ANNEX B. TAXATION QUESTIONNAIRE

The tables that follow present all indicators (including their components, if applicable) under each pillar, with a reference to the corresponding question number in parenthesis. The questions are listed before each table for ease of reference.

For Y/N questions, the Y response accounts for the score and is considered as the good practice, unless otherwise indicated with the sign "Y/N; N – good practice".

In the tables that follow, "AND" means all referenced questions must have a good practice response to obtain a score on the indicator.

In the tables that follow, "OR" means one or more referenced questions must have a good practice response to obtain a score on the indicator.

Questions in the Administrative Framework section are labeled as "not scored," which indicates that they do not impact the score in any way. The purpose of these questions is to further inform and refine the questions design for subsequent years of the rollout phase, as needed, as well as to substantiate and provide further information for the scored questions.

Most indicators of the Taxation topic questionnaire are composite, wherein a score of 1 point is divided between several questions. For example, an indicator 'Binding Rulings and Post-Compliance Procedures' has a score of 1 on both firm flexibility (FFP) and social benefits (SBP) and has four components: (1) "availability and publishing of private binding rulings" 0.4 points; (2) "availability of public binding rulings" 0.2 points; (3) "Dispute resolution process codified in a single legislative act" 0.2 points; and (4) "Tax audit procedures codified in a single legislative act" 0.2 points.

ADMINISTRATIVE FRAMEWORK	
Parameters	
Business Location	The largest (most populous) city in the economy. Geographical location determines the tax administrative framework applicable to firms.
Tax Residency	Tax residency determines whether firms are resident/registered for tax purposes under the domestic laws of the economy. Experts will be asked to provide information on the regulations that affect firms with tax residency in the assessed economy.
Sector and Activity	No specific industry is determined. Firms can be of any sector and/or industry excluding mineral, extractive, and financial sector.

ADMINISTRATIVE FRAMEWORK

1. **Please indicate at what level the corporate income-based taxes are administered.** *(not scored)*
   1a. One level (e.g., only at the national level)
   1b. Two levels (e.g., at the national and at the state levels)
   1c. Three levels (at the national, state, and municipal levels)
   1d. No corporate income-based taxes exist

2. **Please list the corporate income-based taxes that exist in [Economy].** *(not scored)*

3. **Please indicate at what level the consumption-based taxes (e.g., value-added taxes or sales taxes) are administered.** *(not scored)*
   3a. One level (e.g., only at the national level)
   3b. Two levels (e.g., at the national and at the state levels)
   3c. Three levels (at the national, state, and municipal levels)
   3d. No consumption-based taxes exist

4. **Please list the consumption-based taxes (e.g., value-added taxes or sales taxes) that exist in [Economy].** *(not scored)*

5. **Please indicate at what level the social contributions and employment-based taxes are administered.** *(not scored)*
   5a. One level (e.g., only at the national level)
   5b. Two levels (e.g., at the national and at the state levels)
   5c. Three levels (at the national, state, and municipal levels)
   5d. No social contributions or employment-based taxes exist

6. **Please list the social contributions and employment-based taxes that exist in [Economy].** *(not scored)*

PILLAR I–QUALITY OF TAX REGULATIONS	
Parameters	
Business Location	The largest (most populous) city in the economy. For Pillar I, if tax regulations differ across locations within an economy, the experts will be asked to provide information regarding regulations of the largest city.
Tax Residency	Tax residency determines whether firms are resident/registered for tax purposes under the domestic laws of the economy. Experts will be asked to provide information on the regulations that affect firms with tax residency in the assessed economy.
Sector and Activity	No specific industry is determined. Firms can be of any sector and/or industry excluding mineral, extractive and financial sector.

1.1 CLARITY AND TRANSPARENCY

1.1.1 Clarity of Tax Regulations

7. **Does the tax administration issue tax guides that are available to the public?** (Y/N)
   Y → provide response to questions 10-11.

8. **Does the tax administration issue tax notices that are available to the public?** (Y/N)
   Y → provide response to questions 10-11.

9. **Does the tax administration issue factsheets that are available to the public?** (Y/N)
   Y → provide response to questions 10-11.

10. **Are general tax guidance documents kept up-to-date?**
    10a. Yes, all
    10b. Yes, but not all
    10c. No

11. **Are general tax guidance documents available online?**
    11a. Yes, all
    11b. Yes, but not all
    11c. No

12. **Does the tax administration issue revenue procedures that are accessible to the public?** (Y/N)
    Y → provide response to questions 15-16.

13. **Does the tax administration issue internal revenue manuals that are accessible to the public?** (Y/N)
    Y → provide response to questions 15-16.

14. **Does the tax administration issue technical advice memorandums that are accessible to the public?** (Y/N)
    Y → provide response to questions 15-16.

15. **Are internal tax guidance documents kept up-to-date?**
    15a. Yes, all
    15b. Yes, but not all
    15c. No

16. **Are internal tax guidance documents available online?**
    16a. Yes, all
    16b. Yes, but not all
    16c. No

17. **Does the tax administration in [Economy] issue private binding rulings for tax residents?** (Y/N)
    Y → provide response to question 18.

18. **Are private binding rulings published online? This includes publication of the edited version of the rulings, without any personal or identifying private information to protect the privacy of the applicant.** (Y/N)

19. **Does the tax administration in [Economy] issue public binding rulings?** (Y/N)

20. **Is the tax dispute resolution process codified in the single legislative act that has uniform application across all core taxes?** (Y/N)

21. **Is the tax audit procedure codified in the single legislative act that has uniform application across all core taxes?** (Y/N)

1.1.2 Transparency of Changes in Tax Regulations

22. **Do ministries/legislative/regulatory agencies in [City] systematically consult with the private sector stakeholders on proposed new tax legislation or changes to it? These consultations can take the form of in-person meetings, online meetings, surveys, and other methods.**
    22a. Yes, for the enactment of new tax laws and regulations
    22b. Yes, for the changes to existing tax laws and regulations
    22c. Yes, for both enactment of new laws and changes to existing laws
    22d. No

Y → provide response to questions 23-25.

