Andorra

A. Progress in the implementation of the minimum standard

Andorra has ten tax agreements in force, as reported in its response to the Peer Review questionnaire. Each of those agreements complies with the minimum standard.

Andorra signed the MLI in 2017 and deposited its instrument of ratification on 29 September 2021, listing its non-compliant agreements. The MLI entered into force for Andorra on 1 January 2022. The agreements modified by the MLI came into compliance with the minimum standard once the provisions of the MLI take effect.

Andorra is implementing the minimum standard through the inclusion of the preamble statement and the PPT.²

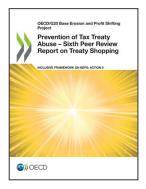
B. Conclusion

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

	1.Treaty partners	2. Compliance with the standard	3. Signature of a complying instrument	4. Minimum standard provision used
1	Cyprus*	Yes other		PPT
2	France	Yes MLI		PPT
3	Hungary	Yes other		PPT
4	Liechtenstein	Yes MLI		PPT
5	Luxembourg	Yes MLI		PPT
6	Malta	Yes MLI		PPT
7	Portugal	Yes MLI		PPT
8	San Marino	Yes other		PPT
9	Spain	Yes MLI		PPT
10	United Arab Emirates	Yes MLI		PPT

Summary of the jurisdiction response – Andorra

 $^{^{2}}$ For its agreements listed under the MLI, Andorra is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI). Andorra has made a reservation pursuant to Article 7(15)(b) of the MLI not to apply Article 7(1) of the MLI with respect to agreements that already contain a PPT (covering two agreements).



From: Prevention of Tax Treaty Abuse – Sixth Peer Review Report on Treaty Shopping

Inclusive Framework on BEPS: Action 6

Access the complete publication at: https://doi.org/10.1787/36cebf8e-en

Please cite this chapter as:

OECD (2024), "Andorra", in *Prevention of Tax Treaty Abuse – Sixth Peer Review Report on Treaty Shopping: Inclusive Framework on BEPS: Action 6*, OECD Publishing, Paris.

DOI: https://doi.org/10.1787/608b98f5-en

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at <u>http://www.oecd.org/termsandconditions</u>.

