



A comparative study of 51 Dutch and 65 EU stock-listed companies

TRANSPARENCY BENCHMARK 2025





Tax Transparency Benchmark 2025

A comparative study of 51 Dutch and 65 EU stock-listed companies

Lead:

Freek van Til (VBDO) and Keetie Jakma (PwC NL)

Input and support:

Angélique Laskewitz and Sara Heinsbroek (VBDO)

Job Lutjens, Matthijs Schut,
Calvin Gu, and Laura van der Hoeven (PwC NL)

For more information:

Please contact: Dutch Association of Investors for Sustainable Development (VBDO),
Utrecht, the Netherlands

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Preface

Reflecting on eleven years of the Tax Transparency Benchmark, I feel that this edition presents a mixed picture. The long-term trajectory remains positive, but 2025 marks the first overall reduction in scores since the benchmark began. The share of companies publishing a tax strategy



Angélique Laskewitz
Executive Director of VBDO

has decreased from 93 percent in 2024 to 89 percent in 2025. Average total scores of the benchmark have also edged down, with the Netherlands moving from 56 percent to 54 percent and the European scope from 44 percent to 37 percent. Companies continue to score relatively strongly on Principle E (Monitor and test tax controls) but Principle F (Provide tax assurance) remains the weakest area. These results confirm both the progress made and the work still ahead, particularly on external assurance, the provision of clear examples that show policy in practice, and consistent country-by-country reporting.

This benchmark sits within an evolving global context. Negotiations toward a United Nations convention on international tax cooperation advanced through 2024 and into 2025, signalling continued momentum to broaden participation in global tax standard setting beyond the traditional fora. At the same time, the OECD/G20 Inclusive Framework on base erosion and profit shifting (BEPS) continued to publish administrative guidance on the global minimum tax rate, with many jurisdictions bringing Pillar Two rules into effect during 2024 and 2025. In the European Union, the Corporate Sustainability Reporting Directive began to apply to first reports published in 2025, raising the bar on governance and disclosure expectations, and the Public Country-by-Country Reporting Directive entered into effect for financial years starting on or after 22 June 2024, which means public tax data will begin to appear in company reports for those years.

Within this regulatory landscape, the benchmark's findings highlight specific areas that require attention. While last year's scores for Principle A were relatively high, this year they have dropped, with the Netherlands now at 57 percent and Europe at 37 percent. Principle C, which tests the spirit of the law and related governance, shows the sharpest reduction in scores when evidence is required in the form of recent and concrete examples. By contrast, Principle E on monitoring and testing controls shows an improved overall score compared to 2024, while Principle F, which has narrowed to a single criterion, shows that only 18 percent of companies in scope obtain external assurance on non-financial tax disclosures, down from 26 percent. These results underline the need to move from statements to evidence and to strengthen assurance readiness.

Tax standards and market practice continue to mature. Global Reporting Initiative (GRI) 207 remains a widely used reference point for tax reporting, and recent analyses indicate that it is even more effective when paired with responsible tax frameworks and clearer assurance scoping. Beyond reporting standards, public interest in responsible tax remains visible through independent initiatives that connect tax conduct with trust in public services.

This year, we also asked how companies integrate artificial intelligence and other technologies in the tax function. Responses indicate selective adoption, with concrete gains in efficiency and reporting but uneven maturity in governance and control. The timing is notable. The European Union's Artificial Intelligence Act entered into force in August 2024, with staged application through 2025, 2026, and 2027. General purpose model obligations start in August 2025, and there is continued debate about guidance and timing. Companies will increasingly need to evidence how AI is being used responsibly in business and hence in tax, how outputs are reviewed, and how audit trails support assurance.

As always, our aim is practical improvement. The 2025 results and the expert jury discussion point to clear priorities. First, ensure that policy statements are matched with recent, concrete examples that demonstrate the spirit of the law in action, including stakeholder engagement and public debate. Second, strengthen risk reporting by clarifying risk appetite, describing specific risks and responses, and explaining technology's role in control. Third, improve assurance readiness by preparing external assurance on non-financial tax disclosures and by clarifying internal control over tax reporting. Finally, prepare for increased public disclosures under European reporting rules and for the responsible use of AI in tax processes, aligning with the emerging regulatory framework.

We thank all participating companies for their engagement and feedback. The benchmark's value depends on a shared willingness to learn and improve. We will continue to support companies in translating expectations into evidence, so that tax transparency strengthens accountability, trust, and long-term value creation.

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Executive Director of VBDO

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Top 5

Ranking	Company name	Score 2025	Country
1	Philips	43	The Netherlands
1	Repsol	43	Spain
1	Enel	43	Italy
4	a.s.r.	42	The Netherlands
5	NN Group	41	The Netherlands

Company ranking 2023-2025

Ranking	Company name	Score 2025		Score 2024		Score 2023		Country
1.	Enel	43	98%	38	100%	35	88%	Italy
	Repsol	43	98%	36	95%	38	95%	Spain
	Philips	43	98%	38	100%	40	100%	Netherlands
4.	a.s.r.	42	95%	31	82%	31	78%	Netherlands
5.	NN Group	41	93%	38	100%	39	98%	Netherlands
6.	Aegon	39	89%	33	87%	36	90%	Netherlands
7.	Ørsted	37	84%	24	63%	31	78%	Denmark
	Randstad	37	84%	35	92%	30	75%	Netherlands
9.	Allianz	36	82%	29	76%	32	80%	Germany
	AXA	36	82%	29	76%	33	83%	France
	KPN	36	82%	37	97%	35	88%	Netherlands
	Achmea	36	82%	34	89%	36	90%	Netherlands
13.	Eni	35	80%	29	76%	33	83%	Italy
	Telefonica	35	80%	33	87%	33	83%	Spain
	Prosus	35	80%	31	82%	31	78%	Netherlands
16	Vestas	34	77%	31	82%	26	65%	Denmark
	Ahold Delhaize	34	77%	30	79%	29	73%	Netherlands
	Fugro	34	77%	27	71%	23	58%	Netherlands
	Signify	34	77%	30	79%	26	65%	Netherlands
20.	Generali	32	73%	31	82%	21	53%	Italy
	AkzoNobel	32	73%	24	63%	20	50%	Netherlands
	ASML	32	73%	27	71%	29	73%	Netherlands
	Van Lanschot Kempen	32	73%	32	84%	31	78%	Netherlands
	Rabobank	32	73%	31	82%	33	83%	Netherlands
25.	Vopak	31	70%	32	84%	32	80%	Netherlands
26.	Intesa Sanpaolo	30	68%	28	74%	18	45%	Italy
	Banco Bilbao Vizcaya Argentaria (BBVA)	30	68%	33	87%	29	73%	Spain
	InPost	30	68%	28	74%	28	70%	Netherlands
	Relx Group	30	68%	27	71%	28	70%	Netherlands
30.	ING Group	29	66%	30	79%	33	83%	Netherlands
31.	TotalEnergies	28	64%	15	39%	29	73%	France
32.	Campari Group	27	61%	13	34%	17	43%	Italy
	ABN Amro	27	61%	20	53%	24	60%	Netherlands
	Adyen	27	61%	32	84%	35	88%	Netherlands
	ArcelorMittal	27	61%	5	13%	5	13%	Netherlands
	DSM-Firmenich	27	61%	27	71%	32	80%	Netherlands
	Heineken	27	61%	27	71%	24	60%	Netherlands

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Ranking	Company name	Score 2025		Score 2024		Score 2023		Country
38.	Amadeus IT	26	59%	22	58%	15	38%	Spain
	OCI	26	59%	19	50%	17	43%	Netherlands
	SBM Offshore	26	59%	28	74%	29	73%	Netherlands
41.	Tryg	25	57%	22	58%	21	53%	Denmark
	Shell	25	57%	27	71%	31	78%	Netherlands
	Unilever	25	57%	24	63%	27	68%	Netherlands
44.	Arcadis	24	55%	12	32%	16	40%	Netherlands
45.	SAP	23	52%	17	45%	15	38%	Germany
	ASM International	23	52%	10	26%	13	33%	Netherlands
47.	RWE	22	50%	12	32%	19	48%	Germany
	Vattenfall	22	50%	21	55%	23	58%	Sweden
	Royal Unibrew	22	50%	22	58%	18	45%	Denmark
	IMCD	22	50%	23	61%	14	35%	Netherlands
	Just Eat Takeaway.com	22	50%	14	37%	14	35%	Netherlands
52.	Engie	21	48%	20	53%	23	58%	France
	BESI	21	48%	13	34%	19	48%	Netherlands
	Wolters Kluwer	21	48%	21	55%	19	48%	Netherlands
55.	UCB	20	45%	21	55%	23	58%	Belgium
	KBC	20	45%	24	63%	24	60%	Belgium
	JDE Peet's	20	45%	21	55%	21	53%	Netherlands
	TKH Group	20	45%	18	47%	23	58%	Netherlands
59.	Acciona Energía	19	43%	16	42%	21	53%	Spain
	Carlsberg Group	19	43%	18	47%	20	50%	Denmark
	Aperam	19	43%	18	47%	20	50%	Netherlands
62.	Nordea Bank	18	41%	17	45%	12	30%	Denmark
	Corbion	18	41%	17	45%	19	48%	Netherlands
	Flow Traders	18	41%	12	32%	19	48%	Netherlands
65.	L'Oréal	17	39%	23	61%	21	53%	France
	Banco Santander	17	39%	19	50%	24	60%	Spain
	CTP	17	39%	17	45%	17	43%	Netherlands
68.	Bayer	16	36%	21	55%	24	60%	Germany
	Novonesis	16	36%	15	39%	17	43%	Denmark
	AMG Critical Minerals	16	36%	19	50%	24	60%	Netherlands
71.	Deutsche Bank	15	34%	12	32%	13	33%	Germany
	Logista	15	34%	14	37%	8	20%	Spain
73.	EDF Group	14	32%	13	34%	11	28%	Belgium
	Colruyt Group	14	32%	12	32%	1	3%	Belgium
75.	The Linde Group	13	30%	13	34%	11	28%	Germany
	Sanofi	13	30%	12	32%	14	35%	France
	Handelsbanken	13	30%	12	32%	9	23%	Sweden
	Grifols	13	30%	13	34%	14	35%	Spain
	ArgenX	13	30%	16	42%	3	8%	Belgium
	Novo Nordisk	13	30%	17	45%	19	48%	Denmark
	Eurocommercial Properties	13	30%	19	50%	17	43%	Netherlands
82.	Gruppo TIM	12	27%	19	50%	24	60%	Italy
	Elia Group	12	27%	14	37%	19	48%	Belgium
84.	Henkel	11	25%	11	29%	18	45%	Germany
	Carrefour	11	25%	11	29%	8	20%	France
	Nexi	11	25%	19	50%	16	40%	Italy

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Ranking	Company name	Score 2025		Score 2024		Score 2023		Country
87.	BNP Paribas	10	23%	19	50%	19	48%	France
	Schneider Electric	10	23%	17	45%	11	28%	France
89.	Sartorius	9	20%	6	16%	3	8%	Germany
	Aalberts	9	20%	10	26%	12	30%	Netherlands
91.	Telenet Group	8	18%	8	21%	1	3%	Belgium
	SimCorp	8	18%	8	21%	11	28%	Denmark
93.	Tele2	7	16%	13	34%	7	18%	Sweden
	Netcompany	7	16%	6	16%	12	30%	Denmark
	Galapagos	7	16%	7	18%	8	20%	Netherlands
96.	Essity	6	14%	8	21%	11	28%	Sweden
97.	Eurofins Scientific	5	11%	5	13%	7	18%	France
	Swedbank	5	11%	10	26%	12	30%	Sweden
	Ageas	5	11%	6	16%	7	18%	Belgium
	Air France-KLM	5	11%	5	13%	11	28%	Netherlands
101.	Beiersdorf	4	9%	20	53%	4	10%	Germany
	Alfen	4	9%	4	11%	6	15%	Netherlands
	Exor	4	9%	-	-	-	-	Netherlands
104.	Orange	3	7%	18	47%	11	28%	France
	Laboratorios Rovi	3	7%	11	29%	9	23%	Spain
106.	Deutsche Telekom	2	5%	12	32%	3	8%	Germany
	Ericsson	2	5%	3	8%	4	10%	Sweden
	Proximus Group	2	5%	3	8%	1	3%	Belgium
109.	Recordati	1	2%	18	47%	19	48%	Italy
	DiaSorin	1	2%	10	26%	10	25%	Italy
	AB InBev	1	2%	1	3%	7	18%	Belgium
	Basic-Fit	1	2%	5	13%	7	18%	Netherlands
113.	Pila Pharma	0	0%	0	0%	0	0%	Sweden
	Fagron	0	0%	0	0%	9	23%	Netherlands
	WDP	0	0%	0	0%	0	0%	Netherlands
	Vivoryon Therapeutics	0	0%	2	5%	2	5%	Netherlands



Executive Summary

The Tax Transparency Benchmark has run for eleven consecutive years. Over this period, we have observed substantial progress both within the benchmark’s scope and in corporate tax transparency more broadly. When we launched the benchmark in 2015, 45 percent of companies publicly disclosed their tax strategy. This has risen steadily over the years, reaching a record 93 percent in 2024, the benchmark’s tenth edition.