23. **Are the consultations open to all interested private sector stakeholders or only include selected participants?**
    23a. All interested private sector stakeholders
    23b. Only selected participants (including only informal meetings)

24. **Do such consultations take place <u>before</u> the formulation/prioritization of tax legislative proposals?**
    24a. Yes, but only for primary tax laws
    24b. Yes, but only for subordinate tax laws and regulations
    24c. Yes, for both
    24d. No

25. **Do such consultations take place <u>during</u> the drafting of the tax legislative proposals and tax legislations?**
    25a. Yes, but only for primary tax laws
    25b. Yes, but only for subordinate tax laws and regulations
    25c. Yes, for both
    25d. No

26. **Do such consultations take place <u>after</u> the enactment of tax legislation (i.e., private sector provides feedback on practical challenges in the implementation)?**
    26a. Yes, but only for primary tax laws
    26b. Yes, but only for subordinate tax laws and regulations
    26c. Yes, for both
    26d. No

27. **Is the feedback received through consultations published online?** (Y/N)

28. **Does the tax administration in [Economy] systematically publish online future plans for major changes in the tax legislation including, for example, a multi-year strategic (or reform) plan?** (Y/N)
    Y → provide response to question 29.

29. **Are the future plans published in advance of the period covered by the plans?** (Y/N)

1.1 CLARITY AND TRANSPARENCY			
1.1.1 Clarity of Tax Regulations			
Indicators	**FFP**	**SBP**	**Total Points**
Availability of Tax Guidance	**1**	**1**	**2**
- Tax guides are available to the public (7)	0.1	0.1	0.2
- Tax notices are available to the public (8)	0.1	0.1	0.2
- Factsheets are available to the public (9)	0.1	0.1	0.2
- All types of general tax guidance are up-to-date (10a) OR - Some types of general tax guidance are up-to-date (10b)	0.1 OR 0.05	0.1 OR 0.05	0.2 OR 0.1
- All types of general tax guidance are published online (11a) OR - Some types of general tax guidance are published online (11b)	0.1 OR 0.05	0.1 OR 0.05	0.2 OR 0.1
- Revenue procedures are available to the public (12)	0.1	0.1	0.2

- Internal revenue manuals are available to the public (13) - Technical advice memorandums are available to the public (14)	0.1 0.1	0.1 0.1	0.2 0.2
- All types of internal tax guidance are up-to-date (15a) OR - Some types of internal tax guidance are up-to-date (15b)	0.1 OR 0.05	0.1 OR 0.05	0.2 OR 0.1
- All types of internal tax guidance are published online (16a) OR - Some types of internal tax guidance are published online (16b)	0.1 OR 0.05	0.1 OR 0.05	0.2 OR 0.1
Binding Rulings and Post-Compliance Procedures - Availability and publishing of private binding rulings (17 AND 18) - Availability of public binding rulings (19) - Dispute resolution process codified in a single legislative act (20) - Tax audit procedures codified in a single legislative act (21)	**1** 0.4 0.2 0.2 0.2	**1** 0.4 0.2 0.2 0.2	**2** 0.8 0.4 0.4 0.4
Total Points	**2**	**2**	**4**

1.1.2 Transparency of Changes in Tax Regulations

Indicators	FFP	SBP	Total Points
Broad Public Consultations - Consultations for both the enactment of new laws and changes to existing laws (22c) OR - Consultations for only enactment of new laws or changes to existing laws (22a OR 22b)	**1** 0.25 OR 0.125	**1** 0.25 OR 0.125	**2** 0.5 OR 0.25
- All interested private sector stakeholders can participate in consultations (23a)	0.15	0.15	0.3
- Consultations before the formulation of proposals for both primary and subordinate tax laws (24c) OR - Consultations before the formulation of proposals for primary tax laws only (24a) OR - Consultations before the formulation of proposals for subordinate tax laws only (24b)	0.15 OR 0.1 OR 0.05	0.15 OR 0.1 OR 0.05	0.3 OR 0.2 OR 0.1
- Consultations during the drafting of both primary and subordinate tax laws (25c) OR - Consultations during the drafting of primary tax laws only (25a) OR - Consultations during the drafting of subordinate tax laws only (25b)	0.15 OR 0.1 OR 0.05	0.15 OR 0.1 OR 0.05	0.3 OR 0.2 OR 0.1
- Consultations after the enactment of both primary and subordinate tax laws (26c) OR - Consultations after the enactment of primary tax laws only (26a) OR - Consultations after the enactment of subordinate tax laws only (26b)	0.15 OR 0.1 OR 0.05	0.15 OR 0.1 OR 0.05	0.3 OR 0.2 OR 0.1
- Online publication of feedback (27)	0.15	0.15	0.3
Future Tax Plans - Online publication of future tax plans (28) - Publication of future tax plans prior to implementation (29)	**1** 0.5 0.5	**1** 0.5 0.5	**2** 1 1
Total Points	**2**	**2**	**4**

Note: FFP = Firm Flexibility Point; SBP = Social Benefits Point.

