OECD INVESTMENT TAX INCENTIVES DATABASE 2024 UPDATE

Corporate income tax incentives in emerging and developing economies

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OECD Investment Tax Incentives Database 2024 update: Corporate income tax incentives in emerging and developing economies

The 2024 edition of the OECD Investment Tax Incentives Database (ITID) provides insights into corporate income tax (CIT) incentives for investment in 70 economies, mostly emerging and developing. It describes trends on the design, targeting and granting of CIT incentives, notably in terms of instrument-specific design features and eligibility conditions, and whether they support sustainable development objectives. It also provides insights into the evolution of CIT incentives over the 2022–24 period.

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For further information on the ITID methodological framework and the 2022 ITID edition, please refer to the following publications:

OECD (2022), "OECD Investment Tax Incentives Database – 2022 Update: Tax incentives for sustainable development" (brochure), OECD, Paris, https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/investment/oecd-investment-tax-incentives-database-2022-update-brochure.pdf.

Celani, A., L. Dressler and M. Wermelinger (2022), "Building an Investment Tax Incentives database: Methodology and initial findings for 36 developing countries", OECD Working Papers on International Investment, No. 2022/01, OECD Publishing, Paris, https://doi.org/10.1787/62e075a9-en .

Table of contents

FIGURES

TABLES

Executive summary

The 2024 edition of the OECD Investment Tax Incentives Database (ITID) provides insights into corporate income tax (CIT) incentives for investment in 70 economies, mostly emerging and developing.1 It describes trends in the design, targeting and granting of CIT incentives, and their alignment with sustainable development objectives. It also provides insights into the evolution of CIT incentives over the 2022–24 period in the 52 economies that were part of the 2022 ITID edition.

The 2024 edition of the ITID shows that:

- **Between 2022 and 2024, the use of tax incentives to promote investment has increased in the 52 economies that are part of both editions, accompanied by a greater use of tax credits in upper-middle income economies, and a persistent reliance on CIT exemptions across income groups.** This underscores ongoing competitive pressures as well as challenges in policy design and governance. Strengthening institutional capacity and evaluation, rationalising and improving the design of incentives, and maintaining consistency with economic objectives remains critical for ensuring that tax incentives effectively promote investment without introducing inefficiencies, windfall gains, undue complexity or undermining domestic resource mobilisation.
- **In 2024, more than a third of all incentives in the database target sustainable development objectives**. Incentives that relate to improving the environmental impact of investments are offered in two thirds the economies (66% of all economies). Tax incentives are also commonly used to support employment and job creation (in 44% of all economies), as well as job quality and skills development (in 36% of all economies). Other sustainable development areas promoted by incentives are related to social inclusion and economic development. Sustainable development objectives are mostly promoted through CIT exemptions and tax allowances (40% and 38%, respectively) and less commonly with reduced CIT rates and tax credits (12% and 9%, respectively).
- **Tax exemptions are the most widely used CIT incentive instrument across countries in the database.** 89% of all economies covered in the 2024 edition use at least one CIT incentive in the form of a tax exemption. Tax allowances and reduced CIT rates are also common but less so than exemptions (71% and 67% of all economies use them, respectively). Tax credits are used in one out of every three economies. Instrument choice has important implications for the efficacy of incentives, given that their effectiveness and costs are strongly design- and context-specific. The widespread reliance on income-based instruments across economies is concerning, as these instruments tend to be less cost-effective than expenditure-based incentives (tax allowances and tax credits).
- **Tax exemptions typically are generous.** Most (91%) tax exemptions grant full relief on all income rather than targeting specific qualifying income (e.g. income derived from operational activities) or limiting the scope of relief to a portion of taxable income.
- **Tax allowances target specific assets more often than specific activities.** Tax allowances apply frequently to capital expenditure (70% of all tax allowances). They more often accelerate capital cost-recovery within 100% of the cost (68%) rather than enhance its deduction value above 100% of the capital cost incurred (32%). Only 24% target current expenditure, such as labour and training costs. The remaining 6% target both capital and current expenditure or provide lump-sum deductions, e.g. per new job created.
- **The size, timing, and flexibility of tax relief depend on a range of design features that influence the generosity and accessibility of incentives.** For example, tax exemptions are typically granted on a temporary basis (77% of all exemptions), most commonly for five or ten years (29% and 25% of

all temporary exemptions, respectively). In contrast, reduced CIT rates are as often permanent as they are temporary. Tax credits rarely are refundable in the economies covered (2% of all tax credits).

- **Types of tax incentives vary by economies' level of economic development.** Tax exemptions and reduced CIT rates are relatively more common in lower middle-income and upper middle-income countries, whereas tax allowances are most widely used in low-income economies. Upper middle-income countries stand out for their relatively more frequent use of tax credits compared to other country groups, albeit at a modest level compared to their frequent use of tax exemptions. This suggests a link between the choice of tax credits (and more complex expenditure-based instruments) and the increasing institutional capacity associated with higher income levels.
- **Eligibility for incentives most often is dependent on the sector or the location of activity.** Most economies apply a sector condition to at least one of their incentives (96% of all economies). Targeting investments in specific locations, e.g. Special Economic Zones (SEZs) or specific geographic regions, is another widely used strategy (80% and 71% of all economies respectively apply these conditions to at least one of their incentives). Linking eligibility of at least one of their incentives to a specific performance of the investment (81% of economies) is as common as SEZ conditions, and includes creating a minimum number of new jobs or exporting a minimum share of sales. Two thirds of the economies in the ITID have at least one CIT incentive that requires a minimum investment value.
- **SEZs are more often associated with tax exemptions than with any other instrument.** Outside of SEZs the different tax incentive instruments are more evenly distributed.
- **More than half (58%) of all investment tax incentives in the database combine multiple eligibility conditions**. This can support more precise project or investor targeting and reduce fiscal costs, but can result in complex designs that can make incentives less transparent for investors, policymakers and the general public.
- **The governance of investment tax incentives is complex.** In about three quarters of the economies (71%) CIT incentives are scattered across several laws and regulations, which can reduce their transparency for investors and complicate monitoring and evaluation. Only 29% of economies provide more than 90% of their CIT incentives in one single piece of legislation, generally the income tax law (23%) or dedicated investment laws (6%). In many economies, multiple authorities are involved in granting and administering investment tax incentives.

1 Tax incentives in 70 economies

Governments around the world use investment tax incentives widely with the objective of attracting investors, promoting investment in specific sectors and locations, and encouraging certain investor behaviour. Yet the overall benefits of these policies remain unclear. When carefully designed, tax incentives can help address externalities and frictions that can hinder investment with the potential to enhance productivity and drive economic growth, and support the achievement of the Sustainable Development Goals (SDGs). Conversely, incentives can impose significant costs, including diminished tax revenue and inefficient resource allocation, potentially outweighing their benefits. Notably, poorly designed incentives may be of limited effectiveness and merely offer windfall benefits to projects that would have proceeded without the incentive.

Striking the right balance between an efficient and attractive tax regime for investors and securing necessary tax revenue for public spending and development is a concern, especially in emerging and developing economies. Transparency around investment tax incentives is often lacking, potentially limiting investment, posing governance risks, and complicating assessments of whether incentives in place achieve their policy goals, and at what costs.

The OECD Investment Tax Incentives Database (ITID) improves transparency on tax incentives and facilitates the understanding of countries' tax incentive policies, with a particular focus on emerging and developing economies. It systematically compiles quantitative and qualitative information on the design and targeting of corporate income tax (CIT) incentives using a transparent data collection methodology (Box 1). For each tax incentive regime, the ITID provides information on three dimensions: instrument-specific design features, eligibility conditions and governance features.

Table 1. OECD Investment Tax Incentives Database – 2024 edition: Economy coverage

Europe and Central Asia	Latin America and the Caribbean	Middle East and North Africa	South and East Asia	Sub-Saharan Africa	
Armenia	Argentina	**Algeria**	**Bangladesh**	Angola	Madagascar
Azerbaijan	Brazil	Egypt	**Brunei Darussalam**	Botswana	Malawi
Georgia	**Colombia**	Jordan	Cambodia	**Burundi**	Mauritius
Moldova	**Costa Rica**	**Lebanon**	China (People's Republic of)	Cameroon	Mozambique
Ukraine	Dominican Republic	**Libya**	India	Comoros	Namibia
Uzbekistan	**Ecuador**	Morocco	Indonesia	Côte d'Ivoire	Nigeria
	El Salvador	Palestinian Authority	Lao People's Democratic Republic	Democratic Republic of Congo	Rwanda
	Jamaica				Senegal
	Paraguay	**Saudi Arabia**	Malaysia	Eswatini	**Seychelles**
	Peru	Tunisia	Myanmar	Ethiopia	Sierra Leone
	Uruguay		**Papua New Guinea**	Gabon	South Africa
			Philippines	Gambia	**South Sudan**
			Thailand	Ghana	Tanzania
			Viet Nam	Kenya	**Uganda**
				Lesotho	Zambia
				Liberia	Zimbabwe

Note: Countries in bold indicate new additions to the 2024 edition of the database. Other countries are included in the 2022 and 2024 edition.

The 2024 edition of the database includes 667 tax incentives across 70 economies in Europe and Central Asia, Latin America and the Caribbean (LAC), the Middle East and North Africa (MENA), South and East Asia (SEA); and Sub-Saharan Africa (SSA) (Table 1). It covers incentives available on 1 July 2024.

Box 1. Introducing the OECD Investment Tax Incentives Database

The OECD ITID compiles quantitative and qualitative information on the design and targeting of investment tax incentives available across economies, using a consistent data collection methodology. It focuses on incentives provided through the CIT system and defines investment tax incentives as:

Targeted tax provisions that provide favourable deviations from the standard tax treatment in an economy resulting in reduced or postponed tax liability with the objective of promoting investment.

