

Grenada

A. Progress in the implementation of the minimum standard

Grenada has four tax agreements in force as reported in its response to the Peer Review questionnaire, including the multilateral agreement among the members of the CARICOM concluded with ten treaty partners (the CARICOM Agreement).⁶⁴ None of those agreements comply with the minimum standard.

Grenada has not signed the MLI.

Grenada indicated in its response to the Peer Review questionnaire that steps have been taken (other than under the MLI) to implement the minimum standard in the CARICOM Agreement.

In its response to the Peer Review questionnaire, Switzerland indicated that its agreement with Grenada did not give rise to material treaty shopping concerns for Switzerland.

B. Conclusion

Recommendation

It is recommended that Grenada formulates a plan for the implementation of the minimum standard in its agreements for which no steps have yet been taken and that were concluded with members of the BEPS Inclusive Framework (South Africa and the United Kingdom).

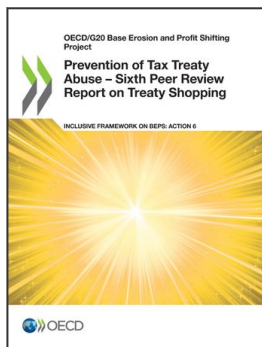
Summary of the jurisdiction response – Grenada

	1. Treaty partners	2. Compliance with the standard	3. Signature of a complying instrument	4. Minimum standard provision used
1	CARICOM Agreement treaty partners (Antigua and Barbuda, Barbados, Belize, Dominica, Guyana*, Jamaica, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Trinidad and Tobago)	No	No	PPT

⁶⁴ Agreement Among the Governments of the Member States of the Caribbean Community for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income, Profits or Gains and Capital Gains and for the Encouragement of Regional Trade and Investment, St. Michael Barbados, 6 July 1994; between: Antigua and Barbuda (18 February 1998), Barbados (7 July 1995), Belize (30 November 1994), Dominica (19 June 1996), Grenada (1 March 1996), Guyana* (26 November 1997), Jamaica (16 February 1995), St. Kitts/Nevis (8 May 1997), St. Lucia (22 May 1995) St. Vincent (12 February 1998) and Trinidad & Tobago (29 November 1994).

Other agreements

	1. Treaty partners	2. Inclusive Framework member
1	South Africa	Yes
2	Switzerland	Yes
3	United Kingdom	Yes



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