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**The Sovereign Bond Issuance and Tax Competition for Portfolio
Investment: A Political Economy Approach**

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キーワード: tax haven, interest income tax, sovereign default, Tax Information
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【要旨】

This study investigates interjurisdictional tax competition aimed at attracting foreign creditors' portfolio investments in sovereign bonds and corporate loans. In each of two jurisdictions with lower and higher capital, governments seek to maximize workers' expected utility by determining the volume of sovereign bond issuance to fund public inputs, the tax rate on creditors' interest income, and the extent of compliance with bilateral treaty provisions concerning the exchange of information on creditors' income. Under a bilateral treaty mandating only information exchange, the jurisdiction with initially lower capital tends to set a lower tax rate and exhibits less compliance effort, effectively functioning as a tax haven. Conversely, the jurisdiction with higher capital imposes a higher tax rate and demonstrates greater compliance, benefiting from the residence principle due to its substantial global interest income. Alternatively, under a bilateral treaty that includes provisions of both information exchange and withholding tax at the source for foreign creditors, the jurisdiction with lower capital sets a higher tax rate on domestic creditors and allocates more resources to public inputs than its wealthier counterpart, even at the risk of increasing sovereign default potential. These findings suggest that the specific design of international tax cooperation agreements significantly influences jurisdictions' fiscal behaviors, leading to divergent outcomes despite a shared objective of implementing residence-based taxation.

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The Sovereign Bond Issuance and Tax Competition for Portfolio Investment: A Political Economy Approach

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Abstract

This study investigates interjurisdictional tax competition aimed at attracting foreign creditors' portfolio investments in sovereign bonds and corporate loans. In each of two jurisdictions with lower and higher capital, governments seek to maximize workers' expected utility by determining the volume of sovereign bond issuance to fund public inputs, the tax rate on creditors' interest income, and the extent of compliance with bilateral treaty provisions concerning the exchange of information on creditors' income. Under a bilateral treaty mandating only information exchange, the jurisdiction with initially lower capital tends to set a lower tax rate and exhibits less compliance effort, effectively functioning as a tax haven. Conversely, the jurisdiction with higher capital imposes a higher tax rate and demonstrates greater compliance, benefiting from the residence principle due to its substantial global interest income. Alternatively, under a bilateral treaty that includes provisions of both information exchange and withholding tax at the source for foreign creditors, the jurisdiction with lower capital sets a higher tax rate on domestic creditors and allocates more resources to public inputs than its wealthier counterpart, even at the risk of increasing sovereign default potential. These findings suggest that the specific design

of international tax cooperation agreements significantly influences jurisdictions' fiscal behaviors, leading to divergent outcomes despite a shared objective of implementing residence-based taxation.

Keywords: tax haven; interest income tax; sovereign default; Tax Information Exchange Agreement; Double Taxation Agreement

JEL classification: H26, H54, H63, H73

1 Introduction

In this study, we extend a tax-competition model centered on interest income to incorporate two distinct investment options: sovereign bonds and loans to corporations. We employ this enhanced framework to examine how disparities in initial capital allocation between two jurisdictions influence differences in tax rates, investment in public and private input, and fiscal sustainability. Specifically, we consider two jurisdictions that are linked by either a bilateral Tax Information Exchange Agreement (TIEA) or a bilateral Double Taxation Agreement (DTA). We investigate how the form of international tax cooperation—information exchange under a TIEA versus comprehensive tax coordination under a DTA—affects outcomes in terms of governmental fiscal policy and private portfolio investment.

A TIEA is primarily aimed at curtailing tax evasion by eliminating banking secrecy in tax havens and enhancing transparency. A DTA is a more comprehensive treaty, established primarily to prevent double taxation by allocating taxing rights and often including provisions for reduced tax rates at source and information sharing. Both agreements are rooted in broader frameworks of international cooperation. In 2002, the OECD established the OECD Model TIEA, beginning the formal signing of bilateral treaties. DTAs, having been continuously negotiated over many years, have proliferated in alignment with the OECD Model Tax Convention on Income and on Capital, notably accelerated by the OECD/G20 BEPS (Base Erosion and Profit Shifting) Project’s revision efforts in 2010s. The number of DTAs has continued to grow, particularly those embedding tax information exchange clauses. At one time, the U.S. had signed TIEAs with 74 jurisdictions (OECD, 2009). The U.S. Department of the Treasury (2025) indicates the U.S. maintains TIEAs with 11 jurisdictions—primarily tax-haven jurisdictions such as the Cayman Islands, Hong Kong, Jersey, Panama, and Singapore—representing a marked decline in TIEA partners. This suggests that TIEAs and DTAs might to some extent be substitutional initiatives aimed at mitigating tax

evasion.

Following Huizinga and Nielsen (2002), our tax-competition model incorporates substantial residence-based taxation of interest income from cross-border portfolio investment.¹ Specifically, each jurisdiction’s government chooses (i) the volume of sovereign bond issuance, (ii) the tax rate on interest income, and (iii) whether to report interest income earned by foreign creditors within its jurisdiction to their home jurisdiction. In each of the two jurisdictions, the population comprises workers and creditors, with workers constituting the majority. We employ a political-economy view in that the government maximizes the expected utility of the majority—that is, the workers. Adopting this approach is meaningful because statements by governments regarding fiscal policy and debt crises arise from economic conditions and political decision-making (Reinhart and Rogoff, 2011), which in turn is influenced by voters.

First, we examine fiscal policies implemented under the TIEA. Interest income from portfolio investment is taxed at a uniform rate for both domestic and foreign creditors. If a source jurisdiction reports foreign creditors’ interest income to the residence jurisdiction, it is ultimately taxed on a residence basis. When portfolio investment exhibits a moderate elasticity to after-tax rates of return, a jurisdiction with smaller capital tends to favor a lower tax rate compared to the one with larger capital. Moreover, the jurisdiction with limited capital is less likely to facilitate information exchange. This confidentiality is characteristic of so-called tax havens.

Subsequently, we introduce a DTA that obliges the governments of both jurisdictions to set a source-based withholding tax rate on interest income that does not exceed the rate applicable to domestic creditors. It is demonstrated that the jurisdiction with relatively small capital adopts a higher tax rate on domestic creditors than its counterpart. Consequently, this enables the small-capital jurisdiction to expand its provision of public input, while an increased issuance of sovereign

¹Our model also draws upon Nielsen’s (2001) cross-border shopping framework, as the concept of cross-border portfolio investments being subject to withholding taxes in the investee jurisdiction parallels the mechanism of commodity taxation in cross-border shopping scenarios.

bonds to finance these public expenditures may increase the associated risk of sovereign debt crises and jeopardize fiscal sustainability.