In 2025, however, we are reporting the first decline since 2015 of companies that publicly disclose their tax strategy. The share has fallen to 89 percent; while this is still well above the starting point, it is a step backward. Several companies have withdrawn their public tax strategy and therefore score zero on this indicator. For most companies, tax is not considered material when performing a materiality assessment under the Corporate Sustainability Reporting Directive. For the first time (apart from the anticipated dip in 2022 due to a major questionnaire overhaul and the inclusion of European companies) we observe a sharp decline, from 49 percent to 44 percent. Figure 1 provides an overview of the long-term progress and the downturn in the current year.

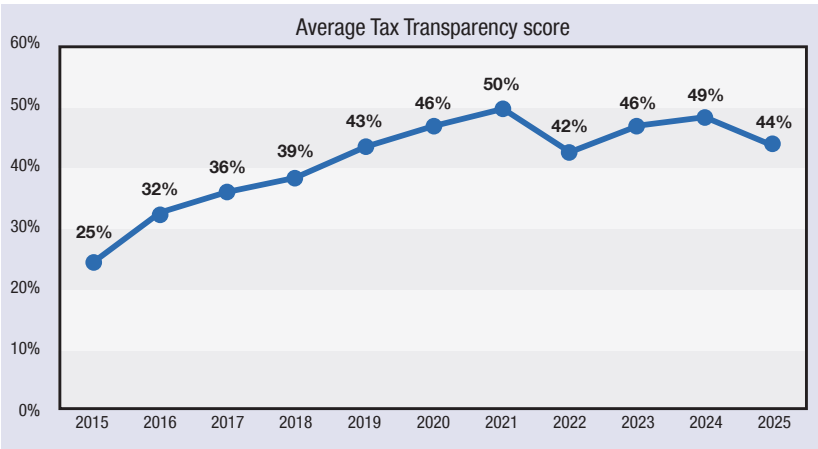


Figure 1: Historic performance - Total Average Score 2015-2025

Another observation, which is not directly visible in the figure above or the table below, is the widening performance gap between the highest and lowest scoring companies. The overall decline contrasts with the fact that a group of companies that consistently score high are now

joined by companies scoring much higher than in previous years. At the same time, several companies score significantly lower than in previous editions, with some now receiving zero or very few points.

As in previous editions, differences between the eight countries in scope remain considerable. Last year, Italy, Spain, and the Netherlands stood out as clear leaders. This year, the 51 companies from the Netherlands achieve the highest country average at 54 percent. Spain follows with 51 percent and Italy with 48 percent, both lower than last year. Belgium is at 25 percent and Sweden at 18 percent; they already scored low last year, and both have declined further since 2024. In line with the overall drop in the average score across all companies in 2025, none of the eight countries increased their average score. All country averages have decreased in 2025.

The benchmark covers 116 companies from eight European countries and five sectors. The report provides further analysis of differences by country and sector.

Table 1: Average score per country 2025 and 2024

	2025	2024
The Netherlands (51)	54%	56%
Europe (65) ¹	37%	44%
Italy (9)	51%	58%
Spain (9)	48%	60%
Denmark (10)	45%	47%
France (10)	35%	44%
Germany (10)	34%	40%
Belgium (10)	25%	31%
Sweden (7)	18%	25%

Table 1 shows the level of progress per country. Aside from the overall downward trend, the company scope has remained unchanged compared to the 2024 and 2023 editions. Key takeaways:

- The Italy scope scores significantly lower than last year, falling from 60 percent to 48 percent. Spain also declines but still maintains a higher average than other countries, except the Netherlands at 54 percent.

¹ Europe or EU in the text and tables both refer to the following countries in the context of this benchmark: Italy, Spain, Denmark, Belgium, Sweden, Germany, and France.

- Dutch companies, while scoring slightly lower than in 2024, maintain a high average of 54 percent. In the 2024 report, concerns were raised about a possible ceiling; this stagnation has now shifted to a mild decline.
- Although no country has improved its average, Denmark and the Netherlands drop only 2 percentage points. They show notable resilience compared with Italy, which falls by 12 percentage points, France by 9 percentage points, and Sweden by 7 percentage points.
- Lower averages may suggest a general decline in tax transparency, yet company level results reveal sharp differences between low and high performers. The gap is especially pronounced in Italy: two of the nine companies score only 1 point, but the scope includes one of the three highest scoring companies (Enel at 43 points) and three that score above 30 points (Eni Group at 35, Generali at 32, and Intesa Sanpaolo at 30).
- The benchmark applies a minimum threshold of 25 percent of the points. Last year, Sweden, with seven participating companies, matched this threshold exactly and no countries were below it. With this year's decline in scores, Sweden (at 18 percent) and Belgium (at 25 percent) are at or below this threshold.

In 2025, we continue to assess the same five sectors as in the past three years: Financial, Energy, Pharmaceutical, Technology, and Fast-Moving Consumer Goods (FMCG). This allows for the comparison of progress within and between sectors.

Table 2: Average score per sector in 2025

	Financial	Energy	Pharma	Technology	FMCG
Europe (65)	48%	60%	22%	25%	30%
NL (51)	73%	55%	8%	62%	55%

Table 3: Average score per sector in 2024

	Financial	Energy	Pharma	Technology	FMCG
Europe (65)	54%	57%	33%	37%	37%
NL (51)	77%	62%	12%	61%	59%

Table 4: Average score per sector in 2023

	Financial	Energy	Pharma	Technology	FMCG
Europe (65)	50%	61%	31%	29%	30%
NL (51)	79%	61%	13% ²	61%	53%

Please note the number in brackets in the first column. It indicates the total number of companies in that scope. In 2022, we ran a pilot with 25 companies from European countries outside the Netherlands. This expanded to 65 in 2023 and remained the same in 2024. The Dutch scope declined from 78 in 2022 to 51 in 2023 and 2024. Since 2023, the overall scope has remained unchanged through 2025, which supports fair and comparable analyses. To avoid confusion, the 2022 pilot data are omitted here and remain available in earlier reports.

The three tables show several developments that we discuss in detail in the Results chapter. Key takeaways for the five sectors are:

- In line with the general 2025 outcome, most sectors have a lower average than in 2024. Only two sectors have increased their scores (and then only slightly): the Dutch Technology sector has increased its score slightly from 61 percent to 62 percent, and the European Energy sector score has risen from 57 percent to 60 percent.
- The largest reductions appear in the European Pharmaceutical and Technology sectors, down by 11 and 12 percentage points respectively.
- Despite the overall decline, several sectors still score relatively high on average, in particular the Dutch Financial and Technology sectors, and the European Energy sector.
- With the drop in the European Pharmaceutical sector score, this sector now scores below the minimum threshold of 25 percent. Belgium's UCB is the highest scoring company in this scope, with 20 points, equal to 45 percent.

In general, the average scores show a modest decline. This does not by itself prove a negative trend in tax transparency or corporate governance. Several internal and external factors are relevant:

- Minor improvements to the 2025 questionnaire have increased the maximum number of available points to 44 and given more weight to indicators such as stakeholder engagement, public debate policies, external assurance on non-financial tax disclosures, and training for personnel in the tax function.

² Only two companies assessed in the Netherlands are included in this category, therefore this is not a fully representative indication of the sector. We, however, do report on this sector as it provides some insights into the differences between the NL companies and the EU companies.

- Guidance for many criteria has been refined and thresholds for full marks have been recalibrated. In some cases, a policy segment or report excerpt that previously earned full points no longer meets the updated standard.
- Fewer companies provided feedback this year. Each score is based on an assessment completed by the benchmark team using public sources and then shared for company feedback. If no feedback is provided, no changes are made, which can give a slight advantage to companies that do engage. That said, while fewer companies responded, the depth and quality of feedback were markedly higher than in previous editions.

In the following pages, we provide more detail about the 2025 questionnaire updates. In 2024, we shifted toward requiring concrete examples, moving from a “tell you” to a “show you” approach. In 2025, we have built on this by requiring a clear time frame for examples, meaning examples must be from 2022 or later, and by applying a stricter interpretation of what counts as concrete. For example, rather than merely stating a commitment to both the letter and the spirit of the law, companies are expected to explain these commitments with clear, understandable examples from the stated time frame. We have applied the same standard to positions in the public tax debate and to judging how companies consult stakeholders for input on the tax strategy.

Last year, this shift led to a sharp decline in scores for several updated criteria. This year, we see a mixed picture. On the criterion relating to the spirit of the law, the Dutch scope improves slightly from 33 percent to 35 percent, while the European scope declines from 18 percent to 15 percent. Last year's criterion on stakeholder engagement has been split into two parts in 2025. Criterion 5a covers policy and 5b covers a proven example. For 5a, we observe a notable rise, from 35 percent to 49 percent for Dutch companies and from 20 percent to 26 percent for European companies. For 5b, averages are far lower at 14 percent for European companies and 22 percent for Dutch companies. This suggests two things. First, many companies still struggle to provide clear and recent examples that show how policy is put into practice. Second, the maturity of this aspect of good tax governance is still developing. Companies that have provided feedback and engaged actively with the benchmark team in recent years tend to score higher on these updated criteria than companies that have not engaged.

This benchmark aims to establish a clear pathway for tax transparency, promote the sharing of best practices, and assist companies on their journey toward greater transparency. As we celebrate this eleventh edition, we can reflect on a rich history of progress. The strides taken by these companies in their quest for transparency and commitment to being responsible taxpayers are both significant and commendable, as many of them have now set the standard for others to

emulate. Notably, 2023 marked the first time a company achieved a perfect score of 100 percent against our benchmark, and in 2024, this milestone was surpassed, with three companies attaining this highest achievement. In 2025, once again, three companies are clearly leading the way; however, no full marks have been achieved. This year's top three companies are as follows:

Philips (43 points) leads the way for the third consecutive year. The company is complimented for the integration of ESG and sustainability throughout its Country Activity and Tax Report. Philips reports on the three individual ESG aspects (environment, social, and governance) and provides clear examples of how it takes tax into account when addressing ESG issues.

Enel (43 points) takes joint first place for the second year in a row. The company does a great job of disclosing its approach to corporate tax. This includes reporting on the relationship between its business activities and taxes paid. Additionally, the reporting on the use of tax incentives, which nowadays is especially relevant for an energy company, is particularly welcome.

Repsol (43 points) is back at the top after just missing out in the previous edition. The company publishes a comprehensive overview of its tax risks and disputes, which includes a description of how these tax risks impact Repsol's business. Furthermore, Repsol is complimented for its extensive reporting, which includes having separate documents for various topics (e.g. cooperative relationships, presence in tax havens, etc.).

It is encouraging that three companies are one point short of a perfect score this year. At the same time, there are many companies that need to improve. In total, 33 companies score below the minimum threshold of 25 percent (below 11 points). Of these, 24 are European companies and nine are from the Netherlands. This means that 28 percent of all companies are lagging, which underlines the need for continued efforts to improve transparency.

Only three of the 33 low scoring companies provided feedback on our assessment. By comparison, 72 percent of Dutch companies and 37 percent of European companies provided feedback overall. This pattern may indicate a stakeholder engagement barrier that limits the ability of lower scoring companies to improve their results.

A more positive finding is that several companies have made clear progress in their tax governance and so improved their scores. Notable examples are ArcelorMittal (Netherlands), Campari Group (Italy), ASM International (Netherlands), TotalEnergies (France), and Ørsted (Denmark). ArcelorMittal (Netherlands) shows the largest increase (of 22 points), underscoring a

stronger commitment to transparency. These companies are moving from laggards to learners and in some cases to leaders, showing that proactive strategies deliver results.

By contrast, reduced scores for Beiersdorf (Germany), Orange (France), and Recordati (Italy) are a concern. It is important to understand the drivers of these setbacks, especially as stakeholder expectations continue to rise. Companies should address these issues to stay competitive and align with good practice in tax governance.

Good Tax Governance Principles

In the table below, we present the scores for each of the six Good Tax Governance Principles defined by VBDO. The table shows the average score for both Dutch and European companies. We also share the results of the 2023 and 2024 benchmarks for comparison.