1.2 ADMINISTRATIVE PROCEDURES

1.2.1 Simplified Tax Record Keeping and Reporting

30. Is there a legal provision that allows corporate taxpayers to keep all tax records online?

30a. Yes
30b. Partially
30c. No

31. **Is there a legal provision that allows small businesses to use simplified record-keeping methods, for example single-entry bookkeeping?** (Y/N)

32. **Is there a legal provision that allows small businesses to use simplified tax reporting, such as reduced filing frequency, elimination of filing requirements, or simplified tax returns?** (Y/N)

1.2.2 General Tax Registration

33. **Is the information on general tax registration available online?** (Y/N)

34. **Does the legislation define all registration fees for all taxes and social contributions that a company must report and pay?** (Y/N)

35. **Does the legislation define the registration timeframe for all taxes and social contributions that a company must report and pay?** (Y/N)

36. **Are corporate taxpayers legally required to notify the tax administration of changes to registration details?**
    36a. Yes, through the company registrar
    36b. Yes, directly
    36c. No
    Y to option 36b → provide response to question 37.

37. **Is there a fixed penalty regime for failure to comply with the requirements to notify the tax administration of changes to registration details?** (Y/N)

1.2.3 VAT Registration

38. **If consumption-based taxes exist, does the legal framework provide a turnover threshold for mandatory registration for VAT or other consumption-based taxes?** (Y/N)
    Y → provide response to question 39.

39. **Does the legal framework allow voluntary VAT or other consumption-based tax registration for businesses that are below the threshold?** (Y/N)

1.2.4 VAT Refund

40. **If consumption-based taxes exist, is the VAT refund mechanism available?** (Y/N)
    Y → provide response to question 41.

41. **Do VAT refund restrictions exist (for example, specific types of corporate taxpayers, specific conditions, specific goods or services provided, a requirement to carry forward for a set period before being able to claim the refund)?** (Y/N; N – good practice)

1.2 ADMINISTRATIVE PROCEDURES			
1.2.1 Simplified Tax Record Keeping and Reporting			
Indicators	**FFP**	**SBP**	**Total Points**

	FFP	SBP	Total Points
Simplified Record Keeping and Reporting	**1**	**1**	**2**
- Tax records can be kept online (30a) OR	0.5 OR	0.5 OR	1 OR
- Tax records can be partially kept online (30b)	0.25	0.25	0.5
- Simplified record keeping for small businesses (31)	0.25	0.25	0.5
- Simplified reporting for small businesses (32)	0.25	0.25	0.5
Total Points	**1**	**1**	**2**

1.2.2 General Tax Registration

Indicators	FFP	SBP	Total Points
Transparency in the Tax Registration Process	**1**	**1**	**2**
- Online information on general tax registration (33)	0.25	0.25	0.5
- Clarity of fees (34)	0.25	0.25	0.5
- Clarity of timeline (35)	0.25	0.25	0.5
- Changes of registration details are notified through company registrar (36a) OR	0.25 OR	0.25 OR	0.5 OR
- Changes of registration details are notified directly and there is penalty for failure to comply (36b AND 37)	0.125	0.125	0.25
Total Points	**1**	**1**	**2**

1.2.3 VAT Registration*

Indicators	FFP	SBP	Total Points
VAT Registration Threshold	**1**	**1**	**2**
- Existence of a VAT registration threshold (38)	0.5	0.5	1
- Availability of voluntary VAT registration (39)	0.5	0.5	1
Total Points	**1**	**1**	**2**

1.2.4 VAT Refund*

Indicators	FFP	SBP	Total Points
VAT Refund*	**1**	**1**	**2**
- Availability of VAT cash refund (40)	0.5	0.5	1
- Restriction on VAT cash refund (41)	0.5	0.5	1
Total Points	**1**	**1**	**2**

Note: FFP = Firm Flexibility Point; SBP = Social Benefits Point; VAT = Value Added Tax.
*Economies that do not impose VAT are not scored on these subcategories. In such cases, points from these subcategories are proportionally redistributed amongst other subcategories within this category.

1.3 ENVIRONMENTAL FISCAL INSTRUMENTS

1.3.1 Existence of Environmental Fiscal Instruments

42. Does a carbon tax exist in [Economy]?

42a. Yes, on non-renewable fossil fuels, which is proportionate to the carbon content of those fuels
42b. Yes, based on the direct emission approach
42c. Both
42d. No (doesn't exist or is not based on the carbon content)
Y to options 42b or 42c → provide response to question 44.

43. Does an Emission Trading System (ETS) exist in [Economy]? (Y/N)
Y → provide response to question 44.

44. Are there specific mechanisms in place for the measurement, reporting, and verification (MRV) of emissions at the facility level in [Economy]? (Y/N)
44a. Yes
44b. No
44c. Under Development

45. Has an explicit fossil fuel subsidy, that is applied to the sale price to the end consumer, been adopted in [Economy]? (Y/N; N – good practice)

46. Are there any tax incentives or tax credits in place to support the private sector in transitioning to a green economy, for example, renewable energy subsidies, tax incentives for green technologies, clean energy tax credits, etc.? (Y/N)

1.3.2 Availability of Public Consultations

47. Do ministries/legislative/regulatory agencies in [Economy] consult with the private sector stakeholders before introducing environmental fiscal instruments?
Note: Such consultations can be in the form of in-person, online meetings, surveys, etc.
47a. Yes, always
47b. Yes, sometimes
47c. No
Y → provide response to question 48

48. Are the results of the consultations published online? (Y/N)

1.3.3 Transition Periods

49. If environmental fiscal instruments exist, does the law establish a mechanism to inform businesses that the tax rate/price for environmental instrument may change over time?
49a. Yes, predetermined trajectory with pre-established changes in the tax rate or automatic adjustment mechanisms (e.g., based on emissions triggers) are included in the law
49b. Yes, rates automatically increase only to match inflation, alongside ad hoc mechanisms (e.g., periodic reviews)
49c. No

50. Does the government in [Economy] communicate the transition periods for implementing new carbon taxes/Emission Trading System to the public? (Y/N)
Y → provide response to question 51.

