



OTP Bank Group

Market: Global

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Category: Taxation issues

New amendment of the „black“ list of EU non-cooperative tax jurisdictions for tax purposes

Summary: The amended „black and grey“ lists of EU non-cooperative tax jurisdictions for tax purposes - update

We hereby inform you that the EU published new "black" list of non-cooperative jurisdictions for tax purposes on February 18th, 2025 and . no jurisdictions were added or removed compared to the previous list issued in October 2024.

The „black“ list comprises a total of 11 countries, namely American Samoa, Anguilla, Fiji, Guam, Palau, Panama, Russia, Samoa, Trinidad and Tobago, US Virgin Islands and Vanuatu.

We remind you that legal entities resident in countries from the list of non-cooperative jurisdictions for tax purposes, except for countries with which Croatia has concluded an Agreement on the Avoidance of Double Taxation, are liable for a higher withholding tax of 25% on all remunerations payable under Article 31 of the Profit Tax Act (including dividend and interest).

Interest payments arising from bonds are still tax-free.

The "grey list" of jurisdictions monitored by the EU, has changed with the removal of Costa Rica and Curaçao, and now consists of the following 8 jurisdictions: Antigua and Barbuda, Belize, British Virgin Islands, Brunei Darussalam, Eswatini, Seychelles, Turkey and Vietnam.

Please note that a jurisdictions on the 'grey' list does not immediately impact tax withholding for investors from those jurisdictions. However, the EU will monitor the progress those jurisdictions are making with their commitments towards tax reform. In the event that a jurisdiction is added to the 'blacklist', investors may be subject to increased rates of withholding when investing in EU countries.



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Impact: legal entities resident in countries from the list of non-cooperative jurisdictions for tax purposes, except for countries with which Croatia has concluded an Agreement on the Avoidance of Double Taxation, are liable for a higher withholding tax of 25% on all remunerations payable.

Required actions: -

Application date: 18.02.2025.

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