



EC proposals

Structure EU bodies

- EC
- Ministerial Council
- Euro Parl
- Court of Justice EU

Competence EC

- Indirect taxes
- Direct taxes
- Market integration

- Tax avoidance
- Tax competition
- D! Taxud
- D! Comp
- Directives "PSD# I\$ \$# %T%D&
- State Aid Cases

Long term solution(

- Directive on Corporate Income Tax on Significant Digital Presence
- Solution) it*in existing CIT s+stem
- Significant digital presence "SDP&
 - , mln re enues
 - - . . k users
 - / k contracts
- 0e) rules on Profit allocation

Recommendation to MS's to adjust **tax treaties** to allow application of CIT SDP

Interim solution

- Council directive on a common s+stem
- Digital Services Tax
- Managing t*e immediate risk of fragmentation

Focus on

- 4activities) *ere t*ere is a large gap bet) een t*e alue created and t*e abilit+ to tax it5
- relying on user participation and data collected

Business(

- Selling ad ertisements on digital interface
- Intermediate bet) een ser ice pro iders and costumers
- Transfer of data collected from users

7 State / 8

7 Thresholds to exclude startups

7 Taxation) where users are located

7 One stop shop