51. Is information on the transition periods for implementing new carbon taxes/Emission Trading System published online? (Y/N)

1.3 ENVIRONMENTAL FISCAL INSTRUMENTS			
1.3.1 Existence of Environmental Fiscal Instruments			
Indicators	**FFP**	**SBP**	**Total Points**
Presence of Environmental Fiscal Instruments (42a OR (42b AND 44a) OR (42c AND 44a) OR (43 AND 44a))	**n/a**	**1**	**1**
Absence of Fossil Fuel Subsidy (45)	**n/a**	**1**	**1**

	FFP	SBP	Total Points
Additional Mechanisms (46)	**1**	**1**	**2**
Total Points	**1**	**3**	**4**
1.3.2 Availability of Public Consultations			
Indicators	**FFP**	**SBP**	**Total Points**
Availability of Public Consultations	**1**	**1**	**2**
- Public consultations conducted always (47a)	0.5	0.5	1
- Online publication of the public consultations' results (48)	0.5	0.5	1
Total Points	**1**	**1**	**2**
1.3.3 Transition Periods			
Indicators	**FFP**	**SBP**	**Total Points**
Transition Periods	**1**	**1**	**2**
- Adjustment mechanisms (49a)	0.5	0.5	1
- Communication of the transition period (50)	0.4	0.4	0.8
- Online publication of the information on the transition periods (51)	0.1	0.1	0.2
Total Points	**1**	**1**	**2**

Note: FFP = Firm Flexibility Point; SBP = Social Benefits Point.

PILLAR II–PUBLIC SERVICES PROVIDED BY THE TAX ADMINISTRATION	
Parameters	
Business Location	The largest (most populous) city in the economy. For Pillar II, if public services provided by the tax administration differ across locations within an economy, the experts will be asked to provide information regarding public services of the largest city.
Tax Residency	Tax residency determines whether firms are resident/registered for tax purposes under the domestic laws of the economy. Experts will be asked to provide information on public services for firms with tax residency in the assessed economy.
Sector and Activity	No specific industry is determined. Firms can be of any sector and/or industry excluding mineral, extractive and financial sector.

2.1 DIGITAL SERVICES FOR TAXPAYERS

2.1.1 Online Service Taxpayer Portal

52. Does a taxpayer online service portal exist? (Y/N)
Y → provide response to questions 53-59.

53. Are there any obstacles to using the portal in practice? For example, portal is not fully functional or has frequent glitches, logging in is not easy, requires extreme high speed internet access, etc. (Y/N; N – good practice)

54. Does the portal cover all taxes and social contributions reported and/or paid by companies in a single digital space? (Y/N)

55. Can taxpayers update their bank account and contact details (such as address and telephone number) on the taxpayer online service portal? (Y/N)

56. **Can taxpayers view, prepare, file, and adjust tax reporting documents on the taxpayer online service portal?** (Y/N)
    56a. Yes, all options are available
    56b. Yes, but not all options are available (e.g., adjustments are not allowed)
    56c. No

57. **Can taxpayers make financial transactions (for example, pay taxes and request refunds) on the taxpayer online service portal?** (Y/N)

58. **Can taxpayers communicate with the tax administration via secure channels on the taxpayer online service portal?** (Y/N)

59. **Can taxpayers access historical files and communication on the taxpayer online service portal?** (Y/N)

2.1.2 Electronic Filing of Taxes

60. **If CIT exists, is an electronic filing arrangement on a tax portal available for all corporate income-based taxes (CIT or other profit-based taxes)?** (Y/N)
    60a. Yes, for all
    60b. Yes, but not for all
    60c. No

61. **If consumption-based taxes exist, is an electronic filing arrangement on a tax portal available for all VAT or other consumption taxes?** (Y/N)
    61a. Yes, for all
    61b. Yes, but not for all
    61c. No

62. **If social contributions and employment-based taxes exist, is an electronic filing arrangement on a tax portal available for all social contributions and employment-based taxes?** (Y/N)
    62a. Yes, for all
    62b. Yes, but not for all
    62c. No

2.1.3 Pre-Filled Tax Declarations

63. **If CIT exists, are pre-filled electronic declarations available for all the corporate income-based taxes?** (Y/N)
    63a. Yes, for all
    63b. Yes, but not for all
    63c. No

64. **If consumption-based taxes exist, are pre-filled electronic declarations available for all VAT or other consumption-based taxes?** (Y/N)
    64a. Yes, for all
    64b. Yes, but not for all
    64c. No

65. **If social contributions and employment-based taxes exist, are pre-filled electronic declarations available for all social contributions and employment-based taxes?** (Y/N)
    65a. Yes, for all
    65b. Yes, but not for all
    65c. No

2.1.4 Electronic Payment of Taxes

66. **If CIT exists, is an electronic payment arrangement on a tax portal available for all corporate income-based taxes?** (Y/N)
    66a. Yes, for all
    66b. Yes, but not for all
    66c. No

67. **If consumption-based taxes exist, is an electronic payment arrangement on a tax portal available for all VAT or other consumption-based taxes?** (Y/N)
    67a. Yes, for all
    67b. Yes, but not for all
    67c. No

68. **If social contributions and employment-based taxes exist, is an electronic payment arrangement on a tax portal available for social contributions and employment-based taxes?** (Y/N)
    68a. Yes, for all
    68b. Yes, but not for all
    68c. No

