



## 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