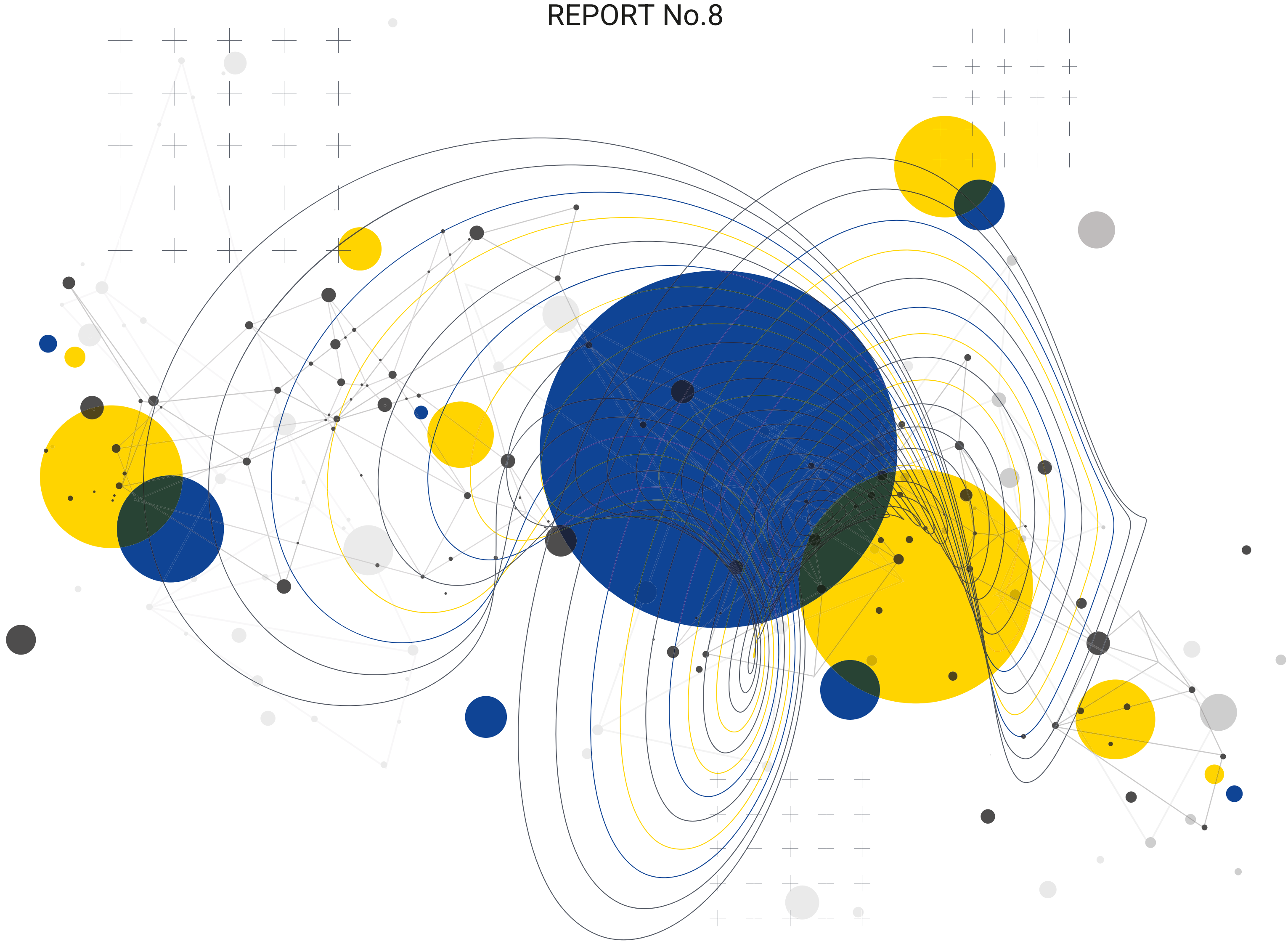
EUTAX Observatory

Effective Tax Blacklists: Rethinking Criteria For the 21st Century

Sébastien Laffitte, Edoardo Montagner

June 2025

REPORT No.8



Effective Tax Blacklists: Rethinking Criteria for the 21st Century*

Sébastien Laffitte† Edoardo Montagner‡

June 13, 2025

Abstract

This report examines the evolution of harmful corporate tax practices in recent years, as well as the development of blacklists intended to identify such practices. First, it shows that harmful tax practices are no longer confined to easily identifiable jurisdictions known for aggressive tax policies. Second, it finds that current blacklists—although they may be linked to potentially effective sanctions—are generally too limited in scope to produce significant economic effects. Finally, the report proposes enhanced criteria for constructing blacklists of harmful tax regimes. In particular, it argues that introducing a quantitative criterion based on effective tax rates is essential to account for the recent evolution of harmful tax competition.

Keywords: Tax Havens, Blacklists, International Taxation, Tax Avoidance, Tax Evasion

JEL codes: H26, H73, H87, F39, N40

*We would like to thank EU Tax Observatory members for helpful comments and discussions. This paper has received funding from the European Union under the grant TAXUD/2023/DE/318. Views and opinions expressed are however those of the authors only and do not necessarily reflect those of the European Union. The European Union can not be held responsible for them.

†THEMA, CY Cergy-Paris University, EU Tax Observatory, Email address: sebastien.laffitte@cyu.fr.

‡EU Tax Observatory, Email address: edoardo.montagner@gmail.com.

1 Introduction

The rising share of taxes in total production since the beginning of the twentieth century has been a defining feature of modern economies. This evolution has been accompanied by the parallel rise of harmful tax competition at the international level, i.e., policies that undermine the fiscal capacity of other governments. These practices have taken various forms, but they share a central feature: they create opportunities for large firms and wealthy individuals to escape the regulations of their residence countries, particularly in terms of transparency requirements and taxation. A key policy challenge since the publication of the OECD's 1998 report on Harmful Tax Competition (OECD, 1998) has been to develop appropriate criteria to identify such policies and implement targeted tools to curb their impact.

One of these tools is the blacklisting of countries deemed non-compliant with minimum standards. Blacklisting is a modern tool of geoeconomics, understood as a strategy whereby "governments use their countries' economic strength from existing financial and trade relationships to achieve geopolitical and economic goals" (Clayton et al., 2023). The objective of blacklisting is to induce a foreign country to change its policies in a specific domain, in line with standards established by the entity issuing the blacklist. It relies on two main mechanisms to achieve this objective. The first is stigma or reputational damage. Stigmatization may lead countries to alter their policies if it results in, or is expected to result in, material economic losses (Sharman, 2009). The second mechanism is the imposition of sanctions triggered by inclusion in the blacklist (Eggenberger, 2018).

In the field of international taxation, the OECD began publishing a blacklist of tax havens in 2000. By 2017, only Trinidad and Tobago remained on the list, and the publication was subsequently discontinued. Building on the OECD's work, the EU Code of Conduct has published a biannual list of non-cooperative jurisdictions for tax purposes since the end of 2017 (refereed to as "blacklist" in the rest of the report). Several countries also maintain blacklists that trigger economic sanctions against firms and individuals exposed to listed countries. Finally, different organizations have also proposed lists of tax havens such as Oxfam (Oxfam, 2017) or the Tax Justice Network (Tax Justice Network, 2019, 2020).

This report proposes a methodology for assessing harmful corporate tax practices through blacklists. We first define harmful tax practices as those that either i) do not follow international standards, preventing foreign countries from effectively accessing to information on their residents, ii) facilitate offshore structures, and iii) allow companies to benefit from low effective tax rates, even in the presence of economic substance. We make the observation that harmful tax practices are less and less the sole preserve of easily identifiable territories specialising in aggressive policies (the so-called tax havens). In the 21st century, the international tax landscape has been reshaped by the proliferation of preferential tax regimes in countries not traditionally considered as tax havens. On a more positive note, this period has also seen growing international cooperation to promote multilateral tax standards. This is reflected in initiatives such as the OECD's Inclusive Framework, which culminated in the 2021 two-pillar reform proposal, or in the work of the United Nations following the adoption of the resolution on the "Promotion of inclusive and effective international tax cooperation at the United Nations."

