

Monaco

A. Progress in the implementation of the minimum standard

Monaco has ten tax agreements in force, as reported in its response to the Peer Review questionnaire. Four of those agreements, the agreements with France, Guernsey, Liechtenstein and Luxembourg, comply with the minimum standard.

Monaco signed the MLI in 2017 and deposited its instrument of ratification on 10 January 2019. The MLI entered into force for Monaco on 1 May 2019. Monaco has not listed its agreement with Malta. This agreement will therefore not, at this stage, be modified by the MLI.

Monaco is implementing the minimum standard through the inclusion of the preamble statement and the PPT.⁹¹

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

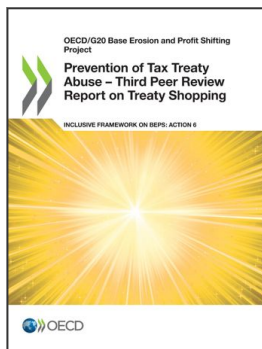
B. Implementation issues

As mentioned above, Monaco has not listed its agreement with Malta under the MLI. Listing the agreement under the MLI or entering into bilateral renegotiations to implement the minimum standard would ensure that the minimum standard could be implemented in that non-covered agreement.

Summary of the jurisdiction response - Monaco

	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	France	Yes	PPT alone	N/A	N/A	
2	Guernsey	Yes	PPT alone	N/A	N/A	
3	Liechtenstein	Yes	PPT alone	N/A	N/A	
4	Luxembourg	Yes	PPT alone	N/A	N/A	
5	Mali*	No	N/A	Yes	N/A	
6	Malta	No	N/A	No	N/A	
7	Mauritius	No	N/A	Yes	N/A	
8	Qatar	No	N/A	Yes	N/A	
9	Saint Kitts and Nevis	No	N/A	Yes	N/A	
10	Seychelles	No	N/A	Yes	N/A	

⁹¹ For its agreements listed under the MLI, Monaco is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI).



From:

Prevention of Tax Treaty Abuse – Third Peer Review Report on Treaty Shopping

Inclusive Framework on BEPS: Action 6

Access the complete publication at:

<https://doi.org/10.1787/d6cecbb8-en>

Please cite this chapter as:

OECD (2021), "Monaco", in *Prevention of Tax Treaty Abuse – Third Peer Review Report on Treaty Shopping : Inclusive Framework on BEPS: Action 6*, OECD Publishing, Paris.

DOI: <https://doi.org/10.1787/83fbac3e-en>

This work is published under the responsibility of the Secretary-General of the OECD. The opinions expressed and arguments employed herein do not necessarily reflect the official views of OECD member countries.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at <http://www.oecd.org/termsandconditions>.