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ENCLOSURE 1
DATE 19 August 2022

RE Public Consultation - Progress Report on Amount A of Pillar One

Dear Sirs and Madams,

We thank you for the opportunity to submit comments on the Progress Report on Amount A of Pillar One released on 11 July 2022 (hereinafter referred as the “Progress Report”).

Our comments to the Progress Report are divided into two parts. In the first part, we aim to provide general comments on Amount A rules in relation to MNE’s desire for predictability (no surprises), operational efficiency, no disturbance of competitive position, and avoidance of double taxation. In the second part of our comments, we make specific suggestions to clarify and better explain the policy rationale behind Pillar One rules while reducing their complexity,

[1] Ms. Ruby Doeleman (former working student at Loyens & Loeff) has also contributed to the preparation of the present document.

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As some of our comments demonstrate, we consider that important conceptual links and justifications for the system proposed under the OECD project on addressing tax challenges of the digitalization have been lost along the way and need to be reintroduced in the negotiations on Pillar One. The comments submitted herein are on behalf of Loyens & Loeff N.V. and should not be construed as representing the opinions of any of its clients.

1 General comments

Pillar One creates a challenging situation: global implementation of a new tax system at once. The current tax systems have been developed over time with clarifying parliamentary discussions, frequent adjustments, and important juridical verdicts to eliminate unclarities in the application of the rules. For Pillar One, only limited background material is available. We are very happy that the group of multinational enterprises (MNE) that will be exposed to the new rules (hereinafter referred as the “Group”) is kept very small. Hopefully, their experience will create valuable knowhow on details of the application of the new rules. However, these “selected” MNE will be confronted with a great deal of unclarity and uncertainty. In our experience, MNE generally want to comply with the rules as their main goals are: predictability (no surprises), operational efficiency, no disturbance of competitive position, and avoidance of double taxation.

As everybody realises, it is impossible to design new rules that immediately cover all possible situations. To allow MNE to “comply” in situations where the rules have not been fully developed yet, it is crucial to understand the exact goals and policy rationale of the new rules. This would allow all MNEs, tax authorities and courts to interpret the new rules in situations not specifically described. The importance will grow once the Group of the “in scope” MNE increases with the anticipated reduction in the revenue threshold in the coming years.

Pillar One started as a reallocation of digital MNEs’ income with a clear policy rational. During the process, for good reasons, the policy rational changed. Unfortunately, these “reasons” are not widely known. From the perspective of MNEs, the current system introduces mechanical rules that lead to unexpected results without an apparent reason supporting it. For example: pursuant to Amount A revenue sourcing rules, a revaluation gain from real estate could result in unrealized profits on investment properties being allocated to other jurisdictions.

In the submission we aim to provide the OECD with suggestions to clarify and better explain the policy rationale behind Pillar One rules, while reducing their complexity.

2 Specific technical considerations

2.1 Scope (Title 1)

Article 1: Covered Group

Article 1 of the Substantive Rules on Amount A regulates the scope of the rules, which – as stated in the Report - is designed to ensure that Amount A only applies to large and highly profitable Groups and, as far as possible, have been drafted to apply in a quantitative and objective manner, such that they are readily administrable and provide certainty as to whether a taxpayer is within scope. This article is supplemented by the provisions on scope included in Schedule A.

In this section, we comment on the following aspects of Amount A's Scope:

Policy rationale:

We consider that the policy rationale underpinning the current approach for Amount A scope is not sufficiently explained in the Progress Report. As it is known, the design of Amount A's scope has significantly changed along the Inclusive Framework's negotiation process on Pillar One. However, we consider that the reasons for these changes in the scope of the rules have not been clearly explained and have created great confusion about which is indeed the policy rationale behind Amount A.

To exemplify this point let's remember that, originally and until the appearance of the "marketing intangibles" alternative which was promoted by the United States and later on combined under the Unified Approach, Pillar One was mainly concerned with highly digitalized businesses that generate revenue from the remote provision of automated and standardised digital services (including revenue from the monetisation of data) to a large and global customer or user base with little or no local infrastructure (physical presence). Later on, the "marketing intangibles" alternative poured into the Unified Approach, extended Pillar One's scope to account for other non-digital businesses that also have the ability to participate in an active and sustained manner in the economic life of a market jurisdiction. Following that logic and to promote administrability, the Report on Pillar One Blueprint published in October 2020 described the scope of Amount A as being based on two elements: an "activity test" and a "threshold test". Under the former test, two categories of activities were included in the scope of Amount A: Automated Digital Services (ADS) and Consumer Facing Businesses (CFB). Under the latter test, a MNE would only be in scope if, it met the activity test described above, and also two thresholds: the MNE's consolidated revenue was above a certain threshold; and its in-scope revenue earned outside its domestic market was also above a certain threshold. In addition, the blueprint mentioned certain businesses that could be excluded from Amount A's scope because they belonged to sectors where "the policy challenges of the digitalised economy do not present themselves" (e.g., certain natural resources; certain financial services; construction, sale and leasing of residential property; and international air and shipping business).

Up to this moment, the policy rationale underpinning Amount A's scope was somehow clear. The goal of the "activity test" seemed to be covering businesses that are able to have significant and sustained interactions with customers and users in a market jurisdiction. On the other hand, the "threshold test" was intended to minimise compliance costs and keep the administration of the new rules manageable for tax administrations.

As arises from the Progress report, the current rules on Amount A's scope have left behind the "activity test" and they make no more reference to ADS and CFB. Differently, Amount A is currently based on a comprehensive scope that uses quantitative thresholds (i.e., revenues > EUR 20 billion and profitability > 10%) to determine whether a MNE is subject to the rules on Amount A. This means that any MNE that meets the scope thresholds will have to apply the Amount A rules, regardless of what type of business and/or activity it undertakes.

In addition, the current rules on Amount A's scope only carve out extractive industries and regulated financial services because these industries are heavily regulated. However, it is not clear with these are the only industries excluded as; (i) the same reasoning is also applicable to other specific businesses (e.g., healthcare, pharmaceuticals, transportation, etc.); (ii) there are other sectors (e.g. construction, sale and leasing of residential property; and international air and shipping business) where – as stated in the Blueprint - "the policy challenges of the digitalised economy do not present themselves". Furthermore, we note that the same logic that applies for carving out the exploitation of natural resources from the scope of Amount A (i.e., presumably on the basis that the taxing right ought to rest in the location of the natural resources) would apply in relation to real estate.[2]

Indeed, the extension of the scope of the rules to cover every type of a business produces unfavorable consequences. Pursuing the goal of non-ring-fencing, it appears that currently the rules have to apply also to the enterprises, for which the old system used to work perfectly, and which did not raise any challenges in relation to the digitalized economy. Industries can be broadly divided in two different Groups based on their main value driver: capital- and asset-intensive industries and consumer-facing physical-asset-light industries. For capital- and asset-intensive industries the main value driver is not the control over consumer markets, but the ownership of key assets (which includes extractives, for example). For consumer-facing industries, the factor that allows to control the global value chain is the control over consumer markets. Their key assets are technology and marketing-related IP, including the technology for algorithmic management of users and data collection. These assets allow them to control access to the market and eliminate competition there. Initially, the OECD project indeed covered the second category of businesses, ADS and CFB, that shared the characteristics of reliance on intangible assets, data-intensity and ability to reach scale without mass. To our vies, the previous approach was better aligned with the objective of the project since the first category of businesses is simply not that prone to digitization. For the first category, the control over consumer markets is not a determinative factor. For the first category of businesses, residual profits arise not because of control over markers, but because of the ownership of, e.g., row materials, financial capital, real estate, ships, etc.

Both the first consultation document on Amount A's Scope and the Progress Report fail to provide an explicit and justified explanation of the policy drivers behind the aforementioned changes. In other words, these documents provide no indication of: (i) why the "activity test" is no longer determinant for Amount A purposes; (ii) why Amount A scope relies exclusively on quantitative thresholds; and (iii) why the specific scope exclusions only cover Extracted Groups and Regulated Financial Services and no other sectors/activities (e.g. exclusions of the domestic businesses)?