2.1 DIGITAL SERVICES FOR TAXPAYERS			
2.1.1 Online Service Taxpayer Portal			
Indicators	**FFP**	**SBP**	**Total Points**
Online Service Taxpayer Portal	**1**	**1**	**1**
- Availability of a taxpayer online service portal (52)	0.125	0.125	0.25
- Absence of obstacles to using the portal in practice (53)	0.125	0.125	0.25
- Portal covers all taxes and social contributions (54)	0.125	0.125	0.25
- Taxpayers can update their bank account and contact details on the portal (55)	0.125	0.125	0.25
- Taxpayers can view, prepare, file AND adjust tax reporting documents on the portal OR (56a)	0.125 OR	0.125 OR	0.25 OR
- Taxpayers can view, prepare, file OR adjust tax reporting documents on the portal (56b)	0.0625	0.0625	0.125
- Taxpayers can make financial transactions on the portal (57)	0.125	0.125	0.25
- Taxpayers can communicate with the tax administration via secure channels on the portal (58)	0.125	0.125	0.25
- Taxpayers can access historical files and communication on the portal (59)	0.125	0.125	0.25
Total Points	**1**	**1**	**2**
2.1.2 Electronic Filing of Taxes*			
Indicators	**FFP**	**SBP**	**Total Points**

Electronic Filing - All companies can file all corporate income-based taxes online (60a) OR - Some or all companies can file some or all corporate income-based taxes online (60b)	**1** 0.33 OR 0.17	**1** 0.33 OR 0.17	**2** 0.66 OR 0.33
- All companies can file all VAT or other consumption taxes online (61a) OR - Some or all companies can file some or all VAT or other consumption taxes online (61b)	0.33 OR 0.17	0.33 OR 0.17	0.66 OR 0.33
- All companies can file all employment-based taxes and social contributions online (62a) OR - Some or all companies can file some or all employment-based taxes and social contributions online (62b)	0.33 OR 0.17	0.33 OR 0.17	0.66 OR 0.33
Total Points	**1**	**1**	**2**
2.1.3 Pre-Filled Tax Declarations*			
Indicators	**FFP**	**SBP**	**Total Points**
Pre-Filled Declarations - Pre-filled declarations for all corporate income-based taxes for all companies (63a) OR - Pre-filled declarations for all or some corporate income-based taxes for all or some companies (63b)	**1** 0.33 OR 0.17	**1** 0.33 OR 0.17	**2** 0.66 OR 0.33
- Pre-filled declarations for all VAT or other consumption taxes for all companies (64a) OR - Pre-filled declarations for all or some VAT or other consumption taxes for all or some companies (64b)	0.33 OR 0.17	0.33 OR 0.17	0.66 OR 0.33
- Pre-filled declarations for all employment-based taxes and social contributions for all companies (65a) OR - Pre-filled declarations for all or some employment-based taxes and social contributions for all or some companies (65b)	0.33 OR 0.17	0.33 OR 0.17	0.66 OR 0.33
Total Points	**1**	**1**	**2**
2.1.4 Electronic Payment of Taxes*			
Indicators	**FFP**	**SBP**	**Total Points**
Electronic Payment - All companies can pay all corporate income-based taxes online (66a) OR - All or some companies can pay all or some corporate income-based taxes online (66b)	**1** 0.33 OR 0.17	**1** 0.33 OR 0.17	**2** 0.66 OR 0.33
- All companies can pay all VAT or other consumption taxes online (67a) OR - All or some companies can pay all or some VAT or other consumption taxes online (67b)	0.33 OR 0.17	0.33 OR 0.17	0.66 OR 0.33
- All companies can pay all employment-based taxes and social contributions online (68a) OR - All or some companies can pay all or some employment-based taxes and social contributions online (68b)	0.33 OR 0.17	0.33 OR 0.17	0.66 OR 0.33
Total Points	**1**	**1**	**2**

Note: FFP = Firm Flexibility Point; SBP = Social Benefits Point; VAT = Value Added Tax.
*Economies that do not impose one of the following taxes - corporate income-based taxes, VAT, other consumption taxes, or employment-based taxes and social contributions - are not assessed on the respective components. The points from these components are proportionately redistributed to other components within this indicator.

2.2 DATA MANAGEMENT AND SYSTEM INTEGRATION IN THE TAX ADMINISTRATION

2.2.1 Tax Registration

69. **In practice, when a company is incorporated, are any separate/additional interactions required to complete registration for all taxes and social contributions with all levels of administrations?** (Y/N; N – good practice)
    Y → provide response to question 70.

70. **In practice, can registration for all taxes and social contributions be done fully online and without submitting any hard copies in person?** (Y/N)

2.2.2 Taxpayer Database and Tax Identification Number (TIN)

71. **If CIT are administered on one level, is there a unified taxpayer database?** (Y/N)

72. **If CIT are administered on several levels, is there a unified taxpayer database on each level of tax administration?** (Y/N)

73. **Is the taxpayer database computerized or paper-based?**
    73a. Computerized
    73b. Paper-based
    73c. [If CIT are administered on several levels], Mixed, depending on the level of administration

74. **Does the taxpayer database have full national coverage?** (Y/N)

75. **Does the tax authority use the unified identification number for all of a company's taxes and social contributions?** (Y/N)
    N → provide response to question 75.

76. **Do registered companies have separate tax identification number(s) for corporate income-based taxes, or VAT or other consumption-based taxes, or employment-based taxes and social contributions?** (Y/N; N – good practice)

2.2.3 Tax Deregistration

77. **In practice, after a company undergoes termination, and company deregistration is initiated, are any separate/ additional interactions between such company and public authorities required to complete deregistration for all taxes and social contributions?** (Y/N; N – good practice)
    Y → provide response to question 78.

78. **In practice, can deregistration for all taxes and social contributions be done fully online and without submitting any hard copies?** (Y/N)

2.2.4 Data Exchange and Usage (includes gender)

79. **In practice, is information reported by corporate taxpayers crosschecked against third-party information sources (for example, databases of other agencies, publicly available information, etc.)** (Y/N)

80. Are the sex-disaggregated data on corporate taxpayers available to the tax authority? (Y/N)
Y → provide response to question 81.

