SIGNATORIES AND PARTIES TO THE MULTILATERAL CONVENTION TO IMPLEMENT TAX TREATY RELATED MEASURES TO PREVENT BASE EROSION AND PROFIT SHIFTING

Status as of 18 June 2025

This document contains a list of signatories and parties to the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting. Under the provisions of the Convention, each jurisdiction is required to provide a list of reservations and notifications (the "MLI Position") at the time of signature.

The MLI Positions provided for each jurisdiction upon the deposit of the instrument of ratification, acceptance or approval and/or signature, the notifications made pursuant to Article 35(7)(b) of the MLI and the notifications made after becoming a Party to the Convention are available via the links below.

Arbitration Profiles have been developed to provide taxpayers with relevant information on the application of Part VI of the MLI for each jurisdiction choosing to apply that Part.

IMPORTANT: The current position for each jurisdiction will be the later of the positions provided upon the deposit of its instrument of ratification, acceptance or approval of the Convention or made after becoming a Party to the Convention.

Entry into force of agreements notified pursuant to Article 2 of the Convention: Upon ratification of the Convention, some Parties had notified agreements pursuant to Article 2 without indicating dates on the entry into force of those agreements. Following their ratification, some of those Parties confirmed that some of those agreements have now entered into force. The information associated with those agreements is accessible in this <u>information note</u>. Parties identified with an asterisk (*) in the List of Signatories and Parties are those that confirmed that some of their agreements notified pursuant to Article 2 have now entered into force.

No	Jurisdiction	Signature	Deposit of Instrument of Ratification, Acceptance or Approval	Entry into Force	Notifications made pursuant to Article 35(7)(b) of the MLI	Notifications made after becoming a Party ¹	Arbitration Profile
1	Albania	<u>28-05-2019</u>	<u>22-09-2020</u>	01-01-2021			
2	Algeria	27-06-2024					
3	Andorra	07-06-2017	<u>29-09-2021</u>	01-01-2022			<u>28-06-2022</u>
4	Antigua and Barbuda	<u>18-06-2025</u>					
5	Argentina	07-06-2017					
6	Armenia	07-06-2017	<u>25-09-2023</u>	01-01-2024			

¹ The notifications made by Parties to the Convention after becoming a Party include notifications made pursuant to Article 35(1)(b) of the MLI to apply a shorter period for the purposes of the entry into effect of the Convention.

No	Jurisdiction	Signature	Deposit of Instrument of Ratification, Acceptance or Approval	Entry into Force	Notifications made pursuant to Article 35(7)(b) of the MLI	Notifications made after becoming a Party ¹	Arbitration Profile
7	Australia	07-06-2017	<u>26-09-2018</u>	01-01-2019		02-10-2020	<u>28-06-2022</u>
8	Austria	07-06-2017	22-09-2017	01-07-2018		<u>28-08-2023</u>	<u>28-06-2022</u>
9	Azerbaijan	20-11-2023	24-09-2024	01-01-2025			
10	Bahrain*	27-11-2020	23-02-2022	01-06-2022			
11	Barbados	24-01-2018	<u>21-12-2020</u>	01-04-2021			<u>25-03-2021</u>
12	Belgium	07-06-2017	<u>26-06-2019</u>	01-10-2019		<u>25-11-2021</u>	21-02-2023
13	Belize	11-01-2019	07-04-2022	01-08-2022			
14	Bosnia and Herzegovina	30-10-2019	<u>16-09-2020</u>	01-01-2021			
15	Bulgaria	07-06-2017	<u>16-09-2022</u>	01-01-2023			
16	Burkina Faso	07-06-2017	30-10-2020	01-02-2021			
17	Cameroon	11-07-2017	21-04-2022	01-08-2022			
18	Canada	07-06-2017	<u>29-08-2019</u>	01-12-2019		08-10-2020	<u>16-12-2022</u>
19	Chile	07-06-2017	<u>26-11-2020</u>	01-03-2021			
20	China (People's Republic of)	07-06-2017	25-05-2022	01-09-2022			
21	Colombia	07-06-2017					
22	Costa Rica	07-06-2017	22-09-2020	01-01-2021			
23	Côte d'Ivoire	24-01-2018	<u>25-09-2023</u>	01-01-2024			
24	Croatia	07-06-2017	<u>18-02-2021</u>	01-06-2021		02-10-2024	
25	Curaçao*2	20-12-2017 ³	<u>29-03-2019</u>	01-07-2019			<u>25-03-2021</u>
26	Cyprus	07-06-2017	<u>23-01-2020</u>	01-05-2020			

The Kingdom of the Netherlands, which is a Party to the Convention, is responsible to the international relations of Curação and has submitted the relevant reservations and notifications on behalf of Curação pursuant to Article 2(1)(a)(i)(B) of the Convention.

On this date, the Kingdom of Netherlands communicated a provisional list of reservations and notifications in respect of Curação and informed the OECD that it intended to deposit, at the time of the deposit of its instrument of acceptance, a definitive list of reservations and notifications pursuant to Article 28(4) and (5) and Article 29(1) and (2) of the Convention.