[2] In this regard, it is generally accepted, not least in the OECD's MTC, that real estate is a special case as it is so closely (and literally) connected to the territory where it is sited. Consequently, rental income and gains on the disposal of investment properties are expressly allocated to the territory where they are located, regardless of the considerations that would generally apply to other types of business. This presumably partly reflects the fact that real estate and the profits arising from it, are by their nature extremely difficult to shift across borders. Perhaps for this reason, the original blueprints issued in 2020 had not proposed to include real estate income within the scope of Amount A.

We suggest that instead of focusing on the activity either for limiting the scope of the rules at outset or limiting it through carve-outs, the OECD could focus on different ways of market presence that go beyond subsidiary or a PE. Such modes would be broadly labeled as non-equity modes of internationalization that would include such forms as business format franchising, licensing, expansion through algorithmic management in case of digital intermediation platforms and other forms of economically dependent involvement of resource in the market jurisdiction to carry on business on behalf of an MNE.

The profitability test

According to the Progress Report Amount A shall only apply to “highly profitable” Groups. However, the determination of what can be considered as “highly profitable” seems to be largely subjective. Indeed, when considering various industries and benchmarks (also those used for transfer pricing purposes) 10% Pre-Tax Profit Margin is not necessarily a “highly profitable” business. Thus, we consider that the Task Force on the Digital Economy (TFDE) should better justify why the 10% margin has been chosen and consider increasing the required profit margin for Amount A.

Accounting standards and tax adjustments

We consider that both the accounting standards as well as the tax adjustments required to calculate the Groups’ Pre-Tax Profit Margin (which are relevant for determining Amount A’s scope) are subject to the interpretation of jurisdictions when implementing and applying Amount A rules. In the case of accounting standards, they may have their peculiarities, such as a greater focus on serving stakeholders of a company if the US GAAP or financial reporting regulations come into attention, whereas the IFRS might allow greater discretion for corporate management and auditors to interpret relevant principles. In the case of tax adjustments for determining the tax base, allowing additions or exclusions from the P&L statement reflects much more the decisions taken by the jurisdiction in relation to its tax policy (e.g., permitting an accelerated tax amortisation of an intangible might reflect the country’s tax policy to stimulate investments on this type of assets).

Option to elect to be in-scope of Amount A for a fixed term

To increase flexibility in the system and reduce administrative and compliance burdens, the Group should be allowed to elect to remain or be in-scope of Amount A for a fixed period of time. The election would be available to a Group that would satisfy the global revenue and profitability thresholds for Amount A in the year it is making the election. Each Group will have their own set of facts and circumstances and some Groups may find it less burdensome (particularly on systems process) to be ensured consistency in complying with their Amount A obligations.

Exclude certain amounts from the scope determination

We believe that any profits or revenues that would be eliminated from the Amount A calculation itself (e.g., amounts falling within the marketing and distribution safe harbour) should be excluded from the scope determination as well, similar to what has been provided in relation to the amounts related to Extractive Activities and Regulated Financial Services. This again we believe will reduce the administrative and compliance burden for certain Groups that have significant amounts falling within

the marketing and distribution safe harbour to not have to go through the full Amount A calculation process for those amounts.

Anti-fragmentation rule

In relation to the anti-abuse measure included in Amount A's scope (which will apply as a deterrent to prevent a Group that is held under certain types of entities from being artificially fragmented into numerous Groups in order to circumvent the scope rules), we consider that this provision should only be applicable after the announcement date of final rules and that it should not have retroactive effect. In addition, to enhance certainty and avoid potential controversy, we suggest the OECD to replace the chosen "principal purpose test" with another test that is more objective and less prone to creating disputes. Furthermore, the TFDE should further clarify how other existing (general) anti-abuse measures would interact with the proposed anti-fragmentation rule.

Certainty in advance

We believe that for all of these elements it is key that there is a clear and expedient process for a Group to obtain certainty in advance whether they are in scope of Amount A or not, as many of these items contain elements that are open for discussion as mentioned in the aforementioned.

Permanent prior period and average test

The Progress Report applies the prior period test and the average test for profitability only as an "entry test". Once a Group is in scope of Amount A, only the Total Revenues and profitability of the Group in the current Period would determine whether the Group remains in scope. It should be recognized that requiring a two-year period of not being in scope for the application of the "entry test" reduces administrative costs for MNEs, as they do not have to continuously track revenues to determine whether they are in scope of Pillar One. However, we consider that applying the prior period and average test on a rolling bases would add certainty and would ensure that Amount A only applies to Groups that are consistently highly profitable. Thus, we suggest making the prior period and the average tests a "permanent test" rather than an "entry test", This is in line with the OECD's goal of ensuring Groups with volatile profitability are not inappropriately brought into scope, and therefore limits the compliance burden placed on taxpayers and tax authorities.

In addition, we believe that a similar test should not only apply for the purposes of measuring the profitability of the Group, but also to the calculation of their total revenues.

2.2 Nexus and revenue sourcing rules (Title 3)

Article 3: Nexus test

GDP and sales revenue thresholds

We consider that the OECD's GDP threshold is not representative with respect to the market size. It does not provide an equitable mechanism to differentiate between bigger and smaller markers. For example, it is the same revenue threshold that applies to market presence in the United States and Croatia. The initial idea of the project was to attribute revenues to market jurisdiction where an MNE

has a significant economic/market presence. However, the present fixed thresholds of GDP and revenue thresholds do not serve those purposes. In 2020, 90 countries in the world were above the GDP threshold of EUR 40 billion (Data; World Bank Statistics).

In Annex 1, we conducted the calculations of what would be the relative significant engagement in the market provided that EUR 1 million annual sales revenue is a benchmark of a significant engagement in the economy with the GDP level of EUR 40 billion.

Column 6 in the table below contains the calculation of the ratio of the revenue threshold (1 million or 250 thousand) to an actual country's GDP level. One can assume that, according to the OECD, EUR 1 million of sales revenue represents significant engagement in the market for the economy with at least EUR 40 billion annual GDP. The ratio of the revenue threshold to the threshold of GDP (EUR 1 million/ EUR 40 billion) is 0,0025% - the minimum threshold indicating significant engagement into the market. Interestingly enough that with the present thresholds and the actual GDP level, for Slovenia, the ratio of the revenue threshold to the GDP level is 0,0019%, while only it is 0,0000048% for the US. To our opinion, a fixed revenue threshold cannot account for significant differences in market sizes. EUR 1 million does not appear to be an indicator of significant engagement in the market in the US, China, Japan, Germany and a number of the leading countries by GDP.

We calculated what would be the sales revenue threshold for each country had the same standard of significant engagement applied. Column 4 provides calculations of what would be the sales revenue threshold in every country had it were based on such an indicator as to the ratio of the sales revenue to a country's GDP level. The calculations are based on the assumption that the ratio that amounts to 0,0025% is an indicator of a significant engagement in the market.

Column 4 = GDP X 0,0025% ; Column 5 = Rounded (Column 4)

Evidently, had the same standard of significant engagement applied, the revenue thresholds would be significantly higher for the leading countries by GDP. For example, EUR 1,34 million engagement in the Slovenian market would correspond to EUR 522,34 million in the U.S. market if the size of the economies is relevant for the design of the nexus.

There can be several approaches to align the sales revenue threshold with the actual market sizes:

1. Define a percentage that would apply to an average country's GDP (e.g., 5-year average published every year) to calculate the sales revenue threshold. E.g., Sales revenue threshold = GDP*X, where X indicates a significant level of engagement in the economy.
2. Define GDP brackets with different fixed revenues thresholds applicable (see for example Column 3 and different shades of blue that schematically divide the list into several brackets).