These observations lead us to the following conclusion. First, harmful tax practices should be identified as deviations from internationally defined standards to promote their adoption. This can be assessed using qualitative criteria that evaluate the effective adoption of such standards. We follow the current criteria of the EU Code of Conduct and provide two innovations. We make some criteria more stringent (quality of the implementation of the automatic exchange of information, inclusion of countries with low statutory tax rates, even in the presence of substance regimes) and we introduce new criteria. In particular we check for the presence of beneficial ownership registries, the presence of high-risk citizenship- or residency-by-investment schemes and the strategic implementation of tax credits to undermine the global minimum tax.

Second, harmful tax practices should also be identified based on whether they result in an effective tax rate that is considered too low. Instead of assessing measures individually, we argue that this objective requires a quantitative criterion. Such a criterion offers flexibility in two key respects: its threshold can be determined through a deliberative process reflecting what is deemed, at a given point in time, to be an unacceptably low effective tax rate; and it avoids the need for a lengthy and subjective classification of harmful tax policies. Regardless of the specific policy in place, if it results in an effective tax rate below the agreed threshold, it can be classified as harmful. This quantitative criterion is based on the effective tax rate computed using country-by-country reporting (CbCR) data and propose three different rates as thresholds for harmful tax policies (7.5%, 10% and 15%). We find that many countries that are not captured by the qualitative criteria will be captured by this criterion. This highlights the necessary for such an approach where the qualitative criteria and the quantitative criterion are complementary.

The report is organized as follows. We first discuss the past experience of blacklists and review evidence about their mechanisms and effectiveness. Then, we discuss the definition of harmful tax policies adopted in this report and discuss their evolution over the past decades, highlighting the peculiarity of harmful tax practices in the 21st century. As the regime of harmful tax practices has changed in the last years, the way we identify them should also evolve. In sections 4 and 5, we propose different criteria to identify harmful tax practices and discuss which countries they target.

2 Background and literature

The main point of comparison in this report is the list of non-cooperative territories for tax purposes of the EU Code of Conduct. Indeed, at the moment, this is the only institutional list that targets harmful tax practices. This list can be seen as a continuation of the effort of the OECD that has provided lists of tax havens until 2017. In the domain of international financial regulation, the list of non-cooperative countries for money laundering purposes created by the Financial Action Task Force (FATF) have been published since 2000, sharing common criteria with the Code of Conduct's one. Several countries also introduced blacklists for tax purposes. Member states of the European Union must adopt the list of the Code of Conduct in their domestic legislation.[1] Several countries also maintain national lists for tax purposes in order to implement withholding taxes or CFC rules when domestic firms operate in these countries (for instance El Salvador, Ecuador or Chile). It is also worth noting that the blacklisting process, precisely because it can have effects through stigma at very limited costs, is regularly done by non-governmental bodies.[2] For instance, Oxfam (2017) has used the criteria of the EU with their own assessment to propose an extended list of tax havens. The Tax Justice Network also proposes interesting rankings of "Financial Secrecy" (Tax Justice Network, 2020) and "Corporate Tax Havens" (Tax Justice Network, 2019) following a methodology that aggregates 20 variables for each index, providing detailed data on the offshore legal architecture of many jurisdictions.

The list of the Code of Conduct, first published in 2017, use both sanctions and the stigma effect to reach its goals. When a country is blacklisted, EU members must apply at least one of four different defensive measures against these countries. The type and scope of the defensive measures is chosen by member states among the following options: i) the non-deductibility of costs, ii) the inclusion of foreign income in the domestic tax base through CFC rules, iii) withholding taxes, and iv) limitation of participation exemption.[3] The Code of Conduct list also serves as a diplomatic tool, as it facilitates discussions with countries that do not meet its criteria, helping them understand how to comply and monitoring their progress to ensure that reforms are properly implemented. The Code of Conduct removes countries from the list when they undertake adequate reforms or put them on a grey list if they have pending commitments. As a diplomatic tool, the Code of Conduct adapts its work to policy objectives: decisions might be driven by policy objectives rather than pure objective decision criteria (see on this topic the in-depth analysis of the Code of Conduct by Nouwen, 2021).

The literature on blacklisting can be divided into two strands. The first focuses on the mechanisms and asks whether blacklisting have material economic consequences. The answers to this question vary across studies. Kudrle (2009) examines the effects of OECD and FATF blacklisting processes on banking investment and finds no robust and consistent impact. This null result is confirmed by Balakina et al. (2017) that analyse the effect of being listed by the FATF on cross-border capital flows, and Case-Ruchala and Nance (2024) that studies the impact of FATF greylisting on financial flows. On the contrary, Morse (2020) and Kida and Paetzold (2021) find that FATF greylisting negatively affects

1. They can also add other countries as it is the case for France or Portugal for instance. France adds countries in its list based on transparency and exchange of information requirements specific to France.

2. To insist on the low cost of a blacklisting process, Sharman (2009) refers to the performativity of what Austin calls "speech acts" (Austin, 1962). In this case, the simple fact of declaring a country a tax haven (the "speech act") affects the reputation of the country without further action being taken.

3. On top of these defensive measures, cross-border payments to countries on the list must be reported under the DAC6 rules and countries listed on the blacklist must appear separately on the public country-by-country reports that large EU companies must file from 2026. Administrative measures are also taken against firms exposed to blacklisted territories such as an increased audit rate. Finally, some EU funding instruments such as the European fund for sustainable development (EFSD) or the European fund for strategic investments (EFSI) cannot be channelled through blacklisted countries.

capital flows. Grottke and Kittl (2016) and Rusina (2020) address a related but slightly different question, examining how firms exposed to a blacklisted country are affected. Both of these papers find a negative effect on firm outcomes. For instance, Rusina (2020) finds that the publication in 2017 of the first EU Code of Conduct blacklist erased \$56 billion in market capitalization, suggesting a significant economic effect. As a comparison, Gómez-Cram and Olbert (2023) estimate a reduction of, *a minima*, \$112 billion in market capitalization following the announcement of Pillar 2. This result points to the potential for future negative economic impacts of blacklists if targeted firms adjust their strategies in the medium run. Brounstein et al. (2025) study more precisely the role of sanctions associated to blacklisting. Ecuador established in 2015 a surtax to firms when their ultimate owners is located in a blacklisted country. The authors find an almost complete switch to non-haven ownership, and an increase in profits and tax liability, highlighting the success of the policy. Finally, Roland et al. (2025) propose a new potential mechanism by asking whether blacklisting influences public opinion in the targeted countries. They find modest but positive effects, suggesting that blacklists may shape domestic public opinion and exert pressure for reform over the medium term. Following these results, the economic impact of blacklisting seems real but often limited to a modest effect.

The second strand of the literature investigates whether blacklisting achieves its primary objective which is encouraging the adoption of improved regulatory and tax standards. Sharman (2009) emphasizes the role of stigma and introduces the concept of pre-emptive compliance, whereby countries react to blacklisting even before incurring economic costs. This response is more likely to occur in countries that rely heavily on institutional investors, who may be particularly sensitive to reputational risk. In the 2000s, this dynamic was exemplified by the reactions of jurisdictions such as the Cayman Islands and Mauritius to the OECD and FATF lists. This mechanism also suggests that blacklisting can be efficient even in the absence of observable economic effects. In contrast, reactive compliance arises from actual economic losses and tends to occur in countries more dependent on individual investors. A notable example is Saint Kitts and Nevis, which took corrective action in 2000 after being blacklisted by both the FATF and the OECD. Eggenberger (2018) explores the interaction between stigma and the formal sanctions associated with blacklisting. She argues that FATF blacklisting carries significantly more sanctions and reputational consequences than OECD listings, which may help explain its relatively greater effectiveness.

Finally, Collin (2023) investigates the effects of blacklisting under the EU Code of Conduct. By comparing countries that were blacklisted to similar countries that marginally avoided being listed, he finds positive but limited effects of blacklisting on the adoption of international tax standards. He identifies a positive impact of blacklisting on the limitation of unfair tax practices and a strong positive effect on countries' decisions to join the Inclusive Framework, the multilateral negotiation forum created by the OECD. Importantly, he finds no significant effects on broader outcomes such as offshore wealth, FDI, or profit shifting, suggesting that the blacklisting process has limited impact beyond formal commitments. This limited effectiveness comes from the fact that the process does not target major global players.