No	Jurisdiction	Signature	Deposit of Instrument of Ratification, Acceptance or Approval	Entry into Force	Notifications made pursuant to Article 35(7)(b) of the MLI	Notifications made after becoming a Party ¹	Arbitration Profile
27	Czechia	<u>07-06-2017</u>	<u>13-05-2020</u> 4	01-09-2020		<u>16-08-2024</u> ⁵	
28	Democratic Republic of the Congo	<u>19-09-2024</u>					
29	Denmark	<u>07-06-2017</u>	<u>30-09-2019</u>	01-01-2020		<u>29-06-2021</u>	07-09-2023
30	Egypt	07-06-2017	30-09-2020	01-01-2021			
31	Estonia	<u>29-06-2018</u>	<u>15-01-2021</u>	01-05-2021	<u>01-06-2022</u>		
32	Eswatini	<u>27-09-2023</u>					
33	Fiji	07-06-2017					<u>25-03-2021</u>
34	Finland	07-06-2017	<u>25-02-2019</u>	01-06-2019		27-06-2023	<u>26-05-2025</u>
35	France*	07-06-2017	26-09-2018	01-01-2019		22-09-2020 13-11-2024	<u>16-09-2022</u>
36	Gabon	07-06-2017					
37	Georgia	07-06-2017	<u>29-03-2019</u>	01-07-2019			
38	Germany	07-06-2017	<u>18-12-2020</u>	01-04-2021	01-06-2	2025	28-06-2022
39	Greece	07-06-2017	30-03-2021	01-07-2021		02-10-2024	<u>25-03-2021</u>
40	Guernsey	07-06-2017	<u>12-02-2019</u>	01-06-2019			
41	Hong Kong (China) ⁶	07-06-2017	<u>25-05-2022</u>	01-09-2022	22-02-2024		
42	Hungary	07-06-2017	<u>25-03-2021</u>	01-07-2021		02-10-2024	28-06-2022
43	Iceland	07-06-2017	<u>26-09-2019</u>	01-01-2020		14-12-2021	
44	India	07-06-2017	<u>25-06-2019</u>	01-10-2019			

The List of Reservations and Notifications ("the MLI Position") deposited by Czechia at the time of deposit of the instrument of ratification does not follow the standard format: the notifications and reservations are listed separately and with the English text following the Czech text.

The notifications made by Czechia after the deposit of its instrument of ratification have not been consolidated into its list of reservations and notifications ("the MLI Position") submitted upon the deposit of its instrument of ratification.

⁶ China (People's Republic of) which is a Party to the Convention, is responsible to the international relations of Hong Kong (China) and has submitted the relevant reservations and notifications on behalf of Hong Kong (China) pursuant to Article 2(1)(a)(i)(B) of the Convention.

No	Jurisdiction	Signature	Deposit of Instrument of Ratification, Acceptance or Approval	Entry into Force	Notifications made pursuant to Article 35(7)(b) of the MLI	Notifications made after becoming a Party ¹	Arbitration Profile
45	Indonesia	<u>07-06-2017</u>	<u>28-04-2020</u>	01-08-2020	<u>29-10-2024</u>	<u>27-11-2023</u>	
46	Ireland	<u>07-06-2017</u>	<u>29-01-2019</u>	01-05-2019			<u>25-03-2021</u>
47	Isle of Man	<u>07-06-2017</u>	<u>25-10-2017</u>	01-07-2018			
48	Israel*	07-06-2017	13-09-2018	01-01-2019			
49	Italy	07-06-2017					28-06-2022
50	Jamaica	<u>24-01-2018</u>					
51	Japan	07-06-2017	<u>26-09-2018</u>	01-01-2019		20-06-2023	28-06-2022
52	Jersey*	07-06-2017	<u>15-12-2017</u>	01-07-2018			
53	Jordan	<u>19-12-2019</u>	29-09-2020	01-01-2021			
54	Kazakhstan	<u>25-06-2018</u>	24-06-2020	01-10-2020		<u>26-11-2020</u>	
55	Kenya	<u>26-11-2019</u>	<u>08-01-2025</u>	01-05-2025			
56	Korea	07-06-2017	<u>13-05-2020</u>	01-09-2020			
57	Kuwait	07-06-2017					
58	Latvia	07-06-2017	<u>29-10-2019</u>	01-02-2020		20-04-2021	
59	Lesotho	09-02-2022	28-07-2022	01-11-2022			28-06-2022
60	Liechtenstein	07-06-2017	<u>19-12-2019</u>	01-04-2020			<u>25-03-2021</u>
61	Lithuania*	07-06-2017	11-09-2018	01-01-2019			
62	Luxembourg	07-06-2017	<u>09-04-2019</u>	01-08-2019			21-02-2023
63	Malaysia*	24-01-2018	<u>18-02-2021</u>	01-06-2021		<u>10-11-2022</u>	
64	Malta*	07-06-2017	<u>18-12-2018</u>	01-04-2019		02-10-2024	28-06-2022
65	Mauritius	<u>05-07-2017</u> ⁷	<u>18-10-2019</u>	01-02-2020			28-06-2022
66	Mexico	07-06-2017	<u>15-03-2023</u>	01-07-2023			

On 10 October 2018, Mauritius submitted a draft MLI position to the OECD Secretariat in preparation of Mauritius' definitive MLI Position to be provided upon the deposit of its instrument of ratification.