81. Does the tax authority conduct sex-disaggregated analysis of taxpayer information? (Y/N)
Y → provide response to question 82.

82. Are the findings of sex-disaggregated analysis available online? (Y/N)

2.2 DATA MANAGEMENT AND SYSTEM INTEGRATION IN THE TAX ADMINISTRATION			
2.2.1 Tax Registration			
Indicators	**FFP**	**SBP**	**Total Points**
Tax Registration Process - Fully automated (69) OR - Fully online (70)	**1** 1 OR 0.5	**1** 1 OR 0.5	**2** 2 OR 1
Total Points	**1**	**1**	**2**
2.2.2 Taxpayer Database and Tax Identification Number (TIN)			
Indicators	**FFP**	**SBP**	**Total Points**
Taxpayer Database and TIN - Unified taxpayer database (71 OR 72) - Computerized taxpayer database (73a) - Database with full national coverage (74)	**1** 0.25 0.25 0.25	**1** 0.25 0.25 0.25	**2** 0.5 0.5 0.5
- Single tax identification number for all company's taxes (75) OR - Single tax identification number for corporate income-based taxes, VAT/other consumption-based taxes and employment-based taxes and social contributions (76)	0.25 OR 0.125	0.25 OR 0.125	0.5 OR 0.25
Total Points	**1**	**1**	**2**
2.2.3 Tax Deregistration			
Indicators	**FFP**	**SBP**	**Total Points**
Tax Deregistration - Fully automated (77) OR - Fully online (78)	**1** 1 OR 0.5	**1** 1 OR 0.5	**2** 2 OR 1
Total Points	**1**	**1**	**2**
2.2.4 Data Exchange and Usage (includes gender)			
Indicators	**FFP**	**SBP**	**Total Points**
Information Cross-Checking on Tax Portal (79)	**1**	**1**	**2**
Availability of Sex-Disaggregated Data and Their Analysis - Availability of sex-disaggregated data (80) - Tax authority conduct sex-disaggregated analysis (81) - Publication of findings of the analysis (82)	**1** 0.33 0.33 0.33	**1** 0.33 0.33 0.33	**2** 0.66 0.66 0.66
Total Points	**2**	**2**	**4**

Note: TIN = Tax Identification Number; FFP = Firm Flexibility Point; SBP = Social Benefits Point; VAT = Value Added Tax.

2.3 TRANSPARENCY

2.3.1 Annual Performance and Gender Diversity in the Tax Administration

83. Is the recent annual report(s) outlining the performance of the tax administration available online?
83a. Yes, for financial performance
83b. Yes, for the operational performance
83c. Yes, for both
83d. No

84. Does an independent external review body (e.g., a government auditor or independent entity appointed in accordance with the economy's laws and regulations) perform periodical audits of the tax administration's financial and operational performance?
84a. Yes, for financial performance
84b. Yes, for the operational performance
84c. Yes, for both
84d. No
Y → provide response to question 85.

85. Are the findings and recommendations of the external review body available online? (Y/N)

86. Is up-to-date information on the gender composition of the tax authority's staff available online? (Y/N)

87. Is up-to-date information on the gender composition of the tax authority's senior executives available online? (Y/N)

2.3.2 Public Accountability

88. Within the past three years, did the tax administration in [City] conduct surveys focused on corporate taxpayers' perceptions of services and communication with the tax administration? For example, feedback from taxpayer on overall quality of service received from tax administration, ease of use of online services portal, call center assistance quality, features to be added on tax administration website, etc. (Y/N)
Y → provide response to question 89.

89. Are the results of the taxpayer perception surveys available online? (Y/N)

90. Is there a tax administration's code of ethics and professional conduct available online? (Y/N)
Y → provide response to question 91.

91. Does the code of ethics and professional conduct contain provisions outlining consequences, such as warning letter, temporary suspension, or dismissal, when the tax official does not abide by the code of ethics and professional conduct? (Y/N)

92. Does a tax ombudsman or equivalent authority (e.g., taxpayer advocate) investigate unresolved complaints from corporate taxpayers regarding the service and treatment they receive from the tax administration? (Y/N)

93. Is there an anti-corruption agency responsible for investigating allegations of corrupt conduct among tax officials? (Y/N)

2.3 TRANSPARENCY			
2.3.1 Annual Performance and Gender Diversity in the Tax Administration			
Indicators	**FFP**	**SBP**	**Total Points**
Annual Performance	**n/a**	**1**	**1**
- Online publication of the annual report on financial and operational performance (83c) OR	n/a	0.4 OR	0.4 OR
- Online publication of the annual report on financial or operational performance (83a OR 83b)	n/a	0.2	0.2
- Audits on the financial and operational performance of a tax administration (84c) OR	n/a	0.4 OR	0.4 OR
- Audits on the financial or operational performance of a tax administration (84a OR 84b)	n/a	0.2	0.2
- Online access to findings of an external review body (85)	n/a	0.2	0.2
Gender Composition of the Staff in the Tax Administration	**1**	**1**	**2**
- Public availability of gender composition of the staff (86)	0.5	0.5	1
- Public availability of gender composition of the senior executives (87)	0.5	0.5	1
Total Points	**1**	**2**	**3**
2.3.2 Public Accountability			
Indicators	**FFP**	**SBP**	**Total Points**
Public Accountability	**1**	**1**	**2**
- Taxpayer's perceptions surveys (88)	0.17	0.17	0.33
- Online publication of the surveys' results (89)	0.17	0.17	0.33
- Availability of the code of ethics (90)	0.17	0.17	0.33
- Consequences for misconduct (91)	0.17	0.17	0.33
- Presence of tax ombudsman or equivalent authority (92)	0.17	0.17	0.33
- Presence of an anti-corruption agency (93)	0.17	0.17	0.33
Total Points	**1**	**1**	**2**

Note: FFP = Firm Flexibility Point; SBP = Social Benefits Point.