Table 5: Average score per principle in 2023 – 2025

Good Tax Governance Principles	Average % by companies per principle					
	2025		2024		2023	
	EU	NL	EU	NL	EU	NL
A: Define and communicate a clear strategy	37%	57%	53%	67%	46%	64%
B: Tax must be aligned with the business and is not a profit centre in itself	40%	48%	39%	49%	39%	45%
C: Respect the spirit of the law. Tax-compliant behaviour is the norm	30%	53%	43%	59%	44%	69%
D: Know and manage tax risks	36%	63%	46%	65%	38%	67%
E: Monitor and test tax controls	60%	78%	67%	75%	55%	74%
F: Provide tax assurance	20%	16%	22%	26%	21%	24%
Total average score	37%	54%	44%	56%	41%	56%

Table 5 shows a broad decline across principles in 2025, with the EU total average falling from 44 percent to 37 percent and the Netherlands from 56 percent to 54 percent. The largest drops are for Principle A and Principle C. For the EU scope, A falls from 53 percent to 37 percent and C from 43 percent to 30 percent. For the Netherlands scope, A declines from 67 percent to 57 percent and C from 59 percent to 53 percent. Risk management (Principle D) also recedes, from 46 percent to 36 percent for the EU and from 65 percent to 63 percent for the Netherlands.

TAX TRANSPARENCY BENCHMARK 2025

A comparative study of 51 Dutch and 65 EU stock-listed companies

Monitoring and testing (Principle E) remains the strongest area, despite a step down by the EU scope from 67 percent to 60 percent, as the Netherlands scope improves from 75 percent to 78 percent. Tax assurance (Principle F) is consistently lowest and weakens further, especially for the Netherlands scope, which drops from 26 percent to 16 percent. Alignment with the business (Principle B) is comparatively stable, edging to 40 percent for the EU and 48 percent for the Netherlands. Overall, the pattern points to persistent strengths in controls and a widening challenge on strategy, spirit of the law, and assurance.



1. Clarity counts: Responsible investment practices in a changing tax world

How transparency powers responsible investments



Astrid Durgaram

Expert Advisor Legal and Tax at ABP

Introduction ABP

ABP is Europe's largest pension fund, serving employees in the Dutch public and education sectors. We manage approximately EUR 500 billion in assets, comprising of invested pension capital. It is our mission to deliver a good pension, for our pensioners to enjoy in a livable world, by investing responsibly. Even in a rapidly changing geopolitical and regulatory environment.

ABP's responsible investment approach and the role of taxation

We view responsible tax behavior as part of our responsible investment strategy. We believe that transparent and fair tax practices help assess tax risk, support a stable global financial system, and contribute to a sustainable society. We apply our tax principles across all our investments, while maintaining different accents depending on the asset class.

We expect our listed investee companies in which we hold long-term shareholding positions to meet at least three core standards:

1. publicly disclose their tax policy, strategy, and principles;
2. provide public tax reporting for each key jurisdiction where they operate; and
3. maintain an effective tax rate (ETR) of at least 15%, or, if below 15%, explain the reasons and commit to fair tax practices

Our focus on maintaining consistent standards on responsible investing and tax transparency has become even more important to us in a changing tax world. Geopolitical developments are increasingly shaping fiscal policy and the investment climate. Heightened cross border tensions have introduced greater uncertainty for investors. Tax measures are increasingly being used by governments as instruments of international relations, affecting supply chains, the prevention of double taxation as agreed in tax treaties, and corporate decision-making. Political shifts have contributed to a more uncertain environment, in which rules and norms can change quickly and unevenly across jurisdictions.

The value of tax transparency

In that context, ABP's stance on tax transparency is that insight into the tax profile and behavior of corporations is both a risk management tool, as well as an amplifier for illustrating societal value by corporations. Clear tax policies and country level reporting give investors and stakeholders insight into how companies operate across borders, while minimum ETR expectations promote fairness and reduce reputational and regulatory risk. Consistent disclosure (for example, aligned with GRI 207 or public country by country reporting) allows investors to benchmark companies and sectors, distinguish between substance-based tax outcomes and aggressive planning and direct capital to more resilient business models that are aligned with our values.

Due to a lack of harmonized global reporting standards for listed companies, we - as a global institutional investor - are relying and depending on insights that companies make (publicly) available on their tax position. By continuing to request our investee companies to disclose tax information and holding them to these standards, we aim to safeguard long-term returns and uphold our fiduciary responsibility to beneficiaries, without losing sight of the broader public interest.

ABP's view is straightforward: sustainable pensions depend on sustainable practices. As geopolitical relations and tax regulations evolve, transparency and fairness remain our foundation for resilience. By aligning investment performance with responsible tax conduct, ABP seeks to build a sustainable future and a world in which its participants can retire well.





2. When AI Redefines Value Creation: What Responsible Enterprises Must Rethink About Tax Transparency



Mona de Boer

Partner Data & AI at PwC Netherlands

Executive summary

Artificial intelligence is transforming business processes and models faster than most governance systems can adapt. As companies shift from mostly physical to increasingly digital value creation — powered by data, algorithms, and automation — traditional notions of where and how value is created are becoming blurred. This shift has major implications for corporate tax strategy and transparency. Responsible AI — AI that is explainable, accountable, and aligned with organisational values — offers a framework for addressing this challenge. It enables enterprises to maintain trust and transparency as AI transforms the foundations of business value creation and taxation.

AI is changing where and how business value is created

AI is driving a profound shift in how companies design, deliver, and capture value. Innovation cycles are shortening, allowing enterprises to reconfigure around data and algorithms. Product companies are becoming service platforms, manufacturers are turning into software providers, professional services are being automated or delivered through digital ecosystems, and data is emerging as the primary source of competitive advantage.

Three structural shifts are visible across sectors:

- From products to platforms – AI connects producers, consumers, and business partners in real time, creating ecosystems where value emerges from data (interactions) rather than asset ownership.
- From human-only workflows to algorithmic processes – Generative and predictive systems augment or take over tasks once exclusively managed by people, from coding and marketing to customer engagement, fundamentally altering cost structures and value chains.
- From location-based operations to distributed digital creation – Cloud and AI technologies blur geographical boundaries. A model trained in one country may serve users globally, continuously learning from distributed data streams.

These shifts redefine where and how corporate value arises. In an AI-driven enterprise, the sources of value creation — data, algorithms, intellectual property — are intangible, mobile, and dynamic. For tax governance, this challenges long-standing concepts of physical presence, clear jurisdictional boundaries, and relatively stable value chains.

Tax in the age of algorithmic value

Existing corporate tax systems largely depend on defining where value is created to determine where profits should be taxed. AI disrupts this logic:

- A generative AI system might create marketing content in seconds — who, or what, created the value?
- A pricing algorithm operating across multiple markets might shift margins continuously — where does the resulting profit originate?
- A global model trained on data collected in dozens of jurisdictions may deliver insights everywhere — where is the economic activity located?

AI challenges the notion that value creation can be tied neatly to geography or headcount. Instead, value becomes diffused across digital infrastructure, algorithms, and data ecosystems — often spanning multiple tax jurisdictions at once.

For corporate tax functions, this creates a strategic dilemma: How can they maintain compliance and transparency when the company's own value-creation model evolves faster than existing tax frameworks can adapt?

Embedding Responsible AI in tax governance

While AI raises new complexities, it also offers new capabilities — provided it is governed responsibly. Responsible AI refers to the principles, processes, and controls that ensure AI systems are transparent, explainable, accountable, and aligned with organisational values.

Applying these principles to the tax domain creates both safeguards and opportunities:

- Transparency and explainability in AI-driven decisions. Many tax departments are already using AI to automate data analysis, scenario modelling, and compliance checks. But as these systems influence strategic and financial decisions, leaders must ensure their logic and assumptions are explainable to relevant stakeholders.
- Accountability for model-driven operations. As AI permeates business processes, the boundary between operational and fiscal decisions blurs. Responsible AI governance ensures that accountability for tax outcomes remains with human decision-makers, not with opaque automated systems.
- Data integrity and traceability. Tax transparency depends on accurate and traceable data. Responsible AI practices — such as data-lineage tracking and validation — help maintain the trustworthiness of financial and tax data pipelines.

Making Responsible AI a pillar of corporate tax governance ensures AI enhances the link between digital value creation and fair taxation.

From tax compliance to tax intelligence

AI is not just a risk to manage; it can also elevate the strategic role of tax. Properly governed, AI tools can provide tax intelligence — real-time insights into cross-border risks, forecasting of regulatory changes, and scenario analysis for business-model design.

However, the more these systems influence decision-making, the more essential Responsible AI oversight becomes. Without governance, automated systems could inadvertently drive aggressive optimisation or create reporting inconsistencies that damage credibility. With governance, they can enhance transparency, efficiency, and trust — aligning the tax function with the company's broader values.

Preparing for what's next

As enterprises progressively reinvent themselves around digital and algorithmic value, tax functions will need to evolve to strategic partners in business reinvention — ensuring that tax approaches remain aligned with rapidly changing sources of value.

Business and tax leaders can focus on three priorities:

- Embed Responsible AI into enterprise governance – Align AI oversight across business and compliance functions, including tax.
- Reassess tax strategy through an AI lens – Revisit definitions of economic substance to ensure tax approaches reflect how digital value is truly created.
- Use AI to enhance transparency – Automate data reconciliation, anomaly detection, and real-time monitoring while keeping systems fully explainable and accountable.

A new era of responsible business

AI is redefining how companies innovate, operate, and account for themselves. Tax transparency, once viewed as a compliance matter, is emerging as a measure of corporate accountability in the digital age. Enterprises that integrate Responsible AI into their governance structures will set the standard for how technology, trust, and taxation coexist. The future of corporate tax is no longer about where the data, servers or headcount is located—it is about how clearly companies can explain the link between their digital value creation and their contribution to society.



3. Methodology

The Tax Transparency Benchmark 2025 is based on the benchmark methodology for Good Tax Governance Principles designed by VBDO and Oikos in 2014³. VBDO intends to update the benchmark methodology questions every three years. In that light, the benchmark was thoroughly overhauled in 2022 to better reflect the latest status, trends, and developments on tax transparency, as well as to include new tax laws, regulations, and ESG expectations. This update resulted in an adjustment of some of the criteria, stricter assessment (from “tell me” to “show me”) and the addition of new criteria. New questions include those on ESG and tax; how the company monitors the alignment of its tax strategy with the organisational values and overall business strategy; tax havens; government incentives; advocacy; and how tax relates to the value creation model. The eighth edition of the benchmark was the first time this updated methodology was used, and VBDO has received feedback on the materiality of the new criteria. For this year’s benchmark, we have been able to use the feedback on the past three editions to strengthen the current methodology. This has led to minor changes in the questions, which can be found in Appendix A. VBDO encourages companies to adapt to the changing environment and continuously seek to improve the quality of their reporting.

Companies in scope are assessed against the measurable criteria using publicly available information. In order to encourage companies to contribute to the ongoing debate about good tax governance and tax transparency, companies are evaluated on their current practices and are able to provide feedback on their assessed score. We are pleased to report that 72 percent of the Dutch companies and 37 percent of the EU companies made use of this opportunity. We have noticed that companies that provide feedback tend to also rank higher on the benchmark. This would imply that these companies are more active and inclined to improve the degree of transparency with regard to their tax approach, which we find very encouraging.

Quick facts

51 NL companies (AEX + AMX)

65 companies from seven other EU countries

35 criteria worth 44 points in total

72 percent feedback response rate from NL; 37 percent from EU

³ VBDO & Oikos (2014), Good Tax Governance in Transition, Transcending the tax debate to CSR.

Scope

2022 marked the first time that we assessed companies from European countries other than the Netherlands for this benchmark. For the pilot, we selected 25 companies from seven countries. Following the successful pilot and the positive progress regarding tax transparency made by the assessed companies, we decided to broaden the European scope by including more European companies while decreasing the number of Dutch companies. The 2023 benchmark included 51 Dutch companies and 65 companies from seven other European countries (Belgium, Denmark, France, Germany, Italy, Spain, and Sweden) across five sectors (Pharmaceutical, Technology, Financial, FMCG, and Energy). The scope has remained unchanged in 2025. The full list of companies can be found in the overall ranking section at the beginning of this report. With regards to those companies in the Netherlands, the benchmark focuses on AEX and AMX companies and also includes two of their non-listed peers.⁴

Criteria

The Tax Transparency Benchmark is based on the guiding Good Tax Governance Principles that were designed by VBDO and Oikos to help create a common language on what good tax governance looks like. The Good Tax Governance Principles are as follows:

- A. Define and communicate a clear tax strategy;
- B. Tax must be aligned with the business and is not a profit centre in itself;
- C. Respect the spirit of the law. Tax-compliant behaviour is the norm;
- D. Know and manage tax risks;
- E. Monitor and test tax controls;
- F. Provide tax assurance.

