

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 14.02.2023](#))

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
Albania	<ul style="list-style-type: none"> Has a harmful tax regime (Industrial incentives)
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"> Has a “Non-compliant” rating by the Global Forum in relation to exchange of information on request² but will undergo a supplementary review to obtain a higher rating Does not ensure the effective monitoring of company obligations regarding substance requirements in the jurisdiction
Armenia	<ul style="list-style-type: none"> Has harmful tax regimes (Free economic zones and Information technology projects)
Aruba	<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 Standard³.
Bahamas <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not ensure the effective monitoring of company obligations regarding substance requirements in the jurisdiction
Belize	<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 Standard⁴. Has not put in place all the necessary administrative arrangements to exchange CbCR information in line with the minimum standard
Botswana	<ul style="list-style-type: none"> Has a “Partially Compliant” rating by the Global Forum in relation to exchange of information on request⁵ but is undergoing a supplementary review to obtain a higher rating

¹ [73dc97a6-en.pdf \(oecd-ilibrary.org\)](#)

² [ac228609-en.pdf \(oecd-ilibrary.org\)](#)

³ [36e7cded-en.pdf \(oecd-ilibrary.org\)](#) p.80

⁴ [36e7cded-en.pdf \(oecd-ilibrary.org\)](#) p.170

⁵ [fd32b72f9-en.pdf \(oecd-ilibrary.org\)](#)

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.

Jurisdiction	Tax deficiencies
British Virgin Islands <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Has a “Partially Compliant” rating by the Global Forum in relation to exchange of information on request⁶.
Costa Rica <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 Standard. Has a harmful tax regime (Foreign-source income exemption regime⁷)
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 Standard⁸.
Dominica	<ul style="list-style-type: none"> Has a “Partially Compliant” rating by the Global Forum in relation to exchange of information on request⁹ but is undergoing a supplementary review to obtain a higher rating
Eswatini	<ul style="list-style-type: none"> Has a harmful tax regime (Special economic zone)
Fiji <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Is not a member of the Global Forum Has not signed and ratified the MAC Has harmful tax regimes (Exporting companies, Income communication technology (ICT) incentive, Concessionary rate of tax for regional or global headquarters) Has not become a member of the Inclusive Framework or implemented OECD anti-BEPS minimum standards
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
Hong Kong	<ul style="list-style-type: none"> Has a harmful tax regime (Foreign-source income exemption regime)¹⁰ in relation to capital gains.
Israel	<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 Standard¹¹ Has not introduced the necessary legal and administrative framework to implement the CbCR minimum standard
Jordan	<ul style="list-style-type: none"> Has a harmful tax regime (Aqaba special economic zone)
Malaysia	<ul style="list-style-type: none"> Has a harmful tax regime (Foreign-source income exemption regime)¹² in relation to capital gains.
Montserrat	<ul style="list-style-type: none"> Has not introduced the necessary legal and administrative framework to implement the CbCR minimum standard

⁶ [d3fade82-en.pdf \(oecd-ilibrary.org\)](https://data.consilium.europa.eu/doc/document/ST-14222-2021-INIT/en/pdf)

⁷ [https://data.consilium.europa.eu/doc/document/ST-14222-2021-INIT/en/pdf \(europa.eu\)](https://data.consilium.europa.eu/doc/document/ST-14222-2021-INIT/en/pdf)

⁸ [36e7cded-en.pdf \(oecd-ilibrary.org\)](https://data.consilium.europa.eu/doc/document/ST-14222-2021-INIT/en/pdf) p. 324

⁹ [b6dd4a18-en.pdf \(oecd-ilibrary.org\)](https://data.consilium.europa.eu/doc/document/ST-14222-2021-INIT/en/pdf)

¹⁰ <https://data.consilium.europa.eu/doc/document/ST-14223-2021-INIT/en/pdf>

¹¹ [36e7cded-en.pdf \(oecd-ilibrary.org\)](https://data.consilium.europa.eu/doc/document/ST-14223-2021-INIT/en/pdf) p. 562

¹² [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)

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.

Jurisdiction	Tax deficiencies
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)¹³ Has not put in place all the necessary administrative arrangements to exchange CbCR information in line with the minimum standard
Qatar	<ul style="list-style-type: none"> Has a harmful tax regime (Foreign-source income exemption regime)¹⁴
Republic of Marshall Islands <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not ensure the effective monitoring of company obligations regarding substance requirements in the jurisdiction
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 request¹⁵ but will undergo a supplementary review to obtain a higher rating
Thailand	<ul style="list-style-type: none"> Has not introduced the necessary legal and administrative framework to implement the CbCR minimum standard
Trinidad and Tobago <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not apply any automatic exchange of financial account information 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
Turkey	<ul style="list-style-type: none"> Has not exchanged financial account information with all EU Member States
Turks and Caicos Islands <i>(non-cooperative jurisdiction)</i>	<ul style="list-style-type: none"> Does not ensure the effective monitoring of company obligations regarding substance requirements in the jurisdiction

¹³ [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))

¹⁴ [https://data.consilium.europa.eu/doc/document/ST-14227-2021-INIT/en/pdf\(europa.eu\)](https://data.consilium.europa.eu/doc/document/ST-14227-2021-INIT/en/pdf(europa.eu))

¹⁵ [688fc4f9-en.pdf \(oecd-ilibrary.org\)](https://data.consilium.europa.eu/doc/document/ST-14227-2021-INIT/en/pdf(688fc4f9-en.pdf(oecd-ilibrary.org)))

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.

Jurisdiction	Tax deficiencies
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 request¹⁶ 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