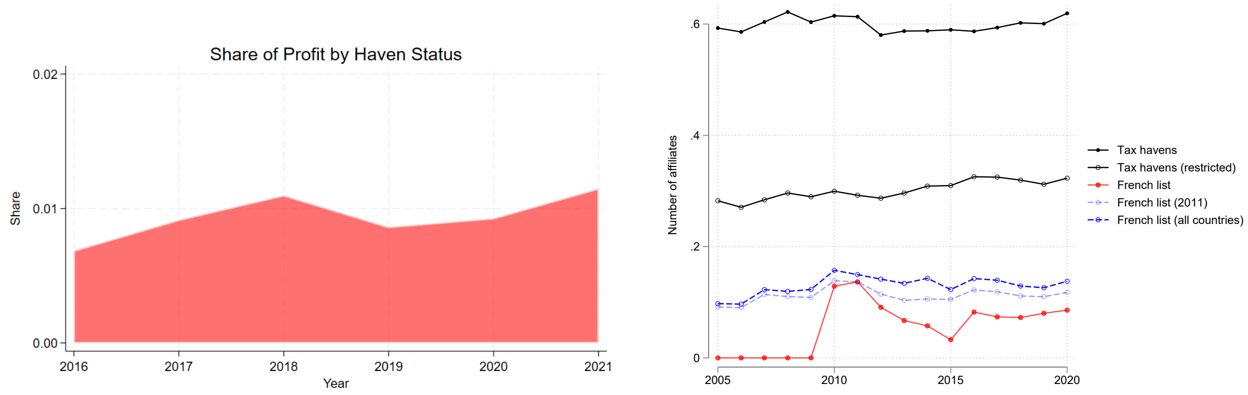
In addition to the evidence from the literature, we provide two pieces of evidence regarding the potential effectiveness of the EU blacklisting process in Figure 1. Figure 1a presents the share of global foreign profits (i.e. profits of multinational firms made out of their residence country) reported in blacklisted countries according to Country-by-country reporting data. This share is very small, around 1%, and does not increase over time. In Figure 1b, we study the exposition of French firms to blacklisted countries using micro-level data on the ownership links of French firms. The French blacklist, enacted in 2010, broadly follows the principles of the OECD and of the Code of Conduct. We find that only 15% of firms are exposed to a blacklisted country through ownership links while approximately 60% of them are exposed to countries being part of a broader list of tax havens (Dharmapala and Hines, 2009) and 30% when we exclude European countries close to France (the Netherlands, Luxembourg, Ireland and Switzerland). Studying a constant list of blacklisted countries in the light blue (list of 2011) and dark blue lines (all countries ever considered in the French blacklist), we observe no reduction in exposure to blacklisted countries. The reduction in exposure observed in the red line, representing the actual exposition to the French blacklist, is only due to the fact that some countries were taken out of the list, not to a decrease in ownership links. These findings imply that, even if the blacklisting process was effective in influencing the targeted jurisdictions, in particular through targetted sanctions, its overall impact on global economic aggregates would remain limited, simply because the countries concerned represent a marginal share of international economic activity. We show at the end of the report that the criteria we propose allow to cover a much larger share of world foreign profit than the current list, allowing the defensive measures to be fully effective at a large scale.

3 Harmful tax policies

This report adopts a definition of harmful tax policies based on the following principles. Are considered as harmful:

1. Policies that do not follow internationally set standards of transparency, preventing other countries to gather effectively information on their residents.
2. Policies that facilitate offshore structures, that attract profits without real economic activity.
3. Policies that allow firms to benefit from low statutory or effective tax rates, even in the presence of substance.

These principles are broadly aligned with existing definitions of harmful tax practices. The OECD's definition, as laid out in the BEPS Action 5 report (OECD, 2015), identifies five key criteria for assessing whether a regime is harmful: (i) the regime provides no or low taxation for mobile financial and service income, (ii) it is ring-fenced from the domestic economy, (iii) it lacks transparency, (iv) there is no effective exchange of information, and (v) there is no substantial activity. The EU Code of Conduct's definition of harmful tax practices largely follows these same principles (of the European Union, 2022).



(a) Share of foreign profits covered by the current Code of Conduct list

(b) Share of French firms exposed to blacklisted countries

Figure 1 – The global reach of ther current Code of Conduct blacklist

Note: In Panel (a), the data source for foreign profits are CbCR. In Panel (b) data comes from the French micro-level tax returns (BIC-IS) and ownership (LIFI) datasets. Blacklisting begins in France in 2010. Blacklisted countries are retrieved through the archives of the "Arrêté du 12 février 2010 pris en application du deuxième alinéa du 1 de l'article 238-0 A du code général des impôts" available at https://www.legifrance.gouv.fr/loda/id/JORFTEXT000021838443. "Tax havens" corresponds to the countries listed in the list by Dharmapala and Hines (2009), the restricted set of tax havens excludes tax havens close to France (Netherlands, Switzerland, Ireland and Luxembourg), "French list" corresponds to the list in force at the period, "French list (2011)" keeps a constant list of countries over time with the 2011 definition, and "French list (all countries) keeps a constant list of countries considering any country ever blacklisted by France.

The first two principles used in this report are in line with the OECD's and the Code of Conduct's approaches. The minimum standards established in recent years under the BEPS project are central to the Code of Conduct's assessments, which often rely on OECD peer review reports. Likewise, offshore structures, typically designed to attract income without real economic substance and often ring-fenced from the domestic economy, are also considered harmful by both the OECD and the EU.

The third principle is where this report departs more significantly from the current consensus. While encompassing the definitions of the OECD and the Code of Conduct, where harmful regimes are identified as those where there is a divergence between the statutory and effective tax rate, it goes further. For instance, the Forum on Harmful Tax Practices (FHTP), the OECD body that classifies tax regimes, does not consider regimes harmful if a low effective tax rate is paired with sufficient substance requirements. To implement this, the OECD released guidelines to give substance requirements to IP regimes (OECD, 2015), or to establish substance-based regimes in zero- or low-tax jurisdictions (OECD, 2017). This position might appear in contrast to the OECD's own emphasis on the displacement of activity as a marker of harmful effects (OECD, 2015, p. 21).[4] This report follows the spirit of those last provisions but broadens the scope: it considers any regime that offers very low tax rates to genuine economic activity, regardless of substance, to be harmful.

4. Similarly, the Code of Conduct notes that even measures of general application can be deemed harmful if they "affect in a significant way the location of business activity within the Union" (see the main page of the Code of Conduct website: https://www.consilium.europa.eu/en/council-eu/preparatory-bodies/code-conduct-group/).

Such policies generate negative externalities. These are direct, by attracting tax bases away from other countries, and indirect, by pressuring countries to lower their own tax rates below socially optimal levels. This view is supported by the tax competition literature, which seminal models show that tax competition leads to a suboptimal equilibrium from a social welfare perspective (Keen and Konrad, 2013). The third principle is also aligned with the European Commission's stated goal in its directive establishing a global minimum corporate tax rate, namely to "put a floor on competition over corporate income tax rates" (of the European Union, 2025, p. 13).

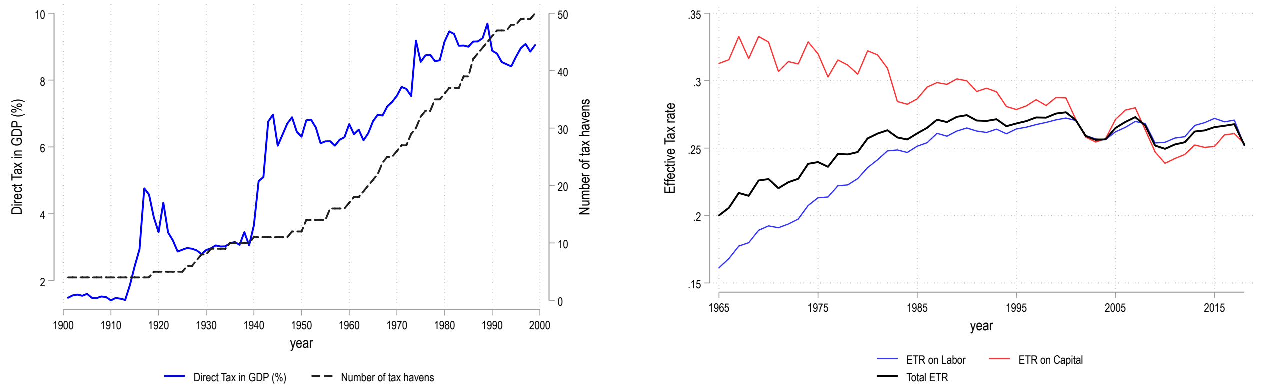
In the rest of the section, we will provide elements about the nature and evolution of harmful tax practices at the turn of the 21st century. We argue that the nature of the legal architecture that sustains harmful tax practices has evolved. As a consequence, the necessary tools to combat these practices and the identification of countries having harmful tax practices must be adapted.

