BEPS *VS* investment climate

Belgium

Different initiatives

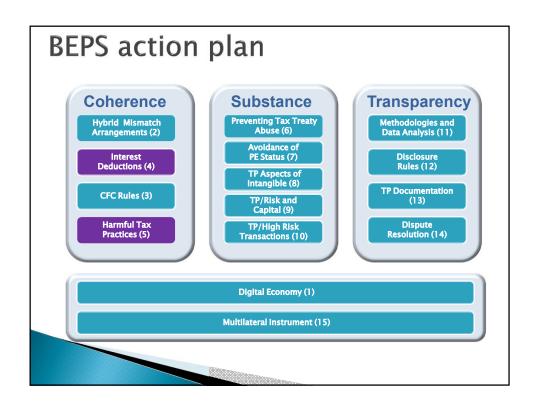
- ▶ G20/OECD: BEPS action plan
 - Joint actions
 - Unilateral actions
- ▶ EU-BEPS
 - Existing rules
 - "Transparency"
 - Other initiatives

Investment climate

- Certainty
- Competitiveness
- No double taxation
- [Sales potential]
- Central location
- Qualified staff
- **)** ...

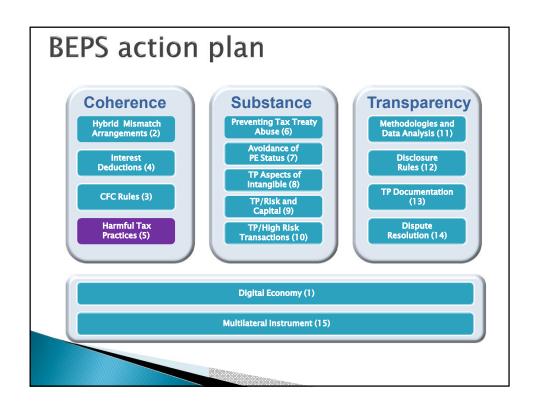
Impact BEPS and EU-BEPS

- At this moment
 - Uncertainty
 - Are we losing competitiveness?
 - Within EU
 - Worldwide
 - Fear for double taxation
 - Unilateral measures
 - "abuse" of transparency
 - · Not enough arbitration



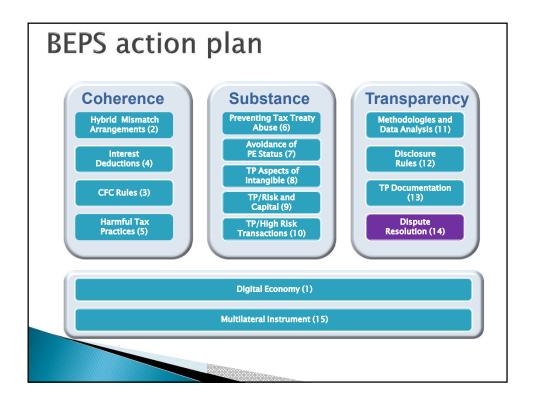
Uncertainty

- Actions 4 and 5
 - PID?
 - Notional interest deduction?
 - Interest deductions?
- EU-BEPS
 - Tax rulings and state aid



competitiveness

- Action 5
 - PID?
 - Notional interest deduction?
- ▶ EU-BEPS
 - Tax rulings



Double taxation

- General view that the number of cases of double taxation will increase significantly
 - Different interpretations
 - Unilateral measures
 - Abuse of transparency measures
- Positive impact for countries
 - Applying the general principles
 - Willing to adopt arbitration?

Intentions Belgian government

- Choice for the path of transparency
- Active participation in the BEPS project
- Making the Belgian legislation BEPS proof where needed

Conclusion

- Create certainty
- Focus on competitive tax legislation compliant with the BEPS framework and EU regulations