Some studies examine the incentives for tax authorities to engage in information exchange with their counterparts (e.g., Eggert and Kolmar, 2002; Keen and Ligthart, 2006a) and the substitutability between information exchange and withholding taxes (Bacchetta and Espinosa, 1995; Huizinga and Nielsen, 2002; Keen and Ligthart, 2006a, 2006b). As the literature theoretically and empirically points out, countries with smaller populations or areas are more likely to become tax havens (Huizinga and Nielsen, 2002; Dharmapala and Hines, 2009; Keen and Konrad, 2013). These studies show that they are more likely to set low tax rates to encourage profit-shifting and tax arbitrage so they are likely to gain the least from information sharing.

In contrast, in our model, the regional capital position affects which jurisdictions become tax havens. Countries with significant assets invest substantial capital abroad and earn considerable interest income from these investments. For such countries, adopting residence-based taxation—taxing the worldwide income of their residents—and choosing higher tax rates allow them to secure revenue. However, countries with fewer assets pay large amounts of interest to foreign lenders. By adopting source-based taxation—taxing income generated within their own jurisdiction without reporting it to the residence jurisdiction—and setting lower tax rates, they can secure tax revenue. Our model successfully describes this fact.

Tax havens and investors' tax-evasion behavior have long been a focus of research in public finance (see, e.g., Hines and Rice, 1994; Desai et al., 2006; Dharmapala and Hines, 2009; Hines, 2010; Zucman, 2013). Zucman (2013) shows that official statistics substantially underestimate the net foreign asset positions of the euro area and the U.S. because they fail to capture most of the assets held by households in offshore tax havens. Recently, there has been significant progress in understanding and adjusting for the role of tax havens in international financial positions.²

²Florez-Orrego et al. (2024) review the recently surging literature in the area of international macroeconomics

Drawing on newly published macroeconomic statistics, Alstadsæter et al. (2018) conclude that approximately 10% of the world’s GDP is held in tax havens globally. Some recent works, using micro-level data (e.g., by each investor and security), reallocate the holdings of assets by tax haven countries to the countries of the ultimate investors (Coppola et al., 2021; Beck et al., 2023).

This study also contributes to a growing literature on governments’ capacity to borrow from global capital markets. Ballard-Rosa et al. (2021), using comprehensive data on sovereign bond issues, identify the political and macroeconomic conditions that enable nations to issue debt. Cormier and Naqvi (2023) present evidence that asset managers replicate benchmark indices, which can dilute market discipline on borrowing governments. Their analysis reveals that countries included in prominent indices are less constrained by typical country-specific factors previously thought to restrict bond market access.

The above-mentioned studies have typically analyzed tax havens and the political economy of sovereign borrowing as separate phenomena. This study distinguishes itself by integrating both elements into a unified analytical framework. This integrated approach facilitates a comprehensive examination of how increased public investment can stimulate private capital formation and enhance overall economic value creation, while simultaneously assessing the heightened default risk associated with substantial sovereign bond issuance. By capturing these dynamics within a single model, the study offers novel insights into the interplay between fiscal policy, private sector investment, and sovereign credit risk.

and finance.

2 Framework

2.1 Government

There exist two jurisdictions $i = 1, 2$. The government in jurisdiction i (referred to as government i) simultaneously and independently makes decisions about the quantity of government bond issuance $g_i(\geq 0)$, which is measured on per-worker basis, tax rate on interest income $\gamma_i(\geq 0)$, the ratio $x_i \in [0, 1]$ of interest income to be reported to the government $j = 1, 2, j \neq i$, to total interest income that is earned in jurisdiction i by jurisdiction- j creditors, and whether to redeem the principal of its borrowing. The tax authority of jurisdiction i can adjust x_i by deliberately avoiding collecting information on interjurisdictional deposits in financial institutions or enacting a law that makes tax avoidance challenging to identify.

The government borrows from the market to supply a public input that is used by the firm in the jurisdiction. The instances of a public input include infrastructure, or government officials who serve to establish legal frameworks for market transaction. Let $\rho_i(\geq 0)$ denote the coupon rate of the government bond. It is set as generating the same expected rate of return for creditors to hold government bonds or the other option, as described in Section 3.3. Let government- i 's bonds be solely transacted in the capital market of jurisdiction i .

When making decisions regarding bond issuance and tax rates, each government only takes into account the utility of domestic labor. In our model, the population comprises creditors and workers, and this supposition reflects stronger preferences of the incumbent government toward the majority of the electorate. In reality, individuals who only earn from portfolio investment occupy a very small portion of the population. Therefore, examining this scenario is plausible even if we do not describe the electoral process explicitly.

The government also requires workers to pay lump-sum labor income tax as long as interest income tax revenue is insufficient for payments to bond holders. Let t_i denote the lump-sum labor

income tax for each worker; if negative, its absolute value equals the amount of subsidy. Let b_i denote the base to be imposed as interest income tax. Then, government i is faced with the fiscal constraint:

$$t_i = \begin{cases} t_i^R = (1 + \rho_i)g_i - \gamma_i b_i^R, & \text{if government bonds are redeemed;} \\ t_i^D = -\gamma_i b_i^D, & \text{if government bonds are defaulted,} \end{cases} \quad (1)$$

where superscripts R and D stand for the states where the sovereign debt is determined to be redeemed and to be defaulted, respectively.

2.2 Workers

A continuum of immobile and homogeneous workers dwell in each jurisdiction i and their mass is equal to 1. Each of them supplies one unit of labor inelastically and earns wage w_i . An individual worker's consumption is $c_i = w_i - t_i$, and their utility is given by $u(c_i) = c_i$.

2.3 Creditors

Jurisdiction i has a continuum of immobile risk-neutral creditors whose mass is less than 1. The total capital they initially possess is a_i , which is, again, measured on a per-worker basis. We suppose asymmetric financial ability between two jurisdictions: $a_1 > a_2 > 0$. The total quantity of capital supplied in both jurisdictions is $a_1 + a_2 = a$.

Creditors, whether residing in or out of jurisdiction i , can purchase bonds issued by government i . Alternatively, creditors can finance their funds to another option, such as corporate bonds and loans, and for simplicity we suppose this option is riskless and earns returns with rate r . We refer to this option as *riskless loan*. As Section 2.4 shows, the funds are used by the firm for investment in private capital.

