## Digital Tax Update: 2024 Digital Services Taxes in Europe

| Country                   | Tax Rate             | Scope   | Global<br>Revenue<br>Threshold             | Domestic<br>Revenue<br>Threshold           | Status  |
|---------------------------|----------------------|---|--|--|---|
| Austria (AT)              | 5%                   | Online advertising  | EUR 750<br>million<br>(USD 801<br>million) | EUR 25<br>million<br>(USD 27<br>million)   | Implemented (Effective from January 1, 2020); joined statement on October 21, 2021, that repeal of the DST would be contingent on Pillar One implementation.  |
| Belgium<br>(BE)           | 3%                   | · Selling of user data<br>· Selling advertising<br>space on a digital<br>platform · Digital<br>intermediation<br>services facilitating<br>the exchange of<br>supplies of goods or<br>services | EUR 750<br>million<br>(USD 801<br>million) | EUR 5<br>million<br>(USD 5.3<br>million)   | Proposed (A DST was first introduced in January 2019 but was rejected in March 2019; an adjusted DST proposal was reintroduced in June 2020). Expected to introduce one if global consensus is not reached.   |
| Czech<br>Republic<br>(CZ) | 5%                   | Online advertising     Transmission of user data · Digital interface to facilitate the provision of supplies of goods and services among users  | EUR 750<br>million<br>(USD 801<br>million) | CZK 100<br>million<br>(USD 4.2<br>million) | Proposed (There was a proposed amendment to reduce the tax rate from 7% to 5%. However, the discussion on the bill has stalled and there is support for a DST solution at the OECD level).  |
| Denmark<br>(DK)           | 2% (3%<br>surcharge) | On-demand, audio-<br>visual media service<br>providers  |  | DKK 15<br>million<br>(USD 2.2<br>million)  | Implemented (Effective from January 1, 2024. There is an additional 3% surcharge for companies that invest less than 5% of their Danish revenues in Danish content. Additionally, the Finance Ministers of Denmark, Finland, and Sweden released a joint statement on digital tax, indicating that the digital and traditional economy should be taxed where value is created, and any solution reached should be a consensusbased OECD solution. However, the Danish Prime Minister announced Denmark's support to an EU-wide agreement on the DST controversy in case a global consensus is not reached). |
| Finland (FI)              |                      |   |  |  | The Finance Ministers of Denmark, Finland, and Sweden released a joint statement on digital tax, indicating that the digital and traditional economy should be taxed where value is created, and any solution reached should be a consensusbased OECD solution.   |
| France (FR)               | 3%                   | · Provision of a<br>digital interface ·<br>Advertising services<br>based on users' data   | EUR 750<br>million<br>(USD 801<br>million) | EUR 25<br>million<br>(USD 27<br>million)   | Implemented (Retroactively applicable as of January 1, 2019. The 2020 DST collection was delayed to the end of 2020); joined statement on October 21, 2021, that repeal of the DST would be contingent on Pillar One implementation.  |
| France (FR)               | 1.20%                | Paid and free access  |  | EUR 20                                     | Implemented (January 1, 2024. Due   |