A key qualification for incentives to feature in the database is that they are targeted provisions that are only available to a specific group of corporate taxpayers, based on the taxpayers' sector, activity, location or other investor- or project-related characteristics.

For each CIT incentive, the database covers three dimensions with about 45 parameters on average collected from country-specific legal documents:

A. Design features	B. Eligibility conditions	C. Governance
How is the tax benefit determined and for how long does it apply?	**Which investors and investment projects qualify for receiving the tax incentive?**	**Which law(s) describe(s) tax incentives? Which authority(ies) are involved in granting them?**
Design features describe how an incentive provides tax relief. This is done by first classifying the incentive into one of the four **instrument** types: reduced rates, tax exemptions, tax allowances and tax credits. In addition, it includes granular instrument-specific details on other design features, such as rates, qualifying income and qualifying expenditure.	**Eligibility conditions** are criteria that investors or investment projects must meet to benefit from a tax incentive. They touch upon a wide variety of areas, such as the sector, location and size of investments. Eligibility conditions can help describe an economy's strategy for targeting incentives and how broadly it may apply.	**Governance** includes information on the legal provision(s) that introduce and govern the tax incentive, as well as the information on the authorities involved in granting the incentive. In some cases, several provisions govern one tax incentive.

Further information on the OECD ITID methodology and key classifications can be found in Celani, Dressler and Wermelinger (2022[1]).

2 The design of investment tax incentives varies widely across economies

Investment tax incentives include a broad variety of instruments and design features (Box 2).

Tax exemptions remain the most widely used instrument across emerging and developing economies in 2024, while tax credits are used much less frequently: 62 out of 70 economies covered (89%) have at least one tax exemption in place (Figure 1, Panel A). Tax allowances and reduced rates are the next most widely used instrument, in 50 and 47 out of 70 economies respectively (71% and 67%). Tax credits are only used in 23 economies (33% of all economies in the ITID).

Box 2. Tax incentive instruments

The OECD ITID focuses on four widely used instruments:

- **Tax exemptions** provide a full or partial exemption of qualifying taxable income and apply on a temporary or permanent basis.
- **Reduced rates** are CIT rates set below the standard rate that apply on a temporary or permanent basis.
- **Tax allowances** may relate to current_expenditure (e.g. operation expenses) or capital expenditures. Tax allowances for capital expenditure may allow for a faster write-off of the value of capital expenditure from taxable income up to 100% of incurred costs (i.e. acceleration) or can go beyond 100% of acquisition cost (i.e. enhancement). This could include, for example, allowing firms to deduct 150% of the value of a new machine. Tax allowances for current expenditure are always enhancing as 100% of current expenditure is immediately deducted.[2]
- **Tax credits** are deductions from the amount of taxes due that may relate to capital expenditures or current expenditures.[3]

Tax exemptions often apply on a temporary basis, but several countries still offer permanent exemptions (Figure 1, Panel B). 77% of CIT exemptions are temporary, while nearly a quarter provide for permanent tax relief. Temporary exemptions apply for periods of between one and 50 years. They most often apply for five or ten years (29% and 25% of all temporary exemptions, respectively, Figure 1, Panel F) and for seven years on average. This could indicate that economies often make use of similar tax exemption designs. Tax exemptions of a similar duration can result in a different tax benefit through their interaction with an economy's standard tax system and project characteristics (Box 3). Out of all CIT exemptions, 91% grant tax relief on all income, i.e. are full exemptions.

Reduced CIT rates are as often permanent as they are temporary (Figure 1, Panel D). Of all reduced CIT rates, half are permanently reduced while the other half are reduced on a temporary basis. For permanent reductions, the rates are reduced by 50% or more compared to their statutory CIT rate in over

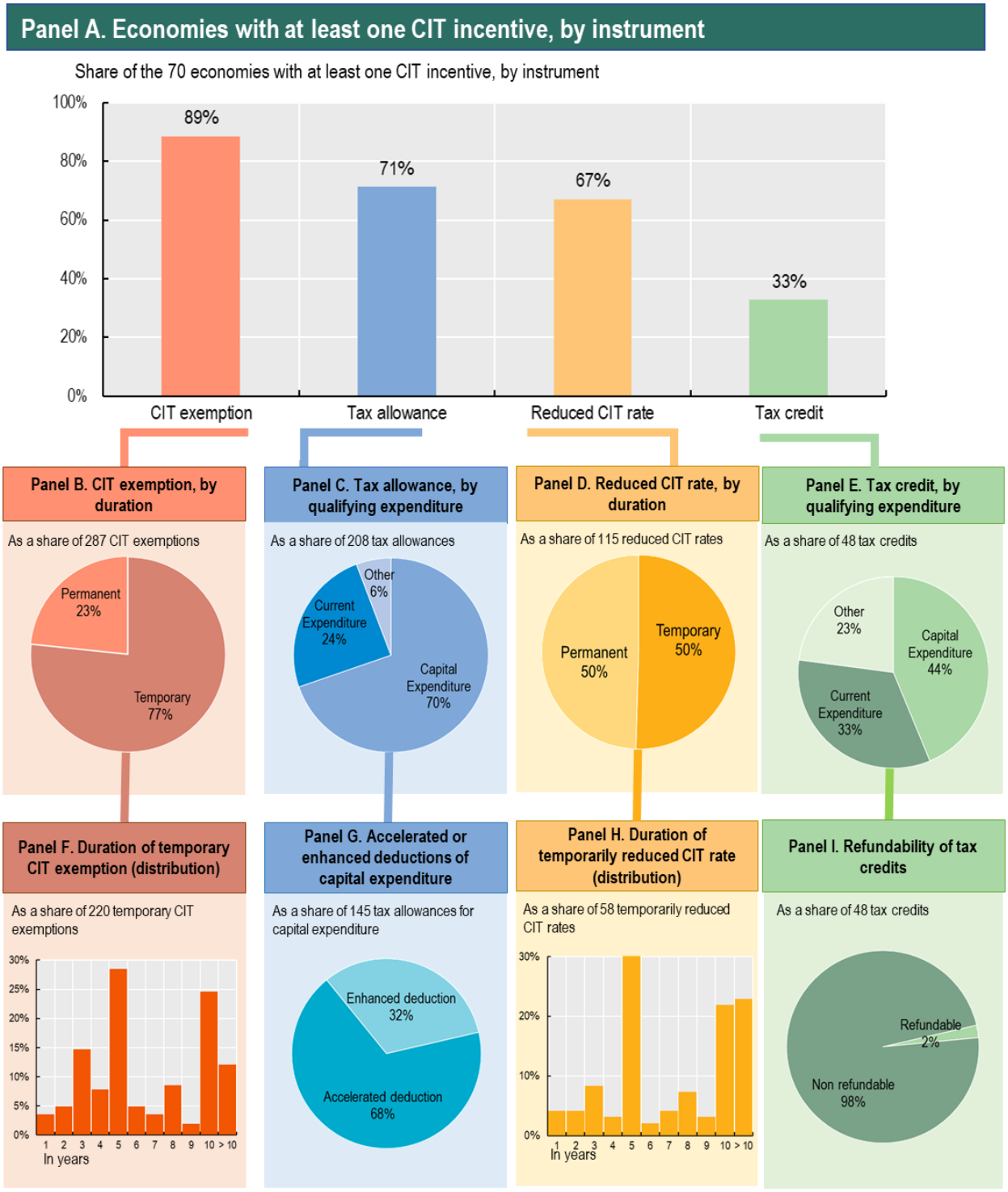
half of the cases. In 3% of the cases, the permanent reduction is of 100% (i.e. rates are zero).[4] When CIT rates are reduced on a temporary basis, they tend to be more generous: in almost 70% of the cases, they are reduced by 50% or more, and in 8% of the cases, the rate is temporarily reduced to zero. Temporarily reduced rates apply for ten years on average, which is longer than for temporary tax exemptions. Over 40% of temporarily reduced rates apply for ten years or more and almost a third for five years (Figure 1, Panel H).

Tax allowances apply more often to capital expenditure than to current expenditure (70% and 24% of all tax allowances, respectively, (Figure 1, Panel C). In some cases (6%) allowances relate to capital and current expenditures at the same time, or involve less common designs, such as providing a lump-sum deduction (e.g. per new job created). When tax allowances apply to capital expenditure, they more often accelerate capital cost-recovery (68%) rather than to enhance its deduction value above 100% of the cost incurred (32%) (Figure 1, Panel G).

Tax credits are less frequently used (23 economies, i.e. 33% of all economies in the database) and apply more evenly to capital and current expenditure compared to tax allowances. 44% of tax credits apply to capital expenditure and 33% to current expenditure (Figure 1, Panel E). Some tax credits relate to capital and current expenditures at the same time or involve other designs (23%). Only one out of the 48 tax credits used across the 70 economies include a refundability provision. Refundability allows direct cash benefits when firms are unable to fully utilise tax benefits due to limited benefits or losses and may more effectively support firm cashflow than other credit designs. Refundability can carry immediate and important costs for governments, if no additional limitations are introduced, and impede forecasting of revenue forgone. Limited use of refundability provisions among emerging and developing economies may be linked to these economies' more restricted fiscal space (OECD, 2022[2])**.**

Choice of tax incentive instrument is key to better design. Depending on how the incentive reduces taxation, it can be more or less likely to stimulate additional investment, encourage specific investor behaviour, and have higher or lower costs and distortions. Tax incentives that provide preferential tax treatment to expenditure (tax allowances and credits) are generally found to be more efficient at stimulating additional investment and more cost-effective than those that provide relief to income (tax exemptions and reduced rates, without links to expenditure) (House and Shapiro, 2008[3]; Zwick and Mahon, 2017[4]; Maffini, Xing and Devereux, 2019[5]; Ohrn, 2019[6]; Rodgers and Hambur, 2018[7]). Expenditure-based incentives are also more closely linked to policy goals, by directly reducing costs of specific investment (e.g., R&D, training costs, green technologies). On their own, tax exemptions and reduced rates may provide tax relief with only an indirect link to a change in firm behaviour, or no link at all, as they typically apply to all income, potentially benefiting returns from existing rather new capital investments or arising from non-operational activities. They may also disproportionately benefit projects that are already profitable, making them more at risk of providing windfall gains to firms, i.e. providing tax incentive support to projects that would have occurred without the incentive (IMF-OECD-UN-World Bank, 2024[8]; OECD, forthcoming[9]; van Parys and James, 2010[10]; Klemm and Van Parys, 2012[11]). Different tax incentives tend to be differently affected by the GloBE rules (Box 4).