The regime of harmful tax practices in the 20th century A defining fact about the public sphere in the twentieth century is the enormous increase in tax revenues for most countries in the world. The main tool for this increase in fiscal capacity has been the implementation of direct taxation (Besley and Persson, 2011, Seelkopf et al., 2021). The blue line in Figure 2a shows this increase for 31 countries in the world during the twentieth century (Andersson and Brambor, 2019). Direct taxation went from less than 2% of GDP at the beginning of the twentieth century to 9% of GDP at the end of the century. The figure shows clearly that this increase has been driven by the two world wars and continuously sustained from then (Scheve and Stasavage, 2010, Londoño-Vélez, 2014). The figure correlates this rise in direct taxation with the rise of tax havens, jurisdictions that offer services to economic agents in non-haven countries to avoid and evade domestic taxation. We use data about the historical development of tax havens following Laffitte (2024). The figure shows that at the same time that taxes are raised in many countries, many tax havens appear. These countries represent the bulk of harmful tax practices in the twentieth century.

This regime of harmful tax practices, characterized by a dichotomy between high-tax countries and tax havens, seems to change at the end of the century. We first notice that the share of direct taxes in GDP stabilizes, or even declines, from the 1980s. The number of tax havens still increases, but at a lower rate.

Figure 2b now looks at the 21st century for a much larger number of countries. Data availability allows us to distinguish the taxation of labor, generally seen as a relatively immobile factor, from the taxation of capital, seen as a relatively mobile factor. The figure shows the evolution of the effective tax rate on labor and the effective tax rate on capital. It reveals a heterogeneous dynamic of the effective tax rate, according to the mobility of the factor. Labor experiences an increase in effective taxation all over the period, while capital sees a massive decrease in its relative contribution to total taxes. This fact highlights how globalization, by increasing competition to attract capital, shifted the burden of taxation from capital to labor (see Egger et al., 2019 and Laffitte, 2024).

We are interested in knowing whether this decreasing trend in capital taxation is driven by harmful tax practices in non-haven countries. Below, we study three different



(a) The correlative rise of direct taxation and tax havens in the 20th century

(b) The decrease in the relative taxation of capital since 1980

Figure 2 – Trends in taxation in the 20th and 21st centuries

Note: In Panel (a), the share of direct taxes in GDP is from Andersson and Brambor (2019) and data on the number of tax haven over time from Laffitte (2024). In Panel (b), all data comes from Bachas et al. (2022).

policies, namely harmful tax regimes as identified by the EU code of Conduct, the use of tax credits and the use of Intellectual Property (IP) Boxes, and provide evidence of potentially harmful tax practices from countries that are not traditionally classified as tax havens.

The regime of harmful tax practices in the 21st century Our exploration begins by studying the data produced by the EU Code of Conduct. One of its main output is a systematic review of EU Member States preferential tax regimes since 1998. We gather data on the regime-by-regime assessment from the Code of Conduct publications (of the European Union, 2024). Even if it partly reflects policy objective and a subjective classification process (Nouwen, 2021), this is an interesting source of data since it provides an assessment over a relative long period of time of the tax policies of member states. Figure 3 shows the average number of tax measures that have been classified as harmful by the Code of Conduct since 1998. We separate them between those made by countries that are traditionally classified as tax havens (following the list of Dharmapala and Hines, 2009) and those made by countries generally not classified as tax havens. On average, and over the 26 last years, three tax regimes per non haven country have been classified as harmful by the Code of Conduct. If this number is lower than that of countries traditionally classified as tax havens (7.8 on average), two remarks are in order. First, this result means that non haven countries do use preferential tax measures that are considered as harmful even they do so at a lower rate than tax havens. This highlights that non haven countries do engage in harmful tax competition. Second, because these countries are the bulk of countries among the member states, the majority of harmful tax measures in the EU are done by non haven countries (59 vs. 39 over the period). This confirms that harmful tax regimes are not the exclusive prerogative of countries traditionally considered as tax havens but are generalized among heterogeneous types of countries.

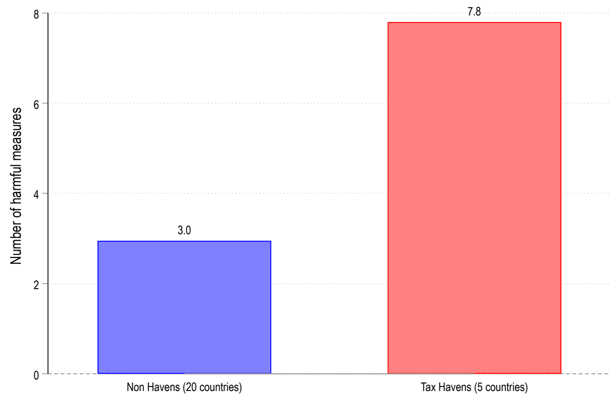


Figure 3 – Harmful Tax Practices among EU member states according to the Code of Conduct (1998-2024)

Note: Data from the EU Code of Conduct (of the European Union, 2024).

Another way to explore harmful tax practices is the examination of policies that create a divergence between statutory tax rates and measured effective tax rates. Ducept and Godar (2025) shows that there has been a general decrease in the statutory and in the effective tax rate since the 2010s but that the decrease in the effective tax rate have been quicker. This result suggests that preferential tax measures have grown over the last years, deepening the gap between the effective and the statutory rate. They also show that this gap is driven by the extension of base narrowing measures, that tend to create a mismatch between the economic definition of profits (used in the denominator to compute the effective tax rate) and the fiscal definition of profits. Another tool that can be used is the use of tax credits, that ultimately allow firms to benefit from lower rates than the standard one.

We explore this issue using OECD data on tax revenues. This data has the advantage of decomposing tax revenues between the raw tax revenues and the tax revenues net of expenditures and transfers, which are the results of different tax measures such as tax credits. This data is only available for a few countries but the results are striking. Figure 4 shows the ratio between raw corporate tax revenues collected and corporate tax revenues net of expenditures and transfers for OECD countries with available data. We observe a diverse set of policies. Along the beginning of the 20th century, several countries decrease their tax base by more than 10% through the use of tax credits. This is the case of Australia, Italy, Great Britain, or Iceland. A striking case is the one of France, where since the early 2010s a large amount of collected tax revenues are given back to firms through tax credits. It amounts to more than 40% in 2018 and 2019. This means that some firms are able to benefit from very low tax rates that diverge in a large way from the statutory tax rate. This result is in line with the micro level exploration of the effective tax rate of French firms according to their size by Bach et al. (2019). The authors find that the effective tax rate of French firms that benefit from the two main tax credit schemes in France can be as low as 12.2%. This rate decrease to 7.7% if we focus on the large firms that are beneficiaries of these credits in 2015.

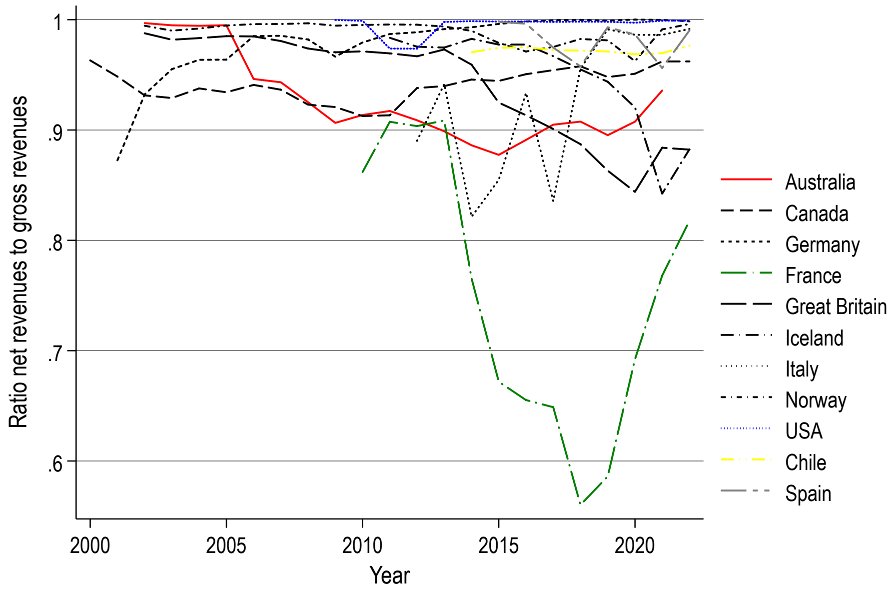


Figure 4 – The use of tax credits in selected OECD countries

Note: Data from the OECD Global Revenue Dataset).