The second approach is more simplistic and predictable, while the first approach allows reaching higher accuracy, as well as it indeed accounts for differences in the market sizes and powers.

It is understandable that the goal of the OECD was to reach a simple and easy-to-administrate solution. We are also of the opinion that ensuring simplicity / manageability of the rules both for taxpayers and tax administrations is one of the key goals. Yet, the current nexus could have several undesirable consequences:

(1) A very low threshold of the sales revenue, especially for the leading countries will bring almost every jurisdiction of the operation of a covered MNE in the loop of Amount A. With higher revenues in the developed countries, the share of Amount A will be mainly allocated to them.

(2) With a low threshold, the cost of administration and compliance can be higher than the benefits received from the Pillar One framework.

(3) The solution does not lead to an equitable allocation of taxing rights by not adequately differentiating between the market sizes. The goal of simplicity cannot have precedence over the goal of equity.

We understand that the choice of the thresholds was based on economic impact assessment conducted by the OECD. In light of the above-mentioned alternatives to the nexus thresholds, it would be useful to specify why the present thresholds were a preferred policy option.

Plus factors and residual profits

Amount of revenues generated in the country is not indicative with respect to whether the country contributes to the generation of residual profits. Since residual profits are defined as profits above the marginal level of return, it could be useful to develop additional plus factors. It is important to build a correlation between the concept of residual profits and market indicators. Normally, in conditions of perfect market competition, over-time a MNE gains only marginal returns. Excess or residual profits are the result of entrepreneurial risk-taking or market imperfections that restrict free competition in that market. As a conceptual consideration, the "market share" of an MNE in the market jurisdiction could be a plus factor in the nexus rules. Although this suggestion provides a more complex approach, it could also lead to even fewer MNE to be in the loop of Amount A in specific countries. Yet, such an approach could prevent the consequence that MNE that do not generate any residual profits in that market have to comply with the Pillar One.

Other comments

To ensure a consistent approach and avoid unnecessary fluctuations (specially for countries that have GDP around the EUR 40 billion level), it may be helpful to specify a longer period (e.g., three years) during which the jurisdiction will apply the GDP threshold established at the start of the Amount A rules. It would be particularly helpful if the OECD would publish lists of jurisdictions categorised between the two different nexus thresholds (i.e., EUR 1 Million and EUR 250.000) for accounting periods beginning in each calendar year to ensure consistency.

We further note the need for the TFDE to clarify expressly whether the nexus test of Amount A would apply when the Covered Group has already a significant presence in a jurisdiction. In other words, the TFDE should specify whether such a significant presence in a certain jurisdiction would exempt the Group from the nexus test.

Article 4: Revenue sourcing rules

General Comments

- We welcome that the TFDE has considered the input from stakeholders and dropped its prior proposal that required Covered Groups to source revenue on a transaction-by-transaction basis. However, we consider that the new criteria for sourcing revenues should be better explained in order to avoid confusion and align the way in which Covered Groups would source the revenue in practice. This could be achieved, for example, by expressly following the general approach of the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (OECD Guidelines), which on transaction types and provide guidance for the general categories of tangible goods, services, intangibles and financial transactions.

- Building on the idea of allowing the use of Allowing Keys, we recommend the TFDE to take into account and analyze the possibility of adopting an approach whereby an allocation key would be the Primary mechanism for revenue sourcing, while the sourcing rules specified for the different transaction types would be applied as a secondary approach when the Group opts to do so and could demonstrate that the approach would yield a Reliable Indicator.
- Considering that many of the guidance in the Progress Report describes Reliable Indicators, which are derived from information which is not always available to tax departments (and in cases not available to the MNE at all), we consider that the TFDE should further clarify the extent to which a Group must attempt to identify a Reliable Indicator and how it must document this effort. Furthermore, as obtaining information from the final customers can be difficult and raise several concerns (about disclosures of confidential business information, the legality of passing on certain information and the commercial implications of doing so), we invite the TFDE to reconsider the definition of "Final Customer".
- We encourage the TFDE to consider that the proposed revenue sourcing rules would also impact many MNE that are not in-scope of Amount A and which will be required to provide data to their suppliers e purposes of determining the latter' tax liability under the new taxing right. This could not only create a need for significant investment by such MNE but also a risk of repercussions if they were to provide information to the supplier that the relevant tax authority considers to be incorrect.
- We encourage the TFDE to consider information already being collected by Groups for Indirect Tax or other Regulatory and Commercial purposes as Reliable Indicators for large business customers.
- The system for sourcing several schedular revenues is complex and further guidance should be provided in order to better understand the interplay and hierarchy between the proposed methodologies for sourcing (i.e., according to Reliable Indicators, Another Reliable Indicator, Allocation Keys, Global Allocation Key and, Knock-Out Rule)
- Many of the Reliability Indicators reference "use" which can be ambiguous in some cases (for example, the place a service is performed or where the benefit of the service is intended). We encourage the TFDE to provide further guidance on this term.
- We appreciate that the TFDE has permitted the use of "Alternative Reliable Indicator(s)" which provide businesses with more flexibility to use a broader range of information to source revenues. Nevertheless, in order to enhance certainty and avoid disputes, we suggest the TFDE to further explain what would mean that such indicators "produce results that are consistent with the revenue sourcing rule for the category of Revenues at issue". This could be achieved by means of examples.
- We also welcome that during the Initial Transition Phase, the Covered Group will be able to use allocation keys as a simplified interim measure (as set out in Section 11 of Schedule E) whilst preparing systems and data for the more detailed transactional approach required in the longer term.
- In order to further refine revenue sourcing rules, we consider that the TFDE could consider the introduction of an option to exclude from the analysis categories of revenues following under a certain percentage threshold of total revenues. In this way, the rules would avoid requiring Groups to apply sourcing rules to negligible categories of revenues for which information may not be fully available.

- We consider necessary that the TFDE adds an express provision (similar to that included for the Nexus Test under Article 3.3.) which confirms that revenue sourcing data will not, by itself, be used as justification for transfer pricing or permanent establishment audits.
- Finally, considering that the new rules of Amount A will coexist with the current system based on domestic tax rules and international tax rules, we consider necessary that Amount A Model Rules consider the interplay between those two set of taxing rules and provide a clear explanation of this (specially for businesses that will have to apply both systems in parallel)

Para 2 Article 4 – Accounting for differences among jurisdictions

We consider that the TFDE should further clarify what does it mean when it states that the revenues must be sourced in a manner that accounts for differences among Jurisdictions in the goods, content, property, products and services sold, licensed or otherwise alienated and provided by the Covered Group, their quantities and their prices.

Para 3 Article 4 (Schedule E, Sec 1) – Categorizing revenues

Revenues must be sourced according to the category of Revenues earned. Revenues that fall under more than one category are sourced according to their predominant character. Revenues derived from Supplementary Transactions may be sourced in accordance with the revenue sourcing rule that applies to the Revenues that they supplement.

Section 1 of Schedule E states that "*Revenues are categorised based on the ordinary or predominant character of the transactions from which they are derived. 2. The character is determined by reference to the substance of the transactions irrespective of legal form, and in accordance with additional guidance provided in the Commentary or agreed by the Conference of the Parties. 3. Revenues that do not fit within any category of Revenues provided in Article 4 and in Schedule E shall be sourced according to the most analogous category of Revenues*". We consider that further guidance clarification is required as how to interpret and apply the "predominant character" test. Despite the Schedule's clarification that a transaction is categorised based on its "ordinary" and "predominant" character, definitions or comments of such notions are not provided by the Progress Report and they may thus comprise several interpretations. To exemplify how difficult it can be to determine the character of a transaction in certain industries, it is useful to think about the struggles at the European Union level for identifying the predominant type of service provided by intermediations platforms (i.e. the Uber Spain and Airbnb Ireland cases ruled by the CJEU).

