

# 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).<sup>72</sup> None of those agreements comply with the minimum standard.

Grenada has not signed the MLI.

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

The CARICOM Agreement does not at this stage comply with the minimum standard and discussions to bring this agreement up to date should be continued.<sup>73</sup>

## 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).

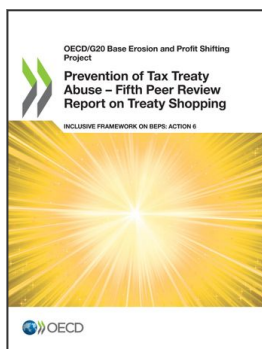
## Other agreements

This Table shows the agreements that are not compliant, not subject to a complying instrument, not covered by a general statement on the implementation of the detailed LOB and for which no steps have been taken to implement the minimum standard.

	1. Treaty partners	2. Inclusive Framework member
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)	Yes (Antigua and Barbuda, Barbados, Belize, Dominica, Jamaica, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Trinidad and Tobago) No (Guyana*)
2	South Africa	Yes
3	Switzerland	Yes
4	United Kingdom	Yes

<sup>72</sup> 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).

<sup>73</sup> Revisions to the CARICOM Agreement require an agreement from its eleven treaty partners.



**From:**  
**Prevention of Tax Treaty Abuse – Fifth Peer Review  
Report on Treaty Shopping**  
Inclusive Framework on BEPS: Action 6

**Access the complete publication at:**

<https://doi.org/10.1787/9afac47c-en>

**Please cite this chapter as:**

OECD (2023), “Grenada”, in *Prevention of Tax Treaty Abuse – Fifth Peer Review Report on Treaty Shopping: Inclusive Framework on BEPS: Action 6*, OECD Publishing, Paris.

DOI: <https://doi.org/10.1787/55616212-en>

This work is published under the responsibility of the Secretary-General of the OECD. The opinions expressed and arguments employed herein do not necessarily reflect the official views of OECD member countries.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at <http://www.oecd.org/termsandconditions>.