

EU list of third country non-cooperative jurisdictions for tax purposes, updated October 2025

Issue N-15-2025, 20 October 2025

In brief

On 10 October 2025 the ECOFIN Council (the 'Council') approved conclusions on Annex I (the EU list of 'non-cooperative jurisdictions for tax purposes', commonly referred to as the EU '**blacklist**'). No jurisdictions were added to or removed from Annex I.

On 10 October 2025 the Council also made amendments to Annex II (the EU list of third country 'cooperative jurisdictions for tax purposes subject to the successful delivery of their commitments', commonly referred to as the EU '**greylist**'). The Council decided to:

- remove **Vietnam** from the EU 'greylist',
- add **Greenland, Jordan, Morocco, Montenegro** to the EU 'greylist'.

The Council adopted the initial EU 'blacklist' and 'greylist' on 5 December 2017. These lists have since been updated several times. As agreed by the Council in its conclusions of 12 March 2019, the aim, as from 2020 onwards, is for any updates of the EU lists to be done no more than twice a year. This is the second update for 2025.

The Council conclusions in effect adopt recommendations made by the EU Code of Conduct Group (Business Taxation) and take effect from the day of publication in the Official Journal of the EU (published on 17 October 2025).

In detail

The latest (10 October 2025) Council decisions on the EU ‘blacklist’ and the EU ‘greylist’.

As a result of the latest Council decisions:

A. The Council decided not to make any amendments to the EU ‘blacklist’.

Thus, the following eleven (11) countries remain on the EU ‘blacklist’:

American Samoa	Anguilla	Fiji
Guam	Palau	Panama
Russian Federation	Samoa	Trinidad and Tobago
U.S. Virgin Islands	vanuatu	

B. The Council also decided that:

- **Vietnam** should be removed from the EU ‘greylist’ since it has fulfilled its commitment regarding implementation of CbCR standards for MNEs operating in the country,
- **Greenland, Jordan and Morocco** should be added to the EU ‘greylist’ following their commitments to implement CbCR standards for MNEs operating in the countries,
- **Montenegro** should be added to the EU “greylist” following its commitment to improve its automatic exchange of financial account information and exchange of tax information on request.

Following the above, the following eleven (11) countries are now on the EU ‘greylist’:

Antigua and Barbuda	Belize	British Virgin Islands
Brunei Darussalam	Eswatini	Greenland
Jordan	Montenegro	Morocco
Seychelles	Turkey	

All jurisdictions on the EU 'greylist' have made commitments towards the EU to comply with the relevant EU criteria within specific timeframes (the timeframes may be extended).

For more background on the EU lists, and their evolution over time, please refer to our prior Tax Update Newsletters:

[N-17-2017](#), [N-4-2018](#), [N-11-2018](#), [N-19-2018](#), [N-5-2019](#), [N-9-2019](#), [N-11-2019](#), [N-14-2019](#), [N-2-2020](#), [N-28-2020](#), [N-2-2021](#), [N-28-2021](#), [N-11-2022](#), [N-1-2023](#), [N-17-2023](#), [N-3-2024](#), [N-8-2024](#) and [N-5-2025](#).

The takeaway

Possible impacts on taxpayers in jurisdictions on the EU 'blacklist' include facing increased monitoring and audits, special documentation requirements, increased withholding taxes, and other possible defensive tax measures by EU Member States.

- In particular for Cyprus, withholding tax is applicable in certain circumstances where a recipient, that is a company, is in an EU blacklisted jurisdiction. The Cyprus withholding tax as regards EU blacklisted jurisdictions is not applicable in cases where the recipient is an individual. This is with effect from 31 December 2022, as amended with effect from 16 April 2025, subject to any reduction or exemption as per any applicable double tax treaty (DTT). For more details please refer to our prior Tax Update Newsletters [N-38-2021](#), [N-8-2025](#) and [N-9-2025](#).

Additionally, we expect the Cyprus Tax Authorities to issue clarifications as regards their interpretation of this Cyprus withholding tax, which are expected, inter alia, to indicate which version of the EU blacklist will be applicable at any one time.

Lastly, increased DAC6 reporting obligations would apply to certain related party transactions between taxpayers in the EU and taxpayers in EU 'blacklisted' jurisdictions. For Cyprus DAC6 obligations the relevant list to use is expected to be the list as it stands in the Official Journal of the EU on the date the DAC6 obligation arises.

Let's talk

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