Based on the aforementioned omissions of the Progress Report, we consider that the categorisation of revenues is based upon subjective interpretations of their characters that require further clarification. In this regard, guidance in the form of commentaries would be desirable (e.g., examples of when a transaction would be considered 'predominant', and when it would not).

Similarly, the determination of the character of the revenue by reference to "the substance of the transaction irrespective of legal form" also requires further commentary. The main question that arises is what would be the role that the legal form will play in this analysis.

Para 7 Article 4 – Sale of components

Revenues derived from a transaction for the sale of Components arise in [a Jurisdiction] when the place of delivery to the Final Customer of the Finished Good into which the Component is incorporated is in [a Jurisdiction].

In transactions between *unrelated* parties, it is not clear how a seller of components to a stand-alone entity has to monitor where the place of delivery of the finished good to the final customer is. Moreover, the strength of the connection of a seller of components to the market of finished good is questionable.

In any case, since it will be difficult and complex for a Group to keep track of the sold components within supply chains of unrelated parties the probable outcome in these cases would be the use of the Global Allocation Key as the only viable alternative. Thus, we suggest that the TFDE expressly acknowledges this in the commentaries and considers the “reasonable steps” requirement for dismissing the use of a Reliable Indicator in these circumstances to provide certainty for Groups with such (significant) component sales to third parties.

Para 8(b)(i) Article 4 – Online advertising services

Revenues derived from a transaction for the provision of online Advertising Services arise in [a Jurisdiction] when the Location of the Viewer of the advertisement is in [a Jurisdiction].

To our opinion, the proposed revenue sourcing rule appears to be incoherent with the chosen approach for revenue sourcing. The provision of advertising services occurs between a company in the business of advertising and a business purchasing the service. There is no (immediate) transaction between the advertising company and the viewer (if, for example, the revenue is not based on clicks). The revenue is physically generated in the country of the purchaser of advertising services (i.e., B2B transaction). The commentary to the revenue sourcing approach has to address the mismatches between the revenue flows and deemed sources of revenue.

It is clear that the intention of the TFDE was to identify the final destination of the service based on the underlying logic that users (in this case viewers) create value. We consider that advertising services are triangular transactions where, for an advertisement business supplier, both the state of the service purchaser and the state of viewer are the levant market jurisdictions. Therefore, the revenue sourcing rules for online advertising services could be deemed to arise in two places: the place of a purchaser of the advertisement services and the place of the viewer (by analogy with the revenue sourcing rules for online intermediation services).

Where the provider and the purchaser of online advertising services are related parties, the place of the viewer could be the only revenue source rule.

Para 8(b)(ii) Article 4 – Offline advertising services

The same suggestions as for online advertising services could apply for offline advertising services.

Para 8(c) icw Para 8(b); Para 8(f) Article 4

Para 8(c) establishes a revenue source rule for intermediation services. A number of digital intermediation platforms provide advertising (Para 8(b)) or financing services (para 8(f)) that are separately addressed in the source rules. There is a need to address the question of the predominant character of services offered by intermediation platforms since the source rules are different for the mentioned types of services. In proving further guidance on how to answer the question of which is the predominant character of these services, we suggest considering the inclusion of objective criteria which provides certainty to Groups on the correct way to characterize this type of blended and/or hybrid services.

Para 8(f) Article 4 – Other Services

Revenues derived from the provision of Other Services to which subparagraphs (a) to (e) do not apply are treated as arising in a Jurisdiction when the place of use of the service is in that Jurisdiction.

In the event of 'Digital Content' (i.e., content provided through digital means such as. music, books, videos, text, games, applications, computer programmes, software, online newspapers, online libraries and online databases, whether for access one time, a limited period or in perpetuity) being provided to a customer that is operating in different jurisdictions and that utilizes these online services simultaneously in a range of jurisdictions, we consider that the TFDE should further clarify how the revenues earned from these services should be sourced to individual markets under the envisaged sourcing rules.

Para 9(a) Article 4 – Revenues from a transaction for the licensing, sale or other alienation of intangible property

In case of location-specific services supported by the intangible property (e.g., coffeeshop, hotel), the market jurisdiction might be entitled to charge a withholding tax on royalties under double tax treaties. If the Amount A is additionally contributed to that state, the possibility to levy a withholding tax on royalties has to be revoked.

It is also could be useful considering splitting the revenues in half, where one half would be attributed to the country of licensee /purchaser of the intangible property (if unrelated) and the other -- to the place of use of the service supported by the intangible property or the place of final customer, since both these places are the relevant markets for the owner of the intangible property.

Certain complexities may arise when a licensor grants a non-exclusive right to use the intangible property to an unrelated party. First, it can be administratively burdensome for the licensor to monitor the destination of the service; second, the choice of the markets to exploit the intangible property does not depend on the intention of the licensor.

Para 10 Article 4 – Revenues from real property

Revenues derived from Real Property located in [a Jurisdiction] arise in [a Jurisdiction].

Under the current rules, income, which is related to real property may be taxed by the state where the property is located (Article 6 2017 OECD MTC). The residence state of a person that derives income from immovable property can apply the credit or exemption method for the income (Articles 23A and 23B OECD MTC).

The inclusion of revenues derived from real property in the scope of Amount A seems to be redundant since the jurisdiction where the real property is located is already recognized as the source state and has the taxing right over business income.

Schedule E (Sections 2.6 and 12).

In relation to the application of Allocation Keys, we first encourage the TFDE to explain why these are the only mechanism available to be used when sourcing revenues from Transport Services.

We suggest the TFDE to further develop comments on the definition of "Reasonable Steps". As known, the accuracy decrescent sourcing methodology of Amount A (which begins with the Reliable Indicators and presents the Global Allocation Key as a last method) is built upon the notion of

"Reasonable Steps", which the Group must undertake in order to gather relevant data before stepping into the less accurate method to be applied. Such term is defined by the rules as:

> *"Reasonable Steps" means efforts that are consistent with the guidance provided in the Commentary, or agreed by the Conference of the Parties, or with a recommendation included in an agreed Advance Certainty Outcome or an agreed Comprehensive Certainty Outcome relevant to the Covered Group for the relevant Period and for the relevant category of Revenues, but does not include changing contractual arrangements.*

Despite such definition, we consider that the concept of "Reasonable Steps" is still not clear. We suggest further clarifications on this concept and, in particular, that: (I) this due diligence procedures are expressly stated, better described and only cover the minimum required checks; and (ii) Covered Groups are provided with an optional and more objective safe harbour to demonstrate that their efforts are "consistent" with the benchmarks listed under the aforementioned definition (i.e. guidance provided in the Commentary, or agreed by the Conference of the Parties, or with a recommendation included in an agreed Advance Certainty Outcome or an agreed Comprehensive Certainty Outcome relevant to the Covered Group for the relevant Period and for the relevant category of Revenues). This would reduce Covered Groups exposure to liabilities arising from an incorrect application of the revenue sourcing rules. Furthermore, we encourage the TFDE to clarify what is the sense of excluding the "change of contractual arrangements" from the reasonable steps definition.

Concerning the 'knock-out rule' which is intended to eliminate countries for which there is reliable information that revenue did not arise due to legal, regulatory or commercial reasons, we would welcome that the TFDE explains the rationale for excluding such jurisdictions or group of Jurisdictions when applying the Allocation Key. We also encourage the TFDE to exemplify these cases with examples.