Creditors in a jurisdiction are homogeneous except in their degree of home bias. As a benchmark, let both domestic and foreign creditors face the same interest income tax rate. The expected after-tax profit from a unit of before-tax interest income that is earned by creditors in jurisdiction i is modelled as

$$\begin{cases} (1 - \gamma_i) + v_i, & \text{if investing in jurisdiction } i; \\ x_j(1 - \gamma_i) + (1 - x_j)(1 - \gamma_j), & \text{if investing in jurisdiction } j, \end{cases} \quad (2)$$

where v_i represents an extent of home bias, being uniformly distributed within the interval $[0, d]$ with density $\frac{1}{d} (> 0)$. The uniform distribution with density $\frac{1}{d}$ first-order stochastically dominates the uniform distribution with density $\frac{1}{d'}$ if $\frac{1}{d} < \frac{1}{d'}$. Therefore a greater value of d indicates that home bias is more prominent. Recall that x_j represents the ratio of jurisdiction- i creditors' interest income earned in jurisdiction j and reported by government j to government i , indicating how strictly government j complies with the residence principle. Government j deducts tax from jurisdiction- i creditors' unreported interest income at source with rate γ_j . For reported interest income, the creditors are liable for additional taxation in jurisdiction i at $\gamma_i - \gamma_j$, with tax credit being given for taxes paid abroad; therefore, the total tax is ultimately the same as the full home rate.

2.4 Firm

A firm in jurisdiction i produces a good whose market price is equal to 1, by using a public input, private capital, and labor. To employ private capital $k_i (\geq 0)$ per worker, the firm borrows the amount k_i from creditors in jurisdictions 1 and 2 via the capital market.

Technology to produce output y_i per worker is described as

$$y_i = g_i k_i - \frac{(k_i)^2}{2}. \quad (3)$$

Following the literature using tax-competition models, we suppose that the residual profit after paying interest rk_i to creditors is paid to workers as wages.

2.5 Timing

Events unfold as follows.

1. Government $i = 1, 2$ simultaneously and independently chooses the amount of government bonds to be issued, g_i .
2. Government $i = 1, 2$ simultaneously and independently chooses interest income tax rate, γ_i , and the ratio of reporting to government j , x_i .
3. Creditors in jurisdiction i purchase government bonds issued by government i or j , or finance funds to riskless loans in jurisdiction i or j .
4. The firm in jurisdiction i borrows k_i and spends it on employing private capital k_i for production.
5. Production takes place and rewards w_i and r are paid to workers and creditors, respectively.
6. Government i redeems government debt with interest payment, or alternatively, defaults on paying the principal to bond holders.
7. Labor and interest income taxes are implemented.

We explore the subgame perfect Nash equilibrium by solving the game backwards. The outcome derived from the benchmark-model analysis in Section 3 corresponds with the outcome when encouraging information exchange is the sole purpose of a bilateral treaty called the TIEA. In Section 4, we modify the benchmark model to analyze the agents' choices under the DTA, which is

supposed to not only encourage an information exchange but also enforce the withholding tax rate 0 at its source.

3 Benchmark: The outcomes under the TIEA

3.1 Decision on sovereign default

When deciding whether to default on its sovereign debt obligations, government i weighs the reduced labor tax burden resulting from default against the political repercussions that could directly harm the incumbent administration. From (1), workers' expected utility is affected by tax burden $-t_i^D$ on the sovereign default, and by t_i^R otherwise. Under the supposition that interest income tax is levied on aggregation of profit and loss, government i chooses to repudiate the principal of its sovereign debt if

$$-t_i^D - \xi_i > -t_i^R \Leftrightarrow (1 - \theta_i \gamma_i)(1 + \rho_i)g_i > \xi_i, \quad (4)$$

where $\xi_i (\geq 0)$ captures the political costs incurred by government i ; θ_i is the ratio of government- i 's bonds the return from which is taxed by government i . It is higher when the government mainly borrows from domestic creditors and they are not committed to tax-avoidance behavior. The political costs encompass the loss of public and international trust, escalation of social unrest, policy gridlock, and potential resignation of government officials. For example, in 2001, Argentina's default triggered widespread protests, culminating in the resignation of President Fernando de la Rúa.

Let the exact value of ξ_i in (4) be *ex ante* unknown to agents, including creditors; they only

know the distribution function F_i . Then, the probability of the sovereign default is estimated as

$$\pi_i = F_i((1 - \theta_i \gamma_i)(1 + \rho_i)g_i), \quad (5)$$

indicating that a higher quantity of bond issuance, a higher coupon rate, a low interest income tax rate, and a higher overseas ownership ratio more likely lead to sovereign default.

3.2 Production

Given the supply of public input in two jurisdictions g_i and g_j , the firm in jurisdiction i chooses k_i to maximize its profit

$$g_i k_i - \frac{k_i^2}{2} - r k_i. \quad (6)$$

The firm can borrow and creditors can lend in either jurisdiction i or j , so that the interest rate is common interjurisdictionally. Then, the optimal quantity of private capital should satisfy

$$g_i - k_i = r. \quad (7)$$

From (7) and the resource condition

$$g_i + k_i + g_j + k_j = a, \quad (8)$$

we derive

$$r = g_i + g_j - \frac{a}{2}; \quad (9)$$

$$k_i = -g_j + \frac{a}{2}. \quad (10)$$

For derivation see the Appendix. With regard to (9), providing a large quantity of public input in any jurisdiction raises the demand for capital, and therefore, the interest rate. This cancels out the crowding-in effect generated by public input provision, and consequently crowds out investment in private capital, as shown in (10).

3.3 Portfolio investment

3.3.1 Government bond price

Either purchasing government i 's bonds or lending to the firm in jurisdiction i should generate the same expected rate of return to risk-neutral domestic creditors. With $((g_i, g_j), (\gamma_i, \gamma_j), (x_i, x_j))$ given and (5) being calculated, this logic has government i set the coupon rate ρ_i of the government bond to satisfy the following relationship:

$$(1 - \gamma_i) [(1 - \pi_i)\rho_i + \pi_i(-1)] = (1 - \gamma_i) [(1 - \pi_i)(1 + \rho_i) - 1] = (1 - \gamma_i)r. \quad (11)$$

Again, the derivation of (11) assumes that interest income tax is levied on the aggregation of profit and loss. Taking the logarithm of (11) derives the approximate relation $\rho_i \approx r + \pi_i$, which helps us understand the difference in the rates of return from two options. That is, ρ_i is higher than r , which is specified by (g_i, g_j) as shown in (9), by the estimated probability of sovereign default. Combining (11) with (5), the probability of the sovereign default is implicitly given by

$$\pi_i = F_i \left((1 - \theta_i \gamma_i) \left(\frac{1 + r}{1 - \pi_i} \right) g_i \right). \quad (12)$$

At this stage, the relationship between (γ_i, g_i, g_j) and π_i is not straightforward because of the endogeneity of ρ_i .

3.3.2 Tax evasion

Another arbitrage works when creditors consider allocating their funds between two jurisdictions. Creditors residing in a jurisdiction may be attracted to invest in another jurisdiction due to profits gained by tax evasion. If they have strong home bias, however, they may hesitate to make an overseas portfolio investment.

