France; Montenegro

France Publishes Agreement with Montenegro on French Development Agency's Activities

12 December 2023

Report from our correspondent Pierre Burg

France and Montenegro have signed an Agreement on the Activities of the French Development Agency (*Agence Française de Développement*, AFD), its financing subsidiary (*Proparco*) and the French International Technical Expertise Agency (*Expertise France*) in Montenegro.

Regarding taxation, article 6 of the agreement provides that AFD, Proparco and Expertise France are exempt from any taxes (indirect taxes such as VAT, direct taxes, wages taxes or withholding taxes) concerning interest or fees derived from activities carried out in Montenegro and referred to in article 3(1)(a) of the agreement.

The agreement was signed in Paris on 21 April 2021, in French and Montenegrin languages, each text having equal authenticity, and was published in the French Official Journal on 9 December 2023 through decree no. 2023-1154.

It entered into force on 1 February 2022 for an indefinite period, but it will expire by the date of accession of Montenegro to the European Union at the latest. It may be terminated at any time upon notification, with 6 months' notice.

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