Figure 1. Usage and characteristics of CIT incentives

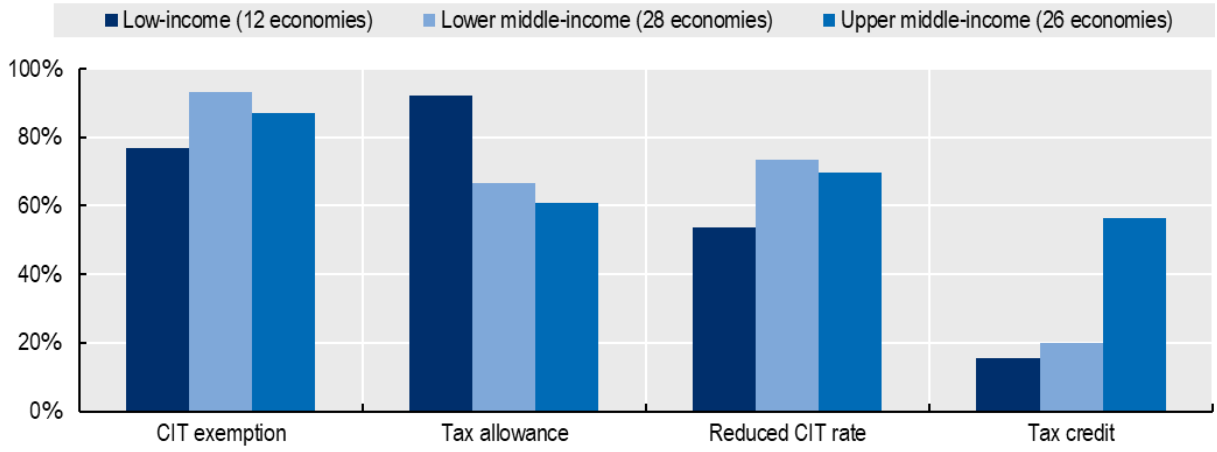


Notes: See Box 2 and Celani, Dressler and Wermelinger (2022[1]) for definitions. Panel C and E: *Other* refers to incentives applying to both capital and current expenditures and incentives that are not directly related to expenditure (e.g. lump-sum). Panel F and G: One incentive may have different durations in specific cases. The distribution shows all durations. Panel I: When refundability is introduced through another provision than is used to grant the incentive, it is not necessarily included in the ITID.
Source: OECD ITID, October 2024 edition, based on information on 70 economies and 667 CIT incentive entries as at 1 July 2024.

Tax incentive design varies with economies' income level (Figure 2). Tax exemptions and reduced CIT rates are more commonly utilised in middle-income economies than in low-income ones. The use of tax credits seems to be positively correlated with income levels, while for tax allowances this trend appears to be reversed. Tax allowances are more widely used in low-income economies, while the widest use of tax credits can be observed in upper middle-income economies. Upper middle-income economies use tax allowances and tax credits to a similar extent (61% and 57%, respectively). However, tax allowances for current expenditures are more widely used by upper-middle than low-income economies (52% and 38%, respectively), suggesting a stronger focus on incentivising investment in tangible assets in the latter group. Tax credits may provide some advantages over tax allowances, depending on the context, including that the value of the benefit might be easier for firms to understand. The evolution of instruments between 2022 and 2024 across income groups is further discussed on page 24.

Figure 2. Tax incentives design varies across income levels

Share of economies in each income group with at least one CIT incentive, by instrument



Note: The figure excludes the four high-income economies that are part of the 2024 ITID edition (see Table A.1 for information on economy coverage by region and income group). Income-groups based on World Bank Country and Lending Groups for the 2024 fiscal year, based on the *Historical classification by income,* accessed http://databank.worldbank.org/data/download/site-content/OGHIST.xlsx.
Source: OECD ITID, based on information on 70 economies and 667 CIT incentive entries as at 1 July 2024.

Box 3. Corporate effective tax rates (ETRs) as an indicator of tax incentive generosity

Detailed descriptions of how tax incentives apply across economies is a first step towards increasing transparency and understanding of economies' tax incentive policies. However, the descriptive statistics in this brochure do not provide information on the extent to which tax relief is provided, nor do they give a comprehensive view on the scope of tax relief available in an economy.

Tax incentives instruments and other design features can vary significantly and their impact often depends on economies' standard tax systems, making it difficult for policy makers and researchers to understand their generosity and assess their impacts across economies. Forward-looking ETRs can help synthetise tax relief from different tax incentives policies in a cross-country comparable measure. ETRs capture the amount of the taxes that are expected to be paid over the lifetime of a hypothetical investment project and summarise them into a single measure, while accounting for design feature details, such as rates, duration, and qualifying income and expenditure. They can help answer questions such as: how does the tax relief of a 30% tax allowance compare to a five-year tax

exemption? Or how does the tax relief provided by a five-year tax exemption in an economy with a 30% standard CIT rate compare to the same incentive in an economy with a 20% rate?

OECD work presents a methodology for calculating forward-looking effective average tax rates (EATRs) to assess common tax incentive designs identified in the OECD ITID (Celani, Dressler and Hanappi, 2022[12]). The methodology has been used to compare the generosity of incentives across ten LAC economies (Gascon et al., forthcoming[13]), including in the tourism sector, in Special Economic Zones (SEZs) and for renewable energy. Findings show that SEZ incentives reduce EATRs by 82% on average, while renewable energy incentives reduce EATRs by 60% with wide variety of incentive designs across countries. The analysis shows that some countries offer several incentives with similar targeting and generosity, particularly in SEZs, which calls for streamlining these overlapping policies.

Box 4. Tax incentives and the global minimum tax (GMT) for MNEs

A global minimum effective taxation level for large MNEs

Pillar Two of the two-pillar international tax agreement establishes a global minimum effective corporate tax rate of 15% for large multinational enterprises (MNEs), i.e. groups with annual revenue above EUR 750M (OECD, 2021[14]). Where an in-scope MNE's ETR in a jurisdiction falls below 15%, the MNE will be subject to top-up taxes under the Global Anti-Base Erosion (GloBE) Rules. Top-up taxes apply to profits in excess of a substance-based income exclusion (SBIE), which allows some profits based on economic substance (tangible assets and payroll) to be deducted from the GloBE tax base. The GloBE Rules establish the minimum corporate tax and are complemented by the 'subject to tax rule', which allows developing economies to tax certain base-eroding payments (such as interest and royalties) when they are not taxed up to a minimum rate of 9%.

Impact on the use of tax incentives

The GloBE Rules will not affect all jurisdictions, MNEs and tax incentives in the same manner. The impact of the GloBE Rules on tax incentives will depend on their design, the jurisdiction's tax system (its baseline tax system and its use of base narrowing provisions), and on the characteristics of MNEs and the activities they perform in the jurisdiction (OECD, 2022[2])**.** For example, incentives for MNEs below the EUR 750M revenue threshold remain unaffected. Income-based incentives, such as full exemptions, are likely to be most impacted as these tend to reduce effective tax rates substantially. Expenditure-based incentives targeted to payroll or tangible assets, or tax incentives with economic substance requirements will be less affected due to the SBIE. Overall, policymakers may need to reassess incentives, especially tax holidays, given the new context brought about by widespread introduction of the GloBE Rules.

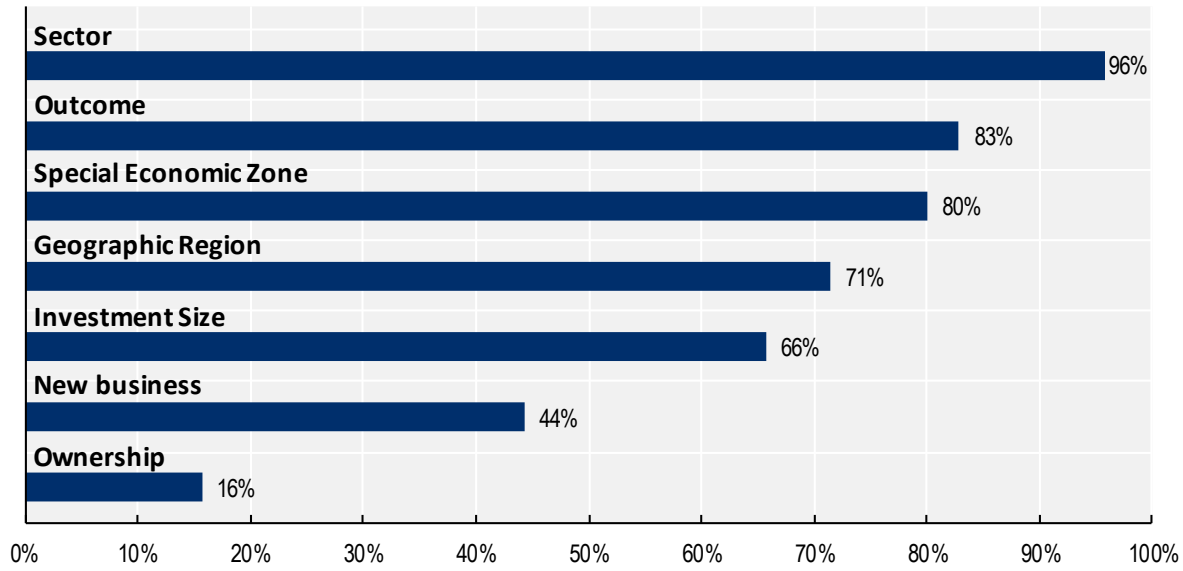
3 Diverse conditions determine eligibility for incentives

Investment tax incentives typically include specific criteria that define the eligibility of a project or investor. Eligibility criteria can cover a variety of areas including business and project characteristics (Box 5).

