	2017	HARMFUL (doc. 6671/18)	2019 (doc. 7219/19)
	AN001 (F020) "Offshore companies"	1999	HARMFUL (doc. 14313/99)	2002: abolished 2019: end of grandfathering (doc. 14812/02)
Netherlands Antilles (dissolved in 2010)	AN002 (F021) "New businesses"	1999	Not harmful	
	AN003 (F022) "Mutual funds"	1999	Not harmful	
	AN004 (F023) "Captive Insurance"	1999	HARMFUL (doc. 14313/99)	2002: abolished (doc. 14812/02)

⁷ As of the date of notification/identification.

⁸ 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).

⁹ Date of identification by the COCG or notification by the MS concerned

				2019: end of grandfathering (doc. 14812/12)
AN005 (F024) "Free zones"	1999		HARMFUL (doc. 14313/99)	2006 (doc. 9655/06)
AN006 (F025) "Rulings"	1999		Not harmful	
AN007 (F026) "Shipping and Air transport"	1999		Not harmful	
AN008 "Ruling Practice"	2004		HARMFUL (doc. 9805/04)	2004 (doc. 9805/04)
AN009 "Tax treatment of exempt companies under the NFF" ¹⁰	2004		HARMFUL (doc. 9805/04)	2006: amended 2011: end of grandfathering (doc. 9805/04)
AN010 "Tax treatment of holding companies under the NFF"	2004		HARMFUL (doc. 9805/04)	2006: amended 2011: end of grandfathering (doc. 9805/04)

¹⁰ The regime is still in place in Sint Maarten ("Tax exempt company" regime)

Aruba	AW001 (F027) "Offshore Companies"	1999	HARMFUL (doc. 14313/99)	2003 (doc. 7018/1/03)
	AW002 (F028) "Exempt companies (AVVs)"	1999	HARMFUL (doc. 14313/99)	2006 (doc. 7018/1/03)
	AW003 (F029) "Tax exemptions and holidays for new businesses"	1999	Not harmful	
	AW004 (F030) "Free zones"	1999	HARMFUL (doc. 14313/99)	2006 (doc. 7018/1/03)
	AW005 (F031) "Rulings"	1999	Not harmful	
	AW006 (F032) "Captive insurance"	1999	HARMFUL (doc. 14313/99)	2003 (doc. 7018/1/03)
	AW007 (F033) "Shipping and Air Transport"	1999	Not harmful	
	AW008 "New fiscal framework" (or Imputation Payment Company (IPC) regime)	2004	Not harmful	2015: abolished 2025: end of grandfathering ¹¹
	AW009 "Amendments to the IPC regime" (intellectual property)	2016	Not assessed (Intellectual Property)	

¹¹ Potentially harmful but not actually harmful: under monitoring by OECD FHTP until the end of the grandfathering period at the end of 2025.

aspects)			components were abolished before)	
AW010	2017			
"Free Zone " (revision of the AW004 regime)	(OECD FHTP)			
AW011	2017		Not harmful	
"Shipping and aviation companies"	(COCG)			
AW012	2017		HARMFUL	2018
"Special zone San Nicolas"	(COCG)		(doc. 6671/18)	(doc. 7518/19)
AW013	2017		HARMFUL	2019
"Transparency"	(COCG)		(doc. 6671/18)	(doc. 9646/19)
AW014	2019			
"Exempt companies" (revision of the AW002 regime)	(OECD FHTP)			
AW015	2019			
"Investment Promotion" (other geographically mobile activities than intellectual property)	(OECD FHTP)			
BM001 (F049)	1999		Not harmful	
"Tax exemption guarantee"				
BM002	2017		HARMFUL	2019
"Measure under criterion 2.2"			(doc. 6671/18)	(doc. 9671/19)
BM003	2019			
"Legislative amendments and new guidance under				

	critterion 2.2"				
Curacao	CW001 "eZone"	2017 (OECD FHTP)	HARMFUL (doc. 14364/18)	2018 (doc. 14364/18)	
	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 I)		
	CW006 "Foreign source income exemption"	2019 (COCG)	HARMFUL (docs. 5981/19 and 9652/19)		
Falkland Islands	FK001 (F058) "Tax Holidays"	1999	Not harmful		
	GG001 (F037) "Exempt companies"	1999	HARMFUL (doc. 14313/99)	2008 (doc. 14812/02)	
Guernsey	GG002 (F038) "International loan business"	1999	HARMFUL (doc. 14313/99)	2008 (doc. 14812/02)	