Each principle is separated into various elements and converted into measurable criteria. Appendix A provides a comprehensive list of these measurable criteria. The standard maximum number of points awarded for each criterion is one point. However, for the questions on country-by-country reporting; monitoring the implementation and execution of the tax strategy; and tax assurance, a maximum of two points can be awarded.

⁴ Two of the participating companies are non-listed (Financial) and part of VBDO's network. These companies are Achmea and Rabobank.

Approach

In order to be able to assess companies on all the criteria of the Tax Transparency Benchmark, the companies' annual reports were reviewed, together with other relevant and publicly available documents (e.g. the tax strategy, the sustainability report, a transparency report, governance documents, strategy documents, and so on). For each company in the benchmark, the scores were aggregated and subsequently returned to the company to allow for feedback. Where applicable, the feedback from the companies was incorporated in the results. To make the results as measurable and comparable as possible, a strict definition of the criteria was used.

As in previous years, following the results of our study, a top ten of best performing companies was selected. In order to be able to reach an independent verdict on the Tax Transparency Benchmark, an expert jury was appointed by VBDO to weigh the results and assess the validity of the results. See Chapter 6 for the jury report.

Jury

Appointed by VBDO, the expert jury consists of six honourable members acting in a personal capacity. All of them are experts in the fields of good tax governance and tax transparency, but they come from different backgrounds:

- Klaas Bangma, Economic Policy Advisor at FNV;
- Irene Burgers, Professor of Economics of Taxation and Professor of International Tax Law at Groningen University;
- Michiel van Esch, Active Ownership Specialist at Robeco;
- Hans Gribnau, Professor of Tax Law at Tilburg University and Leiden University;
- Anna Gunn, Tax researcher and blogger at Leiden University and Artikel 104;
- Xander Urbach, Senior Advisor Responsible Investment & Governance at MN.



4. Results

In this chapter, we present the results of the 2025 Tax Transparency Benchmark. Historically, this benchmark has focused on Dutch companies, and this remains evident in the current scope. 51 of the 116 companies are Dutch, making the Netherlands the country most represented, and the remaining 65 companies come from seven other European countries, which are each represented by up to ten companies. We have selected companies from five different sectors: Financial, Energy, FMCG, Pharmaceutical, and Technology.

The 2025 benchmark results

The Tax Transparency Benchmark has run for eleven consecutive years. Over this period, we have observed substantial progress both within the benchmark's scope and in corporate tax transparency more broadly. When we launched the benchmark in 2015, 45 percent of companies publicly disclosed their tax strategy. This share rose steadily and reached a record 93 percent in 2024, the benchmark's tenth edition.

In 2025, we record the first decline in scores since 2015. The share has fallen to 89 percent; while this is still well above the starting point, it is a step backward. Several companies have withdrawn their public tax strategy and therefore score zero on this indicator. For some companies, tax is not considered material under the materiality assessment required by the Corporate Sustainability Reporting Directive. This development coincides with a drop in the average score across the 116 companies in scope. For the first time (apart from the anticipated dip in 2022 due to a major questionnaire overhaul and the inclusion of European companies) we observe a sharp decline, from 49 percent to 44 percent. Figure 1 provides an overview of the long-term progress and the downturn in the current year.

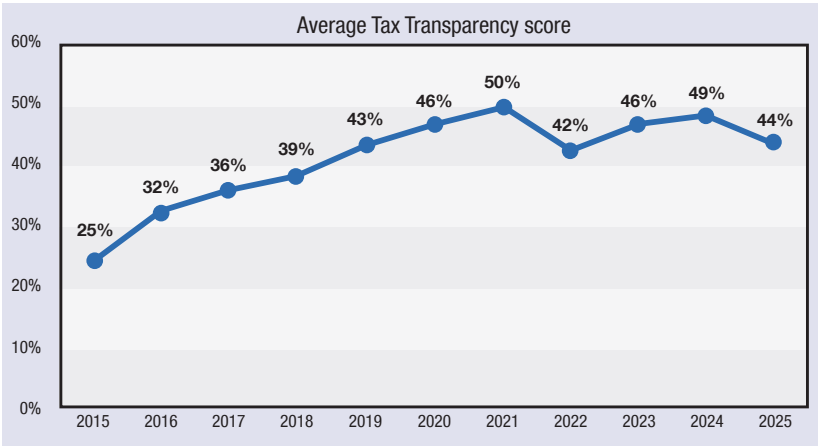


Figure 2: Average tax transparency score from 2015 to 2025

Another observation, which is not directly visible in the figure above or the table below, is the widening performance gap between the highest and lowest scoring companies. The overall decline contrasts with the fact that a group of companies that consistently score high are now joined by companies scoring much higher than in previous years. At the same time, several companies score significantly lower than in previous editions, with some now receiving zero or very few points.

As in previous editions, differences between the eight countries in scope remain considerable. Last year, Italy, Spain, and the Netherlands stood out as clear leaders. This year, the 51 companies from the Netherlands achieve the highest country average at 54 percent. Spain follows with 51 percent and Italy with 48 percent, both significantly lower than last year. Belgium is at 25 percent and Sweden at 18 percent; both scored low last year and have declined further since 2024. In line with the overall drop in the average score across all companies in 2025, none of the eight countries increased their average score. All country averages have decreased in 2025.

The benchmark covers 116 companies from eight European countries and five sectors. The report provides further analysis of differences by country and sector.

Table 6: Average score per country 2025 and 2024

	2025	2024
The Netherlands (51)	54%	56%
Europe (65) ⁵	37%	44%
Spain (9)	51%	58%
Italy (9)	48%	60%
Denmark (10)	45%	47%
France (10)	35%	44%
Germany (10)	34%	40%
Belgium (10)	25%	31%
Sweden (7)	18%	25%

Table 6 shows the level of progress per country. Aside from the overall downward trend, the company scope has remained unchanged compared to the 2024 and 2023 editions. Key takeaways:

- The Italy scope scores significantly lower than last year, falling from 60 percent to 48 percent. Spain also declines but still maintains a higher average than all other countries, except the Netherlands at 54 percent.
- Dutch companies, while scoring slightly lower than in 2024, maintain a high average of 54 percent. In the 2024 report, concerns were raised about a possible ceiling; this stagnation has now shifted to a mild decline.
- Although no country has improved its average, Denmark and the Netherlands drop only 2 percentage points. They show notable resilience compared with Italy, which falls by 12 percentage points, France by 9 percentage points, and Sweden by 7 percentage points.
- Lower averages may suggest a general decline in tax transparency, yet company level results reveal sharp differences between low and high performers. The gap is especially pronounced for Italy, where two of the nine companies score only 1 point; the same scope includes one of the three highest scoring companies (Enel) at 43 points and three companies score above 30 points (Eni Group at 35, Generali at 32, and Intesa Sanpaolo at 30).
- The benchmark applies a minimum threshold of 25 percent of the points. Last year, Sweden (with seven participating companies) was the only country to match this threshold exactly and none were below it. With this year's decline in scores, Sweden (at 18 percent) and Belgium (at 25 percent) are at or below this threshold.

In 2025, we continue to assess the same five sectors as in the past three years: Financial,

⁵ Europe or EU in the text and tables both refer to the following countries in the context of this benchmark: Italy, Spain, Denmark, Belgium, Sweden, Germany, and France.

Energy, Pharmaceutical, Technology, and Fast-Moving Consumer Goods (FMCG). This allows for the comparison of progress within and between sectors.

Table 7: Average score per sector in 2025

	Financial	Energy	Pharma	Technology	FMCG
Europe (65)	48%	60%	22%	25%	30%
NL (51)	73%	55%	8%	62%	55%

Table 8: Average score per sector in 2024

	Financial	Energy	Pharma	Technology	FMCG
Europe (65)	54%	57%	33%	37%	37%
NL (51)	77%	62%	12%	61%	59%

Table 9: Average score per sector in 2023

	Financial	Energy	Pharma	Technology	FMCG
Europe (65)	50%	61%	31%	29%	30%
NL (51)	79%	61%	13% ⁶	61%	53%

Please note the number in brackets in the first column. It indicates the total number of companies in that scope. In 2022, we ran a pilot with 25 companies from European countries outside the Netherlands. This expanded to 65 in 2023 and remained the same in 2024. The Dutch scope declined from 78 in 2022 to 51 in 2023 and 2024. Since 2023, the overall scope has remained unchanged through 2025, which supports fair and comparable analyses. To avoid confusion, the 2022 pilot data are omitted here and remain available in earlier reports.

⁶ Only two companies assessed in the Netherlands are included in this category, therefore this is not a fully representative indication of the sector. We, however, do report on this sector as it provides some insights into the differences between the NL companies and the EU companies.

The three tables show several developments that we discuss in detail later in this chapter. Key takeaways for the five sectors are:

- In line with the general 2025 outcome, most sectors have a lower average than in 2024. Only two sectors have increased their scores (and then only slightly): the Dutch Technology sector has increased its score slightly from 61 percent to 62 percent, and the European Energy sector score has risen from 57 percent to 60 percent.
- The largest reductions appear in the European Pharmaceutical and Technology sectors, down by 11 and 12 percentage points respectively.
- Despite the overall decline, several sectors still score relatively high on average, in particular the Dutch Financial and Technology sectors, and the European Energy sector.
- With the drop in the European Pharmaceutical sector's average score, this sector now scores below the minimum threshold of 25 percent. Belgium's UCB is the highest scoring company in this scope with 20 points, equal to 45 percent.

In general, the averages show a modest decline. This does not by itself prove a negative trend in tax transparency or corporate governance. Several internal and external factors are relevant:

- Minor improvements to the 2025 questionnaire have increased the maximum number of available points to 44 and given more weight to indicators such as stakeholder engagement, public debate policies, external assurance on non-financial tax disclosures, and training for personnel in the tax function.
- Guidance for many criteria has been refined and thresholds for full marks have been recalibrated. In some cases, a policy segment or report excerpt that previously earned full points no longer meets the updated standard.
- Fewer companies provided feedback this year. Each score is based on an assessment completed by the benchmark team using public sources and then shared for company feedback. If no feedback is provided, no changes are made, which can give a slight advantage to companies that do engage. That said, while fewer companies responded, the depth and quality of feedback were markedly higher than for previous editions.

Below, we provide more details about the 2025 questionnaire updates. In 2024, we shifted toward concrete examples, moving from a “tell you” to a “show you” approach. In 2025, we have built on this by requiring a clear time frame for examples, meaning examples must be from 2022 or later, and by applying a stricter interpretation of what counts as concrete. For example, rather than merely stating a commitment to both the letter and the spirit of the law, companies are expected to explain these commitments with clear, understandable examples from the stated time frame. We have applied the same standard to positions in the public tax debate and to judging how companies consult stakeholders for input to the tax strategy.

Last year, this shift led to a sharp decline in the scores for several updated criteria. This year, we see a mixed picture. On the criterion relating to the “spirit of the law”, the Dutch scope improves slightly, from 33 percent to 35 percent, while the European scope declines from 18 percent to 15 percent. Last year’s criterion on stakeholder engagement has been split into two parts in 2025. Criterion 5a covers policy and 5b covers a proven example. For 5a, we observe a notable rise, from 35 percent to 49 percent for Dutch companies and from 20 percent to 26 percent for European companies. For 5b, averages are lower, at 14 percent for European companies and 22 percent for Dutch companies. This suggests two things. First, many companies still struggle to provide clear and recent examples that show how policy is put into practice. Second, the maturity of this aspect of good tax governance is still developing. Companies that have provided feedback and engaged actively with the benchmark team in recent years tend to score higher on these updated criteria than companies that have not engaged.

This benchmark aims to establish a clear pathway for tax transparency, promote the sharing of best practices, and assist companies on their journey toward greater transparency. As we celebrate this eleventh edition, we can reflect on a rich history of progress. The strides taken by these companies in their quest for transparency and commitment to being responsible taxpayers are both significant and commendable, as many of them have now set the standard for others to emulate. Notably, 2023 marked the first time a company achieved a perfect score of 100 percent against our benchmark, and in 2024, this milestone was surpassed, with three companies attaining this highest achievement. In 2025, once again, three companies are clearly leading the way; however, no full marks have been achieved. This year’s top three companies are as follows:

Philips (43 points) leads the way for the third consecutive year. The company is complimented for the integration of ESG and sustainability throughout its Country Activity and Tax Report. Philips reports on the three individual ESG aspects (environment, social, and governance) and provides clear examples of how it takes tax into account when addressing ESG issues.