The expected rates of return are the same across two options, and also interjurisdictionally, because the interest rate r is common across jurisdictions. Then, from (2), a creditor in jurisdiction i invests in jurisdiction i if

$$v_i \geq (1 - x_j)(\gamma_i - \gamma_j). \quad (13)$$

The term on the right-hand side of (13) indicates the benefit of tax evasion. For $\gamma_i > \gamma_j$, larger capital flight occurs from jurisdiction i to jurisdiction j , overcoming the home investment inclination, if government j behaves in a less cooperative way as a source jurisdiction and the difference in interest income tax rates is larger. This result is consistent with Huizinga and Nielsen (2002) who assert that the effective cross-border tax is determined by the source country. When $\gamma_i < \gamma_j$, no creditors in jurisdiction i gain through overseas portfolio investment. Thus, the fraction of creditors who invest in their home jurisdiction i is calculated as

$$1 - \frac{1 - x_j}{d} \max[\gamma_i - \gamma_j, 0]. \quad (14)$$

Due to creditors' arbitrage in (11), the expected interest from the income tax base for government i , $E[b_i] = \pi_i b_i^D + (1 - \pi_i) b_i^R$, is decomposed into three elements:

- (i) $ra_i \left\{ 1 - \frac{1 - x_j}{d} \max[\gamma_i - \gamma_j, 0] \right\}$ that is earned in jurisdiction i by jurisdiction- i creditors;
- (ii) $ra_i \frac{x_j(1 - x_j)}{d} \max[\gamma_i - \gamma_j, 0]$ that is earned in jurisdiction j by jurisdiction- i creditors and is

reported to government i ;

- (iii) $ra_j \frac{(1-x_i)^2}{d} \max[\gamma_j - \gamma_i, 0]$ that is earned in jurisdiction i by jurisdiction- j creditors and is not reported to government j ,

and their total is

$$E[b_i] = r \left\{ a_i - a_i \frac{(1-x_j)^2}{d} \max[\gamma_i - \gamma_j, 0] - a_j \frac{(1-x_i)^2}{d} \min[\gamma_i - \gamma_j, 0] \right\}. \quad (15)$$

3.4 Governments' choice of tax rate and public input

From (1) and (15), the expected worker utility is

$$\begin{aligned} Eu(c_i) &= w_i + \gamma_i E[b_i] - (1 - \pi_i)(1 + \rho_i)g_i \\ &= g_i k_i - \frac{k_i^2}{2} - rk_i + \gamma_i r \left\{ a_i - a_i \frac{(1-x_j)^2}{d} \max[\gamma_i - \gamma_j, 0] - a_j \frac{(1-x_i)^2}{d} \min[\gamma_i - \gamma_j, 0] \right\} \\ &\quad - (1 + r)g_i, \end{aligned} \quad (16)$$

where we use (11). That is, given (g_i, g_j) , and hence, given r , ρ_i is adjusted to satisfy $(1 - \pi_i)(1 + \rho_i) = 1 + r$ in (11).

In (16), $g_i k_i - \frac{k_i^2}{2} - g_i$ represents the value generated by public investment, and $r(g_i + k_i)$ corresponds with payment to factors other than labor. Furthermore, the expected tax revenue $\gamma_i E[b_i]$ from interest income comprises three elements. The term $\gamma_i r a_i$ is government i 's interest income tax revenue when two governments completely comply with the TIEA. The term $-\gamma_i r a_i \frac{(1-x_j)^2}{d} \max[\gamma_i - \gamma_j, 0]$ is associated with tax revenue lost by jurisdiction- i creditors' tax-avoidance behavior. The term $-\gamma_i r a_j \frac{(1-x_i)^2}{d} \min[\gamma_i - \gamma_j, 0]$ captures tax revenue gained from jurisdiction- j creditors' tax-avoidance behavior.

Proposition 1 demonstrates the outcome of tax competition at Stage 2 (derivations of proposi-

tions are gathered in the Appendix). It suggests a jurisdiction with smaller capital endowment can be a *tax haven*.

Proposition 1. Under the supposition that interest rate is positive:

- Government $i = 1, 2$ adopts $\gamma_i = \frac{d(2a_i + a_j)}{3a_1}$. That is, government 2, which initially has a smaller capital position, sets a lower interest income tax rate than government 1.
- Any degree of compliance with information exchange $x_1 \in [0, 1]$ is indifferent to government 1, while government 2 prefers $x_2 = 0$.
- With a_1 and a_2 approaching each other, γ_1 and γ_2 approach d . Moreover, with smaller d , tax rates approach the minimum tax rate 0.

Noteworthy in Proposition 1 is the effect of d , which captures the strength of the creditors' home bias or, in other words, how unresponsive their tax-evasion motive is to the difference in tax rates of two jurisdictions. As home bias is stronger, interest income tax rates are diverged between two jurisdictions. See Figure 1, which depicts the best responses by government 1 (in bold black lines) and government 2 (in bold blue lines) in the areas $\gamma_1 > \gamma_2$ and $\gamma_1 < \gamma_2$ against another government's choice. The government of jurisdiction 2, which has smaller capital than that of jurisdiction 1, might synchronize with government 1, giving up attracting more portfolio investment from jurisdiction 1. Under this strategy, intersection A might be a potential candidate for an equilibrium. However, the proof in the Appendix excludes it. Alternatively, government 2 sets a further lower tax rate to more strongly induce creditors in jurisdiction 1 to invest in jurisdiction 2. The unique equilibrium is marked by intersection B , where jurisdiction 2 is a *tax haven*.

With smaller d , that is, with weak home bias, tax competition is more evident, and eventually, jurisdictions are involved in a *race to the bottom*. Lowering an interest income tax rate induces

tax-avoidance behavior by foreign creditors, while suppressing tax-avoidance behavior by domestic creditors.³

Regarding the degree of effort on information transmission, Proposition 1's results are analogous of Bacchetta and Espinosa (1995) and Huizinga and Nielsen (2002), who show that incentives to transmit information exist for jurisdictions with a large population. In our model, jurisdictions differ in initial capital position. Favoring $x_i = 0$ can be interpreted as preferring implementation of source-based taxation, with a higher x_i describing increased preferences toward the residence principle. Indeed, there is a rationale for nations with significant assets to favor residence-based taxation of interest income. They invest substantial capital abroad and earn considerable interest income from these investments. Thus, adopting residence-based taxation and taxing the worldwide income of their residents allow these countries to secure revenue. Meanwhile, nations with small assets prefer source-based taxation because they likely pay large amounts of interest to foreign lenders. By adopting source-based taxation and taxing income generated within their own jurisdiction, they can secure tax revenue from non-residents.

Proposition 2 demonstrates the outcome of the governments' decision at Stage 1.