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|                     |          | to recorded music<br>and online music<br>videos   |  | million<br>(USD 21.4<br>million)           | on amounts exceeding EUR 20 million).   |
| Hungary<br>(HU)     | 7.50%    | Advertising revenue   |  | HUF 100<br>million<br>(USD<br>271,810)     | Implemented (As a temporary measure, the advertisement tax rate has been reduced to 0%, effective from July 1, 2019, through December 31, 2024).  |
| Italy (IT)          | 3%       | · Advertising on a digital interface · Multilateral digital interface that allows users to buy/sell goods and services · Transmission of user data generated from using a digital interface | EUR 750<br>million<br>(USD 801<br>million) | EUR 5.5<br>million<br>(USD 5.9<br>million) | Implemented (Effective from January 1, 2020. In November 2022, there was a proposal to increase the DST rate from 3% to 6%); joined statement on October 21, 2021, that repeal of the DST would be contingent on Pillar One implementation. On March 20, 2024, the Italian Economy Minister announced that Italy might retain and modify its DST if efforts to implement the OECD's Pillar One do not pass. |
| Latvia (LV)         | 3%       | -   | -  | -  | Announced/Shows Intention (The Latvian government commissioned a study to determine the increase of tax revenue based on the assumption that the country levies a 3% DST. However, no further action has been taken for now).   |
| Netherlands<br>(NL) |          |   |  |  | On October 24, 2023, the Dutch State Secretary wrote to the Dutch Parliament saying that an EU DST should be considered as an alternative to the OECD's Pillar One, Amount A if a global agreement is not reached.  |
| Norway<br>(NO)      | -        | -   | -  | -  | Announced/Shows Intention (Norway plans to introduce a unilateral measure if the OECD does not reach a consensus solution; no announcements since the inclusive framework agreement).   |
| Poland (PL)         | 1.50%    | Audiovisual media<br>service and<br>audiovisual<br>commercial<br>communication  | -  | -  | Implemented (Effective from July 2020; there is a separate proposal to introduce a 7% levy on digital sector enterprises with a significant digital presence in the territory of Poland. Additionally, a 5% levy on advertisement revenues is also discussed).  |
| Portugal<br>(PT)    | 4%, 1%   | Audiovisual commercial communication on video-sharing platforms (4%), subscriptions for video-on-demand services  |  |  | Implemented (Effective from<br>February 2021; however, it is not<br>applicable as regulation regarding<br>assessment, collection and payment<br>rules is pending).  |
| Slovakia<br>(SK)    | -        | -   | -  | -  | Announced/Shows Intention (The Ministry of Finance opened a   |

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|                           |          |  |  |   | consultation on a proposal to introduce a DST on revenue of nonresidents from provision of services such as advertising, online platforms, and sale of user data. However, there were no further steps taken).  |
| Slovenia (SI)             | -        | -  | -  | -   | Announced/Shows Intention (The Ministry of Finance announced a government proposal to submit a draft bill to the National Assembly introducing a digital services tax by April 1, 2020; however, there has been no development so far).                                 |
| Spain (ES)                | 3%       | <ul> <li>Online advertising<br/>services · Sale of<br/>online advertising ·<br/>Sale of user data</li> </ul> | EUR 750<br>million<br>(USD 801<br>million) | EUR 3<br>million<br>(USD 3.2<br>million)    | Implemented (Effective from January 16, 2021); joined statement on October 21, 2021, that repeal of the DST would be contingent on Pillar One implementation.   |
| Sweden<br>(SE)            |          |  |  |   | The Finance Ministers of Denmark, Finland, and Sweden released a joint statement on digital tax, indicating that the digital and traditional economy should be taxed where value is created, and any solution reached should be a consensusbased OECD solution.         |
| Switzerland<br>(CH)       | 4%       | Gross income<br>generated in<br>Switzerland from<br>streaming or<br>television services                      |  | CHF 2.5<br>million<br>(USD 2.75<br>million) | Implemented (Effective from January 1, 2024).   |
| Turkey (TR)               | 7.50%    | Online services including advertisements, sales of content, and paid services on social media websites       | EUR 750<br>million<br>(USD 801<br>million) | TRY 20<br>million<br>(USD<br>615,896)       | Implemented (Effective from March 1, 2020; the president can reduce the DST rate as low as 1% or increase it as much as 15%); agreed to same terms of the joint statement on October 21, 2021, that repeal of the DST would be contingent on Pillar One implementation. |
| United<br>Kingdom<br>(GB) | 2%       | · Social media<br>platforms · Internet<br>search engine ·<br>Online marketplace                              | GBP 500<br>million<br>(USD 623<br>million) | GBP 25<br>million<br>(USD 31.2<br>million)  | Implemented (Retroactively applicable as of April 1, 2020); joined statement on October 21, 2021, that repeal of the DST would be contingent on Pillar One implementation.  |