

Hungary

A. Progress in the implementation of the minimum standard

Hungary has 81 tax agreements, as reported in its response to the Peer Review questionnaire.

Hungary signed the MLI in 2017 and has not listed its agreements with Albania, Armenia, Bahrain, Bosnia-Herzegovina, Montenegro, North Macedonia, Oman and the United Arab Emirates. These agreements will therefore not, at this stage, be modified by the MLI. Albania, Armenia, Bosnia-Herzegovina, North Macedonia, Oman and the United Arab Emirates have listed their agreements with Hungary under the MLI.

Hungary indicated in its response to the Peer Review questionnaire that the agreements not listed under the MLI were concluded with treaty partners that were not Ad Hoc Group members at the time of Hungary's signature. Hungary further indicated that it is not concerned by treaty shopping with respect to those agreements.

Hungary is implementing the minimum standard through the inclusion of the preamble statement and the PPT.⁶²

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.

B. Implementation issues

Hungary's listed agreements under the MLI will start to be compliant after Hungary's ratification of the MLI. Hungary indicated that it expected to deposit its instrument of ratification of the MLI early in 2021.

As mentioned above, Hungary has not listed its agreements with Albania, Armenia, Bahrain, Bosnia Herzegovina, Montenegro, North Macedonia, Oman and the United Arab Emirates under the MLI. Listing the agreements under the MLI or entering into bilateral renegotiations to implement the minimum standard would ensure that the minimum standard could be implemented in those non-covered agreements.

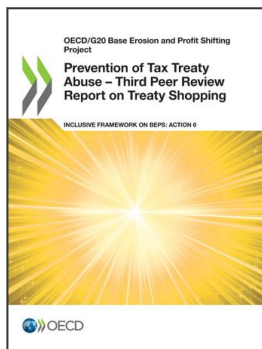
Summary of the jurisdiction response - Hungary

	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	Armenia	No	N/A	No	N/A	
3	Australia	No	N/A	Yes	N/A	
4	Austria	No	N/A	Yes	N/A	
5	Azerbaijan*	No	N/A	Yes	N/A	
6	Bahrain	No	N/A	No	N/A	
7	Belarus*	No	N/A	No	N/A	
8	Belgium	No	N/A	Yes	N/A	
9	Bosnia	No	N/A	No	N/A	

⁶² For its agreements listed under the MLI, Hungary is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI).

	Herzegovina					
10	Brazil	No	N/A	Yes	N/A	
11	Bulgaria	No	N/A	Yes	N/A	
12	Canada	No	N/A	Yes	N/A	
13	China (People's Republic of)	No	N/A	Yes	N/A	
14	Chinese Taipei*	No	N/A	No	N/A	
15	Croatia	No	N/A	Yes	N/A	
16	Cyprus*	No	N/A	Yes	N/A	
17	Czech Republic	No	N/A	Yes	N/A	
18	Denmark	No	N/A	Yes	N/A	
19	Egypt	No	N/A	Yes	N/A	
20	Estonia	No	N/A	Yes	N/A	
21	Finland	No	N/A	Yes	N/A	
22	France	No	N/A	Yes	N/A	
23	Georgia	No	N/A	Yes	N/A	
24	Germany	No	N/A	Yes	N/A	
25	Greece	No	N/A	Yes	N/A	
26	Hong Kong	No	N/A	Yes	N/A	
27	Iceland	No	N/A	Yes	N/A	
28	India	No	N/A	Yes	N/A	
29	Indonesia	No	N/A	Yes	N/A	
30	Iran*	No	N/A	No	N/A	
31	Ireland	No	N/A	Yes	N/A	
32	Israel	No	N/A	Yes	N/A	
33	Italy	No	N/A	Yes	N/A	
34	Japan	No	N/A	Yes	N/A	
35	Kazakhstan	No	N/A	Yes	N/A	
36	Korea	No	N/A	Yes	N/A	
37	Kosovo*	No	N/A	No	N/A	
38	Kuwait*	No	N/A	No	N/A	
39	Latvia	No	N/A	Yes	N/A	
40	Liechtenstein	No	N/A	Yes	N/A	
41	Lithuania	No	N/A	Yes	N/A	
42	Luxembourg	No	N/A	Yes	N/A	
43	Malaysia	No	N/A	Yes	N/A	
44	Malta	No	N/A	Yes	N/A	
45	Mexico	No	N/A	Yes	N/A	
46	Moldova*	No	N/A	Yes	N/A	
47	Mongolia	No	N/A	Yes	N/A	
48	Montenegro	No	N/A	No	N/A	
49	Morocco	No	N/A	Yes	N/A	
50	Netherlands	No	N/A	Yes	N/A	
51	North Macedonia	No	N/A	No	N/A	
52	Norway	No	N/A	Yes	N/A	
53	Oman	No	N/A	No	N/A	
54	Pakistan	No	N/A	Yes	N/A	
55	Philippines*	No	N/A	Yes	N/A	
56	Poland	No	N/A	Yes	N/A	
57	Portugal	No	N/A	Yes	N/A	
58	Qatar	No	N/A	Yes	N/A	
59	Romania	No	N/A	Yes	N/A	
60	Russia	No	N/A	Yes	N/A	
61	San Marino	No	N/A	Yes	N/A	

62	Saudi Arabia	No	N/A	Yes	N/A	
63	Serbia	No	N/A	Yes	N/A	
64	Singapore	No	N/A	Yes	N/A	
65	Slovak republic	No	N/A	Yes	N/A	
66	Slovenia	No	N/A	Yes	N/A	
67	South Africa	No	N/A	Yes	N/A	
68	Spain	No	N/A	Yes	N/A	
69	Sweden	No	N/A	Yes	N/A	
70	Switzerland	No	N/A	Yes	N/A	
71	Thailand	No	N/A	Yes	N/A	
72	Tunisia	No	N/A	Yes	N/A	
73	Turkey	No	N/A	Yes	N/A	
74	Turkmenistan*	No	N/A	No	N/A	
75	Ukraine	No	N/A	Yes	N/A	
76	United Arab Emirates	No	N/A	No	N/A	
77	United Kingdom	No	N/A	Yes	N/A	
78	United States	No	N/A	Yes	N/A	
79	Uruguay	No	N/A	Yes	N/A	
80	Uzbekistan*	No	N/A	No	N/A	
81	Viet Nam	No	N/A	Yes	N/A	



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