Most economies use sector and location conditions to target tax incentives (Figure 3). Almost all economies covered by the ITID have at least one incentive related to a specific sector (67 of 70 economies). Targeting investments in specific locations is another widely used strategy: 80% of economies have a CIT incentive granted to investors that locate in a SEZ, while 71% provide one for specific geographic regions in the economy.

Figure 3. Investment tax incentives often apply to investors in specific sectors or locations

Share of the 70 economies with at least one CIT incentive, by eligibility condition



Source: OECD ITID, based on information on 70 economies and 667 CIT incentive entries as at 1 July 2024.

Box 5. Eligibility conditions

The ITID distinguishes several conditions of eligibility:

- **Economic sector** in which the business operates;
- Location in which an investment project occurs. For example, incentives may require that an investment take place within a **Special Economic Zone**[5] or in a specific **geographic region** of the economy;
- **Outcome** that is required to be achieved by the project benefiting from a tax incentive, such as creating a certain number of new jobs or exporting a minimum share of sales;[6]
- **Investment size,** implying that a minimum amount of money should be invested or the business should operate with a minimum number of employees at the early stages of the project;
- Ownership structure of the business, such as being a publicly **listed business** or a **cooperative**;[7]
- **New business**, or limiting the tax benefit to businesses within the first year(s) of establishment. Such limitations may restrict investment expansion projects from benefitting from an incentive.

Certain sector and outcome conditions may target tax incentives to support investment in areas that may contribute to sustainable development, as well as economic growth more broadly (see Box 6 and Annex A)

Outcome conditions, used in 83% of economies, are diverse and focus most often on project, rather than investor characteristics. Outcome conditions require companies to achieve specific performance results to qualify for or maintain eligibility for a tax incentive. They are linked to the outcomes of the investment project, rather than the attributes of the investor. For example, almost a third of all economies have at least one incentive that requires a minimum share of exports in total sales (23 economies). Another 24% of the economies require the creation of a minimum number of new jobs (17 economies). Certain outcome conditions may support achieving the SDGs (see page 20). Outcome conditions require careful monitoring to ensure compliance, which requires resources and administrative capacity. Their use should be weighed against their monitoring and compliance costs.

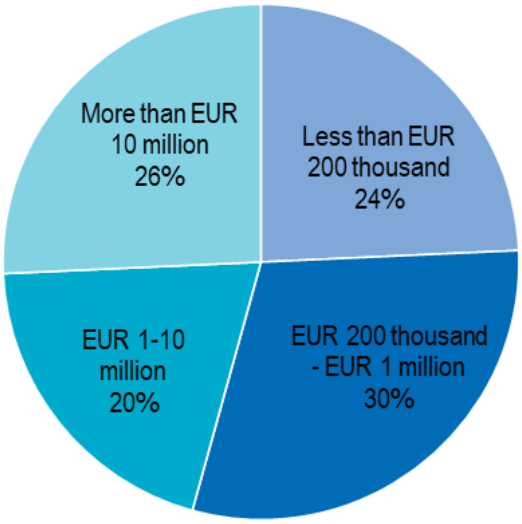
66% of the economies have CIT incentives that require a minimum investment size. Investment size conditions ask businesses to either invest a minimum amount of money (an investment threshold, 40 economies) or employ a minimum number of workers (an employment threshold, 12 economies) to benefit from a tax incentive. Monetary investment thresholds differ widely with almost a quarter requiring investment of less than EUR 200 000, while 26% require projects above EUR 10 million (Figure 4).[8] High investment size requirements can risk excluding SMEs and may contribute to an uneven playing field but may limit the fiscal cost of the incentive.

Over half of investment tax incentives require multiple eligibility conditions to be fulfilled in parallel (Figure 5). For example, a tax allowance may apply only to investment projects of at least EUR 10 million in manufacturing activities (i.e., investment size and sector condition). More targeted incentives can simulate additional investment at lower revenue forgone. But narrow targeting also involves costs, including administrative and compliance costs, risks of distortions by picking winners, and potential greater complexity for investors. Policymakers must consider what targeting is most appropriate depending on the policy goal and government capacity (OECD, forthcoming[9]).

SEZs use tax exemptions much more often than they use other instruments (Figure 6). Tax allowances and tax credits apply much less often within SEZs (in 21% and 5% of economies respectively). Outside of SEZs the different tax incentive instruments are more evenly distributed.

Figure 4. Monetary investment size conditions apply with different thresholds

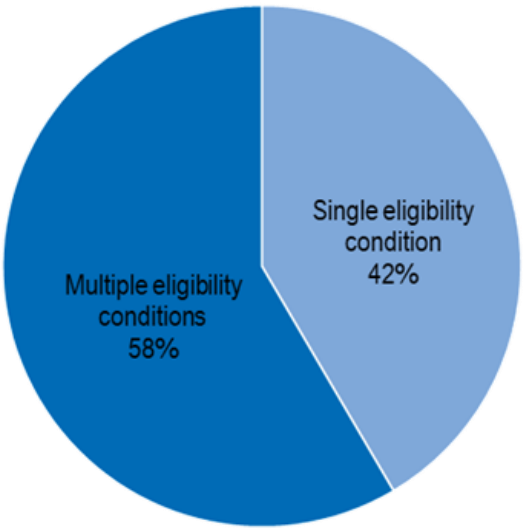
As a share of 80 CIT incentives with a monetary investment size condition



Note: One incentive may have multiple thresholds in specific cases. The distribution shows all thresholds.
Source: OECD ITID, based on information on 70 economies and 667 CIT incentive entries as at 1 July 2024

Figure 5. Eligibility conditions are often combined

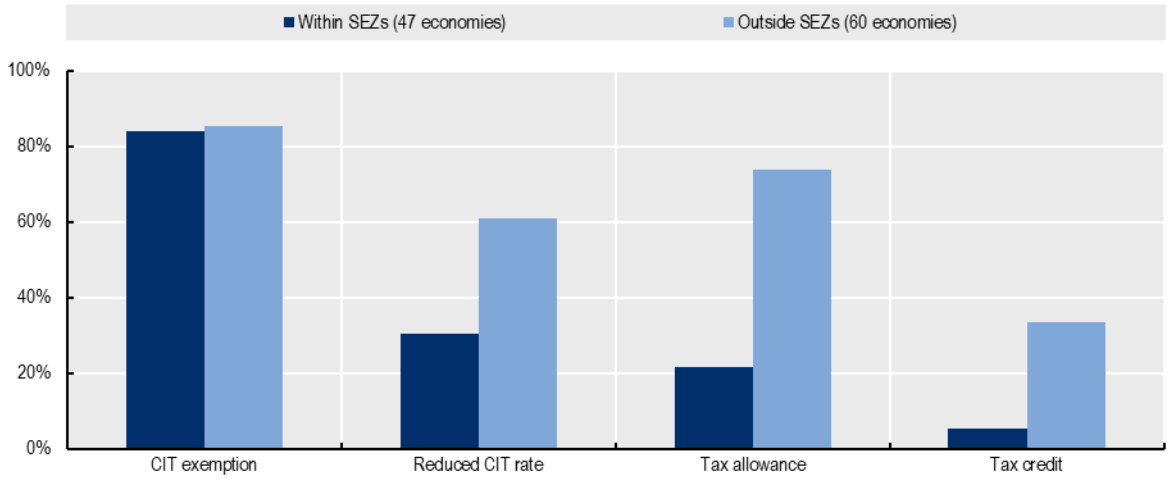
As a share of 667 CIT incentives



Note: One incentive may have multiple thresholds in specific cases. The distribution shows all thresholds.
Source: OECD ITID, based on information on 70 economies and 667 CIT incentive entries as at 1 July 2024.

Figure 6. SEZs use tax exemptions more often than other types of instruments

Share of economies with at least one CIT incentive outside or within SEZs, by instrument

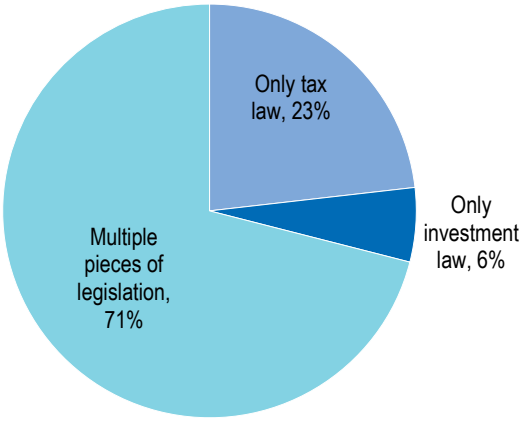


Source: OECD ITID, based on information on 70 economies and 667 CIT incentive entries as at 1 July 2024.