2.4 TAX AUDITS AND RELATED DISPUTES

2.4.1 Tax Audits

94. Does the tax administration have an annual national tax audit plan, which is available online? (Y/N)
Y → provide response to question 95.

95. Does the annual national tax audit plan cover all core taxes that exist in the economy. (Y/N)

96. Do all main types of tax audits exist in [Economy]For the purpose of this questionnaire, main type of tax audits includes comprehensive (multiple tax and multiple years) audits, single-issue audits, inspections of books and records, examination of VAT refund claims (if applicable), and in-depth investigation of suspected tax frauds. Please respond "yes" only if all the above listed types of audits are available. (Y/N)

97. **Are tax audit manuals and guidelines available online?** (Y/N)

2.4.2 Dispute of Tax Audit Results

98. **In practice, can a taxpayer appeal a tax audit assessment to an independent complaint review mechanism within a tax administration? For example, this could be a separate unit or a designated review officer within a tax administration that acts independently from the tax administration's audit department.** (Y/N)
N → provide response to question 99.

99. **In practice, in the majority of cases, what body would conduct a review of complaints on a tax audit assessment?**
    - 99a. Internal dispute resolution review body within a tax administration, which is not independent (i.e., same body conducts the audit and the review, or a head of tax administration)
    - 99b. External review by an independent external specialist review board or committee (e.g., a unit within a Ministry of Finance), a tax tribunal, tax court, a specialized tax chamber within a regular court
    - 99c. First instance court of general jurisdiction or administrative court
    - 99d. Other (for example, external review mechanism that is not independent from the tax auditors in practice)

100. **In practice, if the [independent complaint review mechanism/body selected in question 99] does not review a complaint on a tax audit assessment within a reasonable period of time or by the legal deadline, what happens next?**
    - 100a. The decision is automatically considered in favor of taxpayer (positive silence)
    - 100b. The objection is automatically denied (negative silence)
    - 100c. The taxpayer can escalate the dispute to the next stage (appeal level), even when the decision is pending
    - 100d. No action can be taken until the decision is issued

101. **In practice, what body provides the first avenue of appeal for a taxpayer dissatisfied with the decision of the [independent complaint review mechanism/body selected in question 99]? If multiple options exist, please select the one that will be used in most cases.**
    - 101a. A review board or committee within a tax administration (i.e., head of tax administration)
    - 101b. Independent external specialist review board or committee (e.g., unit within Ministry of Finance), a tax tribunal, tax court, or specialized tax chamber within a regular court
    - 101c. Court of general jurisdiction.
    - 101d. Other (for example, external review mechanism that is not independent from the auditors in practice)

2.4 TAX AUDITS AND RELATED DISPUTES			
2.4.1 Tax Audits			
Indicators	**FFP**	**SBP**	**Total Points**
Annual National Tax Audit Plan	**1**	**1**	**2**
- Online availability of annual national tax audit plan (94)	0.5	0.5	1
- Annual national tax audit plan coverage (95)	0.5	0.5	1
Tax Audit Framework	**1**	**1**	**2**
- Tax audit types (96)	0.5	0.5	1
- Online availability of tax audit manuals and guidelines (97)	0.5	0.5	1

Total Points	2	2	4
2.4.2 Dispute of Tax Audit Results			
Indicators	**FFP**	**SBP**	**Total Points**
First-Level Review Mechanism - Independent internal review (98) OR - Independent external review (99b)	**1** 1 OR 0.5	**1** 1 OR 0.5	**2** 2 OR 1
Second-Level Review Mechanism - Positive silence practice (100a) OR - Escalation of disputes to the next level (100c)	**1** 0.5 OR 0.25	**1** 0.5 OR 0.25	**2** 1 OR 0.5
- Graduate complaint mechanism (101b)	0.5	0.5	1
Total Points	**2**	**2**	**4**

Note: FFP = Firm Flexibility Point; SBP = Social Benefits Point.

PILLAR III–OPERATIONAL EFFICIENCY OF TAX SYSTEM IN PRACTICE

The scores for Pillar III indicators that are based on firm-level data are calculated using the Normal Cumulative Density Function (CDF) transformation method on a scale of 0 to 100, where 0 and 100 represent the lowest and highest possible scores, respectively. The best and worst performers are identified based on the 5th and 95th percentiles of the collected data.

Data for Pillar III on the Operational Efficiency of Tax System in Practice are collected through firm-level surveys (questions 102-106 and 108-112) and expert consultations (question 107) using the following parameters:

PILLAR III – Operational Efficiency of Tax System in Practice	
Parameters	
Business Location	The largest (most populous) city in the economy. For Pillar III, if tax practice differ across locations within an economy, the experts will be asked to provide information regarding practice of the largest city.
Tax Residency	Tax residency determines whether firms are resident/registered for tax purposes under the domestic laws of the economy. Experts will be asked to provide information on the regulations that affect firms with tax residency in the assessed economy.
Sector and Activity	No specific industry is determined. Firms can be of any sector and/or industry excluding mineral, extractive and financial sector.

3.1 TIME AND FUNCTIONALITY OF PROCESSES

3.1.1 Time to File and Pay Taxes

102. What was the total annual number of hours required for the preparation, filing, and payment of all taxes (profit taxes, labor taxes, VAT, GST, or sales taxes) for this establishment in fiscal year [Insert last complete fiscal year]?

