

Korea

A. Progress in the implementation of the minimum standard

Korea has 93 tax agreements in force, as reported in its response to the Peer Review questionnaire.

Korea signed the MLI in 2017, listing 63 tax agreements.

Korea is implementing the minimum standard through the inclusion of the preamble statement and the PPT.⁸⁸

The agreements that will be modified by the MLI will come into compliance with the minimum standard once the provisions of the MLI take effect.

Korea also signed a bilateral complying instrument with the Czech Republic, Singapore, Switzerland, Turkmenistan*, the United Arab Emirates, and Uzbekistan*.

Korea indicated in its response to the Peer Review questionnaire that bilateral negotiations would be used for its agreements with Albania*, Austria, Belarus*, Brazil, Brunei Darussalam, Ecuador*, Ethiopia*, Germany, Iran*, Kyrgyzstan*, Lao*, Myanmar*, Nepal*, Norway, Tajikistan*, Turkey, Venezuela* and Viet Nam.

B. Implementation issues

No jurisdiction has raised any concerns about their agreements with Korea.

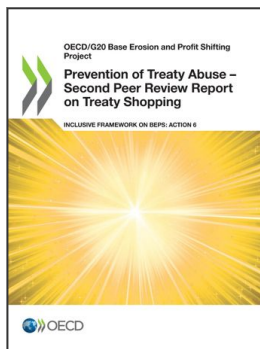
Summary of the jurisdiction response – Korea

	Treaty partners	Compliance with the standard	If compliant, the alternative implemented	Signature of a complying instrument	The alternative implemented through the complying instrument (if not the MLI)	Comments
1	Albania*	No	N/A	No	N/A	
2	Algeria*	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
3	Australia	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
4	Austria	No	N/A	No	N/A	Bilateral negotiation completed
5	Azerbaijan*	No	N/A	Yes	N/A	
6	Bahrain	No	N/A	No	N/A	to be additionally covered by

						MLI when MLI is ratified
7	Bangladesh*	No	N/A	Yes	N/A	
8	Belarus*	No	N/A	No	N/A	
9	Belgium	No	N/A	Yes	N/A	
10	Brazil	No	N/A	No	N/A	
11	Brunei Darussalam	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
12	Bulgaria	No	N/A	Yes	N/A	
13	Canada	No	N/A	Yes	N/A	
14	Chile	No	N/A	Yes	N/A	
15	China (People's Republic of)	No	N/A	Yes	N/A	
16	Colombia	No	N/A	Yes	N/A	
17	Croatia	No	N/A	Yes	N/A	
18	Czech Republic	No	N/A	Yes	PPT alone	
19	Denmark	No	N/A	Yes	N/A	
20	Ecuador*	No	N/A	No	N/A	
21	Egypt	No	N/A	Yes	N/A	
22	Estonia	No	N/A	Yes	N/A	
23	Ethiopia*	No	N/A	No	N/A	
24	Fiji*	No	N/A	Yes	N/A	
25	Finland	No	N/A	Yes	N/A	
26	France	No	N/A	Yes	N/A	
27	Gabon	No	N/A	Yes	N/A	
28	Georgia	No	N/A	Yes	N/A	
29	Germany	No	N/A	Yes	N/A	to be removed from MLI CTA list when MLI is ratified Bilateral negotiation completed
30	Greece	No	N/A	Yes	N/A	
31	Hong Kong (China)	No	N/A	Yes	N/A	
32	Hungary	No	N/A	Yes	N/A	
33	Iceland	No	N/A	Yes	N/A	
34	India	No	N/A	Yes	N/A	
35	Indonesia	No	N/A	Yes	N/A	
36	Iran*	No	N/A	No	N/A	
37	Ireland	No	N/A	Yes	N/A	
38	Israel	No	N/A	Yes	N/A	
39	Italy	No	N/A	Yes	N/A	
40	Japan	No	N/A	Yes	N/A	
41	Jordan*	No	N/A	Yes	N/A	
42	Kazakhstan	No	N/A	Yes	N/A	
43	Kenya	No	N/A	No	N/A	to be additionally covered by MLI when

						MLI is ratified
44	Kuwait*	No	N/A	Yes	N/A	
45	Kyrgyzstan*	No	N/A	No	N/A	
46	Lao People's Democratic Republic*	No	N/A	No	N/A	
47	Latvia	No	N/A	Yes	N/A	
48	Lithuania	No	N/A	Yes	N/A	
49	Luxembourg	No	N/A	Yes	N/A	
50	Malaysia	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
51	Malta	No	N/A	Yes	N/A	
52	Mexico	No	N/A	Yes	N/A	
53	Mongolia	No	N/A	Yes	N/A	
54	Morocco	No	N/A	Yes	N/A	
55	Myanmar*	No	N/A	No	N/A	
56	Nepal*	No	N/A	No	N/A	
57	Netherlands	No	N/A	Yes	N/A	
58	New Zealand	No	N/A	Yes	N/A	
59	Norway	No	N/A	Yes	N/A	
60	Oman	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
61	Pakistan	No	N/A	Yes	N/A	
62	Panama	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
63	Papua New Guinea	No	N/A	Yes	N/A	
64	Peru	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
65	Philippines*	No	N/A	Yes	N/A	
66	Poland	No	N/A	Yes	N/A	
67	Portugal	No	N/A	Yes	N/A	
68	Qatar	No	N/A	Yes	N/A	
69	Romania	No	N/A	Yes	N/A	
70	Russia	No	N/A	Yes	N/A	
71	Saudi Arabia	No	N/A	Yes	N/A	
72	Serbia	No	N/A	Yes	N/A	
73	Singapore	No	N/A	Yes	PPT alone	
74	Slovak Republic	No	N/A	Yes	N/A	
75	Slovenia	No	N/A	Yes	N/A	
76	South Africa	No	N/A	Yes	N/A	
77	Spain	No	N/A	Yes	N/A	
78	Sri Lanka	No	N/A	Yes	N/A	

79	Sweden	No	N/A	Yes	N/A	
80	Switzerland	No	N/A	Yes	PPT alone	to be removed from MLI CTA list when MLI is ratified
81	Tajikistan*	No	N/A	No	N/A	
82	Thailand	No	N/A	Yes	N/A	
83	Tunisia	No	N/A	Yes	N/A	
84	Turkey	No	N/A	No	N/A	Bilateral negotiation completed
85	Turkmenistan*	No	N/A	Yes	PPT alone	
86	Ukraine	No	N/A	Yes	N/A	
87	United Arab Emirates	No	N/A	Yes	PPT alone	to be additionally covered by MLI when MLI is ratified
88	United Kingdom	No	N/A	Yes	N/A	
89	United States	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified
90	Uruguay	No	N/A	Yes	N/A	
91	Uzbekistan*	No	N/A	Yes	PPT alone	
92	Venezuela*	No	N/A	No	N/A	
93	Viet Nam	No	N/A	No	N/A	to be additionally covered by MLI when MLI is ratified



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