Figure 7. Tax incentives are often governed by laws other than, or in addition to, the tax law

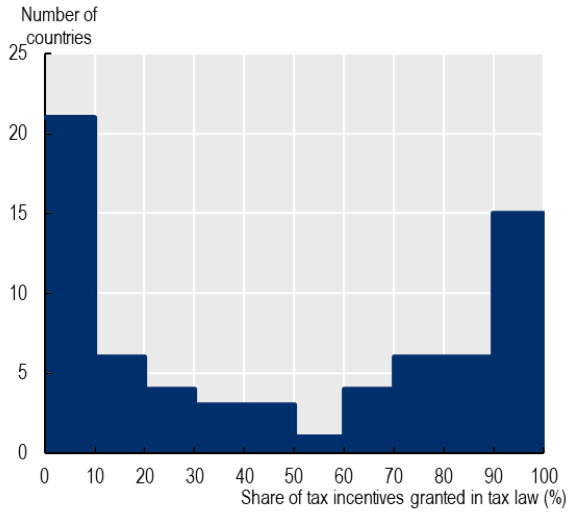
Panel A. Legal basis of CIT incentives per economy

As a share of all economies



Panel B. Share of tax incentives granted in the tax law per economy (distribution across economies)

Considering 667 incentives



Note: Based on data from 69 economies (excluding Paraguay, which only offers incentives outside the scope of the ITID). Tax law refers to income tax law, income tax act or the tax code. Panel A, countries that grant at least 90% of their tax incentives only in the tax law (resp. investment law) are included in the tax law (investment law) category. Panel B shows, for countries that grant at least one tax incentive through the tax law, the percentage of incentives granted in the tax law. Countries that grant all tax incentives in the investment law are not included.
Source: OECD ITID, based on information on 70 economies and 667 CIT incentive entries as at 1 July 2024.

4 The governance of investment tax incentives is often fragmented

The procedures that economies put in place to implement and govern tax incentives may affect transparency and accountability of the granting bodies (OECD, 2023[15]). It also influences prospects for tax reform.

Only 20 of the 70 economies in the ITID (29%) provide more than 90% of their CIT incentives in one single piece of legislation, most often in the tax law (23% of economies) or the investment law (6%) (Figure 7, Panel A). Providing all tax incentives in one single law can increase transparency and reduce redundancies across incentives (Jedlicka and Sabha, 2017[16]; IMF-OECD-UN-World Bank, 2015[17]; 2024[8])

CIT incentives in the other 50 economies (71%) are scattered across several laws and regulations. Even when multiple pieces of legislation offer incentives, tax laws remain the legal basis for more than 60% of incentives in 44% of economies (Figure 7, Panel B). Conversely, several economies still make limited use of tax laws for providing incentives and create more incentives in other types of legislation. For example, some economies introduce CIT incentives through the tax law as well as through investment laws (5 economies), while others use the tax and the SEZ law (8 economies). In other economies the split is more complex. Economies may have tax laws authorising that CIT incentives be granted through regulations or decrees. Including investment tax incentives in primary legislation (i.e. laws) ensures that the legal basis governing the tax incentive is approved by the legislature which in turn, ensures a higher level of parliamentary and public scrutiny of the approved legislation (IMF-OECD-UN-World Bank, 2015[17]).

Often multiple authorities are involved in granting and administering investment tax incentives. For example, the granting process for an incentive may be shared between the investment promotion agency (IPA) and Ministry of Finance when the former grants the investor a special status, while the latter details the CIT benefit available to taxpayers with this special status. In other economies, the SEZ authority may be involved in granting incentives within SEZs, while administering other CIT incentives.[9]

Granting arrangements that involve multiple authorities make governance more complex but benefits can arise from bringing together different expertise and policy priorities. It is crucial that ministries and agencies coordinate their activities, define the role of each agency and align on overarching policy objectives.[10]

5 More than a third of incentives relate to key sustainable development areas

Many economies use investment tax incentives to attract investment that may contribute to sustainable development. The ITID reveals that about 35% of all tax incentive schemes included in the database target at least one of six sustainable development areas (SD areas) (233 incentives out of 667 in 63 out of 70 economies). The ITID considers an SD area being *targeted* by evaluating whether a specific design or eligibility condition of the tax incentive relates to one of six SD areas (Box 6). It does not consider stated policy objectives. Such targeting can arise via different channels (Figure 8, Panel B) either through design features (i.e. preferential treatment of certain qualifying income or expenditures) or through eligibility conditions (i.e. sector targeting or outcome conditions). The OECD FDI Qualities Indicators (OECD, 2019[18]) and the FDI Qualities Policy Toolkit (OECD, 2022[19]) consider similar SD areas. Most incentives targeting SD areas are CIT exemptions (40%) and tax allowances (38%), while reduced CIT rates and tax credits are less often used to do so (12% and 9%, respectively).

Box 6. Sustainable development areas tracked in the ITID

In some economies, CIT incentives include dedicated eligibility conditions and design features tied to SD areas. The ITID tracks six SD areas:

Employment and job creation: tax incentives to support existing employment and the creation of additional jobs.

Environmental impact: tax incentives that promote renewable energy and energy efficiency, protecting environmental quality and improving environmental outcomes.

Job quality and skills: tax incentives related to employment conditions and promoting skills development through apprenticeships, education and training opportunities.

Local linkages: tax incentives to foster linkages with local suppliers, including SMEs, to enhance their potential for Global Value Chain (GVC) upgrading and knowledge spillovers.

Promoting exports: tax incentives that promote exports to enable productivity growth through participation and access to foreign markets.

Social inclusion and gender equality: tax incentives for hiring women or employees with disabilities, supporting their employment or entrepreneurial activities.

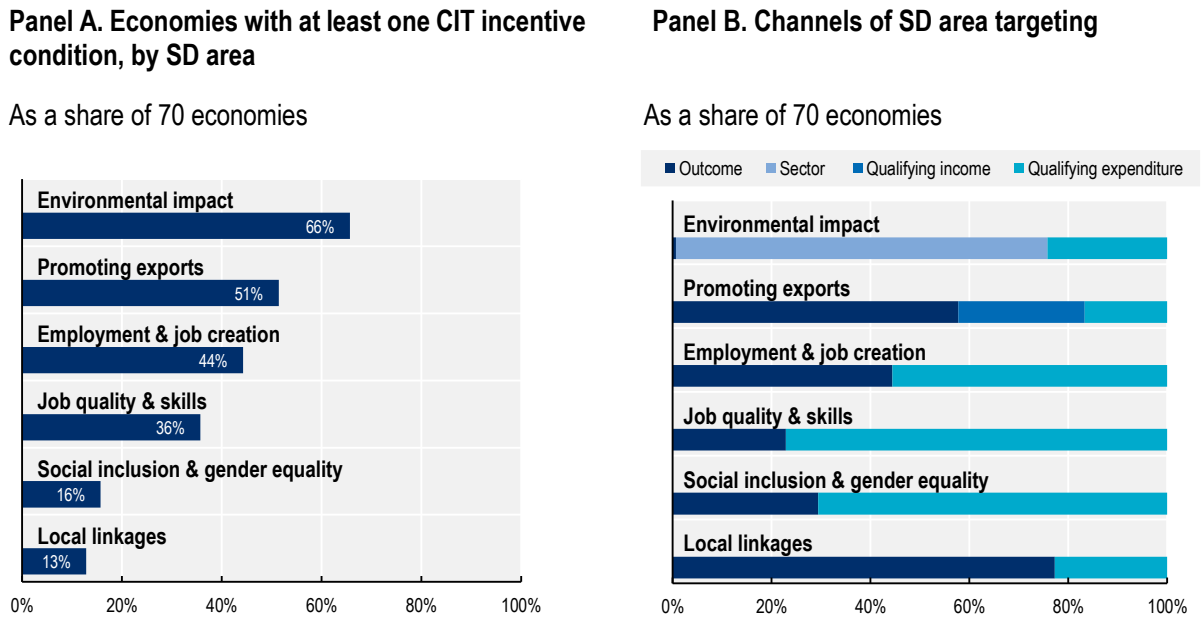
For more information, see Annex A)

Incentives relating to improve the environmental impact of investments are offered in two thirds of the economies (46 out of 70 economies, i.e. 144 incentives), making it the most widely targeted SD area (Figure 8, Panel A). Most incentives (75%) use sector conditions as targeting mechanism (Figure 8, Panel

B). Of these, the water and waste management sector is most often targeted, followed by renewable electricity, with some overlap between the two. In most other economies, targeting occurs through qualifying expenditure (24% of the incentives), e.g., for purchased equipment and machinery to reduce industrial waste or solar photovoltaic systems. Only one incentive uses an outcome condition, requiring that investors have made energy efficiency savings to access the incentive.

Half of the economies target at least one CIT incentive to export promotion (36 out of 70) (Figure 8, Panel A). Incentives for export promotion are commonly observed in SEZs: almost one third of tax incentives targeting export promotion are within SEZs (28 of 88 tax incentives in 18 of the 36 economies promoting exports via tax incentives).

Figure 8. Improving environmental impact is the most widely targeted SD area



Source: OECD ITID, based on information on 233 CIT incentive entries that relate to an SD area as at 1 July 2024.

Tax incentives target employment and job creation in 31 economies (**Figure 8, Panel A).** The majority of these incentives (56%) target specific qualifying expenditure linked to wages, salaries or emoluments (Figure 8, Panel B). Investors can consequently deduct more than the actual labour costs incurred from their taxable income. The remaining incentives (44%) use outcome conditions as a targeting mechanism, such as employing a minimum number of (sometimes local) employees.

Job quality and skills development are targeted in 25 economies and the vast majority of them (77%) do so via qualifying expenditure. Most economies encourage upskilling of employees by offering enhanced deductions of expenditures for training, education, or apprenticeship contracts. Other economies address job quality by tying incentives to the requirement to pay certain minimum wages. One economy, for example, requires investors to pay employees at least 15% above the average salary to access the incentive.