2.3 Determination and allocation of taxable profit (Title 4)

General considerations (Articles 5 and 6):

- The parallel operation of the ALP system and the OECD Pillar One can lead to undesirable consequences that are currently not addressed by the OECD Pillar One. One of such consequences is that under the current transfer pricing rules, residual profits are attributed to the entities that perform the most complex and valuable functions in the Group. The OECD Pillar One instead requires to reallocate a part of residual profits from these entities (i.e. 25% of the Adjusted Profit Before Tax (APBT) in excess of 10% of the Covered Group's Revenues) to the market jurisdiction. In certain circumstances (e.g. when the residual profits are not centralized but spread among several entities in a Group), the aforementioned redistribution of the residual profits could lead to a result in which the entities that perform the most complex functions in the Group are only attributed with a routine remuneration. This outcome would be contradictory to the economic nature of residual profits and the existing transfer pricing principles. It is unclear whether the countries where the most valuable activities are performed would be willing to give up their profits taking into account that there is a substantial legal and economic background for their entitlement to these profits.
- It is unclear how the present rules will fit into the legal realities of the countries that would potentially adopt the provisions of the OECD Pillar One. A multinational enterprise does not have a separate legal personality under no legal system in the world. The implementation of the Pillar One requires the determined Amount A to be paid by a certain entity in the Group. It means that the entity has to pay taxes not based on the economic result of its own operations but based on a certain idea of a fee for being part of the Group.

- The accepted accounting standards for the determination of Amount A are only the standards of highly developed and politically strong countries. Even though it could be that the UPE of the covered MNEs are all located in these jurisdictions, less developed countries will face administrative burden not only with compliance but also with finding qualified personnel to deal with the recognized accounting standards and monitoring tax compliance with the Amount A obligations.
- We encourage the TFDE to further clarify what would be the consequence of having a negative Amount A tax base or, in other words, to be more express about the fact that, if there is a negative Amount A, no reallocation of this amount would occur and there would be no negative impact on market jurisdictions (which would only benefit from a positive Amount A figure).
- As expressed above in relation to Article 1 (Scope), both the accounting standards and tax adjustments described by the Progress Report for determining Amount A tax base are subject to the interpretation of a jurisdiction when implementing and applying such rules. Therefore, countries might have a large level of interpretation autonomy regarding undefined concepts of Amount A model rules (i.e., tax expenses, dividends, equity gains, among others) which could allow them to discretionally include or exclude certain items from the list of potential adjustments (e.g., policy disallowed expenses). As a result, implementation and application of Amount A might be too heterogeneous and complex, leading thus to disputes and coordination issues.
- We encourage the TFDE to further adopt consistent definitions between Amount A and Pillar Two model rules as the Progress Report has done in relation, for example, to the de minimis threshold of €50,000 per entity in respect of “Policy Disallowed Expenses”. There are clearly fewer adjustments outlined in Amount A draft rules than there are for calculating GloBE income (e.g., no adjustments for pension, stock compensation, foreign exchange gain and loss). There is also a very different approach to the utilization of losses between both sets of rules. Thus, we encourage the TFDE to review all the adjustments agreed as part of the Pillar Two GloBE rules and consider arriving at a single tax base determination, to the greatest extent possible, that can be consistently applied across both Pillars.
- We invite the TFDE to be more explicit about the issue of whether and how the tax base determination mechanism and the APBT as described in the Progress Report should also be used to determine whether a Group falls within scope of Amount A, or whether a different application of such mechanism has to be applied for that purpose.
- We note that revaluation movements on immoveable property are not set out as an adjustment or exclusion and that unrealized fair value movements on investment properties would therefore form part of the Amount A total. The inclusion of these amounts poses particular problems for certain jurisdictions where significant revaluation movements could be recognized. Pursuant to Amount A rules, where the profits arise from rental income or sales of real estate, the revenue would be allocated to the location of the real estate in accordance with the allocation key. However, as a revaluation gain is merely an accounting entry without any third-party customer, it has been classified as a “non-customer revenue” and, consequently, it would be automatically allocated in proportion to other revenues, resulting in unrealized profits on investment properties being allocated to other jurisdictions. This is not aligned to the generally accepted principle that rental income and gains on the disposal of investment properties are usually allocated to the territory where they are located. Amount A rules as proposed appear to result in a situation where a Group that has significant valuation increases on investment properties in one jurisdiction may find the right to tax a part of those valuation adjustments assigned to another jurisdiction.

Determination of the APBT of a Group (Article 5):

- In relation to the APBT, we consider that net income should not include income deriving from realized or unrealized gains or losses generated by an ownership interest that is not an entity of the Covered Group. Thus, minority shares of the income that is included in net income but belongs to minority shareholders should be excluded.
- The definition of “Tax Expenses” and “Dividends” when determining the tax base of Amount A should be further clarified. In relation to Tax Expenses (whose deduction should be reversed when determining Amount A’s tax base) it should be noted that each jurisdiction has its own definition of what constitutes a tax expense and, therefore, it is necessary to provide a specific and clear definition of this term. We also encourage the TFDE to expressly state the reasons why only income taxes fall under the proposed definition of tax expenses and other type of tax expenses are disregarded. As regards to dividends, we encourage the TFDE to consider jurisdictions that allow notional deductions or an allowance for equity-financed investment in order to mitigate debt bias on equity (e.g., Belgium, Italy or the EU proposal on DEBRA).
- We encourage the TFDE to clarify the definition of “Eligible Business Combination” and “Eligible Division” as well as to explain the rationale behind the decision of narrowing the scope of application to exclude certain types of business reorganizations (e.g., situations where a Group spins off part of its business to its shareholders (forming a new Group) but the old Group continues to exist).
- As regards the treatment of losses following business reorganizations for the purpose of the loss carry-forward regime in Article 5, we encourage the TFDE to consider that MNEs that will be subject to Amount A operate diversified lines of business or divisions and rarely operate only one specific business, line of business or division. Moreover, it is not clear how “same or similar” business requirement included as part of the “business continuity conditions” would be practically applied and administrated in a way that didn’t give rise to regular disputes. Thus, we suggest that the model rules on tax base of Amount A address the application of the “same or similar” requirement. We would welcome if the TFDE simplifies this process and includes examples of cases in which ‘business continuity conditions’ are complied with and not, including confirmation on whether an expansion into new markets, corporate Group rationalizations, and utilization of new technologies would be considered changes to the business or not.
- There is no rule taking into account the amount of profits paid by an entity in the source state under Article 12 ‘Royalties’ of the OECD MTC and Article 12A ‘Technical fees’ of the UN MTC. We consider that withholding taxes are linked both to routine profits and to residual profits. This means that, in certain cases, residual profits of a MNE can be taxed by means of existing withholding taxes. In such cases, withholding taxes and Amount A can result in double counting. In such context, we consider that withholding taxes should be either (i) detracted from Amount A to be redistributed to the jurisdiction that applied such withholding at source (whenever this source State is also a market State that would ultimately benefit from Amount A); or (ii) expressly included under the term “Tax Expense”, whenever the source State that applied the withholding does not coincide with the Market State that would ultimately benefit from Amount A.). In any case, we consider that the OECD should make no distinctions between corporate income taxes and their collection mechanisms (e.g. withholding taxes), as this otherwise results in effective double taxation.
- The rules do not address the treatment of goodwill, which can *inter alia* include the value of data as a MNE’s asset.

- Loss carryforward should not be time-limited, either in terms of how many pre-implementation periods could be brought into account for carry forward purposes, or how long any losses can be carried forward for offset. This in order to both reflect the real economic result of the MNE, especially for long-term projects (e.g., infrastructure, IP, life insurance) and to recognize the life cycles of different industry sectors/businesses.

