



TAX TRANSPARENCY: what will change

Proposal on the automatic exchange of information on tax rulings

Current framework

New proposal

Obligation: weak

Member States choose what information to send, when, and to whom



Obligation: strong

Member States must send information on all tax rulings to all other Member States

Discretion: some

Member States have discretion to assess whether their tax rulings are relevant for other Member States



Discretion: none

Member States have no discretion to withhold information on tax rulings

When: ad hoc reporting

Information to be exchanged whenever rulings are issued



When: regular reporting

Common framework sets strict timeline to share information

Scope: not clearly defined

Rulings are not defined



Scope: clearly defined

Definition of rulings on which exchange shall take place