Social inclusion and gender equality is targeted by 11 economies. While all 11 economies address the participation of disabled people in the labour force, five economies also target improving gender equality, e.g., by requiring a minimum share of female employees, or supports hiring of women. Incentives are either offered as enhanced deductions of labour costs for female or disabled employees (63% of these

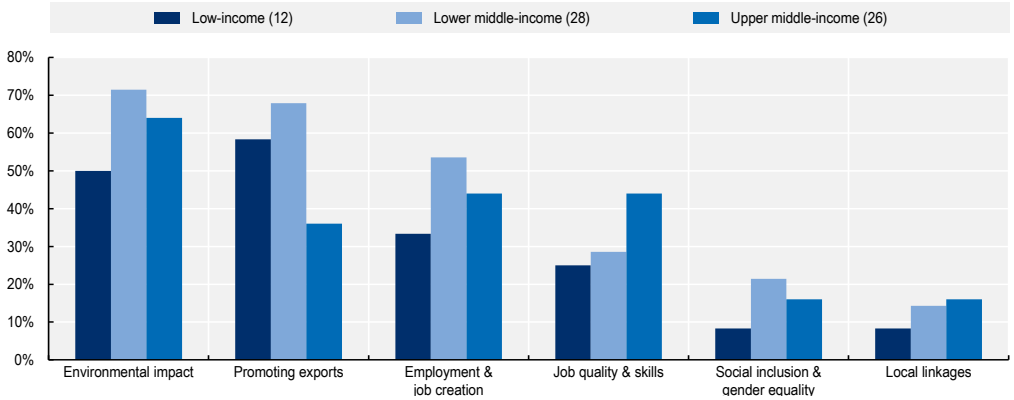
incentives) or require a certain share of women or disabled staff. Another criteria used is the requirement that the founding members of an enterprise are persons with disabilities.

Fostering local linkages is the least often targeted goal of the six SD areas considered in the ITID. Linkages of investors and local suppliers can support economies in their Global Value Chain (GVC) upgrading process, which can enhance knowledge spillovers and more resilient economies. Indeed, spillovers are one of the most cited externalities motivating reduced tax rates to support FDI. Nine out of 70 economies promote supply linkages between foreign and domestic firms via criteria setting a minimum share of domestically sourced inputs.

Sustainable development priorities vary across economies of different income levels. Some SD areas show targeting trends linked to income levels while others not (Figure 9).

Figure 9. Sustainable Development area targeting varies across income levels

Share of economies by income group with at least one CIT incentive, by SD area



Source: OECD ITID, based on information on 233 CIT incentive entries that target one of the respective SD areas as at 1 July 2024.

Reducing the negative environmental impact of investment is a priority across all income categories. About two thirds of lower and upper middle-income economies (71% and 64%, respectively) have at least one CIT incentive that supports this goal, making it the most targeted SD area in these groups (Figure 9).Half of low-income economies target environmental sustainability via CIT incentives, the second most targeted SD area after export promotion in this group. Dressler and Warwick (2025[20]; forthcoming[21]) provide an in-depth discussion of the merits and costs of using CIT incentives to drive investments in technologies relevant for the net-zero transition.

Export incentives are frequently used in lower income economies. More than half of low-income (or 58%) and lower middle-income economies (or 68%) have at least one CIT incentive in place that promotes exports, which makes it the top-tier targeting area in low-income economies (Figure 9). By contrast, in the upper middle-income category, export incentives are only observed in 36% of economies. One possible explanation might be the special and differential treatment provisions under WTO rules for members with developing country status and specific clauses for least-developed countries.

Employment and job creation is more widely supported through CIT incentives in middle-income than low-income economies. More than half (54%) of lower middle-income and 44% of upper-middle income economies have at least one CIT benefit in place that supports this goal, compared to 27% of low-income countries (Figure 9).

Targeting of job quality & skills development and creating local linkages increases with rising income levels. In 25% of low-income economies, CIT incentives encourage training opportunities and good working conditions (Figure 9). For lower middle-income economies this number increases to 29%, while on the upper middle-income level 44% of economies offer at least one such CIT incentive.

Only few countries promote social inclusion & gender equality and local linkages via CIT incentives (Figure 9) Both areas are targeted only to a very limited extent across all economies, though economies may use alternative policy measures to advance these objectives. Local linkages are promoted via tax incentives in 8%, 14% and 16% of economies in respective income groups. Social inclusion and gender equality are promoted in 8% of low-income economies, 21% in lower-middle income economies and 16% in upper middle economies, respectively.

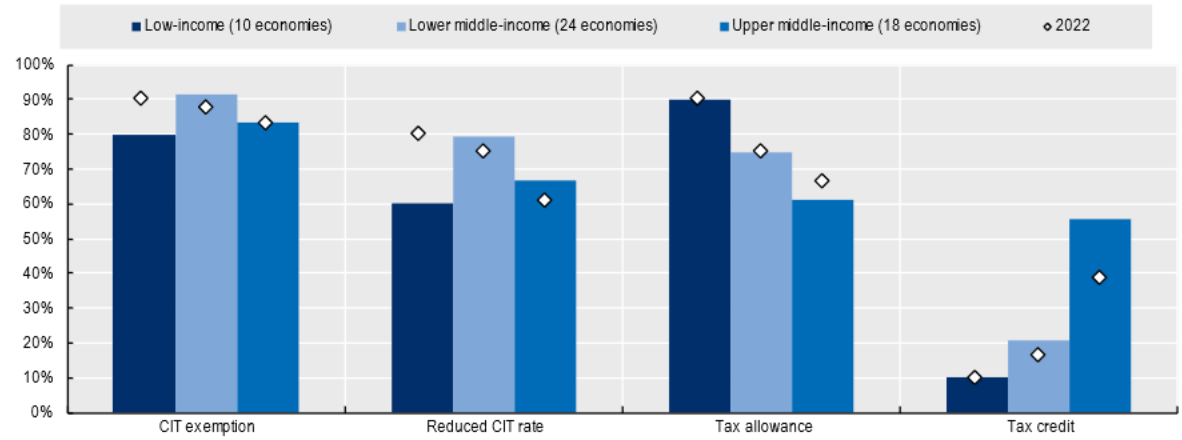
6 Between 2022 and 2024 the use of incentives increased in nearly half of the countries

The 2024 edition of the ITID tracks policy changes across 52 of the 70 economies included in both the 2022 and 2024 editions.[11]

The data reveals that tax incentives remain a popular tool among governments for promoting investment, despite potential uncertainties about their effectiveness. Over the two-year period, the use of investment tax incentives by the 52 economies has risen. In 2024, a total of 503 unique tax incentives were identified across the group, averaging about 10 incentives per country. This represents an increase of nearly 20% compared to 2022, when the average number of incentives per country stood at 8.1. While the number of incentives does not provide information on their generosity or their base (i.e. wide or narrow targeting), it shows that governments are actively using such policies. A proliferation of incentives was observed in 45% of the countries in the sample, while 18% reduced the number of incentives available to investors.

Figure 10. Changes in the use of tax incentive instruments across income levels over 2022–2024

Share of economies in each income group with at least one CIT incentive, by instrument



Note: The figure excludes the four high-income economies part of the 2024 ITID edition. Income-groups based on World Bank Country and Lending Groups for the 2024 fiscal year, based on the *Historical classification by income,* accessed http://databank.worldbank.org/data/download/site-content/OGHIST.xlsx.
Source: OECD ITID, based on information on 52 economies and 422 CIT incentive entries as at 1 July 2022 and 503 CIT incentive entries as at 1 July 2024.

The use of tax credits has increased strongly among upper-middle income economies. The share of economies in this income group offering at least one tax credit rose from 7 to 10. The new countries use tax credits tied to employment and capital expenditures in infrastructure and modernisation projects in less developed areas, as well as credits for current and capital expenditures relating to recycling and the workplace inclusion of disabled persons. Overall, the adoption of tax credits seems to intensify with rising income levels, with nearly 60% of upper-middle-income economies having at least one such incentive in place compared to 21% in lower-middle-income economies and 10% in the low-income group (Figure 10). Despite the growth in tax credits, these instruments remain the least common type of incentive across all income groups, with only 16 out of the 52 economies included in the ITID time series offering at least one tax credit scheme in 2024.

Eligibility conditions tilt towards regional development and investment size. In 2024, governments in the 52 economies continued to focus on specific sectors, special economic zones (SEZs), and specific investment outcomes, such as environmental sustainability, exports, job creation, and inclusion, when designing tax incentives. Trends in the use of eligibility conditions show a greater emphasis on incentives aimed at attracting investment of a certain size or in specific regions in 2024 compared to 2022. The share of economies applying incentives with eligibility conditions tied to investment size rose from 60% to 69%, and those with regional development links from 65% to 75%. This suggests efforts to ensure economic substance of investment and a focus on regional development. Establishing adequate eligibility conditions can, however, be challenging. Investment size thresholds, for instance, may inadvertently encourage overinvestment or clustering of projects below eligibility thresholds, potentially leading to inefficiencies. Region-specific incentives might also unintendedly encourage sub-optimal capital allocation across regions and not necessarily contribute to regional development in an efficient manner. Ensuring that eligibility conditions align with countries' policy goals and adequately address market failures or other investment frictions with minimal or acceptable distortions remain essential to designing effective and efficient incentives (OECD, forthcoming[9]).

SEZs continue to rely strongly on tax exemptions. Over time, tax incentives policies have proved to be quite persistent, especially within SEZs. Tax credits, for instance, have gained traction outside SEZs but adoption remains limited within SEZs. Other instruments have also shown little variation within SEZs, with CIT exemptions remaining largely dominant across both years — 78% of the economies offering incentives in SEZs provide at least one CIT exemption for zone investors in 2024 (compared to 76% in 2022). This relative "stickiness" of SEZ incentive regimes over time and preference for CIT exemptions may stem from the short time series observed here but also to SEZ governance, which often falls outside the purview of finance ministries. Finance authorities are typically more inclined to adopt more targeted expenditure-based instruments that are more closely tied to investment amounts. Income-based incentives represent only 57% of the entries provided uniquely in the tax law, compared to 65% in the investment law.

Governance of tax incentives is more fragmented. Challenges in this area are evident from the increasing share of tax incentives being granted through non-tax-specific legislation. In 2024, 73% of the countries had more than 10% of their incentives governed by laws other than the tax law, compared to 69% in 2022. This rise, coupled with the growing number of incentives, raises concerns about transparency and policy coherence. Granting tax incentives outside the framework of tax-specific legislation deviates from established best practices in tax policy.

