

Foreword

Digitalisation and globalisation have had a profound impact on economies and the lives of people around the world, and this impact has only accelerated in the 21st century. These changes have brought with them challenges to the rules for taxing international business income, which have prevailed for more than a hundred years and created 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.

In 2013, the OECD ramped up efforts to address these challenges in response to growing public and political concerns about tax avoidance by large multinationals. The OECD and G20 countries joined forces and developed an Action Plan to address BEPS in September 2013. The Action Plan identified 15 actions aimed at 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, including those published in an interim form in 2014, were consolidated into a comprehensive package and delivered to G20 Leaders in November 2015. The BEPS package represents the first substantial renovation of the international tax rules in almost a century. As the BEPS measures are implemented, 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 BEPS planning strategies that rely on outdated rules or on poorly co-ordinated domestic measures will be rendered ineffective.

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. As a result, they created 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 its subsidiary bodies. With over 140 members, the Inclusive Framework monitors and peer reviews the implementation of the minimum standards and is completing the work on standard setting to address BEPS issues. In addition to its 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.

Although implementation of the BEPS package is dramatically changing the international tax landscape and improving the fairness of tax systems, one of the key outstanding BEPS issues – to address the tax challenges arising from the digitalisation of the economy – remained unresolved. In a major step forward on 8 October 2021, over 135 Inclusive Framework members, representing more than 95% of global GDP, joined a two-pillar solution to reform the international taxation rules and ensure that multinational enterprises pay a fair share of tax wherever they operate and generate profits in today's digitalised and globalised world economy. The implementation of these new rules is envisaged by 2023.

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Table of contents

Foreword	3
Acknowledgements	4
Executive Summary	9
1 Implementation of the minimum standard: Aggregate data and key figures	12
2 Key role of the MLI	17
3 Plans for the implementation of the minimum standard and support provided to jurisdictions	21
4 Recommendations	24
5 Difficulties in implementing the minimum standard	25
6 Conclusion and next steps	27
7 Background on the Action 6 minimum standard and peer review	29
8 Jurisdictional Sections	36
Albania	38
Andorra	40
Angola	41
Anguilla	42
Antigua and Barbuda	43
Argentina	45
Armenia	47
Aruba	49
Australia	50
Austria	52
The Bahamas	56
Bahrain	57
Barbados	59
Belarus	61
Belgium	64
Belize	67

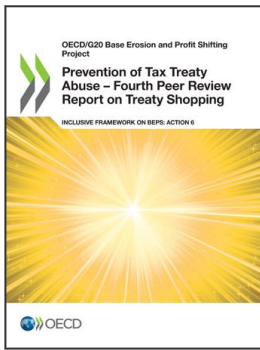
Benin	69
Bermuda	70
Bosnia-Herzegovina	71
Botswana	73
Brazil	74
British Virgin Islands	76
Brunei Darussalam	77
Bulgaria	78
Burkina Faso	81
Cabo Verde	83
Cameroon	84
Canada	85
Cayman Islands	88
Chile	89
China (People's Republic of)	91
Colombia	94
Congo	96
Cook Islands	97
Costa Rica	98
Côte d'Ivoire	99
Croatia	101
Curaçao	103
Czech Republic	104
Democratic Republic of the Congo	108
Denmark	109
Djibouti	112
Dominica	113
Dominican Republic	114
Egypt	115
Estonia	117
Eswatini	119
Faroe Islands	120
Finland	121
France	124
Gabon	127
Georgia	129
Germany	132
Gibraltar	137
Greece	138
Greenland	140
Grenada	141
Guernsey	143
Haiti	144
Honduras	145
Hong Kong (China)	146
Hungary	148
Iceland	151
India	153
Indonesia	156
Ireland	159
Isle of Man	161

Israel	162
Italy	164
Jamaica	167
Japan	169
Jersey	172
Jordan	174
Kazakhstan	176
Kenya	178
Korea	180
Latvia	183
Liberia	185
Liechtenstein	186
Lithuania	187
Luxembourg	189
Macau (China)	192
Malaysia	193
Maldives	195
Malta	196
Mauritius	199
Mexico	201
Monaco	203
Mongolia	204
Montenegro	206
Montserrat	208
Morocco	209
Namibia	211
Netherlands	212
New Zealand	215
Nigeria	217
North Macedonia	218
Norway	220
Oman	224
Pakistan	226
Panama	228
Papua New Guinea	229
Paraguay	230
Peru	231
Poland	233
Portugal	236
Qatar	239
Romania	242
Russian Federation	245
Saint Kitts and Nevis	248
Saint Lucia	250
Saint Vincent and the Grenadines	251
Samoa	253
San Marino	254
Saudi Arabia	255
Senegal	257
Serbia	259
Seychelles	261

Sierra Leone	263
Singapore	264
Slovak Republic	267
Slovenia	270
South Africa	272
Spain	275
Sri Lanka	278
Sweden	280
Switzerland	283
Thailand	287
Trinidad and Tobago	289
Tunisia	291
Turkey	293
Turks and Caicos Islands	296
Ukraine	297
United Arab Emirates	300
United Kingdom	303
United States	307
Uruguay	310
Viet Nam	311
Zambia	314

TABLES

Table 2.1. Treaty networks and ratification of the MLI	18
Table 3.1. Plans to implement the minimum standard	22



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