Finally, we review IP boxes, one of the main tax tool that generates low effective tax rates on (some kinds of) intellectual property income (Alstadsæter et al., 2018). For a long time, many countries introduced IP boxes that did not require enough substance. These loopholes have been closed in many countries following BEPS's Action 5 on harmful tax practices and the work of the Code of Conduct that classified as harmful IP box regimes without enough substance. However, even in the case of substance location, the rate applied in IP boxes are often very low, which would not be in line with our third principle for defining harmful tax policies. Figure 5 shows, for OECD countries, the statutory corporate income tax rate and the reduction in tax rate granted in countries that have implemented IP box regimes, as of 2019. We see that IP Boxes propose massive rate cuts, increasing with the initial level of taxation. For instance, France had a 34.4% tax rate (accounting for exceptional taxes) at the time and offered a reduction of 24.4 percentage points to reach 10% for IP income. It is striking to see that the use of IP boxes is done all along the distribution of statutory tax rates, highlighting that the harmful tax practices are also put in place in traditionally high-tax countries. For some countries, as Israel, Lithuania, Korea or Poland, the preferential tax rate can reach numbers as low as 5%.

This section documented the fact that there has been a relative convergence of tax practices by countries traditionally considered as tax aggressive countries and traditionally high-tax countries. This leads to the conclusion that the nature of harmful tax practices has changed in the 21st century. This important fact must be taken into account when designing the tools to fight these practices.

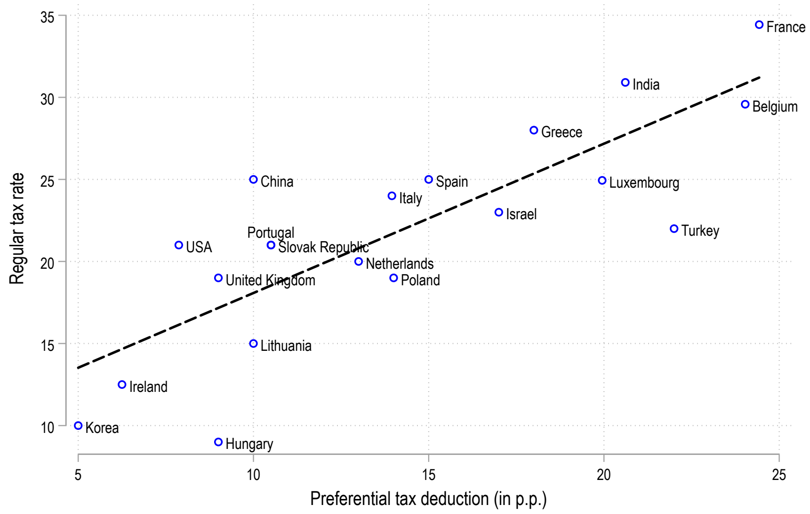


Figure 5 – Tax deductions granted by IP Boxes in OECD countries.

Note: Data on IP boxes as of 2019 from von Haldenwang et al. (2021)

4 Which criteria to determine harmful tax practices?

In this section and the next, we apply the principles outlined earlier to identify more systematically countries that implement harmful tax policies. We argue that a list of countries with harmful tax practices should serve two main objectives. The first is to identify countries that do not comply with global standards and to encourage their adoption through diplomatic engagement and sanctions. This objective supports the promotion of multilateralism and the strengthening of international standards in tax governance. The second objective is to identify jurisdictions that actively facilitate tax avoidance and harmful tax competition, and to pressure them to revise their policies through the use of effective sanctions. As discussed in the previous section, harmful tax practices can be implemented in various ways and by a wide range of countries. This diversity makes case-by-case assessments particularly complex and time-consuming.

These two distinct objectives require different sets of tools. We propose the following:

1. A qualitative framework to assess compliance with minimum international standards, in line with the current approach of the EU Code of Conduct.

2. A quantitative criterion, based on effective tax rates, to identify jurisdictions that promote large-scale tax avoidance and harmful tax competition.

As a starting point, we draw on the categories of criteria established by the OECD and the Code of Conduct. However, we apply more stringent standards within these categories and propose additional criteria. We examine three key areas: tax transparency, fair taxation, and the implementation of anti-BEPS measures. In the next section, we turn to the quantitative criterion, which is designed to capture the most harmful tax policies under our third principle.

To ensure that our analysis targets deliberate harmful practices rather than the unintended consequences of limited administrative capacity, we exclude from consideration countries with GDP per capita below the global median. While supporting the development of administrative capacity in lower-income countries is an important goal, it requires a separate set of instruments and strategies.

Tax Transparency This family of criteria is designed to ensure that countries have legislation in place that promotes tax transparency. Specifically, it aims to guarantee that foreign jurisdictions can access information about the offshore holdings of their own residents. Compliance is primarily assessed with respect to OECD standards, which require countries to adopt specific practices and achieve a "Highly Compliant" rating in peer review reports.

The relevant transparency standards include: the automatic exchange of information (AEOI, criterion 1.1 of the EU Code of Conduct), the exchange of information on request (EOIR, criterion 1.2), and participation in mutual administrative assistance in tax matters (criterion 1.3). Since 2016, the Code of Conduct has also aimed to include compliance with beneficial ownership transparency (criterion 1.4), but no official list based on this criterion has yet been published, nor have detailed assessment criteria been formally adopted.

To improve this family of criteria, our proposals are threefold. First, we recommend tightening the benchmark for assessing compliance with AEOI standards. Countries should be "Largely Compliant" in the Global Forum's evaluation of the Common Reporting Standard (CRS), as these jurisdictions may still present weaknesses in implementation (Alstadsæter et al., 2023). Second, we propose formally incorporating the beneficial ownership criterion. We assess compliance data from Open Ownership, which tracks the existence and implementation of public beneficial ownership registries around the world with a focus on the technical characteristics of effective disclosure regimes. In our analysis, we list countries that have made no commitment to implement such registries. [5]

Third, we account for the risks posed by citizenship- and residency-by-investment (CBI/RBI) schemes. Such programs can undermine the CRS by allowing individuals to obtain residency or citizenship in low-transparency jurisdictions, effectively bypassing the automatic exchange of information. According to the OECD, several countries operate CBI/RBI programs that pose a high risk of facilitating tax evasion (FATF/OECD, 2023, Langenmayr and Zyska, 2023). We rely on the OECD's classification of "high-risk" programs in identifying these jurisdictions. [6]

The list of criteria and the jurisdictions that fail to comply with each of them are shown in Table I. In the rest of the report, we highlight countries that appear on the current EU greylist using italics and countries that appear on the EU blacklist using a bold font.

5. This set includes both non-compliant countries and countries with no available data, as a clear distinction between these two categories is not currently made.

6. The OECD's assessment of high-risk CBI/RBI schemes is available at: https://web-archive.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/residence-citizenship-by-investment/index.htm. We manually checked whether the schemes highlighted in the OECD list were still existing since the publication of the list in 2018. "Malta Individual Investor Programme" Cyprus's "Citizen by Investment Programme" have been terminated, but these two countries had another CBI/RBI listed.

The table shows that expanding the requirements under criterion 1 and introducing criteria 2 and 5 allows us to identify several countries that do not currently appear on the EU Code of Conduct lists. While many of the jurisdictions flagged are small Pacific and Caribbean island states, a number of larger economies and EU member states also fall short such as Argentina, Chile, Israel, Mexico, Romania, and Estonia. Most of these are captured under criterion 1, related to shortcomings in the implementation of the automatic exchange of information.