103. What was the average number of hours per month required for the preparation, filing, and payment of all taxes (profit taxes, labor taxes, VAT, GST, or sales taxes) for this establishment in fiscal year [Insert last complete fiscal year]?

3.1.2 Use of Electronic Systems to File and Pay Taxes

104. In fiscal year [Insert last complete fiscal year], did this establishment file its taxes electronically?

105. In fiscal year [Insert last complete fiscal year], did this establishment pay its taxes electronically?

3.1.3 Duration of Generic Tax Audit

106. How many weeks did it take between the first interaction with the auditors and when the final audit report was received?

3.1.4 Duration of a Tax Dispute

107. In practice, how many calendar days does it usually take for [independent complaint review mechanism / body selected in question 99] to review a complaint on tax audit assessment, from the time it is filed until the full decision is issued in writing?

3.1.5 Use of VAT Refund

108. In the last three years, has this establishment applied for a VAT cash refund?
N → provide response to question 109.
Y → provide response to question 110.

109. What was the main reason this establishment did not apply for a VAT cash refund?
109a. VAT cash refunds take too long to receive
109b. The application for a VAT cash refund is too complicated
109c. The establishment did not need to apply for a VAT cash refund

110. In reference to the most recent VAT cash refund, how many weeks did it take from when the establishment submitted its application until the refund was received?

3.1 TIME AND FUNCTIONALITY OF PROCESSES			
3.1.1 Time to File and Pay Taxes			
Indicators	**FFP**	**SBP**	**Total Points**
Total Time for Preparation, Filing and Payment (102 OR 103)	**100 (100%)**	**n/a**	**100 (100%)**
Total Points for Subcategory 3.1.1	**100**	**n/a**	**100**
3.1.2 Use of Electronic Systems to File and Pay Taxes			
Indicators	**FFP**	**SBP**	**Total Points**
Use of Electronic Systems to File and Pay Taxes - The percentage of respondent firms that used electronic systems to file taxes in the previous calendar year (104) - The percentage of respondent firms that used electronic systems to pay taxes in the previous calendar year (105)	**100 (100%)** 50 (50%) 50 (50%)	**n/a**	**100 (100%)** 50 (50%) 50 (50%)

Total Points for Subcategory 3.1.2	**100**	**n/a**	**100**
3.1.3 Duration of a Generic Tax Audit			
Indicators	**FFP**	**SBP**	**Total Points**
Total Time Needed to Complete the Audit (106)	**100 (100%)**	**n/a**	**100 (100%)**
Total Points for Subcategory 3.1.3	**100**	**n/a**	**100**
3.1.4 Duration of a Tax Dispute			
Indicators	**FFP**	**SBP**	**Total Points**
Time to Review a Tax Dispute (107)	**100 (100%)**	**n/a**	**100 (100%)**
Total Points for Subcategory 3.1.4	**100**	**n/a**	**100**
3.1.5 Use of VAT Refund*			
Indicators	**FFP**	**SBP**	**Total Points**
Use of VAT Refund	**100 (100%)**	**n/a**	**100 (100%)**
- The percentage of firms which did not apply for a VAT refund due to the process being too burdensome, even when they were eligible for such a refund (108 AND 109a AND 109b)	50 (50%)		50 (50%)
- The time to receive a VAT refund adjusted by the number of firms reporting issues with VAT refunds (109a AND 109b AND 110)	50 (50%)		50 (50%)
Total Points for Subcategory 3.1.5	**100**	**n/a**	**100**
Total Points for Category 3.1	**100**	**n/a**	**100**

Note: n/a = not applicable (refers to the cases when the impact on firms or society is either ambiguous or nonexistent).
FFP = Firm Flexibility Point; SBP = Social Benefits Point; VAT = Value Added Tax.
*Economies that do not impose VAT are assigned maximum score on this subcategory.

3.2 FINANCIAL BURDEN ON FIRMS

3.2.1 Effective Tax Rate (ETR) for Profit Taxes

111. For fiscal year [Insert last complete fiscal year] as a share of total annual gross profits, what was the cost of annual income-based taxes? Please exclude any tax credits or deductions.

Note: If taxes have not yet been paid, please include the expected tax payments.

3.2.2 Effective Tax Rate (ETR) for Employment-Based Taxes and Social Contributions

112. From this establishment's Income Statement for fiscal year [Insert last complete fiscal year], please provide the following information:

112.1 Total annual cost of labor including wages, salaries, bonuses, social security payments.

112.2 Of which total annual costs of social security payments and employment-based taxes, excluding employee taxes that were withheld.

3.2 FINANCIAL BURDEN ON FIRMS			
3.2.1 Effective Tax Rate (ETR) for Profit Taxes*			
Indicators	**FFP**	**SBP**	**Total Points**

Effective Tax Rate (ETR) for Profit Taxes (111)	**100 (100%)**	**n/a**	**100 (100%)**
Total Points for Subcategory 3.2.1	**100**	**n/a**	**100**
3.2.2 Effective Tax Rate (ETR) for Employment-Based Taxes and Social Contributions*			
Indicators	**FFP**	**SBP**	**Total Points**
Effective Tax Rate (ETR) for Employment-Based Taxes and Social Contributions (112.1 AND 112.2)	**100 (100%)**	**n/a**	**100 (100%)**
Total Points for Subcategory 3.2.2	**100**	**n/a**	**100**
Total Points for Category 3.2	**100**	**n/a**	**100**

Note: n/a = not applicable (refers to the cases when the impact on firms or society is either ambiguous or nonexistent). FFP = Firm Flexibility Point; SBP = Social Benefits Point.

*Economies that do not impose profit taxes or employment-based taxes and social contributions are assigned maximum score on the respective subcategory.