

Foreword

The integration of national economies and markets has increased substantially in recent years, putting a strain on the international tax rules, which were designed more than a century ago. Weaknesses in the current rules create opportunities for base erosion and profit shifting (BEPS), requiring bold moves by policy makers to restore confidence in the system and ensure that profits are taxed where economic activities take place and value is created.

Following the release of the report *Addressing Base Erosion and Profit Shifting* in February 2013, OECD and G20 countries adopted a 15-point Action Plan to address BEPS in September 2013. The Action Plan identified 15 actions along three key pillars: introducing coherence in the domestic rules that affect cross-border activities, reinforcing substance requirements in the existing international standards, and improving transparency as well as certainty.

After two years of work, measures in response to the 15 actions were delivered to G20 Leaders in Antalya in November 2015. All the different outputs, including those delivered in an interim form in 2014, were consolidated into a comprehensive package. The BEPS package of measures represents the first substantial renovation of the international tax rules in almost a century. Once the new measures become applicable, it is expected that profits will be reported where the economic activities that generate them are carried out and where value is created. BEPS planning strategies that rely on outdated rules or on poorly co-ordinated domestic measures will be rendered ineffective.

Implementation is now the focus of this work. The BEPS package is designed to be implemented via changes in domestic law and practices, and in tax treaties. With the negotiation of a multilateral instrument (MLI) having been finalised in 2016 to facilitate the implementation of the treaty related BEPS measures, over 90 jurisdictions are covered by the MLI. The entry into force of the MLI on 1 July 2018 paves the way for swift implementation of the treaty related measures. OECD and G20 countries also agreed to continue to work together to ensure a consistent and co-ordinated implementation of the BEPS recommendations and to make the project more inclusive. Globalisation requires that global solutions and a global dialogue be established which go beyond OECD and G20 countries.

A better understanding of how the BEPS recommendations are implemented in practice could reduce misunderstandings and disputes between governments. Greater focus on implementation and tax administration should therefore be mutually beneficial to governments and business. Proposed improvements to data and analysis will help support ongoing evaluation of the quantitative impact of BEPS, as well as evaluating the impact of the countermeasures developed under the BEPS Project.

As a result, the OECD established the OECD/G20 Inclusive Framework on BEPS (Inclusive Framework), bringing all interested and committed countries and jurisdictions on an equal footing in the Committee on Fiscal Affairs and all its subsidiary bodies. The Inclusive Framework, which already has more than 135 members, is monitoring and peer reviewing the implementation of the minimum standards as well as completing the work on standard setting to address BEPS issues. In addition to BEPS members, other international organisations and regional tax bodies are involved in the work of the Inclusive Framework, which also consults business and the civil society on its different work streams.

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Table of contents

Foreword	3
Executive summary	8
Notes	8
1 Background	9
Action 6 minimum standard and the terms of reference	9
Notes	9
2 The 2019 Peer Review	10
Implementation of the minimum standard	10
Compliant agreements	10
Notes	11
3 Difficulties in implementing the minimum standard	13
Notes	13
4 Conclusion and next steps	14
Background	14
Notes	17
5 Data for each jurisdiction of the Inclusive Framework	19
Jurisdictional data	19
Andorra	23
Angola	24
Anguilla	25
Antigua and Barbuda	26
Argentina	27
Armenia	28
Aruba	30
Australia	31
Austria	34
The Bahamas	37
Bahrain	38
Barbados	40
Belgium	42
Belize	45
Benin	46

Bermuda	47
Botswana	48
Brazil	49
British Virgin Islands	51
Brunei Darussalam	52
Bulgaria	53
Burkina Faso	55
Cabo Verde	56
Cameroon	57
Canada	58
Cayman Islands	61
Chile	62
China (People's Republic of)	64
Colombia	67
Congo	69
Costa Rica	70
Cook Islands	71
Côte d'Ivoire	72
Croatia	73
Curacao	75
Czech Republic	76
Democratic Republic of the Congo	79
Denmark	80
Djibouti	83
Dominica	84
Dominican Republic	85
Egypt	86
Estonia	88
Faroe Islands	90
Finland	91
France	94
Gabon	97
Georgia	98
Germany	100
Greece	103
Greenland	105
Grenada	107
Guernsey	108
Haiti	110
Hong Kong (China)	111
Hungary	113
Iceland	116
India	118
Indonesia	121
Ireland	123
Isle of Man	126
Israel	127
Italy	129
Jamaica	136
Japan	138
Jersey	141

Kazakhstan	142
Kenya	144
Korea	145
Latvia	149
Liberia	151
Liechtenstein	152
Lithuania	153
Luxembourg	156
Macau (China)	159
Malaysia	160
Maldives	163
Malta	164
Mauritius	167
Mexico	169
Monaco	171
Mongolia	172
Montserrat	173
Morocco	174
Netherlands	176
New Zealand	179
Nigeria	181
The Republic of North Macedonia	182
Norway	184
Oman	187
Pakistan	189
Panama	192
Papua New Guinea	193
Paraguay	194
Peru	195
Poland	196
Portugal	200
Qatar	203
Romania	206
Russian Federation	209
Saint Kitts and Nevis	212
Saint Lucia	213
Saint Vincent and the Grenadines	214
San Marino	215
Saudi Arabia	217
Senegal	219
Serbia	221
Seychelles	223
Sierra Leone	225
Singapore	226
Slovak Republic	229
Slovenia	232
South Africa	234
Spain	237
Sri Lanka	240
Sweden	242
Switzerland	245

Thailand	248
Trinidad and Tobago	250
Tunisia	252
Turks and Caicos Islands	254
Turkey	255
Ukraine	258
United Arab Emirates	260
United Kingdom	263
United States	267
Uruguay	271
Viet Nam	272
Zambia	275
Notes	276


TABLES

Table 5.1. List of jurisdictions in the Inclusive Framework subject to the Peer Review	21
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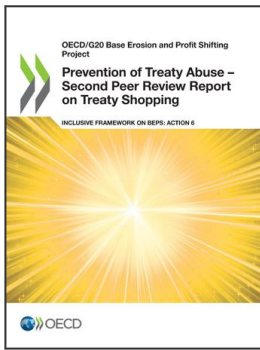

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