Proposition 2. Suppose that the amounts of bond issuance and interest rate are positive. Then, with γ_i , $i = 1, 2$ as given in Proposition 1:

- The quantity of public input in jurisdiction i is $g_i = \frac{a}{6} - \frac{1}{3} + \frac{[2(\gamma_i)^2 - (\gamma_j)^2]a_1}{3d}$, so that g_1 is larger than g_2 by $\frac{d[(a_1)^2 - (a_2)^2]}{3a_1}$.
- The quantity of private capital in jurisdiction i is $k_i = \frac{a}{3} + \frac{1}{3} + \frac{[(\gamma_i)^2 - 2(\gamma_j)^2]a_1}{3d}$, so that k_1 is larger than k_2 by $\frac{d[(a_1)^2 - (a_2)^2]}{3a_1}$.
- Wage income is higher in jurisdiction 1.

³In (13) it is assumed that if the tax rates are the same interjurisdictionally, no capital outflow occurs.

- If home bias is weak, that is, d is small, and interjurisdictional inequality in the initial capital distribution is apparent ($\frac{a_1}{da} > \frac{2}{3}$), jurisdiction 1 exports capital while jurisdiction 2 imports it; otherwise the opposite occurs.

The quantities of public and private inputs are greater in jurisdiction 1. However, whether a jurisdiction becomes a capital-importer or exporter depends on the degree of home bias and interjurisdictional inequality. These results are associated with the interest income tax revenue divided by the interest rate, expressed as $\frac{d(2a_i+a_j)^2}{9a_1}$. The interjurisdictional difference in this measure, $\frac{d[(a_1)^2-(a_2)^2]}{3a_1}$, influences the disparity in public and private inputs between jurisdictions 1 and 2. If d is sufficiently large, indicating strong home bias, this difference becomes large enough to make jurisdiction 1 a capital-importer. A significant inequality in the initial distribution of capital also increases the disparity in public and private inputs. However, in this case, jurisdiction 1 remains a capital-exporter and jurisdiction 2 is a capital-importer because of the amplified disparity in initial capital positions.

4 The outcomes under the DTA

This section focuses on comparing the effects of TIEAs and DTAs, with particular attention to the latter's provisions concerning withholding taxation on non-residents. Article 11 of the Model Tax Convention on Income and on Capital by the OECD provides that the country of residence has the primary right to tax interest income, while also allowing the source country limited taxing rights (OECD, 2019). Many member countries tend to restrict the source country's taxing rights through bilateral treaties. Huizinga and Nielsen (2002) highlight a key distinction between the non-resident withholding tax regime and interjurisdictional information exchange regime from the perspective of tax revenue recipients: withholding taxes are levied at the source, whereas information exchange

mechanisms reinforce the residence principle. In contrast, our analysis emphasizes the differential tax treatment between residents and non-residents under the DTAs as they also promote the exchange of information. To elucidate this point, we assume, without loss of generality, that under a DTA, the withholding tax rate on non-residents is constrained to 0.

Subject to the DTA, stage 2 in the sequence of events in Section 2.5 should be modified as each government i 's adoption of interest income tax rate on domestic creditors, which is denoted by γ_i^* . We apply the usage of this superscript to other variables. The following proposition yields implications that diverge from those of Proposition 1 which exclusively analyzed the impact of engagement in information exchange.

Proposition 3. Let the DTA constrain governments 1 and 2 to set non-resident withholding tax rate at 0. Under the supposition that interest rate is positive:

- Government $i = 1, 2$ adopts $\gamma_i = \frac{d(2a_i + a_j)}{3a_i}$. That is, government 2, with a smaller capital position, sets a higher interest income tax rate for residents than government 1 whose choice is unchanged from γ_1 in Proposition 1.
- Governments 1 and 2 favors $x_1 = x_2 = 0$.
- With a_1 and a_2 approaching each other, γ_1^* and γ_2^* approach d . Moreover, with smaller d , tax rates approach the minimum tax rate 0.

Proposition 3 posits that, in the absence of a need to set its own low tax rate to incentivize tax-avoidance behavior among foreign creditors, jurisdiction 2 prefers to establish a higher tax rate on residents than that of jurisdiction 1, aiming to alleviate the tax burden on labor. Furthermore, unlike the tax scheme without a constraint on non-resident withholding tax rates, a bilateral tax treaty that imposes such a constraint may inadvertently discourage the efforts of the wealthier

jurisdiction to engage in information exchange.

The following proposition describes factor employment and the resultant capital flows under the constraint on withholding tax rates.

Proposition 4. Let the DTA constrain governments 1 and 2 to set non-resident withholding tax rate at 0. Suppose that the amounts of bond issuance and interest rate are positive. Then, with γ_i^* , $i = 1, 2$, being given in Proposition 3:

- The quantity of public input in jurisdiction i is $g_i^* = \frac{a}{6} - \frac{1}{3} + \frac{2a_i(\gamma_i^*)^2 - a_j(\gamma_j^*)^2}{3d}$, so that g_1^* is smaller than g_2^* by $\frac{d[(a_1)^3 - (a_2)^3]}{9a_1a_2}$. Furthermore, g_1^* is smaller than g_1 in Proposition 2 while g_2^* is larger than g_2 .
- The quantity of private input in jurisdiction i is $k_i^* = \frac{a}{3} + \frac{1}{3} + \frac{a_i(\gamma_i^*)^2 - 2a_j(\gamma_j^*)^2}{3d}$, so that k_1^* is smaller than k_2^* by $\frac{d[(a_1)^3 - (a_2)^3]}{9a_1a_2}$. Furthermore, k_1^* is smaller than k_1 in Proposition 2 while k_2^* is larger than k_2 .
- Wage income is higher in jurisdiction 2.
- Jurisdiction 1 is a capital-exporter and jurisdiction 2 is a capital-importer.

A comparison of Propositions 2 and 4 indicates that the imposition of a constraint on non-resident withholding tax rate yields outcomes that markedly differ from those derived from the agreement solely mandating the exchange of information on non-resident interest income. As elucidated in Proposition 4, the DTA empowers contracting jurisdictions to differentiate tax rates between residents and non-residents. Jurisdictions traditionally considered tax havens can elevate tax rates applicable to residents. As examples, Ireland imposes a rate of 33% of Deposit Interest Retention Tax from the total interest paid on all deposit accounts held by Irish-resident individuals, and Switzerland raised a withholding tax rate on interest from publicly offered bonds and on bank

interest up to 35 %, although both are recoverable by tax filings. Such policy adjustments enhance the collection of interest income tax revenues, thereby enabling governments to augment public expenditure and expand the issuance of government bonds. Consequently, there is a stimulative effect on investment in private capital, value-added production, and labor income. However, the concomitant increase in government debt levels might exacerbate the risk of sovereign default.