Table I – Tax transparency criteria

Criteria	*Non-compliant countries*
1. "Largely Compliant" rating by the Global Forum with respect to the AEOI-CRS	*Antigua and Barbuda*, Argentina, Bahamas, *British Virgin Islands*, *Brunei Darussalam*, Chile, Cook Islands, *Costa Rica*, Croatia, Dominica, Estonia, Faroe Islands, Ghana, Gibraltar, Grenada, Israel, Kuwait, Malta, Mexico, Montserrat, *Curaçao*, Aruba, Sint Maarten, **Panama**, Romania, **Anguilla**, Saint Vincent and the Grenadines, *Seychelles*, **Trinidad and Tobago**, *Turkey*, **Vanuatu**, Turks and Caicos Islands
2. High-Risk CBI-RBI	*Antigua and Barbuda*, Bahamas, Bahrain, Barbados, Cyprus, Dominica, Grenada, Malta, Saint Kitts and Nevis, Saint Lucia, *Seychelles*, Turks and Caicos Islands, United Arab Emirates, **Vanuatu**.
3. The jurisdiction should possess at least a "Largely Compliant" rating by the Global Forum with respect to the OECD Exchange of Information on Request (EOIR) standard	**Trinidad and Tobago**, **Anguilla**, *Antigua and Barbuda*, *British Virgin Islands*, **Panama**, *Seychelles*
4. The jurisdiction has to be committed to the OECD Multilateral Convention on Mutual Administrative Assistance (MCMAA) in Tax Matters	**American Samoa**, **Guam**, **Palau**, **Trinidad and Tobago**, **US Virgin Islands**, *Turkey*
5. Global exchange of beneficial-ownership information	Andorra, Azerbaijan, Barbados, Belarus, Dominica, South Georgia and the South Sandwich Islands, Grenada, Israel, Oman, Nauru, **Palau**, Guinea Bissau, Saint Kitts and Nevis, Saint Lucia, San Marino, Turkmenistan

Note: Data from OECD "Compare Your Country – Tax Cooperation" for items 1,3 and 4, Open Ownership's Beneficial Ownership Registries database for item 5, and OECD lists of High-Risk CBI/RBI Programs for item 2. Bold font identifies current EU blacklisted countries and italic font identifies current greylisted countries. Countries with GDP per capita below the median are dropped.

Fair Taxation This family of criteria focuses on the legal architecture of countries and checks whether it incorporates harmful elements. In the Code of Conduct version, the country should not have any preferential tax measures that are judged as harmful (criteria 2.1) and the country should not facilitate offshore structures or aiming at attractive profits without substance (criteria 2.2).

The screening of jurisdiction follows the assessment of the OECD's forum on harmful tax practices (OECD, 2025). The second criterion, is designed such that zero-tax jurisdiction that implemented a substance regime are excluded from the list. This last point raises at least two issues. First, we know very few about the actual implementation of this regime. Even if the OECD conducts peer reviews of the implementation of substance requirements, to date, no formal public evaluation of these substance regimes is available.[7] Second, even when some substance requirements are met, a tax regime can still be considered as harmful in our definition if it allows firms to benefit from low or no taxation. Listing these countries within jurisdictions having harmful tax practices is also in line with the European Parliament resolution of January 21st 2021 on Reforming the EU List of Tax Havens (Parliament, 2021). We also add to the list any country with 0% CIT rate.

The countries falling into the harmful jurisdictions according to these criteria are shown in Table II. First, most of them are not identified by the Code of Conduct as non-cooperative countries despite their very low tax rates. It corresponds mainly to countries traditionally considered as tax havens (in Dharmapala and Hines, 2009's list for instance).

Table II – Fair Taxation Criteria

Source	*Low-tax jurisdictions*
1. Zero- or low-tax countries with substance regimes	**Anguilla**, Bahamas, Bahrain, Barbados, Bermuda, *British Virgin Islands*, Cayman Islands, United Arab Emirates, **Trinidad and Tobago**, Turks and Caicos Islands, Guernsey, Isle of Man, Jersey
2. Countries with 0% CIT	*Belize*, Saint Barthélemy, Tokelau, **Vanuatu**, Wallis and Futuna Islands

Note: Data from OECD FTHP (OECD, 2025) for the first item and Tax Foundation for the second one. Bold font identifies current EU blacklisted countries and italic font identifies current greylisted countries. Countries with GDP per capita below the median are dropped.

Implementation of BEPS measures criteria This family of criteria checks whether countries apply BEPS minimum standards. In the Code of Conduct version, it evaluates the commitment (criterion 3.1) and implementation (criterion 3.2) of BEPS minimum standards on harmful tax measures, treaty shopping, country-by-country reporting and dispute resolution.

In our view, the implementation of BEPS minimum standards is a necessary but not sufficient step for assessing how harmful a tax regime can be, especially given the recent advances in global discussions about the two pillars solution. In particular, in a moment when the Pillar 2 of BEPS is at risk, and where the tax diplomacy of the EU is focused around this instrument, it is important to design criteria robust to strategies trying to bypass Pillar 2's rule. In addition, it is worth noting that the Pillar 2 targets only the biggest MNE leaving more room to others.

Therefore, we add a criterion about the strategic implementation of tax credits falling into the Pillar 2 Quafified Refundable Tax Credits (QRTC). Qualified tax credits are accounted for at the denominator of the effective tax rate used to compute the minimum taxation, rather than at the numerator. Thereby, QRTC increase profits rather than de-

7. Beebeejaun and Bickharry (2024) proposes a qualitative analysis of the Mauritius substance regime and compares it with the one in place in the Cayman Islands. The paper concludes that improvements should be done in Mauritius in order to put in place a regulating authority, some adequate reporting and efficient penalties in case of non-compliance.

creasing taxes paid, which results in a higher ETR than the one that should be computed.[8] In this context, some countries might be tempted to strategically introduce tax credits to allow firms to have effective tax rate below 15% and therefore keeping their attractiveness as profit-booking locations. We assess this criteria using information from PwC's Pillar Two Country Tracker and list countries that have introduced or announced a tax credit coordinated with its Pillar II implementation. If this is a first proposition for a criterion that targets the strategic introduction of QRTC, we believe that improving it with in-depth review processes is an interesting avenue.

While we follow the Code of Conduct criteria and ranking for the commitment to anti-BEPs minimum standards, this second criteria includes few countries but some such as Hungary and Singapore that were not classified as harmful according to the previous criteria.

Table III – Anti-BEPS criteria

Assessment / Source	*Jurisdictions concerned*
1. Implementation of anti-BEPS minimum standards.	**Trinidad and Tobago**, *Vietnam*
2. Strategic QRTC	Barbados, Bermuda, Hungary, Singapore

Note: Data from OECD "Compare Your Country – Tax Cooperation" and Code of Conduct for the first item and PwC's Pillar Two Country Tracker for the second. Bold font identifies current EU blacklisted countries and italic font identifies current greylisted countries. Countries with GDP per capita below the median are dropped.

5 A comprehensive quantitative measure

On top of the qualitative criteria that follows the building of an harmful fiscal architecture, we propose the adoption of a comprehensive quantitative measure. Building on the recent work of the OECD, adopted unanimously within the European Union, we put forward the idea that a quantitative criterion helps to avoid having some countries bypassing or innovating to be out of the qualitative criteria. Similarly as for the minimum tax rate of 15%, the idea of this criterion is to consider that whatever the policies followed, there are some effective tax rate levels that are too low to prevent tax abuse or harmful tax competition.

While such criteria would have been hard to use in practice a few years ago, the recent years have seen the introduction of tools that allow a better production and sharing of information that are relevant for tax authorities. A key tool in this respect are the country-by-country reports (CbCR). These reports are mandatory for groups of firms larger than 750 millions since 2016. This information is effectively shared between tax authorities and aggregated information is available on the OECD website. Importantly the aggregation differentiates between loss-making and profit-making companies, which

8. As an example, assume a company in jurisdiction A that makes 100 of profits, pays 20 in taxes and benefits from a QRTC of 10. Therefore it pays 10 in taxes and its ETR is 10% according to the standard definition. However, the Pillar 2 ETR will rather be computed as $20/(100+10) = 18.2$. In this case, the company will not have to pays the GMT in country A while its economic ETR is 10%.

allow a more precise account of the effective tax rate. The EU also introduced a directive of public CbCR from 2021 with the first reports published in 2024. Firms are required to report several variables such as their profits, employment, capital and tax paid on a country-by-country basis, allowing to precisely compute the effective tax rate applied on large MNEs.