Allocation of Profits (Article 6):

- As provided in the Progress Report, the Amount A profit allocated to a market jurisdiction must be adjusted and reduced by the Marketing and Distribution Profits Safe Harbour (MDSH) based on depreciation and payroll (substance), where that jurisdiction already has taxing rights over the Covered Group's residual profits. We understand that the policy rationale behind this exclusion is to address issues related to 'double counting' (i.e., when a market country has the ability to tax residual profits of an MNE in two ways: once under existing profit allocation rules and again through Amount A allocations). However, we would like to have a more in depth explanation about whether this reduction in the calculation of Amount A is only limited to certain "marketing and distribution" residual profits or whether it also includes other type of residual that might potentially already be taxed at the market (e.g. data collection activities and data analytics). In any case, we consider that all residual profits which are already taxed in a market country should be included under this exclusion in order to avoid double allocation of the same profits).
- We welcome that the TFDE has expressly stated that it is currently exploring fallback metrics for the purposes of the MDSH to address concerns that a pure RoDP approach based on the contemplated thresholds could result in inappropriate outcomes for routine activities with a low payroll and asset base (e.g., routine distributors).
- Although we see a conceptual connection between Amounts A and B, through the MDSH, the fact that the inclusive framework has agreed to proceed with amount A on a shorter timeline than amount B and has entrusted responsibility for these two workstreams to different working groups suggests that this is a view that is not shared at the OECD. Based on this, we encourage the TFDE to clarify whether the MDSH of Amount A and Amount B refer to the same concept and, if not, to explain what the differences are, and the interaction between these concepts.

2.4 Elimination of Double Taxation (Title 5)

- ***General considerations (Articles 5 and 6):*** The rules governing the identification of the relieving jurisdictions and the allocation of double tax relief for Amount A among these jurisdictions are complex in their exposition and will likely be more complex to agree and implement, as this is the most political part of the project where no country wants to suffer a net tax base loss.
- The Progress Report states that Amount A would be adopted by a MLC which would only enter into force: "*upon ratification by a critical mass of countries, which will include the residence jurisdictions of the UPE of a substantial majority of the in-scope companies whose profits will be subject to the Amount A Taxing right, as well as the key additional jurisdictions that will be allocated the obligation to eliminate double taxation otherwise arising as a result of the Amount A tax*". Thus, Amount A will not apply unless the major UPE jurisdictions and key jurisdictions for eliminating double taxation have ratified the MLC. However, the report does not provide detail on how these 'key additional jurisdictions' that will need to relieve double taxation will be determined. Considering these countries are the ones that are likely to lose revenue from Pillar One, this remains an important outstanding issue. Considering the fact that, if a jurisdiction is identified as a relieving jurisdiction and has not joined the MLC there will be double taxation imposed at the rate of the (non-) relieving jurisdiction, we

encourage the TFDE to consider the inclusion of a mechanism which can work in the absence of key ceding jurisdictions supporting Pillar One.

- The mechanism proposed in the draft model rules considers return on depreciation and return on payroll (RoDP) as, together, a suitable proxy for substance-based profits, relying on the simplification that only tangible assets and employees (rather than other forms of expenditure) generate substance-based (routine) profits that are not linked, directly or indirectly, to sales (or to non-routine/residual profits that arise in the market). Nevertheless, it should be considered that depreciation may vary according to accounting policy and age of asset and may cause differences within and between Groups. We encourage the TFDE to consider this issue. This link to RoDP may result in a more practical mechanism, but this does also result in a less logical relief allocation than compared to what was proposed previously. We request the TFDE to state why this formulary approach to the elimination calculation is preferred over the allocation approach previously used, where the connected residual profit jurisdiction to the market jurisdiction provided relief.
- Article 8 refers to taking at least 95% of the Covered Group's total Elimination Profit for the Period into account, where this then potentially leaves up to 5% out of the elimination calculation. The current wording then seems to imply that either up to 5% is not effectively relieved or certain jurisdictions have to provide additional relief for this without having the allocable income. We understand the practicality of this threshold, but request the TFDE to clearly state who will provide this relief for the up to 5% remaining amount in the final rules to ensure that Groups or jurisdictions can apply the elimination mechanism in a fair manner and that there is no double taxation.
- We consider that the elimination of double taxation in a swift and efficient way is key to the 'reallocation' objective of Amount A. We encourage the TFDE to define this mechanism in a clearer way, so it can be applied easily and gives relief from double tax at the same time as payment is made, without long delays waiting for claims to be processed. Concerning the method of relief of double taxation, we consider that the TFDE should consider granting such relief by way of exemption, rather than by a credit method, to ensure that double tax relief is actually available in practice given the complexities of existing tax credit relief regimes.
- We request the TFDE to ensure that the proposed approach for eliminating double taxation under amount A does not lead to inappropriate results as a consequence of having routine profits earned in market jurisdictions being incorrectly classified as residual profit.
- The proposed Pillar One design infrastructure uses similar, but not identical, concepts to those adopted in Pillar Two (e.g., Depreciation, Payroll, Elimination profits vs. Adjusted GloBE Income; Jurisdictional Return on Depreciation and Payroll vs. Excess Profit, etc.). We encourage the TFDE to simplify this terminology and use unique concepts for both Pillars. We further recommend an alignment and an efficient design of the reporting obligations to be adopted as part of both Pillars. This recommendation on alignment predominately extends to the reporting terms for both Pillars and local tax reporting deadlines to ensure that taxpayers can file and meet their obligations in an efficient manner. Mismatches in timing for these obligations would likely result in mismatches and resulting disputes, where we expect that through alignment such mismatches would be more limited. This then alleviates the administrative burden for both taxpayers and tax authorities to limit unnecessary dispute resolution to resolve such.

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Annex 1. The correlation between the sales revenue and GDP thresholds to indicate a significant engagement in the market

1. No	2. Country	3. GDP (nominal 2020) - World Bank	4. Percentage applied to nominal GDP	5. Rounded Threshold (thousand)	6. % of the current threshold to the country's GDP
1	United States	€ 20.893.746.000.000	€ 522.343.650,00	522.344	0,0000048%
2	China	€ 14.722.730.697.890	€ 368.068.267,45	368.068	0,0000068%
3	Japan	€ 5.057.758.958.707	€ 126.443.973,97	126.444	0,0000198%
4	Germany	€ 3.846.413.928.654	€ 96.160.348,22	96.160	0,0000260%
5	United Kingdom	€ 2.764.197.653.965	€ 69.104.941,35	69.105	0,0000362%
6	India	€ 2.660.245.248.868	€ 66.506.131,22	66.506	0,0000376%
7	France	€ 2.630.317.731.455	€ 65.757.943,29	65.758	0,0000380%
8	Italy	€ 1.888.709.443.687	€ 47.217.736,09	47.218	0,0000529%
9	Canada	€ 1.644.037.286.481	€ 41.100.932,16	41.101	0,0000608%
10	Korea, Rep.	€ 1.637.895.802.793	€ 40.947.395,07	40.947	0,0000611%
11	Russian	€ 1.483.497.784.868	€ 37.087.444,62	37.087	0,0000674%
12	Brazil	€ 1.444.733.258.972	€ 36.118.331,47	36.118	0,0000692%
13	Australia	€ 1.327.836.171.069	€ 33.195.904,28	33.196	0,0000753%
14	Spain	€ 1.281.484.640.044	€ 32.037.116,00	32.037	0,0000780%
15	Mexico	€ 1.073.915.880.823	€ 26.847.897,02	26.848	0,0000931%
16	Indonesia	€ 1.058.423.838.345	€ 26.460.595,96	26.461	0,0000945%
17	Netherlands	€ 913.865.395.790	€ 22.846.634,89	22.847	0,0001094%
18	Switzerland	€ 752.248.045.730	€ 18.806.201,14	18.806	0,0001329%
19	Turkey	€ 719.954.821.683	€ 17.998.870,54	17.999	0,0001389%
20	Saudi Arabia	€ 700.117.873.253	€ 17.502.946,83	17.503	0,0001428%
21	Poland	€ 596.624.355.720	€ 14.915.608,89	14.916	0,0001676%
22	Sweden	€ 541.220.059.459	€ 13.530.501,49	13.531	0,0001848%
23	Belgium	€ 521.861.292.587	€ 13.046.532,31	13.047	0,0001916%
24	Thailand	€ 501.643.653.515	€ 12.541.091,34	12.541	0,0001993%
25	Austria	€ 433.258.467.677	€ 10.831.461,69	10.831	0,0002308%
26	Nigeria	€ 432.293.776.262	€ 10.807.344,41	10.807	0,0002313%
27	Ireland	€ 425.888.950.992	€ 10.647.223,77	10.647	0,0002348%
28	Israel	€ 407.100.736.594	€ 10.177.518,41	10.178	0,0002456%
29	Argentina	€ 389.288.056.265	€ 9.732.201,41	9.732	0,0002569%
30	Egypt, Arab Rep.	€ 365.252.651.279	€ 9.131.316,28	9.131	0,0002738%
31	Norway	€ 362.522.347.110	€ 9.063.058,68	9.063	0,0002758%
32	Philippines	€ 361.489.325.231	€ 9.037.233,13	9.037	0,0002766%

