Portugal

A. Progress in the implementation of the minimum standard

Portugal has 77 tax agreements in force, as reported in its response to the Peer Review questionnaire. Forty-three 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 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. 125

B. Conclusion

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

Summary of the jurisdiction response - Portugal

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

¹²⁵ 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).

20	Denmark	Yes MLI		PPT
21	Estonia	No	Yes MLI	PPT
22	Ethiopia*	No	No	
23	France	Yes MLI	110	PPT
24	Georgia	Yes MLI		PPT
25	Germany	No	No	
26	Greece	Yes MLI	110	PPT
27	Guinea-Bissau*	No	No	
28	Hong Kong (China)	No	Yes MLI	PPT
29	Hungary	Yes MLI	100 11121	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	100 IVILI	PPT
37	Korea	Yes MLI		PPT
38	Kuwait*	No	Yes MLI	PPT
39	Latvia	Yes MLI	T CO IVILI	PPT
40	Lithuania	Yes MLI		PPT
41	Luxembourg	Yes MLI		PPT
42	Macau (China)	No	No	111
43	Malta	Yes MLI	NO	PPT
44	Mexico	No	Yes MLI	PPT
45	Moldova*	No	No	111
46	Montenegro	No	No	
47	Morocco	No	Yes MLI	PPT
48	Mozambique*	No	No	111
49	Netherlands	Yes MLI	NO	PPT
50	Norway	Yes MLI		PPT
51	Oman	Yes MLI		PPT
52	Pakistan	Yes MLI		PPT
53	Panama	Yes MLI		PPT
54	Peru	No	Yes MLI	PPT
55	Poland	Yes MLI	1 63 IVILI	PPT
56	Qatar	Yes MLI		PPT
57	Romania	No	Yes MLI	PPT
58	Russian Federation	Yes MLI	T CO IVILI	PPT
59	San Marino	Yes MLI		PPT
60	Sao Tome and Principe*	No	No	
61	Saudi Arabia	Yes MLI	110	PPT
62	Senegal	No	Yes MLI	PPT
63	Singapore	Yes MLI	I OO IVILI	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	Switzerland	No	Yes MLI	PPT
69	Tunisia	No	Yes MLI	PPT
70	Türkiye	No	Yes MLI	PPT
71	Ukraine	Yes MLI	I GO IVILI	PPT
72	United Arab Emirates	Yes MLI		PPT
73	United Kingdom	Yes MLI		PPT

74	United States	No	No	
75	Uruguay	Yes MLI		PPT
76	Venezuela*	No	No	
77	Viet Nam	No	Yes MLI	



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