

Council Directive 2014/86/EU of 8 July 2014 amending Directive 2011/96/EU on the common system of taxation applicable in the case of parent companies and subsidiaries of different Member States

Article 1

Directive 2011/96/EU is amended as follows:

- (1) in Article 4(1), point (a) is replaced by the following:
 - (a) refrain from taxing such profits to the extent that such profits are not deductible by the subsidiary, and tax such profits to the extent that such profits are deductible by the subsidiary; or²;
- (2) in Annex I, part A, point (u) is replaced by the following:
 - (u) companies under Polish law known as: “spółka akcyjna”, “spółka z ograniczoną odpowiedzialnością”, spółka komandytowo-akcyjna;³;
- (3) in Annex I, part A, point (w) is replaced by the following:
 - (w) companies under Romanian law known as: “societăți pe acțiuni”, “societăți în comandită pe acțiuni”, “societăți cu răspundere limitată”, “societăți în nume colectiv”, “societăți în comandită simplă”;⁴.

Article 2

1 Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by 31 December 2015. They shall forthwith communicate to the Commission the text of those provisions.

When Member States adopt those provisions, they shall contain a reference to this Directive or be accompanied by such a reference on the occasion of their official publication. The methods of making such reference shall be laid down by Member States.

2 Member States shall communicate to the Commission the text of the main provisions of national law which they adopt in the field covered by this Directive.

Article 3

This Directive shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

Article 4

This Directive is addressed to the Member States.

Done at Brussels, 8 July 2014.

For the Council

The President

P. C. PADOAN