33	United Arab Emirates	€ 358.868.765.175	€ 8.971.719,13	8.972	0,0002787%
34	Denmark	€ 356.084.867.686	€ 8.902.121,69	8.902	0,0002808%
35	Hong Kong SAR, China	€ 346.585.881.504	€ 8.664.647,04	8.665	0,0002885%
36	Singapore	€ 339.998.477.930	€ 8.499.961,95	8.500	0,0002941%
37	Malaysia	€ 337.006.066.373	€ 8.425.151,66	8.425	0,0002967%
38	South Africa	€ 335.442.101.366	€ 8.386.052,53	8.386	0,0002981%
39	Bangladesh	€ 323.056.957.972	€ 8.076.423,95	8.076	0,0003095%
40	Colombia	€ 271.437.596.294	€ 6.785.939,91	6.786	0,0003684%
41	Vietnam	€ 271.158.442.449	€ 6.778.961,06	6.779	0,0003688%
42	Finland	€ 269.751.312.854	€ 6.743.782,82	6.744	0,0003707%
43	Pakistan	€ 262.610.002.939	€ 6.565.250,07	6.565	0,0003808%
44	Chile	€ 252.940.023.046	€ 6.323.500,58	6.324	0,0003954%
45	Romania	€ 248.715.551.367	€ 6.217.888,78	6.218	0,0004021%
46	Czech Republic	€ 245.349.489.988	€ 6.133.737,25	6.134	0,0004076%
47	Portugal	€ 228.539.245.045	€ 5.713.481,13	5.713	0,0004376%
48	New Zealand	€ 210.700.848.974	€ 5.267.521,22	5.268	0,0004746%
49	Iran, Islamic Rep.	€ 203.471.303.952	€ 5.086.782,60	5.087	0,0004915%
50	Peru	€ 202.014.363.787	€ 5.050.359,09	5.050	0,0004950%
51	Greece	€ 188.835.201.626	€ 4.720.880,04	4.721	0,0005296%
52	Kazakhstan	€ 171.082.379.533	€ 4.277.059,49	4.277	0,0005845%
53	Iraq	€ 166.756.984.396	€ 4.168.924,61	4.169	0,0005997%
54	Hungary	€ 155.808.436.238	€ 3.895.210,91	3.895	0,0006418%
55	Ukraine	€ 155.498.989.150	€ 3.887.474,73	3.887	0,0006431%
56	Algeria	€ 145.009.181.491	€ 3.625.229,54	3.625	0,0006896%
57	Qatar	€ 144.411.363.345	€ 3.610.284,08	3.610	0,0006925%
58	Morocco	€ 114.725.065.285	€ 2.868.126,63	2.868	0,0008716%
59	Ethiopia	€ 107.645.054.312	€ 2.691.126,36	2.691	0,0009290%
60	Cuba	€ 107.352.000.000	€ 2.683.800,00	2.684	0,0009315%
61	Kuwait	€ 105.960.225.688	€ 2.649.005,64	2.649	0,0009438%
62	Slovak Republic	€ 105.172.564.492	€ 2.629.314,11	2.629	0,0009508%
63	Puerto Rico	€ 103.138.300.000	€ 2.578.457,50	2.578	0,0009696%
64	Kenya	€ 101.013.726.529	€ 2.525.343,16	2.525	0,0009900%
65	Ecuador	€ 98.808.010.000	€ 2.470.200,25	2.470	0,0010121%
66	Sri Lanka	€ 80.676.681.934	€ 2.016.917,05	2.017	0,0012395%
67	Myanmar	€ 79.852.046.611	€ 1.996.301,17	1.996	0,0012523%
68	Dominican Republic	€ 78.844.702.329	€ 1.971.117,56	1.971	0,0012683%
69	Guatemala	€ 77.604.632.171	€ 1.940.115,80	1.940	0,0012886%

70	Luxembourg	€ 73.353.132.794	€ 1.833.828,32	1.834	0,0013633%
71	Bulgaria	€ 69.889.347.433	€ 1.747.233,69	1.747	0,0014308%
72	Ghana	€ 68.532.281.806	€ 1.713.307,05	1.713	0,0014592%
73	Oman	€ 64.648.393.044	€ 1.616.209,83	1.616	0,0015468%
74	Tanzania	€ 62.409.709.111	€ 1.560.242,73	1.560	0,0016023%
75	Costa Rica	€ 61.846.895.121	€ 1.546.172,38	1.546	0,0016169%
76	Cote d'Ivoire	€ 61.348.579.465	€ 1.533.714,49	1.534	0,0016300%
77	Belarus	€ 60.258.239.056	€ 1.506.455,98	1.506	0,0016595%
78	Uzbekistan	€ 59.929.951.114	€ 1.498.248,78	1.498	0,0016686%
79	Angola	€ 58.375.976.293	€ 1.459.399,41	1.459	0,0017130%
80	Croatia	€ 57.203.783.203	€ 1.430.094,58	1.430	0,0017481%
81	Lithuania	€ 56.546.957.475	€ 1.413.673,94	1.414	0,0017684%
82	Panama	€ 53.977.036.995	€ 1.349.425,92	1.349	0,0018526%
83	Uruguay	€ 53.628.827.440	€ 1.340.720,69	1.341	0,0018647%
84	Slovenia	€ 53.589.609.581	€ 1.339.740,24	1.340	0,0018660%
85	Serbia	€ 53.335.016.425	€ 1.333.375,41	1.333	0,0018749%
86	Congo, Dem. Rep.	€ 48.716.960.860	€ 1.217.924,02	1.218	0,0020527%
87	Jordan	€ 43.697.659.296	€ 1.092.441,48	1.092	0,0022885%
88	Azerbaijan	€ 42.607.176.471	€ 1.065.179,41	1.065	0,0023470%
89	Tunisia	€ 41.620.349.986	€ 1.040.508,75	1.041	0,0024027%
90	Cameroon	€ 40.804.449.726	€ 1.020.111,24	1.020	0,0024507%
91	Uganda	€ 37.600.368.181	€ 940.009,20	940	0,0007%
92	Bolivia	€ 36.572.764.863	€ 914.319,12	914	0,0007%
93	Paraguay	€ 35.670.301.496	€ 891.757,54	892	0,0007%
94	Bahrain	€ 34.729.228.723	€ 868.230,72	868	0,0007%
95	Latvia	€ 33.707.320.816	€ 842.683,02	843	0,0007%
96	Nepal	€ 33.657.175.561	€ 841.429,39	841	0,0007%
97	Lebanon	€ 31.735.217.785	€ 793.380,44	793	0,0008%
98	Estonia	€ 30.650.285.472	€ 766.257,14	766	0,0008%
99	Cambodia	€ 25.808.561.551	€ 645.214,04	645	0,0010%
100	Macao SAR, China	€ 25.586.111.076	€ 639.652,78	640	0,0010%
101	Libya	€ 25.418.916.029	€ 635.472,90	635	0,0010%
102	Papua New Guinea	€ 24.668.899.683	€ 616.722,49	617	0,0010%
103	Senegal	€ 24.644.234.595	€ 616.105,86	616	0,0010%
104	El Salvador	€ 24.638.720.000	€ 615.968,00	616	0,0010%
105	Cyprus	€ 24.612.646.488	€ 615.316,16	615	0,0010%
106	Honduras	€ 23.662.231.634	€ 591.555,79	592	0,0011%
107	Iceland	€ 21.718.075.725	€ 542.951,89	543	0,0012%