	GG003 (F039)	1999	Not harmful	
	"Unit trusts and collective investment companies"			
	GG004 (F040)	1999	HARMFUL (doc. 14313/99)	2008 (doc. 14812/02)
	"International Bodies"			
	GG005 (F041)	1999	Not harmful	
	"Captive insurance companies"			
	GG006 (F042)	1999	HARMFUL (doc. 14313/99)	2008 (doc. 14812/02)
	"Offshore insurance companies"			
	GG007 (F043)	1999	HARMFUL (doc. 14313/99)	2008 (doc. 14812/02)
	"Insurance companies"			
	GG008	2008	HARMFUL (doc. 16766/10)	2012 (doc. 16488/12)
	"Zero-ten corporate tax"			
	GG009	2017	HARMFUL (doc. 6671/18)	2019 (doc. 7223/19)
	"Measure under criterion 2.2"			
	GG010	2019		
	"New guidance under criterion 2.2"			
Greenland	GL001 (F001)	1999	Not harmful	
	"Deduction for investment in mineral processing"			
	GL002 (F002)	1999	Not harmful	
	"Surcharge exemption for raw materials concession holders"			

Isle of Man	IM001 (F059)	1999	Not harmful	
	"Free Depreciation and balancing charges on ships"			
	IM002 (F060)	1999	Not harmful	
	"Special depreciation for tourist premises"			
	IM003 (F061)	1999	HARMFUL (doc. 14313/99)	2006 (doc. 14812/02)
	"International Business companies"			
	IM004 (F062)	1999	HARMFUL (doc. 14313/99)	2006 (doc. 14812/02)
	"Exemption for non-residents companies"			
	IM005 (F063)	1999	HARMFUL (doc. 14313/99)	2006 (doc. 14812/02)
	"Exempt insurance companies"			
	IM006 (F064)	1999	Not harmful	
"Tax holidays for industrial undertakings"				
IM007 (F065)	1999	HARMFUL (doc. 14313/99)	2006 (doc. 14812/02)	
"International loan business"				
IM008 (F066)	1999	HARMFUL (doc. 14313/99)	2006 (doc. 14812/02)	
"Offshore banking business"				
IM009 (F067)	1999	HARMFUL (doc. 14313/99)	2006 (doc. 14812/02)	
"Fund management"				
IM010 (F068)	1999	Not harmful		
"Exempt Public Companies"				
IM011 (F069)	1999	Not harmful		

	"Film industry tax credits"				
	IM012	2007		Not harmful	
	"General and non-discriminatory corporate taxation system" (abolishing F061-F062-F063-F065-F066-F067)				
	IM013	2007		HARMFUL (doc. 15545/1/07)	2008 (doc. 9633/08)
	"Distributable Profits Charge (DPC)"				
	IM014	2013		Not assessed	
	"New tax legislation"			(doc. 16656/13)	
	IM015	2017		HARMFUL (doc. 6671/18)	2019 (doc. 7223/19)
	"Measure under criterion 2.2"				
	IM016	2019			
	"New guidance under criterion 2.2"				
Jersey	JE001 (F045)	1999		HARMFUL (doc. 14313/99)	2008 (doc. 14812/02)
	"Tax exempt companies"				
	JE002 (F046)	1999		HARMFUL (doc. 14313/99)	2006 (doc. 14812/02)
	"International Treasury operations"				
	JE003 (F047)	1999		HARMFUL (doc. 14313/99)	2006: abolished 2012: end of grandfathering (doc. 14812/02)
	"International Business companies"				
	JE004 (F048)	1999		HARMFUL	2006

