Portugal

A. Progress in the implementation of the minimum standard

Portugal has 78 tax agreements in force, as reported in its response to the Peer Review questionnaire. Thirty-five of those agreements comply with the minimum standard.

Portugal signed the MLI in 2017 and deposited its instrument of ratification on 28 February 2020, listing its non-compliant agreements. The MLI entered into force for Portugal on 1 June 2020. The agreements modified by the MLI come into compliance with the minimum standard once the provisions of the MLI take effect.

Portugal has signed a bilateral complying instrument with respect to its agreement with Sweden.

Portugal indicated in its response to the Peer Review questionnaire that steps have been taken (other than under the MLI) to implement the minimum standard in its agreements with Brazil, Cabo Verde, Germany, and Mozambique*.

Portugal is implementing the minimum standard through the inclusion of the preamble statement and the PPT.¹³⁹

B. Conclusion

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

2. Compliance with the 3. Signature of a complying 4. Minimum standard 1.Treaty partners standard instrument provision used 1 Algeria* No No PPT 2 No Yes MLI Andorra 3 Yes other PPT Angola 4 Austria Yes MLI PPT Yes MLI PPT 5 Bahrain No 6 Barbados No Yes MLI PPT 7 Yes MLI PPT Belgium 8 Brazil No No Yes MLI PPT 9 Bulgaria No 10 Cabo Verde No No Yes MLI PPT 11 Canada 12 Chile No Yes MLI PPT 13 China (People's Republic of) Yes MLI PPT No Yes MLI PPT 14 Colombia No 15 Côte d'Ivoire No Yes MLI PPT Yes MLI 16 Croatia No PPT 17 Cuba* No No PPT 18 Cyprus* Yes MLI

Summary of the jurisdiction response - Portugal

¹³⁹ For its agreements listed under the MLI, Portugal is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI).

19	Czech Republic	Yes MLI		PPT
20	Denmark	Yes MLI		PPT
21	Estonia	No	Yes MLI	PPT
22	Ethiopia*	No	No	
23	France	Yes MLI		PPT
24	Georgia	Yes MLI		PPT
25	Germany	No	No	
26	Greece	No	Yes MLI	PPT
27	Guinea-Bissau*	No	No	
28	Hong Kong (China)	No	Yes MLI	PPT
29	Hungary	No	Yes MLI	PPT
30	Iceland	Yes MLI		PPT
31	India	Yes MLI		PPT
32	Indonesia	Yes MLI		PPT
33	Ireland	Yes MLI		PPT
34	Israel	Yes MLI		PPT
35	Italy	No	Yes MLI	PPT
36	Japan	Yes MLI		PPT
30 37	Korea	Yes MLI		PPT
38	Kuwait*	No	Yes MLI	PPT
39	Latvia	Yes MLI		PPT
39 40	Lithuania	Yes MLI		PPT
40 41		Yes MLI		PPT
	Luxembourg	No	Na	PFI
42	Macau (China)	Yes MLI	No	PPT
43	Malta			
44	Mexico	No	Yes MLI	PPT
45	Moldova*	No	No	
46	Montenegro	No	No	
47	Morocco	No	Yes MLI	PPT
48	Mozambique*	No	No	
49	Netherlands	Yes MLI		PPT
50	Norway	Yes MLI		PPT
51	Oman	Yes MLI		PPT
52	Pakistan	No	Yes MLI	PPT
53	Panama	No	Yes MLI	PPT
54	Peru	No	Yes MLI	PPT
55	Poland	Yes MLI		PPT
56	Qatar	Yes MLI		PPT
57	Romania	No	Yes MLI	PPT
58	Russian Federation	Yes MLI		PPT
59	San Marino	Yes MLI		PPT
60	Sao Tome and Principe*	No	No	
61	Saudi Arabia	Yes MLI		PPT
62	Senegal	No	Yes MLI	PPT
63	Singapore	Yes MLI		PPT
64	Slovak Republic	Yes MLI		PPT
65	Slovenia	Yes MLI		PPT
66	South Africa	No	Yes MLI	PPT
67	Spain	No	Yes MLI	PPT
68	Sweden	No	Yes other	PPT
69	Switzerland	No	Yes MLI	PPT
70	Tunisia	No	Yes MLI	PPT
71	Turkey	No	Yes MLI	PPT

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72	Ukraine	Yes MLI		PPT
73	United Arab Emirates	Yes MLI		PPT
74	United Kingdom	Yes MLI		PPT
75	United States	No	No	
76	Uruguay	Yes MLI		PPT
77	Venezuela*	No	No	
78	Viet Nam	No	No	



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