No	Jurisdiction	Signature	Deposit of Instrument of Ratification, Acceptance or Approval	Entry into Force	Notifications made pursuant to Article 35(7)(b) of the MLI	Notifications made after becoming a Party ¹	Arbitration Profile
67	Monaco	<u>07-06-2017</u>	<u>10-01-2019</u>	01-05-2019			
68	Mongolia	<u>06-10-2022</u>	30-09-2024	01-01-2025			
69	Morocco	<u>25-06-2019</u>					
70	Namibia	30-09-2021					
71	Netherlands	07-06-2017	<u>29-03-2019</u>	01-07-2019		<u>25-11-2021</u>	<u>29-02-2024</u>
72	New Zealand	07-06-2017	<u>27-06-2018</u>	01-10-2018			<u>26-05-2025</u>
73	Nigeria	<u>17-08-2017</u>					
74	North Macedonia	<u>29-01-2020</u>					
75	Norway	07-06-2017	<u>17-07-2019</u>	01-11-2019			
76	Oman	<u>26-11-2019</u>	07-07-2020	01-11-2020			
77	Pakistan	07-06-2017	<u>18-12-2020</u>	01-04-2021			
78	Panama	<u>24-01-2018</u>	<u>05-11-2020</u>	01-03-2021			
79	Papua New Guinea	<u>23-01-2019</u>	<u>31-08-2023</u>	01-12-2023			<u>11-01-2024</u>
80	Peru	<u>27-06-2018</u>	<u>09-06-2025</u>	01-10-2025			
81	Poland*	07-06-2017	<u>23-01-2018</u>	01-07-2018			
82	Portugal	07-06-2017	<u>28-02-2020</u>	01-06-2020		06-03-2023	<u>25-03-2021</u>
83	Qatar*	04-12-2018	<u>23-12-2019</u>	01-04-2020		<u>25-11-2021</u>	
84	Romania	07-06-2017	<u>28-02-2022</u>	01-06-2022	<u>10-01-2025</u>		
85	Russian Federation	07-06-2017	<u>18-06-2019</u>	01-10-2019	<u>17-01-2024</u>		
86	San Marino*	07-06-2017	<u>11-03-2020</u>	01-07-2020			
87	Saudi Arabia*	18-09-2018	<u>23-01-2020</u>	01-05-2020			
88	Senegal	07-06-2017	<u>10-05-2022</u>	01-09-2022			
89	Serbia	07-06-2017	<u>05-06-2018</u>	01-10-2018		27-09-2023	

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90	Seychelles	07-06-2017	<u>14-12-2021</u>	01-04-2022			
91	Singapore	07-06-2017	<u>21-12-2018</u>	01-04-2019		11-08-2021	<u>20-12-2024</u>
92	Slovak Republic	07-06-2017	<u>20-09-2018</u>	01-01-2019		02-10-2024	
93	Slovenia	07-06-2017	<u>22-03-2018</u>	01-07-2018		23-03-2023	<u>28-06-2022</u>
94	South Africa	07-06-2017	30-09-2022	01-01-2023			
95	Spain	<u>07-06-2017</u> ⁸	<u>28-09-2021</u>	01-01-2022	<u>26-05-</u>	<u>2025</u>	<u>25-03-2021</u>
96	Sweden	07-06-2017	<u>22-06-2018</u>	01-10-2018			<u>25-03-2021</u>
97	Switzerland	07-06-2017	<u>29-08-2019</u>	01-12-2019	<u>16-12-2022</u>		<u>28-06-2022</u>
98	Thailand	09-02-2022	31-03-2022	01-07-2022			
99	Tunisia	24-01-2018	24-07-2023	01-11-2023			
100	Türkiye	<u>07-06-2017</u> 9					
101	Ukraine*	23-07-2018	<u>08-08-2019</u>	01-12-2019			
102	United Arab Emirates*	27-06-2018	<u>29-05-2019</u>	01-09-2019			
103	United Kingdom*	07-06-2017	29-06-2018	01-10-2018			31-05-2024
104	Uruguay	07-06-2017	06-02-2020	01-06-2020			
105	Viet Nam	09-02-2022	<u>23-05-2023</u>	01-09-2023			

The following jurisdiction has expressed its intent to sign the Convention:

Lebanon

Beclaration made by Spain: https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/beps-mli/beps-mli-declaration-spain.pdf

⁹ Declaration made by Türkiye: <a href="https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/beps-mli/beps-