	"Captive insurance companies"			(doc. 14313/99)	(doc. 14812/02)
	JE005	2008		HARMFUL	2011
	"Zero-ten corporate tax"			(doc. 16766/10)	(doc.17081/11)
	JE006	2017		HARMFUL	2019
	"Measure under criterion 2.2"			(doc. 6671/18)	(doc. 7223/19)
	JE007	2019			
	"New guidance under criterion 2.2"				
Caymans Islands	KY001 (F057)	1999		Not harmful	
	"Tax Exemption Guarantee"				
	KY002	2017		HARMFUL	2019
	"Measure under criterion 2.2"			(doc. 6671/18)	(doc. 7222/19)
	KY003	2019		HARMFUL	2019
	"Legislative amendments under criterion 2.2"			(doc. 12284/1/19 REV 1)	(doc. 7222/19 ADD 1)
Macao	MO001 (F035)	1999		Not harmful	
	"Offshore Banking"				
Montserrat	MS001 (F070)	1999		Not harmful	
	"Reduced rate for industrial and offshore companies"				
	MS002 (F071)	1999		Not harmful	
	"International business companies"				
	MS003 (F072)	1999		Not harmful	

	"Tax holidays for approved enterprises"				
	MS004 (F073)	1999		Not harmful	
	"Exemption for newly constructed or enlarged hotels"				
	MS005	2017		HARMFUL	2019
	"International Business Companies"	(<i>OECD FHTP</i>)		(<i>doc. 14364/18</i>)	(<i>doc. 9652/19</i>)
New Caledonia	NC001 (F004)	1999		Not harmful	
	"Exemption for 8 years for certain activities in specified communes"				
	NC002 (F005)	1999		Not harmful	
	"Metallurgical companies"				
	NC003 (F006)	1999		Not harmful	
	"Exemption or reduced rate base for rental income in specified communes"				
	NC004 (F007)	1999		Not harmful	
	"10-15 year exemption in hotel and tourist industry"				
	NC005 (F008)	1999		Not harmful	
	"Deductions for investment in certain industries"				
	NC006 (F009)	1999		Not harmful	
	"Deduction for capital investment"				
French Polynesia	PF001 (F010)	1999		Not harmful	
	"Investment and job incentives (tax exemptions) in				

	certain sectors (tourism, maritime, etc. but excluding banking and insurance)"				
Saint-Pierre and Miquelon	PM001 (F016)	1999		Not harmful	
	"Temporary exemptions for certain sectors"				
	PM002 (F017)	1999		Not harmful	
	"Partial exemption from distribution tax"				
	PM003 (F018)	1999		Not harmful	
	"Deduction for productive investment"				
	PM004 (F019)	1999		Not harmful	
	"Share in the subscribed capital of certain companies"				
St Helena and Dependencies	SH001 (F075)	1999		Not harmful	
	"Tax holidays"				
	SH002 (F076)	1999		Not harmful	
Turks and Caicos Islands	"150% deductions"				
	TC001 (F078)	1999		Not harmful	
	"Tax Exemption Guarantee"				
	TC002	2017		HARMFUL	2019
British Virgin	"Measure under criterion 2.2"			(doc. 6671/18)	(doc. 7225/19)
	TC003	2019			
	"Legislative amendments under criterion 2.2"				
	VG001 (F052)	1999		Not harmful	

