

Barbados

A. Progress in the implementation of the minimum standard

Barbados has 31 tax agreements in force as reported in its response to the Peer Review questionnaire, including the multilateral agreement among the members of the CARICOM concluded with ten treaty partners (the CARICOM Agreement).¹⁸ One of those agreements, the agreement with Mauritius, complies with the minimum standard.

Barbados signed the MLI in 2018 and deposited its instrument of ratification on 21 December 2020, listing its non-compliant bilateral agreements concluded with other members of the Inclusive Framework. The MLI entered into force for Barbados on 1 April 2021. The agreements modified by the MLI come into compliance with the minimum standard once the provisions of the MLI take effect.

Barbados is implementing the minimum standard through the inclusion of the preamble statement and the PPT.¹⁹

B. Conclusion

The CARICOM Agreement does not at this stage comply with the minimum standard and discussions to bring this agreement up to date should be contemplated.²⁰

Summary of the jurisdiction response – Barbados

| | 1. Treaty partners | 2. Compliance with the standard | 3. Signature of a complying instrument | 4. Minimum standard provision used |
|---|------------------------------|---------------------------------|--|------------------------------------|
| 1 | Austria | No | No | PPT |
| 2 | Bahrain | No | Yes MLI | PPT |
| 3 | Botswana | No | No | PPT |
| 4 | Canada | No | Yes MLI | PPT |
| 5 | China (People's Republic of) | No | Yes MLI | PPT |
| 6 | Cyprus* | No | Yes MLI | PPT |
| 7 | Czech Republic | No | No | PPT |
| 8 | Finland | No | Yes MLI | PPT |

¹⁸ Agreement Among the Governments of the Member States of the Caribbean Community for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income, Profits or Gains and Capital Gains and for the Encouragement of Regional Trade and Investment, St. Michael Barbados, 6 July 1994; between: Antigua and Barbuda (18 February 1998), Barbados (7 July 1995), Belize (30 November 1994), Dominica (19 June 1996), Grenada (1 March 1996), Guyana* (26 November 1997), Jamaica (16 February 1995), St. Kitts/Nevis (8 May 1997), St. Lucia (22 May 1995) St. Vincent (12 February 1998) and Trinidad & Tobago (29 November 1994). In total, Barbados identified 40 "agreements" in its List of Tax agreements: 30 bilateral agreements and the CARICOM Agreement concluded with ten of its treaty partners.

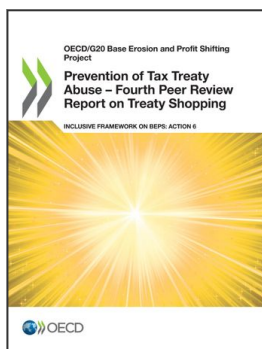
¹⁹ For its agreements listed under the MLI, Barbados is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI).

²⁰ Revisions to the CARICOM Agreement require an agreement from its eleven treaty partners.

| | | | | |
|----|----------------------|---------|---------|-----|
| 9 | Iceland | No | Yes MLI | PPT |
| 10 | Italy | No | Yes MLI | PPT |
| 11 | Luxembourg | No | Yes MLI | PPT |
| 12 | Malta | No | Yes MLI | PPT |
| 13 | Mauritius | Yes MLI | | PPT |
| 14 | Mexico | No | Yes MLI | PPT |
| 15 | Netherlands | No | Yes MLI | PPT |
| 16 | Norway | No | No | PPT |
| 17 | Panama | No | Yes MLI | PPT |
| 18 | Portugal | No | Yes MLI | PPT |
| 19 | Qatar | No | Yes MLI | PPT |
| 20 | San Marino | No | Yes MLI | PPT |
| 21 | Seychelles | No | Yes MLI | PPT |
| 22 | Singapore | No | Yes MLI | PPT |
| 23 | Spain | No | Yes MLI | PPT |
| 24 | Sweden | No | Yes MLI | PPT |
| 25 | Switzerland | No | No | PPT |
| 26 | United Arab Emirates | No | Yes MLI | PPT |
| 27 | United Kingdom | No | Yes MLI | PPT |
| 28 | United States | No | No | PPT |
| 29 | Venezuela* | No | No | PPT |

Other agreements

| | 1. Treaty partners | 2. Inclusive Framework member |
|----|----------------------------------|-------------------------------|
| 1 | Antigua and Barbuda | Yes |
| 2 | Belize | Yes |
| 3 | Cuba* | No |
| 4 | Dominica | Yes |
| 5 | Grenada | Yes |
| 6 | Guyana* | No |
| 7 | Jamaica | Yes |
| 8 | Saint Kitts and Nevis | Yes |
| 9 | Saint Lucia | Yes |
| 10 | Saint Vincent and the Grenadines | Yes |
| 11 | Trinidad and Tobago | Yes |



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