A range of theoretical propositions helps to account—at least in part—for observed trends in governmental revenues and expenditures among tax-haven jurisdictions. In the early 2000s, the OECD initiated an information-exchange framework, which was followed in the 2010s by the proliferation of the DTAs as the BEPS measures. Consistent with Proposition 4, Figure 2 shows that during the 2010s, tax-haven countries’ average total expenditure ratio of general governments (measured relative to GDP) increased, approaching OECD averages—though this trajectory was subsequently disrupted by the COVID-19 pandemic.⁴ Figure 3 presents the average general government revenue ratios relative to GDP with respect to tax-haven and OECD countries. Notably, tax-haven countries exhibited increasing revenue ratios throughout the 2010s in comparison with a relatively constant trend in OECD members. This finding suggests that, during that period, the revenue-enhancing effects of international tax coordination might have been explicit in tax-haven countries, although a more granular decomposition of revenue components is necessary to isolate the specific influence of such coordination.⁵

⁴32 countries that are included both in the list of tax havens in Dharmapala and Hines (2009) and in the IMF’s World Economic Outlook Database, April 2025 are listed here as tax-haven countries. This group includes Andorra, Antigua and Barbuda, Aruba, Bahrain, Barbados, Belize, Cyprus, Dominica, Grenada, Hong Kong SAR, Ireland, Jordan, Lebanon, Liberia, Luxembourg, Macao SAR, Maldives, Malta, Marshall Islands, Mauritius, Nauru (since 2009), Panama, Samoa, San Marino (since 2004), Seychelles, Singapore, St. Kitts and Nevis, St. Lucia, St. Vincent and the Grenadines, Switzerland, Tonga, and Vanuatu. Additionally, 38 OECD countries as of June 2025 are included in the corresponding category. Ireland and Luxembourg belong to both categories.

⁵In the IMF’s World Economic Outlook Database, revenue consists of taxes, social contributions, grants receivable, and other revenue.

5 Conclusion

In this article, we extend the traditional tax-competition model to encompass intergovernmental competition for portfolio investment. Despite the typically adopted residence-based taxation of financial income, considerable personal funds are held in low-tax jurisdictions, commonly referred to as tax havens. This observation suggests that countries may still engage in competition to attract portfolio investments through tax rate adjustments accompanying other means, such as financial secrecy. Models incorporating the concealment of account information from the investor's country of residence already exist. However, our study aims to develop a comprehensive model incorporating the government's and firm's borrowing, to compare the effects of two types of tax cooperation: the establishment of bilateral treaties for information exchange between tax authorities and bilateral treaties which are originally designed to prevent double taxation. This approach provides insights into how international tax cooperation influences an interplay between tax evasion by creditors, private and public capital formation, and fiscal sustainability in the context of global portfolio investment competition.

Our analysis indicates that the two forms of international cooperation yield different outcomes regarding how so-called tax-haven countries set their tax rates. Under a bilateral treaty that promotes only information exchange, a jurisdiction with initially low levels of capital tends to select a lower tax rate than another region to attract capital. However, under a bilateral treaty designed not only for information exchange but also for double-taxation prevention—emphasizing a low withholding tax rate applied to income earned by investors from a partner jurisdiction—a tax-haven country sets a high tax rate for its own resident investors. This, in turn, can lead to increased public spending and greater issuance of government bonds, potentially even raising the risk of sovereign default. These theoretical predictions may clarify why, during the implementation of the OECD/G20 BEPS Project, which promoted the establishment of DTAs, public expenditure

as a percentage of GDP in tax-haven countries increased, in contrast to a declining trend in OECD member states.

There are also several limitations in this analysis. First, the decision to default on sovereign debt is modeled as being made with consideration for the interests of the voters in the majority—workers. However, a government could also act with more strategic decision-making that prioritizes the acquisition of other types of political rents. An analysis that takes this into account would help explain why some tax-haven countries have weak fiscal conditions while others do not. A second issue concerns consistency with empirical evidence. In this study, we indicate alignment with theoretical predictions using macro-level data. However, to firmly establish the validity of our theoretical analysis, it will be necessary to conduct statistical testing using more detailed tax and investment data. These points remain as tasks for future research.

Glossary

Double Taxation Agreement (DTA): An agreement between countries designed to prevent the same income from being taxed in multiple jurisdictions.

Residence principle of taxation: A concept dictating that residents of a particular jurisdiction are taxed on their worldwide income.

Source principle of taxation: A concept dictating that a jurisdiction is allowed to impose tax on income that originates within its borders, regardless of the taxpayer's residence.

Tax Information Exchange Agreement (TIEA): An agreement between countries that facilitates the exchange of tax-related information upon request.

Withdrawing tax: A tax that the payer of income deducts at the source before making the payment to the recipient.

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Appendix A Derivation of (9) and (10)

From (7) we have

$$g_i - k_i = r = g_j - k_j. \quad (\text{A.1})$$

Subject to (8),

$$g_i - k_i + g_j - k_j = g_i + g_j - (a - g_i - g_j) = 2r, \quad (\text{A.2})$$

so that we obtain (9). The substitution of (9) into (A.1) leads to (10).

Appendix B Proof of Proposition 1

Define the interest income tax revenue divided by interest rate as

$$z_i \equiv \frac{\gamma_i E[b_i]}{r} = \gamma_i \left\{ a_i - a_i \frac{(1 - x_j)^2}{d} \max[\gamma_i - \gamma_j, 0] - a_j \frac{(1 - x_i)^2}{d} \min[\gamma_i - \gamma_j, 0] \right\}. \quad (\text{B.1})$$

With g_i and g_j being determined, each government i calculates r using (9). Under the supposition of r is positive, x_i that maximizes $Eu(c_i)$ should maximize z_i , and γ_i that maximizes $Eu(c_i)$ should maximize z_i .

Taking γ_j and x_j as given, the first derivative of (B.1) with regard to x_i is

$$\frac{\partial z_i}{\partial x_i} = 2\gamma_i a_j \frac{1 - x_i}{d} \min[\gamma_i - \gamma_j, 0]. \quad (\text{B.2})$$

Thus, the optimal choice of x_i by government i , when it would like to select $\gamma_i < \gamma_j$, is setting 0. Otherwise any $x_i \in [0, 1]$ is indifferent and included in its best choices. We can apply this logic to the choice of x_j by government j .

Next we examine government i 's optimal choice of γ_i by categorizing the relative position of γ_i to γ_j into (i) to (iii) below.

(i) For the area $\gamma_i > \gamma_j$,

$$\frac{\partial z_i}{\partial \gamma_i} = a_i \left(1 - \frac{2\gamma_i}{d} + \frac{\gamma_j}{d} \right) = 0, \quad (\text{B.3})$$

gives us government i 's best choice in the area against γ_j :

$$\gamma_i = \frac{d}{2} + \frac{\gamma_j}{2}, \quad (\text{B.4})$$

because the second derivative is negative.

