OECD

OECD releases final BEPS package – summary

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On 5 October 2015, the OECD released its final package for a coordinated international approach to combat tax avoidance by multinational enterprises under Action Plan on Base Erosion and Profit Shifting (AP-BEPS) (see OECD-2, News 31 July 2013).

The following reports are included:

– Action 1: addressing the tax challenges of the digital economy;
– Action 2: neutralising the effects of hybrid mismatch arrangements;
– Action 3: designing effective controlled foreign company rules;
– Action 4: limiting base erosion involving interest deductions and other financial payments;
– Action 5: countering harmful tax practices more effectively, taking into account transparency and substance;
– Action 6: preventing the granting of treaty benefits in inappropriate circumstances;
– Action 7: preventing the artificial avoidance of permanent establishment status;
– Actions 8-10: guidance on transfer pricing aspects of intangibles;
– Action 11: measuring and monitoring BEPS;
– Action 12: mandatory disclosure rules;
– Action 13: guidance on transfer pricing documentation and country-by-country reporting;
– Action 14: making dispute resolution mechanisms more effective; and
– Action 15: developing a multilateral instrument to modify bilateral tax treaties.

Following this announcement, the final set of BEPS deliverables will be presented to the G20 Meeting of Finance Ministers on 8 October 2015 in Lima, Peru.

See also

OECD-1, News 28 September 2015
OECD-1, News 16 September 2014
OECD-2, News 31 July 2013