International Compliance in a Post-BEPS World

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Overview

BEPS- new compliance rules

Master File and local file- interpreting compliance requirements

Master file and local file- challenging changes

Challenges and recommendations

BEPS

New Compliance Rules

BEPS Action Items

1. Digital Economy
2. Hybrids
3. CFC Rules
4. Interest Deductions
5. Harmful Tax Practices
6. Treaty Abuse
7. Permanent Establishment Status
8. Transfer Pricing: Intangibles
9. Transfer Pricing: Risks & Capital
10. Transfer Pricing: High-Risk Transactions
11. BEPS Data Analysis
12. Disclosure of Aggressive Tax Planning
13. Transfer Pricing Documentation
14. Dispute Resolution
15. Multilateral Instrument

BEPS Action 13

Master file

High-level information about the group's business, transfer pricing policies, and agreements with tax authorities in a single document available to all tax authorities where the group has operations

Local file

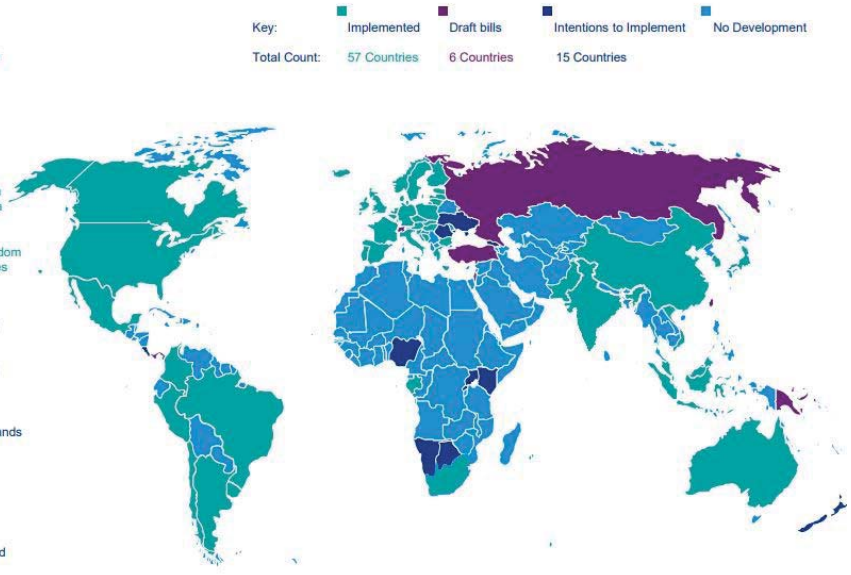
Detailed information about the group's local business, including related-party payments and receipts for products, services, royalties, interest, etc.

CbC report

High-level information about the group's jurisdictional allocation of profits, revenues, employees and assets

CbC Reporting Implementation

- Argentina
- Australia
- Austria
- Belgium
- Bermuda
- Bosnia and Herzegovina (Fed. of Bosnia and Herzegovina)
- Bosnia and Herzegovina (Rep. of Srpska)
- Bulgaria
- Brazil
- Canada
- Chile
- China
- Colombia
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Gabon
- Germany
- Gibraltar
- Greece
- Guernsey
- Hungary
- Iceland
- India
- Indonesia
- Ireland
- Isle of Man
- Italy
- Japan
- Jersey
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malaysia
- Malta
- Mexico
- Netherlands
- Norway
- Pakistan
- Peru
- Poland
- Portugal
- Singapore
- Slovenia
- Slovakia
- South Africa
- South Korea
- Spain
- Sweden
- United Kingdom
- United States
- Uruguay
- Vietnam
- Israel
- Papua New Guinea
- Russia
- Switzerland
- Taiwan
- Turkey
- Botswana
- Cayman Islands
- Costa Rica
- Curacao
- Georgia
- Hong Kong
- Kenya
- Mauritius
- Namibia
- New Zealand
- Nigeria
- Panama
- Romania
- Ukraine
- Uganda



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First appeared as part of the conference materials for the
14th Biennial Parker C. Fielder Oil and Gas Tax Conference session
"International Compliance "