Islands	"Arising and remittance basis"				
	VG002 (F053) "1% rate"	1999		Not harmful	
	VG003 (F054) "Pioneer industry exemption"	1999		Not harmful	
	VG004 (F055) "Exemption for newly constructed hotels"	1999		Not harmful	
	VG005 (F056) "International Business companies"	1999		HARMFUL (doc. 14313/99)	2005 (doc. 15434/05)
	VG006 "Measure under criterion 2.2"	2017		HARMFUL (doc. 6671/18)	2019 (doc. 7226/19)
	VG007 "New guidance under criterion 2.2"	2019			
	WF001 (F011) "Investment and Job Incentives"	1999		Not harmful	
	YT001 (F013) "Temporary tax exemptions for companies"	1999		Not harmful	
	YT002 (F014) "Tax deductions for productive investments"	1999		Not harmful	
YT003 (F015) "Capital contributions to certain companies"	1999		Not harmful		

III. Other jurisdictions

NAME OF THE JURISDICTION	PREFERENTIAL TAX REGIMES Code by jurisdiction "Name of the regime"	STANDSTILL DATE ¹² (and indication of whether the regime is mainly under the monitoring of the COCG or of the OECD Forum on Harmful Tax Practices - FHTP ¹³)	ASSESSMENT	ROLLBACK DATE
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)
	AD003	2017	HARMFUL	2018

¹² Date of identification by the COCG

¹³ 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.

	"Intra-Group finance companies" (Inter-company and financing regime)	(OECD FHTP)	(doc. 6671/18)	(doc. 14364/18)
United Arab Emirates	AD004 "Holding companies"	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2018 (doc. 14364/18)
	AE001 "Free Zones"	2017	Not assessed ¹⁴ (doc. 8304/1/18)	
	AE002 "Measure under criterion 2.2"	2018	HARMFUL (doc. 8304/1/18)	2019 (doc. 13047/19)
	AE003 "New guidance under criterion 2.2"	2019		
	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)		
AG003 "Free Trade Zones (Paradise Found Act, Yida Act, Free	2018 (COCG)	HARMFUL (doc. 14364/18)		

¹⁴ UAE was in the end reviewed under criterion 2.2 of the EU listing exercise: see measure AE002.

	Trade Zone Act, Special Economic Zone Act)"				
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)	
	BB001 "International Business Companies"	2017 (OECD FHTP)		HARMFUL (doc. 6671/18)	2019 (doc. 9652/19)
Barbados	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	2017		Not harmful	

	"Shipping Regime"	(COCG)		
	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	HARMFUL (doc. 5981/19)	
Bahrain	BH001 "Measure under criterion 2.2"	2017	HARMFUL (doc. 6671/18)	2019 (doc. 7221/19)
	BH002 "New guidance under criterion 2.2"	2019		
Brazil	BR001 "Export Processing Zone "	2017 (COCG)	Not harmful ¹⁵	
Bahamas	BS001	2017	HARMFUL	2019

¹⁵ 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.

	"Measure under criterion 2.2"			(doc. 6671/18)	(doc. 7220/19)
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 (COCC)			
Belize	BZ001 "International business company (IBC)"	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)		
	BZ002 "Export processing zones (EPZ) enterprises"	2017 (COCC)	HARMFUL (doc. 6671/18)	2019 (doc. 7615/19 + ADDs 1-2)	
	BZ003 "Fiscal incentives Act"	2019 (COCC)	Not harmful (doc. 14114/19 ADD 4)		
	BZ004 "General Income Tax Act (section 14)"	2019 (COCC)	Not harmful (doc. 14114/19 ADD 5)		
	BZ005 "Commercial free zone (CFZ)"	2019 (COCC)	Not harmful (doc. 14114/19 ADD 6)		
	BZ006	2019	HARMFUL		

	"Foreign source income exemption"	(COCG)	(docs. 5981/19 and 9652/19)	
Canada	CA001 "Life insurance business"	2018 (OECD FHTP)	Potentially harmful but not actually harmful (under monitoring) (doc. 14364/18)	
	CH001 "Cantonal administrative company status (auxiliary company regime)"	2012 (COCG)	HARMFUL (doc. 11133/13)	2019 (doc. 13196/19)
Switzerland	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	2019	Not harmful	