108	Trinidad and Tobago	€ 21.588.037.505	€ 539.700,94	540	0,0012%
109	Sudan	€ 21.329.109.522	€ 533.227,74	533	0,0012%
110	Afghanistan	€ 20.116.137.326	€ 502.903,43	503	0,0012%
111	Bosnia and Herzegovina	€ 19.946.496.563	€ 498.662,41	499	0,0013%
112	Lao PDR	€ 19.132.635.712	€ 478.315,89	478	0,0013%
113	Zambia	€ 18.110.631.358	€ 452.765,78	453	0,0014%
114	Zimbabwe	€ 18.051.170.799	€ 451.279,27	451	0,0014%
115	Burkina Faso	€ 17.933.606.353	€ 448.340,16	448	0,0014%
116	Mali	€ 17.465.392.916	€ 436.634,82	437	0,0014%
117	Georgia	€ 15.846.489.611	€ 396.162,24	396	0,0016%
118	Guinea	€ 15.681.050.917	€ 392.026,27	392	0,0016%
119	Benin	€ 15.651.545.332	€ 391.288,63	391	0,0016%
120	Gabon	€ 15.316.826.192	€ 382.920,65	383	0,0016%
121	Botswana	€ 15.061.922.802	€ 376.548,07	377	0,0017%
122	Albania	€ 14.887.629.268	€ 372.190,73	372	0,0017%
123	Malta	€ 14.647.384.608	€ 366.184,62	366	0,0017%
124	Haiti	€ 14.508.218.017	€ 362.705,45	363	0,0017%
125	Mozambique	€ 14.019.446.610	€ 350.486,17	350	0,0018%
126	Jamaica	€ 13.812.425.037	€ 345.310,63	345	0,0018%
127	Niger	€ 13.741.378.450	€ 343.534,46	344	0,0018%
128	Mongolia	€ 13.312.981.595	€ 332.824,54	333	0,0019%
129	Madagascar	€ 13.056.079.982	€ 326.402,00	326	0,0019%
130	Armenia	€ 12.641.209.802	€ 316.030,25	316	0,0020%
131	Nicaragua	€ 12.621.505.383	€ 315.537,63	316	0,0020%
132	North Macedonia	€ 12.263.710.123	€ 306.592,75	307	0,0020%
133	Malawi	€ 12.182.348.213	€ 304.558,71	305	0,0021%
134	Brunei Darussalam	€ 12.005.825.770	€ 300.145,64	300	0,0021%
135	Moldova	€ 11.915.547.263	€ 297.888,68	298	0,0021%
136	Mauritius	€ 10.920.606.198	€ 273.015,15	273	0,0023%
137	Chad	€ 10.829.076.802	€ 270.726,92	271	0,0023%
138	Namibia	€ 10.619.194.505	€ 265.479,86	265	0,0024%
139	Rwanda	€ 10.333.991.456	€ 258.349,79	258	0,0024%
140	Congo, Rep.	€ 10.187.122.341	€ 254.678,06	255	0,0025%
141	Equatorial Guinea	€ 10.021.856.754	€ 250.546,42	251	0,0025%
142	Bahamas, The	€ 9.907.500.000	€ 247.687,50	248	0,0025%
143	Tajikistan	€ 8.194.150.302	€ 204.853,76	205	0,0031%
144	Mauritania	€ 7.913.680.231	€ 197.842,01	198	0,0032%

145	Kyrgyz Republic	€ 7.735.976.273	€ 193.399,41	193	0,0032%
146	Kosovo	€ 7.716.925.356	€ 192.923,13	193	0,0032%
147	Togo	€ 7.574.636.979	€ 189.365,92	189	0,0033%
148	Bermuda	€ 6.842.700.000	€ 171.067,50	171	0,0037%
149	Guam	€ 5.844.000.000	€ 146.100,00	146	0,0043%
150	Cayman Islands	€ 5.591.623.665	€ 139.790,59	140	0,0045%
151	Guyana	€ 5.471.256.595	€ 136.781,41	137	0,0046%
152	Somalia	€ 4.988.441.440	€ 124.711,04	125	0,0050%
153	Montenegro	€ 4.769.860.741	€ 119.246,52	119	0,0052%
154	Fiji	€ 4.533.883.782	€ 113.347,09	113	0,0055%
155	Barbados	€ 4.418.000.000	€ 110.450,00	110	0,0057%
156	Sierra Leone	€ 4.063.289.450	€ 101.582,24	102	0,0062%
157	Eswatini	€ 3.972.728.948	€ 99.318,22	99	0,0063%
158	Maldives	€ 3.742.769.967	€ 93.569,25	94	0,0067%
159	Djibouti	€ 3.384.385.217	€ 84.609,63	85	0,0074%
160	Liberia	€ 3.201.187.800	€ 80.029,70	80	0,0078%
161	Suriname	€ 2.884.248.048	€ 72.106,20	72	0,0087%
162	Burundi	€ 2.841.786.382	€ 71.044,66	71	0,0088%
163	Curacao	€ 2.595.821.709	€ 64.895,54	65	0,0096%
164	Central African Republic	€ 2.380.087.758	€ 59.502,19	60	0,0105%
165	Bhutan	€ 2.315.437.338	€ 57.885,93	58	0,0108%
166	Timor-Leste	€ 1.902.156.800	€ 47.553,92	48	0,0131%
167	Lesotho	€ 1.875.227.642	€ 46.880,69	47	0,0133%
168	Gambia, The	€ 1.868.086.275	€ 46.702,16	47	0,0134%
169	Cabo Verde	€ 1.703.698.677	€ 42.592,47	43	0,0147%
170	Belize	€ 1.636.280.797	€ 40.907,02	41	0,0153%
171	St. Lucia	€ 1.616.772.741	€ 40.419,32	40	0,0155%
172	Solomon Islands	€ 1.545.888.426	€ 38.647,21	39	0,0162%
173	Guinea-Bissau	€ 1.431.758.243	€ 35.793,96	36	0,0175%
174	Antigua and Barbuda	€ 1.370.281.481	€ 34.257,04	34	0,0182%
175	Comoros	€ 1.235.400.352	€ 30.885,01	31	0,0202%
176	Seychelles	€ 1.059.886.364	€ 26.497,16	26	0,0236%
177	Grenada	€ 1.042.100.556	€ 26.052,51	26	0,0240%
178	St. Kitts and Nevis	€ 980.740.741	€ 24.518,52	25	0,0255%
179	Turks and Caicos Islands	€ 924.583.000	€ 23.114,58	23	0,0270%
180	Vanuatu	€ 881.547.929	€ 22.038,70	22	0,0284%
181	St. Vincent and the Grenadines	€ 807.474.074	€ 20.186,85	20	0,0310%

182	Samoa	€ 807.100.821	€ 20.177,52	20	0,0310%
183	American Samoa	€ 709.000.000	€ 17.725,00	18	0,0353%
184	Dominica	€ 504.214.815	€ 12.605,37	13	0,0496%
185	Tonga	€ 488.829.964	€ 12.220,75	12	0,0511%
186	Sao Tome and Principe	€ 472.914.470	€ 11.822,86	12	0,0529%
187	Micronesia, Fed. Sts.	€ 410.083.600	€ 10.252,09	10	0,0610%
188	Palau	€ 257.700.000	€ 6.442,50	6	0,0970%
189	Marshall Islands	€ 244.462.400	€ 6.111,56	6	0,1023%
190	Kiribati	€ 197.508.774	€ 4.937,72	5	0,1266%
191	Nauru	€ 114.626.626	€ 2.865,67	3	0,2181%
192	Tuvalu	€ 48.855.550	€ 1.221,39	1	0,5117%