Enel (43 points) takes joint first place for the second year in a row. The company does a great job of disclosing its approach to corporate tax. This includes reporting on the relationship between its business activities and taxes paid. Additionally, the reporting on the use of tax incentives, which nowadays is especially relevant for an energy company, is particularly welcome.

Repsol (43 points) is back at the top after just missing out in the previous edition. The company publishes a comprehensive overview of its tax risks and disputes, which includes a description of how these tax risks impact Repsol's business. Furthermore, Repsol is complimented for its extensive reporting, which includes having separate documents for various topics (e.g. cooperative relationships, presence in tax havens, etc.).

It is encouraging that three companies are all but one point short of a perfect score this year. At the same time, there are many companies that need to improve. In total, 33 companies score below the minimum threshold of 25 percent (below 11 points). Of these, 24 are European companies and nine are from the Netherlands. This means that 28 percent of all companies are lagging, which underlines the need for continued efforts to improve transparency.

Only three of the 33 low scoring companies provided feedback on our assessment. By comparison, 72 percent of Dutch companies and 37 percent of European companies provided feedback overall. This pattern may indicate a stakeholder engagement barrier that limits the ability of lower scoring companies to improve their results.

A more positive finding is that several companies have made clear progress in their tax governance and improved their scores. Notable examples are ArcelorMittal (Netherlands), Campari Group (Italy), ASM International (Netherlands), TotalEnergies (France), and Ørsted (Denmark). ArcelorMittal (Netherlands) shows the largest increase (of 22 points), underscoring a stronger commitment to transparency. These companies are moving from laggards to learners and in some cases to leaders, showing that proactive strategies deliver results.

By contrast, reduced scores for Beiersdorf (Germany), Orange (France), and Recordati (Italy) are a concern. It is important to understand the drivers of these setbacks, especially as stakeholder expectations continue to rise. Companies should address these issues to stay competitive and align with good practice in tax governance.

Good Tax Governance Principles

In the table below, we present the scores for each of the six Good Tax Governance Principles defined by VBD0. The table shows the average score for both Dutch and European companies. We also share the results of the 2023 and 2024 benchmarks for comparison.

Table 10: Average score per principle in 2023 – 2025

Good Tax Governance Principles	Average % by companies per principle					
	2025		2024		2023	
	EU	NL	EU	NL	EU	NL
A: Define and communicate a clear strategy	37%	57%	53%	67%	46%	64%
B: Tax must be aligned with the business and is not a profit centre in itself	40%	48%	39%	49%	39%	45%
C: Respect the spirit of the law. Tax-compliant behaviour is the norm	30%	53%	43%	59%	44%	69%
D: Know and manage tax risks	36%	63%	46%	65%	38%	67%
E: Monitor and test tax controls	60%	78%	67%	75%	55%	74%
F: Provide tax assurance	20%	16%	22%	26%	21%	24%
Total average score	37%	54%	44%	56%	41%	56%

Table 10 shows a broad reduction in scores across principles in 2025, with the EU total average falling from 44 percent to 37 percent and the Netherlands from 56 percent to 54 percent. The largest drops are for Principle A and Principle C. For the EU scope, A falls from 53 percent to 37 percent and C from 43 percent to 30 percent. For the Netherlands scope, A declines from 67 percent to 57 percent and C from 59 percent to 53 percent. Risk management (Principle D) also recedes, from 46 percent to 36 percent by the EU scope and from 65 percent to 63 percent by the Netherlands. Monitoring and testing (Principle E) remains the strongest area, despite a step down by the EU scope from 67 percent to 60 percent, while the Netherlands score improves from 75 percent to 78 percent. Tax assurance (Principle F) is consistently lowest and weakens further, especially for the Netherlands scope, which drops from 26 percent to 16 percent. Alignment with the business (Principle B) is comparatively stable, edging to 40 percent for the EU and 48 percent for the Netherlands. Overall, the pattern points to persistent strengths in controls and a widening challenge on strategy, spirit of the law, and assurance.

Responsible use of AI in the tax function

As part of our ongoing effort to gain deeper insights into the evolving landscape of corporate tax transparency, we posed an open question about technology and practices in this year's benchmark. We asked how companies integrate AI and other technologies in their tax function, and whether a dedicated approach or policy exists to ensure the responsible use of such technologies. This is not a side issue. It speaks directly to good tax governance across strategy, risk management, controls, and assurance. The responses show where practice is moving, where governance is catching up, and where evidence will be expected in future editions of the benchmark.

Several respondents describe a pragmatic start. AI assistants are used for everyday support, such as drafting emails, preparing summaries, and giving a first pass on tax cases, while final judgement remains with tax professionals. AI is also applied to condense jurisprudence, policy notes, and new legislation, which accelerates knowledge sharing inside teams.

A second common way to use AI relates to data. Respondents link AI to business intelligence in order to present indirect tax and other data more clearly for internal and external reporting. Some companies are exploring the use of generative AI to monitor legal changes and to flag potential compliance risks in close to real time. Others see a role for tax chatbots that can answer recurring questions from the business on VAT treatment or the nature of adjustments, with human review and approval in place.

A smaller group reports using more advanced operating models. These include a dedicated tax technology specialist, structured collaboration between tax and IT, and pilots with external advisers. Reported use cases include robotic process automation to support compliance and dashboards that provide timely insight into effective tax rate, litigation, compliance status, intercompany flows, and invoicing accuracy across multiple jurisdictions. Several respondents note that OECD Pillar Two rules have been embedded in tax accounting tools and that work is underway to incorporate the Global anti-Base Erosion Rules (GLoBE) Information Return.

Governance approaches vary. Some rely on company-wide responsible AI frameworks that apply to tax. Others have explicit guidance for generative AI that covers privacy, approved tools, and consent in meetings. A few are still exploring AI-use and do not yet have a tax specific policy, although they are considering a formal framework. Where policies exist, respondents emphasise ethics, transparency, data security, human oversight, and alignment with evolving European requirements, including the direction set by the EU AI Act.

The overall picture is selective adoption with clear gains in efficiency and reporting but uneven maturity in policy, testing, and control. For this benchmark, the question is moving from, “Can AI help?” to, “How is this use governed and evidenced?” Is a general corporate AI policy sufficient for tax, or is a dedicated approach needed that covers model selection, data provenance, validation, and audit trails that support assurance? As AI becomes part of tax accounting and compliance, companies will be asked to show not only that AI speeds up work processes, but that outcomes are reliable, explainable, and governed to a standard that satisfies auditors, authorities, and stakeholders.

Results per principle

A. Define and communicate a clear tax strategy

An appropriate tax strategy is accessible and clearly communicated. It sets out the company's vision and objectives on taxation, aligns with organisational values, business strategy, and sustainability strategy, and considers stakeholder interests. It explains the relationship with tax authorities and the role of technology. As the sustainability landscape evolves, companies are encouraged to show how they integrate sustainability understanding and good tax governance.

Top scorers

Seven companies achieve full points on this principle, down from 16 in 2024. The top performers are Ørsted (DK), Repsol (ES), Enel (IT), Ahold Delhaize (NL), Fugro (NL), Philips (NL), and a.s.r. (NL).

Main results

- Of the 51 Dutch companies, 90 percent communicate their views on tax, closely followed by 88 percent of the 65 European companies. For the first time since the inaugural benchmark, the average on this topic drops, from 93 percent to 89 percent.
- Dutch companies score strongly on describing their approach to government incentives and subsidies, at 78 percent of the 51 companies. The comparable figure for the 65 European companies is 49 percent. On criterion 3a and 3b, European companies score higher than last year, one of the few indicators of progress across the questionnaire.
- This year, questions 4 and 5 were divided into a policy question and an example question. Companies score relatively well, and higher than in previous years, on the policy elements. Scores are markedly lower on the example elements. In both scopes, results for the second part drop by about 50 percent.
- A notable decrease appears for criterion 6a, which asks for a link between the sustainability and tax strategies. The average falls from 69 percent in 2024 to 58 percent in 2025.
- The final question on audit committee involvement was assessed more strictly this year.

Points were awarded only for concrete and recent examples rather than general statements. As a result, the average across all 116 companies falls from 66 percent to 41 percent.

- In total, seven companies (four Dutch and three European) score full marks on Principle A. At the other end of the table, twelve companies score zero in this category, up from seven in 2024, indicating that they lack a public tax strategy and other required elements.

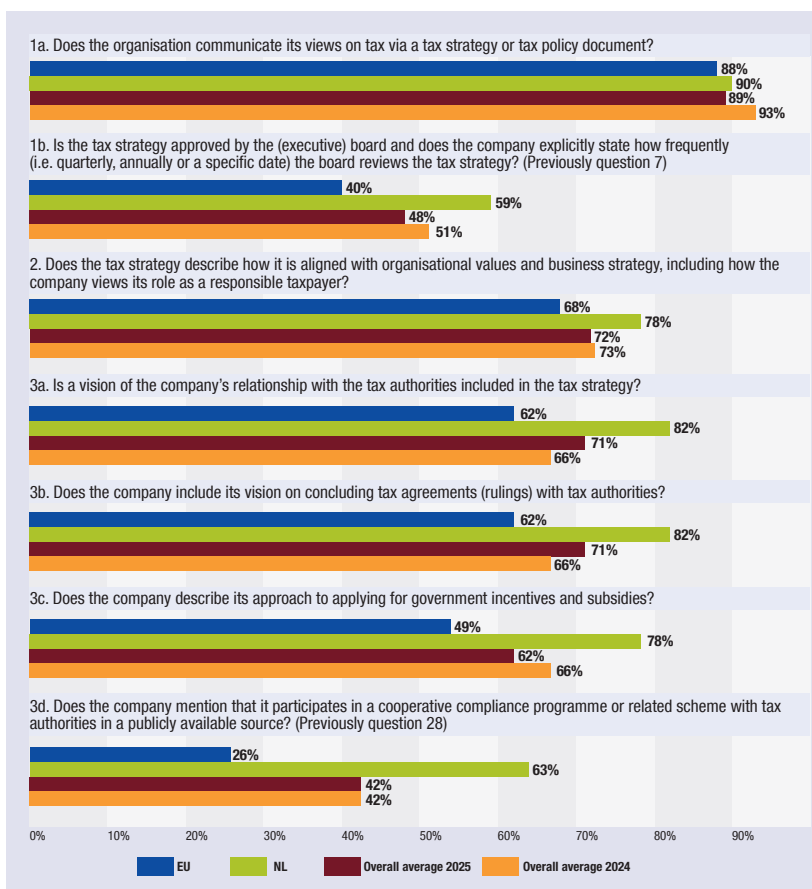


Figure 3: Scores on Principle A (1/2)

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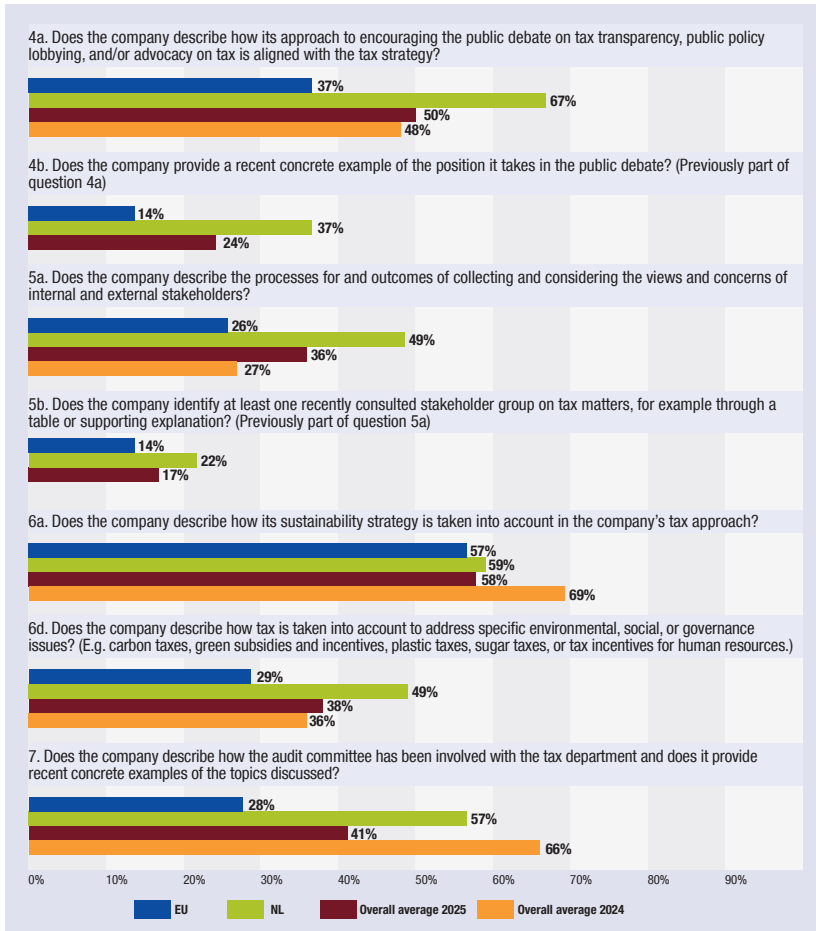


Figure 3: Scores on Principle A (2/2)

B. Tax must be aligned with the business and is not a profit centre in itself

Tax should not be seen as an isolated business component but as an integral part of the company and as part of the broader business strategy. As such, tax should not be the exclusive domain of the tax department. In principle, a company should declare profits and pay taxes where it conducts business activities and should be transparent on how this is done.