	"Patent box of the Canton of Nidwalden"		(OECD FHTP)	(doc. 14114/19)	
	CH007		2019 (COCCG)		
	"Notional interest deduction"				
Cook Islands	CK001	"International Companies"	2017 (COCCG)	HARMFUL (doc. 6671/18)	
	CK002	"International Insurance Companies" (2008 Insurance Act class C)	2017 (COCCG)	HARMFUL (doc. 6671/18)	
	CK003	"Overseas insurance companies" (2008 Insurance Act class B)	2017 (COCCG)	Does not meet the gateway criterion (doc. 9652/19 ADD 8 REV 1)	
	CK004	"International Captive Insurance Companies" (2013 Captive Insurance Bill)	2017 (COCCG)	HARMFUL (doc. 6671/18)	
	CK005	"Encouragement of new industry or enterprise" (Development Investment Act, section 27A)	2017 (COCCG)	HARMFUL (but not used and in the process of being repealed at the time of the screening)	2018
	CK006		2017	HARMFUL	

	"Developing projects" (Income Tax Act, section 42)	(COCG)	(doc. 6671/18)	
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 ¹⁶	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)	
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)	

¹⁶ 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.

	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 I)
	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 I)
	GD005 "Fiscal incentives under various Acts"	2017 (COCG)	HARMFUL (doc. 6671/18)	2019 (doc. 7468/19 + ADD I)
	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 ¹⁷	
	GE003 "Special Trade Companies"	2017 (COCG)	Not harmful ¹⁸	
	GE004 "Virtual Zone Person (VZP)"	2017 (OECD FHTP)	Potentially harmful but not actually harmful (under monitoring)	
Hong Kong SAR	HK001 "Corporate treasury centres (CTC)" (or Profits tax concession for corporate treasury centres)	2017 (OECD FHTP)	HARMFUL (doc. 14364/18)	2018 (doc. 14364/18)
	HK002 "Offshore funds"	2017 (COCG)	HARMFUL (doc. 6671/18)	2019 (doc. 7470/19)
	HK003	2017	HARMFUL	2019

¹⁷ 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.

¹⁸ 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.

	"Offshore Private Equity Funds"	(COCG)	(doc. 7516/19)	
HK004	"Offshore Reinsurance" (or Profits tax concession for professional reinsurers)	2017 (OECD FHTP)	HARMFUL (doc. 14364/18)	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	2017	Not harmful	
	"Tax reduction" (formerly Tax holiday)	(OECD FHTP)		
	ID004	2017	Not harmful	
	"Public / listed company"	(OECD FHTP)		
Israel	IL001	2017	Not harmful	
	"Preferred company" (Amended preferred enterprise and Preferred technological enterprise regimes)	(OECD FHTP)		
India	IN001	2017	Not harmful	
	"Special Economic Zones (SEZS)"	(OECD FHTP)		
Jamaica	JM001	2017	HARMFUL	2014: abolished
	"Industrial (Export Related) Incentives"	(COCG)	(doc. 6671/18)	2017: end of grandfathering
	JM002	2017	Not harmful	
	"Special Economic Zones"	(COCG)		
Jordan	JO001	2017	HARMFUL	2019
	"Free Zone"	(OECD FHTP + COCG)	(doc. 6671/18)	(docs. 7517/19 and 9652/19)
	JO002	2018	HARMFUL	
	"Development Zone"	(OECD FHTP)	(doc. 9652/19)	
	JO003	2018	Out of scope	
	"Least Developed Zones"	(COCG)		

	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)	
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)
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