This idea is also aligned with the EU implementation of public country-by-country reporting that requires country-by-country information about activity in EU member states and in countries listed in the list of non-cooperative territories. A wiser implementation of this standard would be to require an exhaustive country-by-country reporting, such that these reports can be precisely used to help determining which countries do not respect the quantitative standard proposed in this report (Aliprandi, 2024). A drawback of our approach could be the lack of harmonization in reporting in country-by-country reports as highlighted by several studies (Aliprandi and von Zedlitz, 2023, OECD, 2024). Instead of justifying a limitation in the use of the data, this calls for a better alignment of CbCR requirements with standards of reporting that will allow an accurate computation of the effective tax rate. We also provide a version of this criterion using data corrected for the double counting issue in the data. [9] Another drawback is the fact that the effective tax rate from the CbCR averages all firms in an economy, both those benefiting from preferential tax measures and others. In this respect, it will be biased upward and this criteria can be seen as a conservative one. Future application of the criteria could dig into more granular data using Public CbCR reports or aggregating effective tax rates at the sectoral level.

In addition, this quantitative criterion acts as a backstop to the minimum taxation mechanism. If this mechanism is important in to limit harmful tax practices (OECD, 2020, Ferrari et al., 2022), it suffers from different drawbacks that justify the implementation of alternative tools to limit harmful tax competition (Baraké et al., 2021, Alstadsaeter et al., 2023). First, it concerns only groups of companies above the threshold of 750 millions euros. Second, as discussed above, different mechanisms introduced during the negotiations undermine the application of the minimum tax rate. Indeed, given the tax base definitions and computation rules under Pillar 2, it is likely that some firms will still be able to benefit from effective tax rates below 15%.

Finally, this criterion is in line with the domestic implementation of several blacklists for tax purposes that include quantitative effective tax rates thresholds. This is for instance the case in El Salvador, Ecuador, Brazil, or Portugal. [10]

The appropriate value of the ETR threshold can be subject to discussion. Here, we propose three different thresholds to underline the flexibility of the criterion: 7.5%, 10% and 15%. In Figure 6, we show all the countries with harmful tax practices according to this report, following the current Code of Conduct criteria (red), our reinforced qualitative criteria (pale red) and those captured by the quantitative criterion that have

9. The double-counting of profits may arise if firms report their profits including the dividends received from entities they own. In this case, the profits of the lower level company will appear twice in the data, once in the country of activity and a second time in the country where the its headquarters operate. This issue could also be magnified by the presence of investment conduits. On this issue see Blouin and Robinson (2019).

10. For sources, see for instance, Deloitte (2022), BDO (2025), LawsofBrazil (2024), Lawyers (2024).

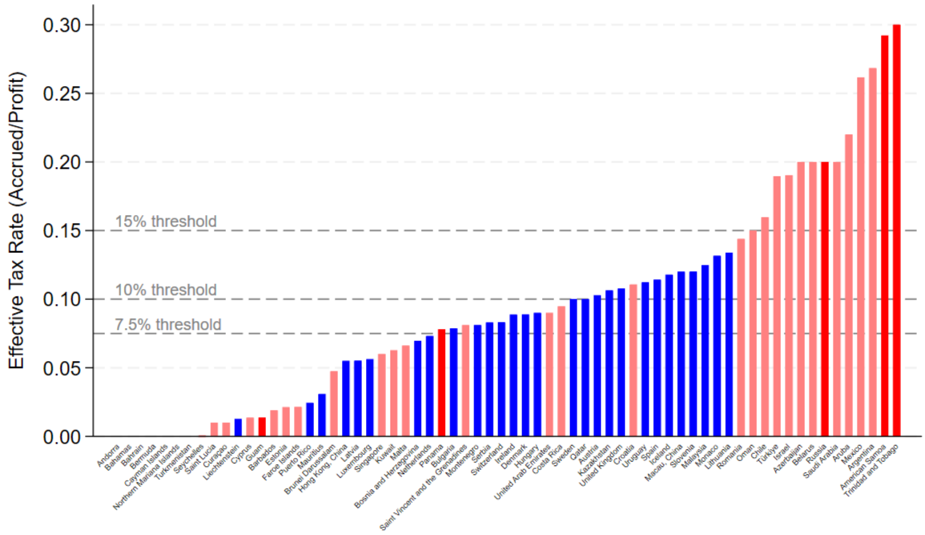


Figure 6 – Non-compliant countries according to the qualitative and quantitative criteria

Note: Data from CbCR restricted to profit-making firms. Countries with GDP per capita below the median are dropped.

effective tax rates lower than the three thresholds in the CbCR over the period of 2020-2022.[11] Twenty-seven countries are below the 7.5% threshold, including Singapore, Luxembourg or the Netherlands. Thirteen additional countries enter if we use the 10% threshold and fourteen with the 15% one. Strikingly, only two of these countries, Guam and Panama, are present in the current EU blacklisting of non-cooperative territories. On the contrary, twelve countries flagged by the qualitative criteria are above the 15% threshold. This shows the complementarity between the qualitative and the quantitative criteria.

This figures shows that the quantitative criteria is able to include many countries that were not classified as harmful using the qualitative assessment. However, such countries can have effective tax rates in the CbCR as low as 6% for Hong-Kong orLuxembourg for instance.

Comparison In Figure 7, we plot the share of foreign profits according to the different criteria for identifying harmful tax policies put forward in this report using CbCR data. The thin red line shows the share of world foreign profits covered by countries currently on the Code of Conduct blacklist. It shows that these countries represent only a minor share of foreign profits as already shown in Figure 1. We then add, with the darker blue area, the share of foreign profits represented by the countries covered by our extended qualitative criteria. It extends the coverage of the list to about 15%-20% of the foreign profits. It shows the importance of considering more ambitious qualitative criteria for identifying harmful tax practices.

We then model the impact of adding a quantitative criteria set at an ETR of 7.5% (the less ambitious threshold), 10%, or 15% (the more ambitious threshold). In any cases, adding the quantitative criteria makes that a substantial share of foreign profits are lo-

11. We use a three-year average to smooth yearly variations.

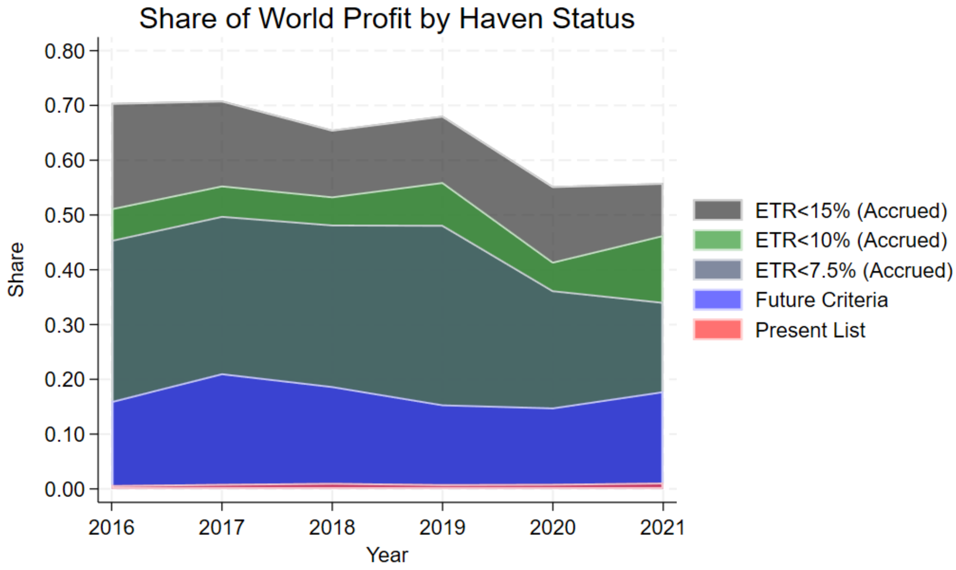


Figure 7 – Share of foreign profits concentrated in harmful tax countries

Note: Data from CbCR restricted to profit-making firms.

cated in countries with harmful tax policies. Overall, it seems that the share of foreign profits included because of the quantitative criterion decreases over time, suggesting a slight reallocation of profits to countries with higher effective tax rates in the recent years.

6 Conclusion

This report proposes enhanced criteria to identify harmful tax policies in the current international taxation environment. We show that making use of the recent data innovation of the CbCR is useful to capture a large range of harmful tax policies. While the current list used by the Code of Conduct might be too restrictive to lead to real economic effects, using extended criteria allows to make the most of the defensive measures that allow to take sanctions against countries with harmful tax measures.

References

Aliprandi, G. (2024). Australian Public CbCR: filling the gaps? *Post-Print*.

Aliprandi, G., & von Zedlitz, G. (2023, May). Benchmarking Country-by-Country Reports.

Alstadsæter, A., Barrios, S., Nicodeme, G., Skonieczna, A. M., & Vezzani, A. (2018). Patent boxes design, patents location, and local R&D. *Economic Policy*, *33*(93), 131–177.