Top scorers

Six companies score full marks on this principle. The following companies did so: Repsol (ES), Enel (IT), Repsol (ES), Aegon (NL), a.s.r. (NL), Philips (NL), and Rabobank (NL).

Main results

- There remains a strong commitment to ethical tax behaviour and alignment with business operations. In 2025, 82 percent of all companies state that business operations lead in setting up international structures, a slight decline from 83 percent in 2024. The Netherlands scope scores 88 percent and the EU 77 percent.
- Commitment is reinforced by communication on not using tax havens or non-cooperative jurisdictions for tax planning. The overall share rises to 77 percent from 76 percent, with the Netherlands scope at 84 percent and the EU at 71 percent. Disclosure of a definition for tax havens improves to 54 percent overall, up from 46 percent.
- Reporting on a country-by-country basis shows mixed results. Alignment with GRI 207-4 for core tax data falls to 38 percent from 43 percent, with the EU scope at 37 percent and the Netherlands at 39 percent. By contrast, narrative reconciliation of the effective tax rate improves to 84 percent from 79 percent. Disclosure of broader tax and government payment data per country increases to 17 percent from 14 percent, and ESG tax reporting per country rises to 16 percent from 13 percent, with the Netherlands at 24 percent and the EU at 11 percent.
- The share of companies providing a description of the role of taxes within the value creation model declines to 16 percent from 28 percent. Overall, 2025 shows little change in the scores for statements on intent and some gains in definitions and reconciliations, alongside a reduction in scores for country-level disclosures and value creation mapping.

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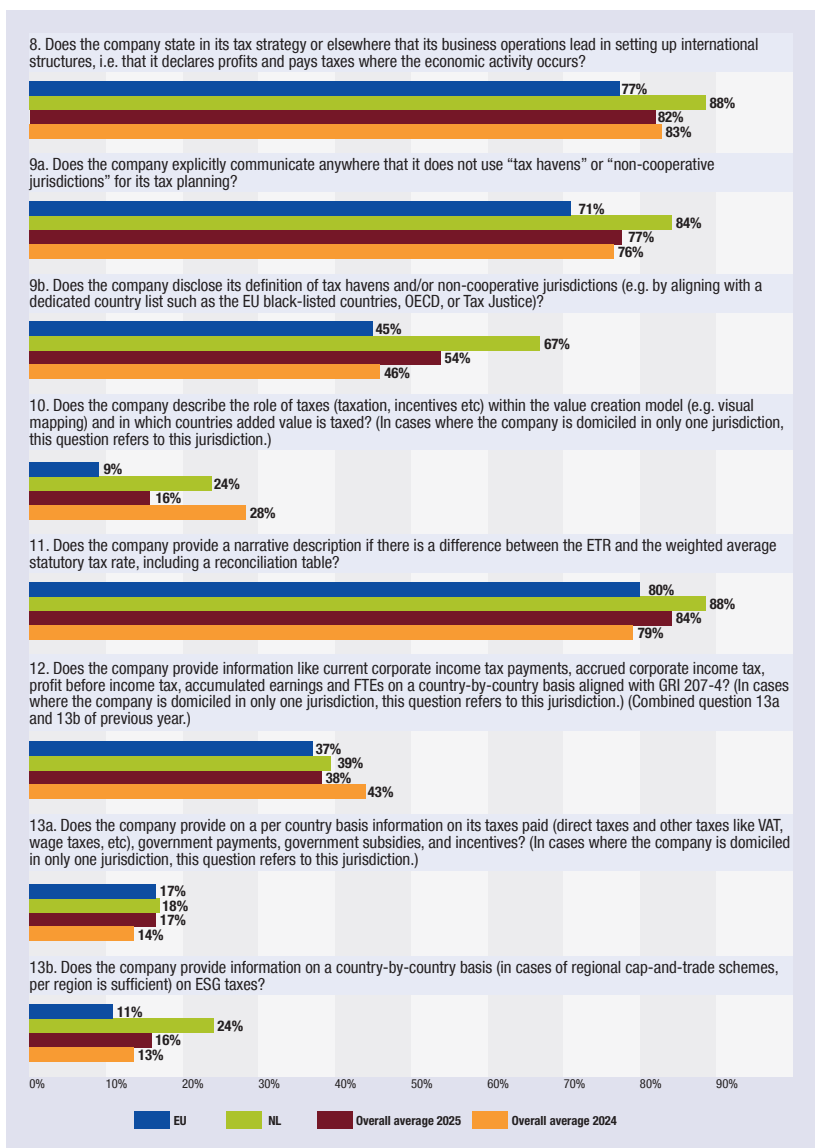


Figure 4: Scores on Principle B

C. Respect the spirit of the law. Tax-compliant behaviour is the norm

A company should aim to comply with the spirit as well as the letter of the law. This means that the intention of the legislator should also be used as a guiding principle for the company to ensure tax-compliant behaviour. By definition, the spirit of the law can be open to interpretation. Therefore, discussions are required with internal stakeholders, including tax, legal, compliance, and CSR officers, as well as external stakeholders, such as investors, government officials, tax authorities, and civil society organisations. Being compliant with tax laws and regulations, statutory financial obligations, and international accounting standards, is the core responsibility of the tax function.

Top scorers

Four companies receive full marks on Principle C in 2025. This is down from 22 companies in 2024 and 29 in 2023. As discussed earlier, the decline is largely driven by stricter assessment of the spirit of the law criterion and the new question 15b on training for audit committee or supervisory board members overseeing the tax strategy. The four Dutch companies scoring the full five points are Ahold Delhaize, Van Lanschot Kempen, NN Group, and a.s.r.. No European companies outside the Netherlands achieved full marks.

Main results

Principle C assesses ethical tax conduct in practice, with greater emphasis in 2025 on recent and concrete examples. This shift clarifies where policies are embedded in day-to-day practice and where gaps remain.

- Principle C shows the sharpest reduction in 2025, linked to stricter evidence requirements for concrete examples.
- The score for the spirit of the law criterion has reduced but only slightly, at 24 percent overall versus 25 percent in 2024, with the Netherlands at 35 percent and the EU at 15 percent.
- Training for tax, legal, and compliance staff holds steady at 56 percent overall, with higher uptake in the Netherlands at 73 percent compared to 43 percent in the EU.
- The new question on training for the audit committee shows very limited uptake in this area, at 7 percent overall, with 16 percent of the Netherlands scope running such training and 0 percent of the EU.
- Whistleblower policy references improve to 60 percent overall from 56 percent in 2024, indicating the gradual reinforcement of reporting channels.
- Explicit reference to tax standards declines to 53 percent overall from 64 percent, suggesting reduced adoption of formal frameworks.

- The overall pattern in 2025 combines VBDO's tougher expectations on examples with modest gains in whistleblowing and stronger staff training in the Netherlands, while the EU lags on multiple criteria.

The 2025 results point to stable intentions but uneven operationalisation. Clear, recent examples and board level training are the main levers for improvement, alongside renewed commitment to recognised tax standards.

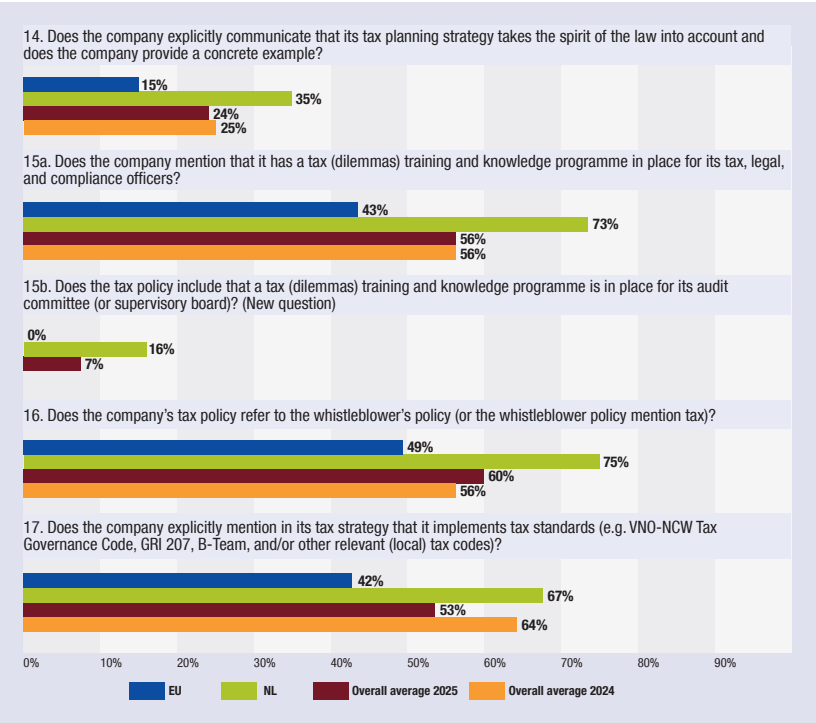


Figure 5: Scores on Principle C

D. Know and manage tax risks

Tax risk management is a proactive process that is demonstrably embedded within the risk management and internal control function of the company. In order for stakeholders, such as investors, to understand national or international tax risks, a company should provide a clear response to each material risk.

Top scorers

This principle remains the highest scoring of the six, despite an overall decline in average scores. In 2025, eighteen companies achieve full points: ArgenX (BE), Repsol (ES), Enel (IT), Aegon (NL), AkzoNobel (NL), Heineken (NL), InPost (NL), KPN (NL), NN Group (NL), OCI (NL), Philips (NL), Prosus (NL), Relx Group (NL), Fugro (NL), JDE Peet's (NL), Randstad (NL), Ahold Delhaize (NL), and TKH Group (NL).

Main results

Principle D evaluates how companies manage and report tax risks, with a focus on concrete examples rather than generic descriptions.

- In 2025, the share of companies making explicit statements about their tax risk appetite rises to 50 percent from 47 percent in 2024. The Netherlands scope leads at 75 percent, while the EU scores 31 percent.
- Reporting on specific tax risks reduces to 59 percent from 63 percent. Dutch companies score 69 percent and EU companies 51 percent.
- Commentary on responses to tax risks edges up to 43 percent from 42 percent. The Netherlands scope records 57 percent, compared with 32 percent for the EU.
- Reporting on the role of technology and AI, including providing a recent example, declines to 28 percent from 39 percent. A wide gap remains between the Netherlands at 45 percent and the EU at 15 percent.

The 2025 results show clearer articulation of risk appetite and a small improvement in risk response commentary, alongside weaker disclosure of specific risks and a marked decline in technology reporting. Strengthening example-based reporting and explaining how technology supports tax risk control are the main levers for improvement.

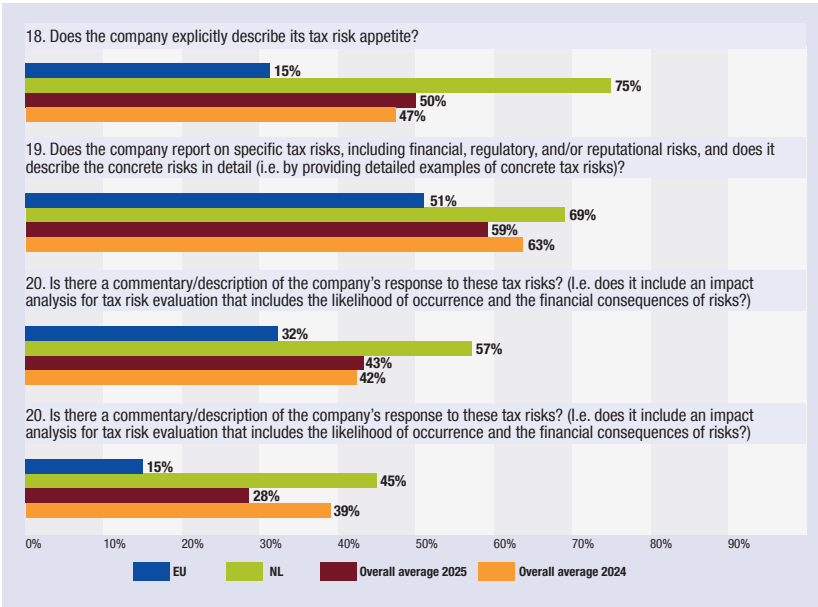


Figure 6: Scores on Principle D

E. Monitor and test tax controls

It is important that a company has a standardised approach to monitoring and testing controls. This allows for the monitoring of the proper execution of its tax strategy on the one hand and substantiating that the organisation is in control of tax matters on the other.