	LC005 "Foreign source income exemption"	2019 (COCG)	HARMFUL (docs. 5981/19 and 9652/19)	
Liechtenstein	LJ001 "Tax Exempt Corporate Income - dividends and capital gains"	2011 (COCG) (doc. 17081/11)	HARMFUL (doc. 14784/17)	2018 (doc. 12773/18)
	LJ002 "The special regime for Private Asset Structures (PAS)"	2011 (COCG) (doc. 17081/11)	Out of scope (doc. 14784/17)	
	LJ003 "Interest deduction on equity (Allowance for Corporate Equity - ACE)"	2016 (COCG)	HARMFUL (doc. 14784/17)	2018 (doc. 12774/18)
	LJ004 "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)	
	MA003 "Export Free Zones (EFZ) or Free Trade Zones (FTZ)"	2017 (COCG)	HARMFUL (doc. 6671/18)	
	MA004	2017	Potentially harmful	2019

	"Offshore Banks" (Banks in offshore zones)	(COCG)	but not actually harmful (under monitoring)	(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 (COCG)	HARMFUL (doc. 14364/18)	
Marshall Islands	MH001 "Measure under criterion 2.2"	2017	HARMFUL (doc. 6671/18)	2019 (doc. 13049/19)
	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)	
Macau SAR	MO002	2017	HARMFUL	2019: abolished

<i>(changed status in 1999¹⁹)</i>	"Offshore companies" (or Macau offshore institutions)	<i>(OECD FHTP)</i>	<i>(doc. 6671/18)</i>	2021: end of grandfathering
Mauritius	MU001 "Global Business Licence 1 (GBL 1)"	2017 <i>(OECD FHTP)</i>	HARMFUL <i>(doc. 6671/18)</i>	2019 <i>(doc. 9652/19)</i>
	MU002 "Global Business Licence 2 (GBL 2)"	2017 <i>(OECD FHTP)</i>	HARMFUL <i>(doc. 6671/18)</i>	2019 <i>(doc. 9652/19)</i>
	MU003 "Freeport Zone"	2017 <i>(OECD FHTP)</i>	HARMFUL <i>(doc. 6671/18)</i>	2018 <i>(doc. 14364/18)</i>
	MU004 "Shipping Regime"	2017 <i>(OECD FHTP)</i>	Not Harmful	
	MU005 "Captive Insurance"	2017 <i>(OECD FHTP)</i>	HARMFUL <i>(doc. 6671/18)</i>	2018 <i>(doc. 14364/18)</i>
	MU006 "Banks Holding a Banking Licence under the Banking Act 2004 (segment B banking)"	2017 <i>(OECD FHTP)</i>	HARMFUL <i>(doc. 6671/18)</i>	2019 <i>(doc. 9652/19)</i>
	MU007 "Global treasury activities"	2017 <i>(OECD FHTP)</i>	Not Harmful	
	MU008 "Global headquarters administration"	2017 <i>(OECD FHTP)</i>	Not Harmful	
	MU009	2017	Not Harmful	

¹⁹ See regime MO001 in the previous section of this document.

	"Investment Banking"	(OECD FHTP)		
	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)	
	MV002 "Foreign source income exemption"	2019 (COCG)		
	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)
Malaysia and Labuan Island	MY002	2017	HARMFUL	2018

"Labuan Island - Financing and Leasing" (or Labuan leasing)	(OECD FHTP)	(doc. 6671/18)	(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	2017	HARMFUL	2019: IP part abolished

	"MSC Malaysia Status"	(OECD FHTP)	(doc. 6671/18)	(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	2019 (COCG)		
Nauru	"Foreign source income exemption"	2019 (COCG)		
	NR001	2019 (COCG)		
	"Foreign source income exemption"	2017 (COCG)	HARMFUL (doc. 6671/18)	2006 ²⁰
Niue	NU001	2017 (COCG)		
	"International Business Companies Act of 1994 (IBC)"	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2019: amended 30/06/2021: end of grandfathering (doc. 9652/19)
Panama	PA001			
	"Multinational Headquarters"	2017 (COCG)		
	PA002	2017 (COCG)	Out of scope	
	"Free Zones Act"	2017 (COCG)	Not harmful	
	PA003			
	"Colon Free Zone"	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2019: amended 30/06/2021: end of grandfathering (doc. 9652/19)
	PA004			
	"Panama-Pacifico Special Economic Area"	2017 (COCG)	HARMFUL (doc. 6671/18)	2018 (doc. 15117/18)
	PA005			
	"Foreign Owned Call Centres "	2017 (COCG)	HARMFUL (doc. 6671/18)	