(ii) For the area $\gamma_i < \gamma_j$, in the similar manner,

$$\frac{\partial z_i}{\partial \gamma_i} = a_i \left(1 - \frac{2a_j}{da_i} \gamma_i + \frac{a_j}{da_i} \gamma_j \right) = 0, \quad (\text{B.5})$$

obtains government i 's best choice in the area against γ_j :

$$\gamma_i = \frac{da_i}{2a_j} + \frac{\gamma_j}{2}. \quad (\text{B.6})$$

- (iii) $\gamma_i = \gamma_j$ is not included in the set of government i 's best reactions because of the strict concavity of (B.1) regarding γ_i (see the middle expressions in (B.3) and (B.5)) and the continuity of (B.1) (and of (16)), except for $\gamma_1 \in \left[d, \frac{da_1}{a_2}\right]$ where government 1 cannot increase workers' expected utility by deviating from $\gamma_1 = \gamma_2$.

Based on these discussions, we can draw Figure 1 in Section 3.4, where bold lines depict (B.4) and (B.6) for $i = 1, 2$. Intersection B indicates the unique equilibrium in which government i adopts $\gamma_i = \frac{d(2a_i + a_j)}{3a_1}$, meaning $\gamma_1 > \gamma_2$. Note that a symmetric pair of $\gamma_1 = \gamma_2 = d$ at intersection A is not an equilibrium because government 2 can increase workers' expected utility by deviating from d to a lower tax rate.

Appendix C Proof of Propotition 2

Taking g_j as given and anticipating $((\gamma_i, x_i), (\gamma_j, x_j))$, because $\frac{\partial r}{\partial g_i} = 1$ from (9), the first-order condition for maximizing (16) with regard to g_i gives us government i 's best reaction:

$$g_i = -\frac{g_j}{2} + \frac{a}{4} - \frac{1}{2} + \frac{z_i}{2}. \quad (\text{C.1})$$

The pair of (C.1) and the comparable relation with i and j interchanged obtains government i 's choice of g_i as

$$g_i = \frac{a}{6} - \frac{1}{3} + \frac{2z_i}{3} - \frac{z_j}{3}. \quad (\text{C.2})$$

Because of $z_i = \frac{d(2a_i+a_j)^2}{9a_1}$ with $\gamma_i = \frac{d(2a_i+a_j)}{3a_1}$, from (C.2),

$$g_i = \frac{a}{6} - \frac{1}{3} + \frac{[2(\gamma_i)^2 - (\gamma_j)^2] a_1}{3d}. \quad (\text{C.3})$$

Also, from (C.2) we obtain $g_i - g_j = z_i - z_j = \frac{d[(a_i)^2 - (a_j)^2]}{3a_1}$, indicating $g_1 > g_2$.

The quantity of private capital is

$$k_i = \frac{a}{3} + \frac{1}{3} - \left(\frac{2z_j}{3} - \frac{z_i}{3} \right) = \frac{a}{3} + \frac{1}{3} + \frac{[(\gamma_i)^2 - 2(\gamma_j)^2] a_1}{3d}. \quad (\text{C.4})$$

Because $k_i - k_j = z_i - z_j = \frac{d[(a_i)^2 - (a_j)^2]}{3a_1}$, we obtain $k_1 > k_2$. Moreover, using (7), wage income is derived as

$$g_i k_i - \frac{(k_i)^2}{2} - r k_i = (g_i - r) k_i - \frac{(k_i)^2}{2} = \frac{(k_i)^2}{2}, \quad (\text{C.5})$$

indicating that workers in jurisdiction 1 earn higher wage income.

Regarding the final assertion in Proposition 2,

$$\begin{aligned} a_i - (g_i + k_i) &= a_i - \left(\frac{a}{2} + z_i - z_j \right) = a_i - \left[\frac{a}{2} + \frac{d[(a_i)^2 - (a_j)^2]}{3a_1} \right] \\ &= (a_i - a_j) \left(\frac{1}{2} - \frac{da}{3a_1} \right). \end{aligned} \quad (\text{C.6})$$

If home bias is weak and inequality in initial capital distribution is apparent ($\frac{a_1}{da} > \frac{2}{3}$), jurisdiction 1 exports capital while jurisdiction 2 imports it. If home bias is prominent or interjurisdictional inequality is not apparent ($\frac{a_1}{da} < \frac{2}{3}$), the opposite occurs.

Appendix D Proof of Propotition 3

Subject to the bilateral treaty that requires a government of a source jurisdiction to impose withholding tax rate 0 for foreigners, (16) and (B.1) are revised as

$$Eu(c_i) = g_i^* k_i^* - \frac{(k_i^*)^2}{2} - r^* k_i^* + r^* z_i^*; \quad (\text{D.1})$$

$$z_i^* = \gamma_i^* \left[a_i - a_i \frac{(1 - x_j^*)^2}{d} \gamma_i^* + a_j \frac{(1 - x_i^*)^2}{d} \gamma_j^* \right]. \quad (\text{D.2})$$

First, because $\gamma_i^* \geq 0$ and $\gamma_j^* \geq 0$, $x_i^* = 0$ is government i 's optimal choice except for $\gamma_i^* = 0$ or $\gamma_j^* = 0$, where any $x_i^* \in [0, 1]$ is indifferent to government i . Next, under the supposition that interest rate r^* is positive, the logic used in the proof of Proposition 1 obtains

$$\frac{\partial z_i^*}{\partial \gamma_i^*} = a_i - \frac{2a_i \gamma_i^*}{d} + \frac{a_j \gamma_j^*}{d} = 0. \quad (\text{D.3})$$

This gives us government i 's reaction function

$$\gamma_i^* = \frac{d}{2} + \frac{a_j}{2a_i} \gamma_j^*, \quad (\text{D.4})$$

and subsequently,

$$\gamma_i^* = \frac{d(2a_i + a_j)}{3a_i}. \quad (\text{D.5})$$

The relation $\gamma_1^* < \gamma_2^*$ holds because

$$\gamma_1^* = \frac{d \left(2 + \frac{a_2}{a_1} \right)}{3} < \gamma_2^* = \frac{d \left(2 + \frac{a_1}{a_2} \right)}{3}. \quad (\text{D.6})$$

Appendix E Proof of Propotion 4

Substituting $z_i^* = \frac{d(2a_i+a_j)^2}{9a_i}$ into z_i in (C.2) and z_j^* into z_j similarly, we obtain the quantity of public input:

$$g_i^* = \frac{a}{6} - \frac{1}{3} + \frac{2a_i(\gamma_i^*)^2 - a_j(\gamma_j^*)^2}{3d}. \quad (\text{E.1})$$

The relation $g_1^* < g_2^*$ is derived by calculating $g_i^* - g_j^* = z_i^* - z_j^* = \frac{d[(a_j)^3 - (a_i)^3]}{9a_i a_j}$ based on (C.2). Furthermore, $z_1^* = z_1$ and $z_2^* > z_2$ straightforwardly derives $g_1^* < g_1$ and $g_2^* > g_2$.

