

CAVEAT

The purpose of this table is, on the basis of publicly available information and in order to facilitate tax due diligence by EU implementing partners, to compile the tax deficiencies identified by the EU in a) jurisdictions committed to address these deficiencies (mentioned in Annex II of the Council conclusions) and b) non-cooperative jurisdictions (mentioned on Annex I of the Council conclusions, i.e. the EU list of non-cooperative jurisdictions for tax purposes). This table compiles jurisdictions of both categories in alphabetical order but should of course not be seen as another EU list.

Tax deficiencies identified by the EU (based on the [Council conclusions of 20.02.2023](#))

For the purposes of this table:

“BEPS” means base erosion and profit shifting in the context of the [OECD/G20 Base Erosion and Profit Shifting Project](#), currently comprising 15 actions, including minimum standards

“CbCR” means country-by-country reporting according to BEPS Action 13¹

“Global Forum” means the [Global Forum on Transparency and Exchange of Information for Tax Purposes](#)

“Inclusive Framework” means the OECD/G20 Inclusive Framework on BEPS

“MAC” means the [OECD Multilateral Convention on Mutual Administrative Assistance in Tax Matters](#), as amended

Jurisdiction	Tax deficiencies
American Samoa <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not apply any automatic exchange of financial account information Has not signed and ratified the MAC Did not commit to apply the BEPS minimum standards
Anguilla <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not have a rating of at least “Largely Compliant” by the Global Forum in relation to exchange of information on request² Does not ensure the effective monitoring of company obligations regarding substance requirements in the jurisdiction
Antigua and Barbuda <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not have a rating of at least “Largely Compliant” by the Global Forum in relation to exchange of information on request³
Armenia	<ul style="list-style-type: none"> Has a harmful tax regime (Free economic zones) but has committed to amend or abolish it
Belize	<ul style="list-style-type: none"> Has a “Partially Compliant” rating by the Global Forum for exchange of information on request⁴ but will undergo a supplementary review to obtain a higher rating
British Virgin Islands	<ul style="list-style-type: none"> Has a “Partially Compliant” rating by the Global Forum in relation to exchange of information on request⁵ but will undergo a supplementary review to obtain a higher rating
Costa Rica	<ul style="list-style-type: none"> Has not put in place the legal framework for the automatic exchange of financial accounts information under the Common Reporting Standard

¹ [Country-by-Country Reporting – Compilation of 2023 Peer Review Reports: Inclusive Framework on BEPS: Action 13 | OECD iLibrary \(oecd-ilibrary.org\)](#)

² [e8051e38-en.pdf \(oecd-ilibrary.org\)](#)

³ [df906926-en.pdf \(oecd-ilibrary.org\)](#)

⁴ [f74baa49-en.pdf \(oecd-ilibrary.org\)](#)

⁵ [d3fade82-en.pdf \(oecd-ilibrary.org\)](#)

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Jurisdiction	Tax deficiencies
Curaçao	<ul style="list-style-type: none"> Has not put in place the legal framework for the automatic exchange of financial accounts information under the Common Reporting Standard⁶
Eswatini	<ul style="list-style-type: none"> Has a harmful tax regime (Special economic zone) but has committed to amend or abolish it
Fiji <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Has not signed and ratified the MAC Has harmful tax regimes (Exporting companies, Income communication technology (ICT) incentive)
Guam <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not apply any automatic exchange of financial account information Has not signed and ratified the MAC Did not commit to apply the BEPS minimum standards
Malaysia	<ul style="list-style-type: none"> Has a harmful tax regime (Foreign-source income exemption regime)⁷ in relation to capital gains but has committed to amend or abolish it
Palau <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not apply any automatic exchange of financial account information Has not signed and ratified the MAC
Panama <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not have a rating of at least “Largely Compliant” by the Global Forum in relation to exchange of information on request Has a harmful tax regime (Foreign-source income exemption regime)⁸
Russian Federation <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Has a harmful tax regime (International holding companies)
Samoa <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Has a harmful tax regime (Offshore business)
Seychelles	<ul style="list-style-type: none"> Has a “Partially Compliant” rating by the Global Forum in relation to exchange of information on request⁹ but will undergo a supplementary review to obtain a higher rating
Trinidad and Tobago <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Has not put in place the legal framework for the automatic exchange of financial accounts information under the Common Reporting Standard¹⁰ Does not have a rating of at least “Largely Compliant” by the Global Forum in relation to exchange of information on request Has not signed and ratified the MAC Has a harmful tax regime (Free zones) Has not introduced the necessary legal and administrative framework to implement the CbCR minimum standard

⁶ [36e7cded-en.pdf \(oecd-ilibrary.org\)](#) p. 324

⁷ [https://data.consilium.europa.eu/doc/document/ST-14224-2021-INIT/en/pdf \(europa.eu\)](https://data.consilium.europa.eu/doc/document/ST-14224-2021-INIT/en/pdf (europa.eu))

⁸ [https://data.consilium.europa.eu/doc/document/ST-14226-2021-INIT/en/pdf \(europa.eu\)](https://data.consilium.europa.eu/doc/document/ST-14226-2021-INIT/en/pdf (europa.eu))

⁹ [ddc3d41d-en.pdf \(oecd-ilibrary.org\)](#)

¹⁰ [36e7cded-en.pdf \(oecd-ilibrary.org\)](#) p.1042

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Jurisdiction	Tax deficiencies
Türkiye	<ul style="list-style-type: none">• Has not exchanged financial account information with all EU Member States
US Virgin Islands <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none">• Does not apply any automatic exchange of financial account information• Has not signed and ratified the MAC• Has harmful tax regimes (Economic development programme, Exempt companies, International banking centre regulatory act)• Did not commit to apply the BEPS minimum standards
Vanuatu <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none">• Facilitates offshore structures and arrangements by not having in place adequate legislation for companies to meet obligations regarding substantial economic activities and by not exchanging information with partner jurisdictions regarding these companies• Has a “Partially Compliant” rating by the Global Forum in relation to exchange of information on request¹¹ and will undergo a supplementary review to obtain a higher rating
Vietnam	<ul style="list-style-type: none">• Has not put in place the necessary legal and administrative arrangements to exchange CbCR information in line with the minimum standard

¹¹ [dd70b774-en.pdf \(oecd-ilibrary.org\)](#)