²⁰ 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	
	QA001 "Qatar Science and Technology Park (QSTP)" (Free zone at science and technology park)	2019 (OECD FHTP)		
Qatar	QA002 "Qatar Financial Centre (QFC)"	2019 (OECD FHTP)		
	QA003 "Free zone areas"	2019 (OECD FHTP)		
	QA004 "Foreign source income exemption"	2019 (COCG)		
	SC001	2017	HARMFUL	2019: abolished
Seychelles				

	"International Business Companies"	(OECD FHTP)	(doc. 6671/18)	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)	
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)	2017 (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		2017	Not Harmful	

	"Aircraft Leasing Scheme (ALS)"	(OECD FHTP)			
	SG012	2017 (OECD FHTP)	Not Harmful		
	SG013	2019 (COCCG)			
	"Foreign source income exemption"				
San Marino	SM001	2017 (OECD FHTP)	HARMFUL (2017 screening)	2017	
	"Financing"				
	SM002	2017 (OECD FHTP)	HARMFUL (2017 screening)	2017	
	"Intellectual Property"				
	SM003	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2018 (doc. 14364/18)	
	"New companies"				
Eswatini	SM004	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2018 (doc. 14364/18)	
	"High-tech start-up companies"				
	SM005	2018 (OECD FHTP)			
	"Intellectual Property regime"				
	SZ001	2019 (COCCG)	Not currently harmful (not yet operational), but annual monitoring (doc. 14114/19)		
	"Special economic zones"				
	SZ002	2019			

	"Foreign source income exemption"	(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 ²¹	2019: abolished 2021: end of grandfathering (doc. 9652/19)	
Tunisia	TH006 "International business centre (IBC)"	2019 (OECD FHTP)	Not harmful (doc. 14114/19)		
	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	2017	HARMFUL	2018	

²¹ This newly identified regime is due to be amended/abolished by end 2018.

	"Technology Development Zones"	(OECD FHTP)	(doc. 6671/18)	(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 (COCC)	HARMFUL (doc. 6671/18)	2019 (doc. 7561/19)
TT001	"Free trade zone" (or Free zones)	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	
TW001	"Free Trade Zone" (including the International Airport Park Development regime)	2017 (COCC)	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 (COCC)	Not Harmful	
	US002 "Delaware - Deduction of interest from affiliated companies"	2017 (COCC)	Not Harmful	

	US003	2018 (OECD FHTP)			
Uruguay	"Foreign Derived Intangible Income (FDII)"				
	UY001	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2019: amended 30/06/2021: end of grandfathering (doc. 9652/19)	
	"Free zones"				
	UY002	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2018 (doc. 14364/18)	
	"Shared service centre"				
	UY003	2017 (OECD FHTP)	Not assessed (abolished before)	2016	
"Financial company reorganisation"					
UY004	2017 (COCCG)	Not harmful			
"General powers under Law 16,906" (or Investment law incentives under law 16.906)					
UY005	2017 (COCCG)	Out of scope			
"Holding company regime / source principle taxation"					
UY006	2017 (OECD FHTP)	HARMFUL (doc. 6671/18)	2019: amended 30/06/2021: end of grandfathering (doc. 9652/19)		
"Software and biotechnology industry incentives" (benefits under lit. S art. 52)					

	UY007 "Benefits under law 16,906 for biotechnology"	2018 (OECD FHTP)	HARMFUL ²²	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)
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 Center Regulatory Act"	2017 (COCG)	HARMFUL (doc. 6671/18)	
Viet Nam	VN001 "Export processing zones"	2017 (COCG)	Not harmful (doc. 12775/18)	

²² This newly identified regime is due to be amended/abolished by end 2018.

	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	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)	