Due to the increased public scrutiny and intensified debate on tax in recent years, boardrooms are still interested in tax risk management. Identifying risks by means of monitoring and testing activities, and reporting and managing tax risks are now considered part of properly embedding tax risk management in an organisation.

Top scorers

More than half of the companies in the benchmark scope score full marks on Principle E, namely 53 percent or 62 companies. It should be noted that only three points can be obtained. However, in light of the overall slight decline in scores, it is encouraging to witness no significant changes for this principle.

Main results

Principle E assesses how companies monitor the implementation of their tax strategy, maintain a tax control framework, and report tax risks to the audit committee.

- In 2025, scores improve across all three criteria compared with 2024. The share of companies describing how implementation and execution are monitored rises to 67 percent overall from 54 percent. Description of how tax risks and controls are tested and monitored increases to 69 percent from 64 percent. Inclusion of tax risk management in audit committee reporting moves up to 67 percent from 64 percent.
- The Netherlands scope scores 78 percent for each of the three criteria, while the EU averages 59 percent for implementation monitoring, 62 percent for testing and monitoring of controls, and 58 percent for audit committee reporting.
- A total of 64 companies, split evenly between the Netherlands and the EU at 32 each, achieve full marks on this principle. Nineteen companies score zero, indicating limited transparency and weak accountability in monitoring and testing tax controls.

The 2025 results show clear advancement in control design and oversight, with stronger integration into audit committee reporting. Companies with low scores should prioritise clearer descriptions of roles, processes, and evidence of testing to strengthen tax risk governance.

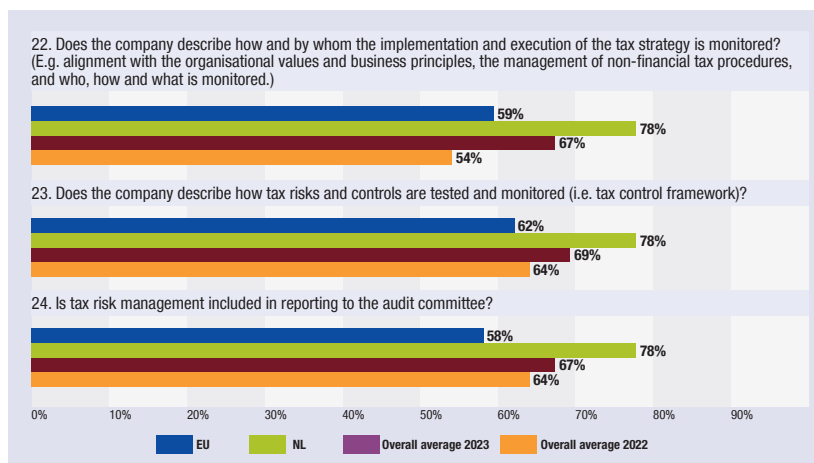


Figure 7: Scores on Principle E

F. Provide tax assurance

Companies should be prepared to provide additional (non-financial) tax information to regulators, tax authorities, and other stakeholders to provide a certain level of assurance regarding tax data and processes. This tax assurance should be based on the implementation and outcome of the five aforementioned principles. Assurance can also be provided by a third party. Third-party tax assurance helps to give stakeholders more certainty about tax processes.

Top scorers

Principle F has historically recorded low scores, mainly due to the in control statement and assurance on non-financial disclosures. In 2025, the in control question was removed and the compliance programme question moved to Principle A, so only the question on providing tax assurance remains. This year, 21 companies provide such assurance. That equals 18 percent of the scope, down from 26 percent in 2024.

Main results

Principle F has been refocused in 2025. The in control question was removed and the cooperative compliance question was moved to Principle A. As a result, Principle F now only covers external tax assurance on non-financial tax disclosures.

- Regarding this single criterion, 18 percent of companies provide assurance in 2025, down from 26 percent in 2024. This equals 21 companies out of 116. The EU scope averages 20 percent and the Netherlands 16 percent.
- The narrower focus clarifies performance but also makes gaps more visible. With only one criterion in play, it becomes clearer that 95 companies do not provide external assurance and therefore score no points on this principle.

The 2025 redesign sharpens the focus of Principle F on assurance quality. The overall decline signals that many companies still need to formalise external assurance on non-financial tax disclosures to demonstrate robust governance.

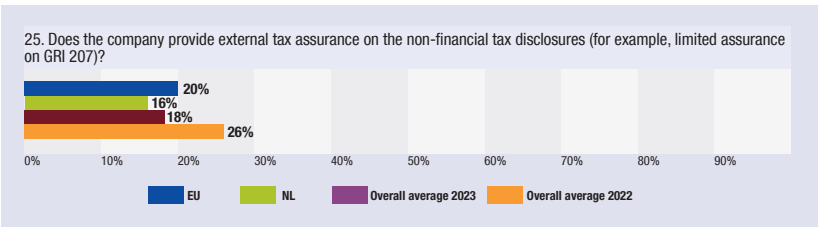


Figure 8: Scores on Principle F

5. Recommendations

The 2025 benchmark indicates a modest weakening in overall tax transparency. Continued improvement is needed, particularly on internal and external tax assurance, comprehensive public country-by-country reporting, integration of ESG considerations, and meaningful engagement with internal and external stakeholders. Drawing on the 2025 results and the expert jury meeting, the recommendations below set out priority actions for each stakeholder group.

To companies

- Keep policies and practice current with reporting developments and align the tax strategy with the sustainability strategy and business strategy.
- Strengthen stakeholder dialogue and report how feedback has influenced tax policy and practice.
- Make the link between sustainability and tax explicit and provide recent and concrete examples.
- Improve cross-function collaboration to meet data needs for CSRD and other disclosures.
- Expand sustainability reporting to include clear tax disclosures and show how tax supports environmental and social goals.
- Move from statements to evidence. Provide recent examples for key claims relating to areas such as spirit of the law, public debate, and stakeholder engagement.
- Disclose the tax risk appetite and report specific tax risks, impacts, and responses.
- Provide a clear narrative that reconciles the statutory and effective tax rate.
- Publish country-by-country data that meet GRI 207 and the EU Public Country-by-Country Reporting Directive requirements. Report per country, not by region.
- Explain value creation and where value and tax coincide across the business model.
- Describe how the tax strategy is implemented and monitored and involve the audit committee.
- Provide external assurance on non-financial tax disclosures.
- Train staff across functions on tax transparency and good tax governance.
- Implement and show a responsible approach to AI in the tax function, including approved tools, controls, and examples of use.

To lawmakers, regulators, and tax authorities

- Set clear and practical standards for good tax governance and transparency that apply to all companies.
- Promote the use of commonly accepted reporting and assurance frameworks to improve comparability across borders.
- Provide guidance and examples of good practice that companies can adopt.
- Clarify expectations for cooperative compliance programmes and encourage participation.
- Increase transparency on supervisory approaches to help rebuild trust in taxation.
- Work with international bodies to align transparency requirements and reduce reporting complexity.

To NGOs

- Engage constructively using evidence and differentiate engagement with high and low performers.
- Share examples of responsible and transparent tax behaviour that companies can apply.
- Include tax administrations and investors in dialogues, not only companies and advisors.
- Encourage the inclusion of a wider set of stakeholder views, including local communities.
- Maintain structured dialogues with governments to promote transparency.

To tax advisory firms

- Ensure teams have strong technical, governance, and digital skills.
- Place tax within the wider sustainability context and support clients to meet transparency expectations.
- Promote responsible tax behaviour and support public reporting and assurance readiness.
- Hold open dialogues with all stakeholders on tax governance.
- Adopt and enforce an internal code of conduct for tax advice.
- Ensure advisors understand each client's sustainability and business strategies.
- Support clients in building responsible AI controls in tax processes.

To investors

- Adopt a tax code of conduct that covers the investor, investment structures, portfolio holdings, and partners.
- Integrate tax into investment analysis and stewardship, including policy, risk, and disclosure.
- Be transparent about your own tax strategy and expectations for investee companies and partners.
- Engage portfolio companies on responsible and transparent tax behaviour with clear milestones set.
- Monitor adherence during ownership and define escalation paths when expectations are not met.
- Support the development of common reporting and assurance standards to improve comparability.

To universities

- Modernise tax curricula to connect tax, governance, and sustainability.
- Include tax topics in economics, geopolitics, business, assurance, mathematics, and social sciences.
- Improve communication to a wider audience using clear and non-technical language.
- Add practical modules on reporting and assurance, including case work with real disclosures.
- Include responsible use of AI in tax as a teaching topic.



6. Jury report 2025

Jury members

Appointed by VBDO, the expert jury consisted of six honourable members acting in a personal capacity. All of them are experts in the fields of good tax governance and tax transparency but they come from different backgrounds:

- Klaas Bangma, Economic Policy Advisor at FNV;
- Irene Burgers, Professor of Economics of Taxation and Professor of International Tax Law at Groningen University;
- Michiel van Esch, Active Ownership Specialist at Robeco;
- Hans Gribnau, Professor of Tax Law at Tilburg University and Leiden University;
- Anna Gunn, Tax researcher and blogger at Leiden University and Artikel 104;
- Xander Urbach, Senior Advisor Responsible Investment & Governance at MN.

Process and nominees

The jury has an important monitoring function within the Tax Transparency Benchmark. In order to be able to reach an independent verdict on this year's benchmark, the jury discussed the process and execution of the benchmark as a whole and weighed and assessed the validity of the results pertaining to the six top performing companies in the benchmark. In this regard, the jury specifically paid attention to the following criteria:

- Total points scored and analysis performed by VBDO;
- Depth of tax strategy, i.e. explaining matters rather than just giving an overview;
- Sector of operation and the presence of a mandatory legal framework;
- Absence of controversies relating to tax and tax transparency;
- The clarity of the implementation and execution of tax strategies.

The following companies were analysed by the jury, which are the six top performing companies of the 2025 benchmark (in alphabetical order):

- Aegon (the Netherlands)
- a.s.r. (the Netherlands)
- Enel (Italy)
- NN Group (the Netherlands)
- Philips (the Netherlands)
- Repsol (Spain)

Winners

For the second year in a row, the jury has chosen three winners of the benchmark that are equally transparent in their tax reporting. The jury congratulates **Enel**, **Repsol** and **Philips** on being the joint winners of the Tax Transparency Benchmark 2025, all with a score of 43 out of 44 points (98%). The companies all publish a comprehensive tax transparency report and therefore achieve top scores in every principle but one that has been assessed as part of the Tax Transparency Benchmark 2025.

Philips is complimented by the jury for its detailed reporting, especially for the integration of ESG and sustainability throughout its Country Activity and Tax Report. Philips reports on the three individual ESG aspects (environment, social, and governance) and provides clear examples of how it takes tax into account when addressing ESG issues. Furthermore, the jury praises Philips for the emphasis it places on explaining how tax is included in the stakeholder dialogue.

Enel received a top score last year, and is again joint winner of the benchmark. As with Philips, it is just one point away from achieving 100%. Enel does a great job of disclosing its approach to corporate tax. This includes reporting on the relationship between its business activities and taxes paid. The jury praises Enel for reporting on the use of tax incentives, which nowadays is especially relevant for an energy company.

After being runner-up for the last two years, **Repsol** is back in joint first place in this year's edition of the Tax Transparency Benchmark. The jury congratulates Repsol, especially for its comprehensive overview of tax risks and disputes, which includes a description of how these tax risks impact Repsol's business. Furthermore, Repsol is complimented for its extensive reporting, which includes having separate documents for various topics (e.g. cooperative relationships, presence in tax havens, etc.).

All three winners are just one point away from achieving 100% on the benchmark. They all missed a point for the criterion on training and knowledge programmes for the audit committee and/or supervisory board members. The jury encourages the winners to not only implement training programmes for tax staff, but also for the audit committee and/or supervisory board members, as these stakeholders fulfil an important oversight function on tax matters.

