



EUROPEAN COMMISSION
Competition DG

Deputy Director General State aids

Brussels, 18/12/2015
COMP/GJK/VS/JT/hvds D* 2015/141092

Permanent Representation of the
Netherlands
Kortenberglaan 4-10
1040 Brussel

To the attention of Mr Vijlbrief,
Head of the Dutch Treasury

Subject: SA.43504 - Tax treatment cocos in the NL

Following our call this morning in which you enquired about the status of the preliminary enquiry concerning the tax treatment of At-A securities, I would like to clarify that no formal investigation has been launched. The sending of a request for information on 9 November 2015 (reference no. 2015/109967) does not prejudge whether the Commission will launch a formal investigation.

The Commission will assess the answers provided by the Netherlands and will then decide on the follow up to be given.

I hope this clarifies the matter.

Kind regards,

KOOPMAN Gert-Jan
Deputy Director General

Please specify the name of the case and the case number in all correspondence.

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