Alstadsæter, A., Casi, E., Miethe, J., & Stage, B. (2023, November). Lost in Information: National Implementation of Global Tax Agreements.

Alstadsaeter, A., Godar, S., Nicolaides, P., & Zucman, G. (2023). *Global Tax Evasion Report 2024* (Rep.). Eu-Tax Observatory.

Andersson, P. F., & Brambor, T. (2019). *Financing the State: Government Tax Revenue from 1800 to 2012* (mimeo).

Austin, J. L. (1962). *How to Do Things with Words*. Oxford: Clarendon Press.

Bach, L., Bozio, A., & Malgouyres, C. (2019). *L'hétérogénéité des taux d'imposition implicites des profits en France : constats et facteurs explicatifs* (Rapport IPP No. 21).

Bachas, P., Fisher-Post, M. H., Jensen, A., & Zucman, G. (2022, March). *Capital Taxation, Development, and Globalization: Evidence from a Macro-Historical Database* (Working Paper No. 29819). National Bureau of Economic Research.

Balakina, O., D'Andrea, A., & Masciandaro, D. (2017). Bank secrecy in offshore centres and capital flows: Does blacklisting matter? *Review of Financial Economics*, *32*(1), 30–57.

Baraké, M., Theresa, N., Chouc, P.-E., & Zucman, G. (2021). Minimizing the Minimum Tax? The Critical Effect of Substance Carve-Outs. *Post-Print*.

BDO. (2025, February). BDO Corporate Tax News - Ecuador.

Beebeejaun, A., & Bickharry, N. (2024). A critical analysis of economic substance rules of Mauritius: a comparative study with Cayman Islands. *International Tax and Public Finance*, *31*(6), 1693–1708.

Besley, T., & Persson, T. (2011). *Pillars of Prosperity – The Political Economics of Development Clusters*. Princeton University Press.

Blouin, J., & Robinson, L. (2019, December). *Double Counting Accounting: How Much Profit of Multinational Enterprises Is Really in Tax Havens?* SSRN Working Paper.

Brounstein, J., Bachas, P., & Bajana, A. (2025). *The three body problem: Ecuador's tax on tax haven ownership* (manuscript).

Case-Ruchala, D., & Nance, M. (2024). The Limits of Enforcement in Global Financial Governance: Blacklisting in FATF as Rational Myth. *International Studies Quarterly*, *68*(3), sqae115.

Clayton, C., Maggiori, M., & Schreger, J. (2023, November). A Framework for Geoeconomics.

Collin, M. E. (2023). The Impact of Tax Blacklisting. *Policy Research Working Paper Series*.

Deloitte. (2022). New edition of guide on tax havens issued for 2023 fiscal year.

Dharmapala, D., & Hines, J. R. (2009). Which countries become tax havens? *Journal of Public Economics*, *93*(9), 1058–1068.

Ducept, J., & Godar, S. (2025). Declining Effective Tax Rates of Multinationals: The Hidden Role of Tax Base Reforms. *EU Tax Observatory Working Papers*, (30).

Eggenberger, K. (2018). When is blacklisting effective? Stigma, sanctions and legitimacy: the reputational and financial costs of being blacklisted. *Review of International Political Economy*, *25*(4), 483–504.

Egger, P. H., Nigai, S., & Strecker, N. M. (2019). The Taxing Deed of Globalization. *The American Economic Review*, *109*(2), 353–390.

FATF/OECD. (2023, November). *Misuse of Citizenship and Residency by Investment Programmes*. FATF. Paris.

Ferrari, A., Laffitte, S., Parenti, M., & Toubal, F. (2022). *Profit Shifting Frictions and the Geography of Multinational Activity* (CEPR Discussion Paper No. DP17801). CEPR.

Gómez-Cram, R., & Olbert, M. (2023). Measuring the Expected Effects of the Global Tax Reform. *The Review of Financial Studies*, *36*(12), 4965–5011.

Grottke, M., & Kittl, M. (2016). First the stick, then the carrot? A cross-country evaluation of the OECD's initiative against harmful tax competition. *Passauer Diskussionspapiere, Betriebswirtschaftliche Reihe*.

Keen, M., & Konrad, K. A. (2013, January). The Theory of International Tax Competition and Coordination. In A. J. Auerbach, R. Chetty, M. Feldstein, & E. Saez (Eds.), *Handbook of Public Economics* (pp. 257–328, Vol. 5). Elsevier.

Kida, M., & Paetzold, S. (2021). The Impact of Gray-Listing on Capital Flows: An Analysis Using Machine Learning. *IMF Working Papers*.

Kudrle, R. T. (2009). Did blacklisting hurt the tax havens? *Journal of Money Laundering Control*, *12*(1), 33–49.

Laffitte, S. (2024). *The Market for Tax Havens* (EU Tax Observatory Working Paper No. 22). EU Tax Observatory.

Langenmayr, D., & Zyska, L. (2023). Escaping the exchange of information: Tax evasion via citizenship-by-investment. *Journal of Public Economics*, *221*, 104865.

LawsofBrazil. (2024). What is a 'tax haven' under Brazilian law?

Lawyers, R. (2024). The list of tax havens - update 2024.

Londoño-Vélez, J. (2014). *War and Progressive Income Taxation in the 20th Century* (No. 2014-03).

Morse, J. C. (2020). Blacklists, Market Enforcement, and the Global Regime to Combat Terrorist Financing. In B. A. Simmons & J. G. Kelley (Eds.), *The Power of Global Performance Indicators* (pp. 61–97). Cambridge University Press.

Nouwen, M. F. (2021, May). *Inside the EU Code of Conduct Group: 20 Years of Tackling Harmful Tax Competition* (IBFD, Vol. 59). Social Science Research Network.

OECD. (1998, May). *Harmful Tax Competition*.

OECD. (2015, October). *Countering Harmful Tax Practices More Effectively, Taking into Account Transparency and Substance, Action 5 - 2015 Final Report*.

OECD. (2017, October). *Harmful Tax Practices - 2017 Progress Report on Preferential Regimes*.

OECD. (2020). *Tax Challenges Arising from Digitalisation – Economic Impact Assessment*.

OECD. (2024). *Important disclaimer regarding the limitations of the Country-by-Country report statistics*.

OECD. (2025). *Harmful Tax Practices – Consolidated Peer Review Results*.

of the European Union, C. (2022). *Council conclusions on the reform of the Code of Conduct for Business Taxation* (Outcome of proceedings No. 13970/22 FISC 209 ECOFIN 1083).

of the European Union, C. (2024, December). *Overview of EU Member States' preferential tax regimes examined since the creation of the COCG in March 1998* (Note No. 8602/8/20).

of the European Union, O. J. (2025). Council Directive (EU) 2022/2523 of 14 December 2022 on ensuring a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union.

Oxfam. (2017). *Blacklist or Whitewash? What a real EU blacklist of tax havens should look like*.

Parliament, E. (2021). European Parliament resolution of 21 January 2021 on reforming the EU list of tax havens (2020/2863(RSP)).

Roland, A., Arel-Bundock, V., Crasnic, L., & Römgens (Indra), I. D. J. (2025). What do citizens in tax havens think? The EU blacklist and public opinion in Switzerland. *Journal of European Integration*.

Rusina, A. (2020). Name and shame? Evidence from the European Union tax haven blacklist. *International Tax and Public Finance*, *27*(6), 1364–1424.

Scheve, K., & Stasavage, D. (2010). The Conscription of Wealth: Mass Warfare and the Demand for Progressive Taxation. *International Organization*, *64*(4), 529–561.

Seelkopf, L., Bubek, M., Eihmanis, E., Ganderson, J., Limberg, J., Mnaili, Y., Zuluaga, P., & Genschel, P. (2021). The rise of modern taxation: A new comprehensive dataset of tax introductions worldwide. *The Review of International Organizations*, *16*(1), 239–263.

Sharman, J. C. (2009). The bark is the bite: International organizations and blacklisting. *Review of International Political Economy*, *16*(4), 573–596.

Tax Justice Network. (2019). The Corporate Tax Haven Index.

Tax Justice Network. (2020). Financial Secrecy Index.

von Haldenwang, C., Redonda, A., & Aliu, F. (2021). *Shedding Light on Worldwide Tax Expenditures. GTED Flagship Report 2021* (GTED Flagship Report). GTED.