

**Question for written answer E-005544/2015
to the Commission**
Rule 130
Giorgos Grammatikakis (S&D)

Subject: Tax evasion structures in the EU

According to a recent report,¹ the mining company Eldorado Gold funds its investments in Greece through its subsidiary Hellenic Gold, with a bond loan from Dutch mailbox subsidiaries which neither trade in Holland nor employ any staff. They in turn are linked via a bond loan with two subsidiaries of the company in the tax haven of Barbados.

The report concludes that this structure provides a strong indication of tax evasion and that the company has saved over 700 000 in withholding taxes over 2 years and 1.7 million in corporation tax over five years, which Greece has lost in tax revenue.

Does the Commission share the view that this structure facilitates tax evasion and does it consider that this practice and thus the Dutch legal framework that allows it is in keeping with its undertaking to prioritise action to combat tax evasion and tax avoidance?

What legislative proposals does the Commission intend to adopt in order to class such practices as unlawful and when?

What measures does it intend to take in the meantime to enable the Member States to identify abusive practices and tax profits generated from activities carried out within their territory?

¹ http://www.somo.nl/publications-en/Publication_4177/at_download/fullfile.