From (C.4) the quantity of private capital is

$$k_i^* = \frac{a}{3} + \frac{1}{3} + \frac{a_i(\gamma_i^*)^2 - 2a_j(\gamma_j^*)^2}{3d}. \quad (\text{E.2})$$

Also, $k_i^* - k_j^* = z_i^* - z_j^* = \frac{d[(a_j)^3 - (a_i)^3]}{9a_i a_j}$ indicates $k_1^* < k_2^*$. Again, the relations $k_1^* < k_1$ and $k_2^* > k_2$ follow from $z_1^* = z_1$ and $z_2^* > z_2$.

The assertion on wage income is an application of (C.5). Finally,

$$a_i - (g_i^* + k_i^*) = a_i - \left[\frac{a}{2} + (z_i^* - z_j^*) \right] = \frac{a_i - a_j}{2} - (z_i^* - z_j^*), \quad (\text{E.3})$$

which means that $a_1 - (g_1^* + k_1^*) > 0$ and $a_2 - (g_2^* + k_2^*) < 0$.

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Figure 1. Potential interest income tax rates

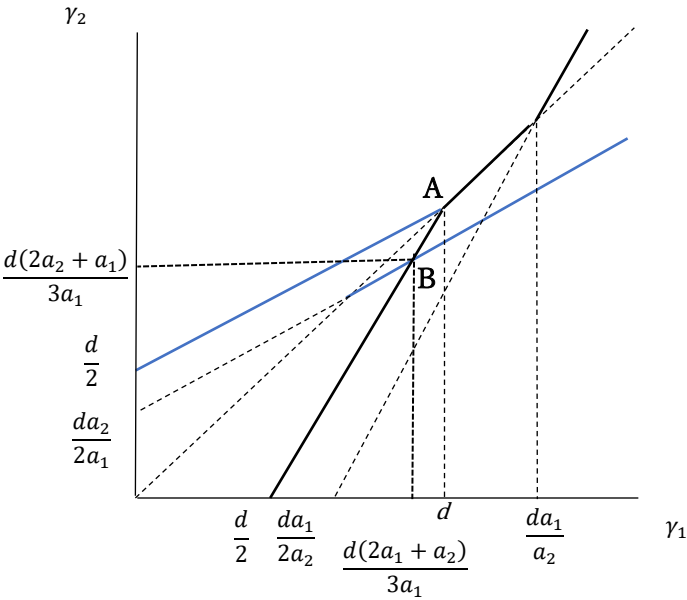
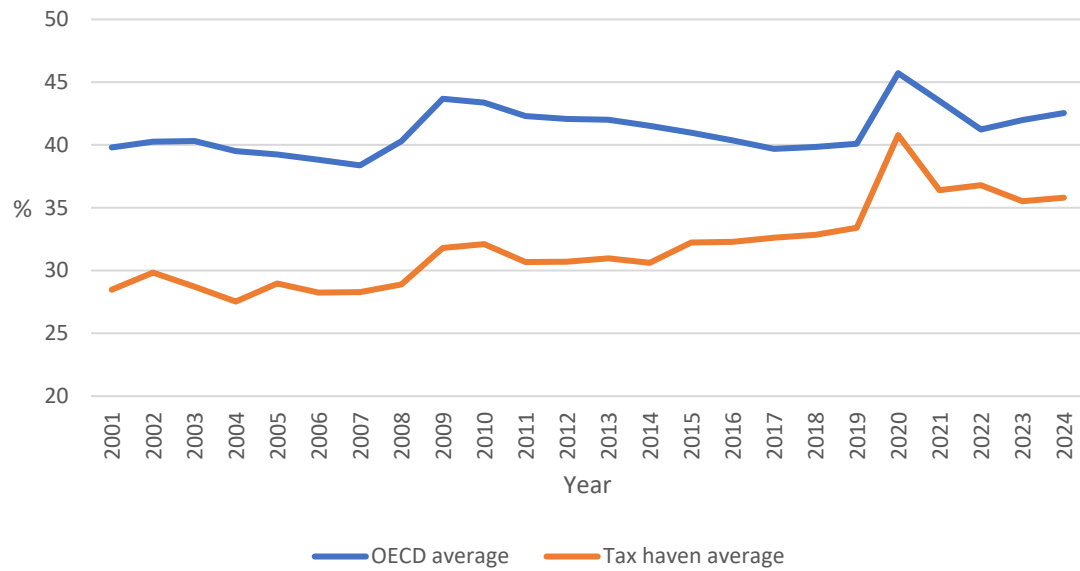
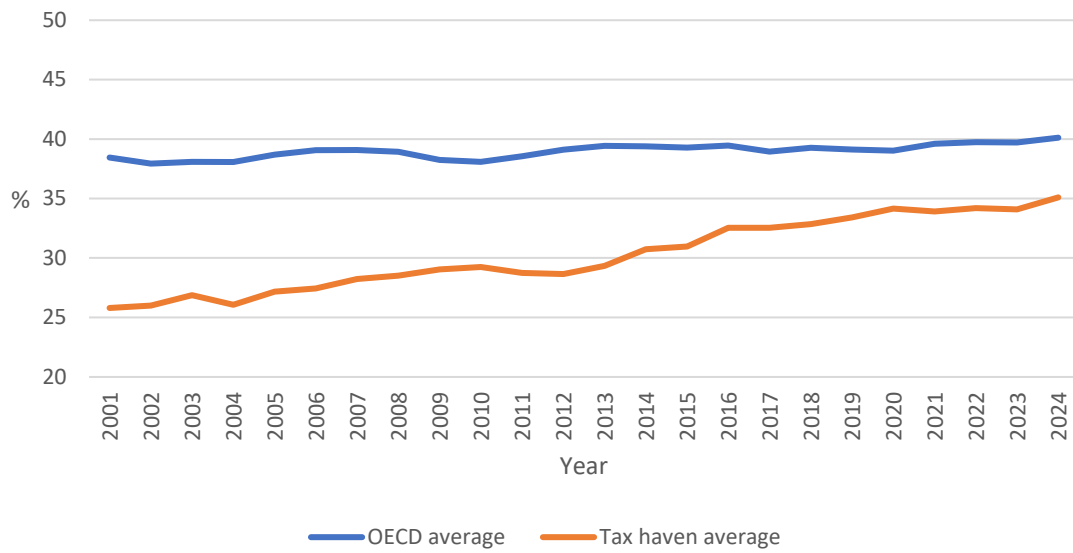


Figure 2. General government total expenditure
(Percent of GDP)



Source: IMF World Economic Outlook Database, April 2025

Figure 3. General government revenue
(percent of GDP)



Source: IMF World Economic Outlook Database, April 2025