Good practices

As well as taking a closer look at the winners, the jury also discussed the results of the other top scoring companies. In general, the jury compliments the participants in the benchmark for the progress that has been made on tax transparency reporting in the last ten years. In comparison to the earliest editions of the benchmark, when some companies did not even have a tax policy in place, tax reporting of these high scoring companies has improved considerably, and the jury has little left to recommend.

Specifically, the jury would like to honourably mention **Aegon, a.s.r.**, and **NN Group** for their high scores in this year's edition of the benchmark. **Aegon** is complimented for its tax transparency; not only does it cover the topics recommended by this benchmark, it also transparently reports on other aspects of its business in relation to taxation. Furthermore, Aegon has a clear policy on the use of tax havens, which is explained in its tax report. **a.s.r.** is praised by the jury for the progression it has made in its tax reporting over the last few years. In particular, the jury praises the clear overview of a.s.r.'s tax principles and how these are implemented and executed in practice, and a.s.r.'s comprehensive paragraph on stakeholder engagement, which makes a distinction between internal and external stakeholders.

Finally, the jury would like to honourably mention **NN Group** for being a pioneer in the field of tax transparency for many years. NN Group has been one of the top scoring companies since the start of the benchmark and has managed to improve its tax reporting even further, by including a specific paragraph on the impact of Pillar Two on its business. The quality of the tax report and clear description of how tax is linked to NN Group's broader strategy and values, resulted in a high score of 41 points.

Recommendations from the jury

The overall verdict on this 2025 edition of the Tax Transparency Benchmark is that there remains a growing commitment to transparency among companies. The jury specifically compliments companies on their progress in reporting on how taxation and sustainability interact and on how the tax strategy is effectively implemented in the business. Nevertheless, challenges remain for the companies. In this regard, the jury notes:

- The improvement made with regards to companies providing insights into stakeholder engagement is stagnating. Although many companies provide a statement that tax is part of the stakeholder dialogue, only a few companies provide further details on the dialogues they had with different stakeholders (i.e., by providing concrete examples). Furthermore, the jury recommends that companies place more emphasis on the order in which the stakeholders are presented, e.g. by mentioning the most important stakeholders first.
- A stagnation of the progress made by the Dutch companies in the benchmark can also be observed, especially in relation to the companies disclosing their approach to tax risks and controls. The jury encourages the companies to take their tax reporting a step further and include more detailed descriptions of their responses to concrete tax risks, including the likelihood of occurrence and the financial consequences of risks.
- Although more and more companies explicitly link their tax strategy to their sustainability strategy, the jury recommends that companies also include the social and governmental part of ESG in their reporting, rather than solely focusing on the environmental aspect.
- Although many companies provide tax training programmes to their staff, we recommend that companies also provide tax upskilling or knowledge sessions to their audit committee and/or supervisory board members, as these stakeholders fulfil an important tax oversight function.
- While many companies explicitly communicate that they do not make use of tax havens and/or non-cooperative jurisdictions, the jury encourages companies to also disclose their definition of tax havens and/or non-cooperative jurisdictions, e.g. by referring to one of the EU lists or using their own definitions.
- Finally, although some companies already refer to specific tax standards, such as GRI 207, the VNO-NCW Tax Governance Code, or B-Team, the jury recommends that companies more explicitly align their tax reporting to these tax standards.

The jury makes the following suggestions relating to the Tax Transparency Benchmark's methodology:

- In general, the jury recommends putting more emphasis on the intention and persuasiveness of a company's tax reporting. The jury suggests further differentiation in the scoring of the benchmark, e.g. by awarding more points for companies that support their answers with concrete and relevant examples or issues and that disclose how they deal with specific tax dilemmas.
- The jury recommends taking the most important developments in the tax landscape, such as Pillar 2 and the Corporate Sustainability Reporting Directive, into account when awarding points to companies. For example, this could be done by awarding additional points to companies that explicitly report on/in line with these initiatives.
- The jury suggests narrowing questions 4a and 4b (on lobbying) by only awarding points for companies that provide a detailed description of the position that the company takes in the public debate and that provide concrete examples of their lobbying activities.
- In this year's benchmark, the jury observes a difference in the extent and quality of tax reporting between the different sectors in which companies are active. When scoring the companies, the jury recommends also taking into account whether there are any (mandatory or voluntary) reporting standards that apply to that specific sector.
- Finally, according to the jury, the presence/absence of controversies should play a more important role within the scoring of the Tax Transparency Benchmark, e.g. by awarding negative points in cases where controversies are found.

Appendix



2025 Tax Transparency Benchmark criteria and scoring

Assessment criteria per guiding principle.

Company assessments are based only on publicly available information.

Total points: 44

Number of questions: 35

Principle	Description	Points
A	Companies should define and communicate a clear strategy on tax governance	
Narrative on tax strategy	A tax strategy is a plan stating the organisation's vision and view with respect to taxes. When we are looking at how a company communicates its tax strategy, we want to ascertain whether it communicates in a way that explains the key elements of the strategy, and whether it also stipulates what these elements mean for stakeholders. Additionally, some criteria relate to the governance structure for the tax strategy and whether the strategy is reviewed in line with the Dutch Corporate Governance Code.	
1a	Does the organisation communicate its views on tax via a tax strategy or tax policy document?	1
1b	Is the tax strategy approved by the (executive) board and does the company explicitly state how frequently (i.e. quarterly, annually, or a specific date) the board reviews the tax strategy?	1
2	Does the tax strategy describe how it is aligned with organisational values and business strategy, including how the company views its role as a responsible taxpayer?	1
3a	Is a vision of the company's relationship with the tax authorities included in the tax strategy?	If a&b 1
3b	Does the company include its vision on concluding tax agreements (rulings) with tax authorities?	If a&b 1
3c	Does the company describe its approach to applying for government incentives and subsidies?	1
3d	Does the company mention that it participates in a cooperative compliance programme or related scheme with tax authorities in a publicly available source?	1

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Principle	Description	Points
4a	Does the company describe how its approach to encouraging the public debate on tax transparency, public policy lobbying and/or advocacy on tax is aligned with the tax strategy?	2
4b	Does the company provide a recent concrete example of the position it takes in the public debate?	2
5a	Does the company describe the processes for and outcomes of collecting and considering the views and concerns of internal and external stakeholders?	2
5b	Does the company identify at least one recently consulted stakeholder group on tax matters, for example through a table or supporting explanation?	2
6a	Does the company describe how its sustainability strategy is taken into account in the company's tax approach?	1
6b	Does the company describe how tax is taken into account to address specific environmental, social, or governance issues? (E.g. carbon taxes, green subsidies and incentives, plastic taxes, sugar taxes, or tax incentives for human resources.)	1
7	Does the company describe how the audit committee has been involved with the tax department and does it provide recent concrete examples of the topics discussed?	1
B	Tax must be aligned with the business and is not a profit centre in itself	
8	Does the company state in its tax strategy or elsewhere that its business operations are leading in setting up international structures, i.e. that it declares profits and pays taxes where the economic activity occurs?	1
9a	Does the company explicitly communicate anywhere that it does not use "tax havens" or "non-cooperative jurisdictions" for its tax planning?	1
9b	Does the company disclose its definition of tax havens and/or non-cooperative jurisdictions (e.g. by aligning with a dedicated country list such as the EU black-listed countries, OECD, or Tax Justice)?	1
10	Does the company describe the role of taxes (taxation, incentives) within the value creation model (e.g. visual mapping) and in which countries added value is taxed? (In cases where the company is domiciled in only one jurisdiction, this question refers to this jurisdiction).	1

TAX TRANSPARENCY BENCHMARK 2025

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Principle	Description	Points
Narrative on tax rate	The effective tax rate (ETR) of organisations is usually not the same as the weighted average or parent company statutory tax rate. In general, this is for legitimate reasons, such as tax-exempt income and non-deductible expenses. Sometimes, however, an ETR that is (sometimes significantly) lower than the weighted average statutory tax rate can signify specific corporate structures aimed predominantly at the artificial reduction of tax bills to increase the profits available for distribution to shareholders. Based on the applicable accounting standards under both US GAAP and IFRS, companies are required to disclose a line-by-line reconciliation between the (weighted average) statutory tax rate and the ETR.	
11	Does the company provide a narrative description in cases where there is a difference between the ETR and weighted average statutory tax rate, including a reconciliation table?	1
12	Does the company provide information like current corporate income tax payments, accrued corporate income tax, profit before income tax, accumulated earnings and FTEs on a country-by-country basis aligned with GRI 207-4? (In cases where the company is domiciled in only one jurisdiction, this question refers to this jurisdiction.)	3
Narrative on CbCR	Country-by-country-reporting (CbCR) is an important compliance requirement resulting from the OECD's BEPS action plan (action 13). Companies that are part of a group and have a consolidated annual turnover of EUR 750 million have to prepare and file a report which (amongst other requirements) shows how much tax they have paid and what the basis is for these taxes on a country-by-country basis. Some companies have voluntarily published these reports or similar information, e.g. as part of their corporate sustainability reporting.	
13a	Does the company provide on a per country basis information on its taxes paid (direct taxes and other taxes like VAT, wage taxes, etc), government payments, government subsidies and incentives? (In cases where the company is domiciled in only one jurisdiction, this question refers to this jurisdiction.)	2
13b	Does the company provide information on a country-by-country basis (in cases of regional cap-and-trade schemes, per region is sufficient) on ESG taxes?	1

Principle	Description	Points
C	Respect the spirit of the law. Tax compliant behaviour is the norm	
Narrative on compliance	Ultimately, managing tax is about filing the correct returns on time, making sure the returns are correct and complete, and ensuring that the payments are made on time. Being compliant with tax laws and regulations, statutory financial obligations, and international accounting standards is the core responsibility of a tax function. We refer to taxes in general, e.g. CIT, VAT, wage taxes, etc.	
14	Does the company explicitly communicate that its tax planning strategy takes the spirit of the law into account and does the company provide a concrete example?	1
15a	Does the company mention that it has a tax (dilemmas) training and knowledge programme in place for its tax, legal, and compliance officers?	1
15b	Does the tax policy include that a tax (dilemmas) training and knowledge programme is in place for its audit committee (or supervisory board)?	1
16	Does the company's tax policy refer to the whistleblower's policy (or the whistleblower policy mention tax)?	1
17	Does the company explicitly mention in its tax strategy it implements tax standards (e.g. VNO-NCW Tax Governance Code, GRI 207, B-Team and/or other relevant (local) tax codes)?	1
D	Know and manage tax risks	
Narrative on tax risks	Companies are required to state their largest risks in their annual report. The purpose of the following questions is to obtain a view on whether the organisation includes tax in its broader risk management approach and whether it references any material tax risks. If any tax risks are included in the risk overview in the annual report, they should be accompanied by an explanation of how the organisation remedies or manages these risks.	
18	Does the company explicitly describe its tax risk appetite?	1
19	Does the company report on specific tax risks, including: financial, regulatory and/or reputational risks and does it describe the concrete risks in detail (i.e. by providing detailed examples of concrete tax risks)?	2
20	Is there a commentary/description of the company's response to these tax risks? (i.e. does it include an impact analysis for tax risk evaluation that includes the likelihood of occurrence and the financial consequences of risks?)	1
21	Does the company describe the role of technology and AI for tax relevant data management and provide a recent example?	1

TAX TRANSPARENCY BENCHMARK 2025

A comparative study of 51 Dutch and 65 EU stock-listed companies

Principle	Description	Points
E	Monitor and test tax controls	
Narrative on monitoring	Has the company created a standardised approach for monitoring and testing the execution of its tax strategy and its controls? It is important to be able to see the full picture to ascertain whether the monitoring and testing takes place on a regular basis, and to ensure that the results are documented and communicated to ensure that they are followed up.	
22	Does the company describe how and by whom the implementation and execution of the tax strategy is monitored? (E.g. alignment with the organisational values and business principles, the management of non-financial tax procedures, who, how and what is monitored.)	1
23	Does the company describe how tax risks and controls are tested and monitored (i.e. tax control framework)?	1
24	Is tax risk management included in the reporting to the audit committee?	1
F	Provide tax assurance	
Narrative on tax assurance	Companies should be prepared to provide additional tax information to regulators, tax authorities, and other stakeholders to provide for a certain level of assurance regarding tax data and processes.	
25	Does the company provide external tax assurance on the non-financial tax disclosures (for example, limited assurance on GRI 207)?	3



VBDO (Dutch Association of Investors for Sustainable Development)

www.vbdo.nl

Pieterstraat 11, 3512 JT Utrecht, The Netherlands

T +31 (0) 30 234 00 31, info@vbdo.nl