Sustainable development targeting remains a priority for many countries. The promotion of SD areas via CIT incentives follows similar trends in 2024 compared to 2022. Limited changes are observable in 2024: Three additional economies promote exports and job quality and skills (29 and 18 economies in 2024). Two additional economies introduced incentives that promote environmental sustainability (32 economies). Supporting social inclusion and gender equality remained steady (8 economies), while one country less supported employment and job creation in 2024 (20 economies)

Further reading

Celani, A., L. Dressler and M. Wermelinger (2022[1]), "Building an Investment Tax Incentives database: Methodology and initial findings for 36 developing countries", *OECD Working Papers on International Investment, No. 2022/01*, OECD Publishing, Paris, https://doi.org/10.1787/62e075a9-en.

Celani, A., L. Dressler and T. Hanappi (2022[12]), "Assessing tax relief from targeted investment tax incentives through corporate effective tax rates: Methodology and initial findings for seven Sub-Saharan African countries", *OECD Taxation Working Papers, No. 58*, OECD Publishing, Paris, https://doi.org/10.1787/3eaddf88-en.

Dressler, L. and R. Warwick (2025[20]), "Corporate income tax, investment, and the net-zero transition: Issues for consideration", *OECD Taxation Working Paper* OECD Publishing, Paris.

Dressler, L. and R. Warwick (forthcoming[21]), "Corporate income tax incentives as climate policy tools? Lessons from three European countries", *OECD Taxation Working Paper* OECD Publishing, Paris

Gascon C. et al. (forthcoming[13]), "Investment Tax Incentives in Latin America and the Carribean: An analysis using effective tax rates", *OECD Taxation Working Paper, OECD Publishing, Paris.*

Heady, C. and M. Mansour (2019), Tax Expenditure Reporting and Its Use in Fiscal Management: A Guide for Developing Economies, IMF, Washington, DC.

IMF-OECD-UN-World Bank (2015[17]), *Options for Low Income Countries' Effective and Efficient Use of Tax Incentives for Investment*, A report prepared for the G-20 Development Working Group by the IMF, OECD, UN and World Bank., https://www.oecd.org/tax/tax-global/options-for-low-income-countries-effective-and-efficient-use-of-tax-incentives-for-investment.pdf.

IMF-OECD-UN-World Bank (2024[8]), *The Platform for Collaboration on Tax: Tax Incentives Principles. Public Consultation Draft*, IMF-OECD-UN-World Bank.

James, S. (2013), Effectiveness of Tax and Non-Tax Incentives and Investments: Evidence and Policy Implications, https://ssrn.com/abstract=2401905 or http://dx.doi.org/10.2139/ssrn.2401905

Klemm, A. and S. Van Parys (2012), "Empirical evidence on the effects of tax incentives", International Tax and Public Finance, Vol. 12, pp. 393–423, https://doi.org/10.1007/s10797-011-9194-8

OECD (2022[2]), *Tax Incentives and the Global Minimum Corporate Tax: Reconsidering Tax Incentives after the GloBE Rules*, OECD Publishing, Paris, https://doi.org/10.1787/25d30b96-en

OECD (2022[22]), "OECD Investment Tax Incentives Database – 2022 Update: Tax incentives for sustainable development" (brochure), OECD, Paris,

OECD (2023), "Improving transparency of incentives for investment facilitation", *OECD Business and*

Finance Policy Papers, No. 35, OECD Publishing, Paris, https://doi.org/10.1787/ab40a2f1-en.

OECD (forthcoming[9]), Tax incentive policymaking: a practical guide, OECD Publishing, Paris.

Pecho M. et al. (2024[23]), "Managing Tax Incentives in Developing Countries", *Technical Notes and Manuals* 007, https://doi.org/10.5089/9798400289590.005.

von Haldenwang, C., A. Redonda and F. Aliu (2023), Tax Expenditures in an Era of Transformative Change: the GTED Flagship Report 2023, IDOS, Bonn, https://www.taxexpenditures.org/2023/10/06/tax-expenditures-in-an-era-of-transformative-change/

World Bank (2024), Tax Expenditure Manual, World Bank, Washington, DC, https://hdl.handle.net/10986/41871 (accessed on 25 July 2024).

Annex A. Additional details on coverage and classifications

Table A.1. OECD Investment Tax Incentives Database – 2024 edition: Economy coverage

Economy coverage by region and income group

Economy	Income Group		Economy	Income Group
Europe, Central Asia				
Armenia	Upper-middle income		Moldova	Upper middle income
Azerbaijan	Upper-middle income		Ukraine	Upper-middle income
Georgia	Upper-middle income		Uzbekistan	Lower-middle income
Latin America and the Caribbean				
Argentina	Upper-middle income		El Salvador	Upper middle income
Brazil	Upper-middle income		Jamaica	Upper middle income
Colombia	Upper-middle income		Paraguay	Upper middle income
Costa Rica	Upper-middle income		Peru	Upper middle income
Dominican Republic	Upper-middle income		Uruguay	High income
Ecuador	Upper middle income			
Middle East and North Africa				
Algeria	Upper-middle income		Morocco	Lower-middle income
Egypt	Lower-middle income		Palestinian Authority	Lower middle income
Jordan	Lower-middle income		Saudi Arabia	High income
Lebanon	Lower middle income		Tunisia	Lower middle income
Libya	Upper-middle income			
South and East Asia				
Bangladesh	Lower-middle income		Malaysia	Upper middle income
Brunei Darussalam	High income		Myanmar	Lower middle income
Cambodia	Lower-middle income		Papua New Guinea	Lower-middle income
China (People's Republic of)	Upper-middle income		Philippines	Lower middle income
India	Lower-middle income		Thailand	Upper middle income
Indonesia	Upper-middle income		Viet Nam	Lower middle income
Lao People's Democratic Republic	Lower-middle income			
Sub-Saharan Africa				
Angola	Lower middle income		Malawi	Low income
Burundi	Low income		Mauritius	Upper middle income
Botswana	Upper middle income		Mozambique	Low income
Cameroon	Lower middle income		Namibia	Upper middle income
Comoros	Lower middle income		Nigeria	Lower middle income
Côte d'Ivoire	Lower middle income		Rwanda	Low income
Democratic Republic of Congo	Low income		Senegal	Lower middle income
Eswatini	Lower middle income		Seychelles	High income
Ethiopia	Low income		Sierra Leone	Low income

Gabon	Upper middle income		South Africa	Upper middle income
Gambia	Low income		South Sudan	Low income
Ghana	Lower middle income		Tanzania	Lower middle income
Kenya	Lower middle income		Uganda	Low income
Lesotho	Lower middle income		Zambia	Lower middle income
Liberia	Low income		Zimbabwe	Lower middle income
Madagascar	Low income			

Source: OECD ITID, 2024 edition, and World Bank Country and Lending Groups for the 2024 fiscal year, based on the *Historical classification by income,* accessed http://databank.worldbank.org/data/download/site-content/OGHIST.xlsx.

Table A.2. Targeting sustainable development through eligibility conditions and design dimensions of investment tax incentives

Column 1 lists SD areas in Box 5. The clusters build on those identified in the OECD FDI Qualities Indicators (OECD, 2022[24]) and the FDI Qualities policy toolkit (OECD, 2022[19]). The table identifies how economies target these respective clusters, either through eligibility conditions or the design features of tax incentives (columns 2-5).

Sustainable Development Areas	Outcome condition	Sector condition	Preferential treatment for certain qualifying income	Preferential treatment for certain qualifying expenditure
Employment & job creation	(a) Create a minimum number of new jobs;			(a) Wages of newly created jobs; (b) Wages of recent graduates; (c) Wages of employees, including for women or workers with disabilities.
Environmental impact	(a) Ensure some or a certain level of energy efficiency improvement.	(a) Electricity generation from renewable energy sources;[1] (b) Waste management.		(a) Acquisition of machinery for electricity production from renewable energy sources; (b) Improving the energy performance of machinery or buildings (e.g. via building retrofitting).
Job quality and skills	(a) Reach a minimum level of expenditure on training and education; (b) Pay an average wage at a certain level.			(a) Expenditure on training and education of employees; (b) Wages of trainees and apprentices; (c) Training expenditures for women re-entering the workforce or workers with disabilities; (d) Expenditures related to building training facilities.
Local linkages	(a) Source a minimum share of inputs from the local market; (b) Source a minimum share of inputs from local SMEs.			(a) Expenditures on inputs sourced from SMEs.
Promoting Exports	(a) Achieve a minimum export share in sales.		(a) Income from exports; (b) Income from transit trade.	(a) Export promotion expenditure.[2]
Social Inclusion	(a) Employ a minimum share of female workers; (b) Employ a minimum share of workers with disabilities;			(a) Wages of female workers or workers with disabilities; (b) Training expenditures for women re-entering the workforce or workers with disabilities.

	(c) Founding members of a company must be people with disabilities.			

Note: Eligibility conditions and design features listed in the table are used by at least one economy included in the database. The list may evolve in the future when economy coverage extends.

[1] Includes only tax incentives benefiting electricity generation from renewable energy sources, but not electricity generation from non-renewable sources. Tax incentive may be part of a broader special regime that benefits other sector of the economy.

[2] Refers to expenses incurred for the purpose of seeking opportunities and promoting the export of goods or services produced in the economy (e.g. publicity and advertisements abroad, export market research, participation in trade fairs amongst others).

References

Celani, A., L. Dressler and T. Hanappi (2022), "Assessing tax relief from targeted investment tax incentives through corporate effective tax rates: Methodology and initial findings for seven Sub-Saharan African countries", *OECD Taxation Working Paper No 58*, OECD Publishing, Paris, https://doi.org/10.1787/3eaddf88-en. [12]

Celani, A., L. Dressler and M. Wermelinger (2022), "Building an Investment Tax Incentives database: Methodology and initial findings for 36 developing countries", *OECD Working Papers on International Investment*, No. 2022/01, OECD Publishing, Paris, https://doi.org/10.1787/62e075a9-en. [1]

Dressler, L. and R. Warwick (2025), "Corporate income tax, investment, and the net-zero transition: Issues for consideration", *OECD Taxation Working Paper* OECD Publishing, Paris. [20]

Dressler, L. and R. Warwick (forthcoming), "Corporate income tax incentives as climate policy tools? Lessons from three European countries", *OECD Taxation Working Paper* OECD Publishing, Paris. [21]

Gascon et al. (forthcoming), "Investment Tax Incentives in Latin America and the Carribean: An analysis using effective tax rates", *OECD Taxation Working Paper*, OECD Publishing, Paris. [13]

House, C. and M. Shapiro (2008), "Temporary Investment Tax Incentives: Theory with Evidence from Bonus Depreciation", *American Economic Review*, Vol. 98/3, pp. 737-768, https://doi.org/10.1257/aer.98.3.737. [3]

IMF-OECD-UN-World Bank (2024), *The Platform for Collaboration on Tax: Tax Incentives Principles. Public Consultation Draft*, IMF-OECD-UN-World Bank. [8]

IMF-OECD-UN-World Bank (2015), *Options for Low Income Countries' Effective and Efficient Use of Tax Incentives for Investment*, A report prepared for the G-20 Development Working Group by the IMF, OECD, UN and World Bank., https://www.oecd.org/tax/tax-global/options-for-low-income-countries-effective-and-efficient-use-of-tax-incentives-for-investment.pdf. [17]

Jedlicka, H. and Y. Sabha (2017), *Lessons from Five Years of Helping Governments Foster Incentives Transparency*, Private Sector Development Blog: World Bank Blogs, https://blogs.worldbank.org/psd/lessons-five-years-helping-governments-foster-incentives-transparency (accessed on 27 July 2021). [16]

Klemm, A. and S. Van Parys (2012), "Empirical evidence on the effects of tax incentives", *International Tax and Public Finance*, Vol. 19/3, pp. 393-423, https://doi.org/10.1007/S10797-011-9194-8/METRICS. [11]

Maffini, G., J. Xing and M. Devereux (2019), "The Impact of Investment Incentives: Evidence from UK Corporation Tax Returns", *American Economic Journal: Economic Policy*, Vol. 11/3, pp. 361-389, https://doi.org/10.1257/pol.20170254. [5]

OECD (2023), "Improving transparency of investment incentives", *OECD Business and Finance Policy Papers*, No. 35, OECD Publishing, Paris, https://doi.org/10.1787/ab40a2f1-en. [15]

OECD (2022), *"OECD Investment Tax Incentives Database – 2022 Update: Tax incentives for sustainable development" (brochure)*, OECD, Paris, https://www.oecd.org/investment/investment-policy/oecd-investment-tax-incentives-database-2022-update-brochure.pdf. [22]

OECD (2022), *FDI Qualities Indicators 2022*, https://www.oecd.org/investment/investment-policy/OECD-FDI-Qualities-Indicators-2022-update.pdf. [24]

OECD (2022), *FDI Qualities Policy Toolkit*, OECD Publishing, Paris, https://doi.org/10.1787/7ba74100-en. [19]

OECD (2022), *Tax incentives and the Global Minimum Corporate Tax: Reconsidering tax incentives after the GloBE rules*, https://www.oecd.org/tax/tax-incentives-and-the-global-minimum-corporate-tax-25d30b96-en.htm. [2]

OECD (2021), *Tax Challenges Arising from the Digitalisation of the Economy – Global Anti-Base Erosion Model Rules (Pillar Two): Inclusive Framework on BEPS*, https://www.oecd.org/tax/beps/tax-challenges-arising-from-the-digitalisation-of-theeconomy-global-anti-base-erosion-model-rules-pillar-two.htm. [14]

OECD (2019), *FDI Qualities Indicators: Measuring the sustainable development impacts of investment*, OECD Paris, https://www.oecd.org/investment/fdi-qualities-indicators.htm. [18]

OECD (forthcoming), *Tax incentive policymaking: A practical guide*, OECD Publishing, Paris. [9]

Ohrn, E. (2019), "The effect of tax incentives on U.S. manufacturing: Evidence from state accelerated depreciation policies", *Journal of Public Economics*, Vol. 180, p. 104084, https://doi.org/10.1016/j.jpubeco.2019.104084. [6]

Pecho, M. et al. (2024), "Managing Tax Incentives in Developing Countries", *Technical Notes and Manuals* 007, https://doi.org/10.5089/9798400289590.005. [23]

Rodgers, D. and J. Hambur (2018), "The GFC Investment Tax Break", *RBA Research Discussion Papers*, No. 07, Reserve Bank of Australia, https://ideas.repec.org/p/rba/rbardp/rdp2018-07.html (accessed on 23 October 2024). [7]

Tax Foundation (2024), *Corporate Tax Rates Around the World, 2024*, https://taxfoundation.org/data/all/global/corporate-tax-rates-by-country-2024/. [25]

van Parys, S. and S. James (2010), "The effectiveness of tax incentives in attracting investment: panel data evidence from the CFA Franc zone", *International Tax and Public Finance*, Vol. 17/4, pp. 400-429, https://doi.org/10.1007/S10797-010-9140-1. [10]

Zwick, E. and J. Mahon (2017), "Tax Policy and Heterogeneous Investment Behavior", *American Economic Review*, Vol. 107/1, pp. 217-48, https://www.aeaweb.org/articles?id=10.1257/aer.20140855 (accessed on 18 October 2024). [4]

Notes

[1] The 2024 ITID edition includes four high income economies (Brunei Darussalam. Saudi Arabia, Seychelles and Uruguay) and two OECD member countries (Colombia and Costa Rica). One country (Paraguay) has no incentives that are in scope of the ITID but is included in the statistics.

[2] Current expenditure relates to operational expenses that are typically immediately deductible for accounting and tax purposes, i.e. in the same year in which the expense occurs. Capital expenditure, in terms of accounting, concerns expenses made in the acquisition of capital assets that have a life of one year or more. Unlike current expenditures, capital expenditures are often not immediately tax deductible, rather they are deducted over the lifetime of the asset following specific depreciation schedules.

[3] Tax credits are sometimes unrelated to expenditures but determined as a percentage on their income tax liability (e.g. companies can deduct 75% of their income tax liability if they invest in SEZs). These forms of tax credits are currently included in the ITID as tax exemptions given their similar effects.

[4] Calculations are based on statutory CIT rates applicable on 1 January 2024, based on OECD Corporate Tax Statistics (https://www.oecd.org/tax/beps/corporate-tax-statistics-database.htm) and publicly available data from Tax Foundation (2024[25]). For permanent reductions, only the reduced CIT rates applying permanently were considered; any CIT reduction applying temporarily before the permanent reduced rate regime was not considered. For temporary reductions, only the reduced CIT rates applicable during the initial incentive term were taken into consideration.

[5] Special economic zones are clearly demarcated geographical areas within which business activity is subject to a different regulatory regime from that prevailing in the rest of the economy, often including tax and non-tax incentives (e.g. provision of infrastructure, regulatory incentives). In the context of the OECD ITID, the term 'Special Economic Zones' is used generically to refer to all types of economic zones, including Special Economic Zones, Industrial Zones, Free Zones, Development Zones, Export Processing Zones, Technology Parks and others.

[6] Outcome conditions are requirements for the investor to achieve a certain quantitative performance target, such as creating at least five new jobs to benefit from a tax incentive. Outcome conditions may also be referred to as *merit-* or *performance-based* conditions. The OECD ITID tracks over 20 outcome condition types and among the most widely used are requirements to: export a minimum share of sales, create a minimum number of new jobs, operate with a minimum value added to turnover ratio and others.

[7] Ownership conditions may also impose requirements for business' capital origin (i.e. to have a minimum or maximum stake of domestic or foreign ownership in the company capital). However, only10% of the 70 economies have such a requirement.

[8] Investment thresholds are often denominated in the economy's local currency, US dollars or in Euros. For comparability, investment thresholds local currency and US dollars were converted into Euro in Figure 4 using the average official exchange rate for the year of 2021, based on *Official exchange rate*

(LCU per US$, period average) accessed through the World Bank Data Bank, *https://data.worldbank.org/indicator/PA.NUS.FCRF*.

[9] The granting authority of an incentive is not systematically tracked in the 2024 ITID edition anymore.

[10] In many countries, the Ministry of Finance and the Tax Administration, Investment Promotion Agencies, investment councils, special economic zone authorities, as well as ministries of energy, innovation, transport, and urban development all administer some incentives to investors.

[11] The results for 2022 may slightly differ from those reported in the previous 2022 brochure (OECD, 2022[22]) due to data corrections and methodological refinements supporting time series consistency.

The following 52 economies are included in both the 2022 and the 2024 ITID edition: Angola, Argentina, Armenia, Azerbaijan, Brazil, Botswana, Cambodia, Cameroon, China, Comoros, DRC, Côte d'Ivoire, Dominican Republic, Egypt, Eswatini, Ethiopia, Gabon, Gambia, Georgia, Ghana, India, Indonesia, Jamaica, Jordan, Kenya, Lao PDR, Lesotho, Liberia, Madagascar, Malawi, Malaysia, Mauritius, Moldova, Morocco, Mozambique, Myanmar, Namibia, Nigeria, Paraguay, Philippines, Rwanda, Senegal, Sierra Leone, South Africa, Tanzania, Thailand, Tunisia, Ukraine, Viet Nam, Palestinian Authority, Zambia and Zimbabwe.