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OECD Releases New Transfer Pricing Profiles

The OECD has made available [transfer pricing profiles](#) for Costa Rica, Greece, the Republic of Korea, Panama, Seychelles, South Africa and Turkey. A previously released profile concerning Singapore has also been updated.

Profiles are currently available for 52 countries, and are published for OECD countries and countries who are members of the Inclusive Framework on BEPS, concerning current national legislation and the implementation in practice of the arm's length principle.

Other key transfer pricing aspects, including information on pricing methods, intangible property, intra-group services, safe harbours, transfer pricing documentation and administrative approaches to handling disputes are also included in the profile.



France & Malaysia Discuss Introducing Digital Tax

Malaysia's Deputy Finance Minister Datuk Amiruddin Mazah has [stated](#) that the government is contemplating introducing a form of tax for the digital economy. Amiruddin stated that "we will impose something because if we don't, I think the nation will be losing its revenue." Additionally, a paper presented to the French National Assembly's Finance Committee [reportedly](#) recommended that a national measure be introduced to impose a levy on diverted profits, and introduce an appropriate nexus in order to tax digital business, should Member States fail to agree to the current EU proposal to introduce an interim EU-wide digital services tax.

This follows from [reports](#) that during the informal ECOFIN meeting that took place in Vienna from 7 to 8 September, French Finance Minister Bruno Le Maire proposed that a sunset clause could be introduced in relation to the interim tax, and that Member States which would be most adversely affected by the introduction of the tax could be allocated more of the revenue from the interim tax.

The Austrian Presidency's [Agenda Programme](#) states that taxation of the digital economy is one of the main priorities for the focus of taxation work for the Presidency.



Israel and Lithuania Deposit Ratification Instruments for MLI BEPS Convention

Israel and Lithuania have now deposited instruments of ratification for the OECD's [Multilateral Convention](#) to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI). Saudia Arabia also became a signatory to the MLI in September.

The MLI entered into force in July 2018, after being concluded in 2016. The MLI implements tax treaty measures which update international tax rules and aims to restrict opportunity for tax avoidance by implementing minimum tax standards and improving dispute resolution mechanisms.



Global Tax Advisers Platform ('GTAP') Issues Declaration Establishing Key Priorities

On 12 September 2018, GTAP issued the Ulaanbaatar Declaration, establishing 10 key priorities for GTAP in pursuing international cooperation among tax advisers and optimisation of the national and international taxation framework.

GTAP was established by CFE, AOTCA and WAUTI, who collectively represent more than 600,000 tax advisers in Europe, Asia and Africa. GTAP is an international platform that seeks to bring together national and international organisations of tax professionals from all around the world.

The Ulaanbaatar Declaration sets out common key priorities for the collective promotion of an optimal tax framework worldwide. A copy of the Declaration can be viewed [here](#).



CFE & AEDAF Mandatory Disclosure Rules Conference Programme: Madrid 23 November

CFE Tax Advisers Europe and the Asociación Española de Asesores Fiscales (AEDAF) are pleased to invite you to the 11th European Conference on Tax Advisers' Professional Affairs, to be held in Madrid, Spain, on Friday 23 November 2018 on the topic of **"Transparency Trends in Taxation: How to Implement New EU & OECD Mandatory Disclosure Rules"**.

Two panels of expert speakers from the EU, national tax administration and practice will discuss the implications of the OECD and EU's initiatives on Mandatory Disclosure Rules, implementation issues, analyse the specific features of the Directive and the specific hallmarks. The panels will address issues such as how tax administrations and advisers will face the challenging task of implementing this directive and the merits of these policy initiatives for stakeholders across the board. The programme for the event is available [here](#).

[Register](#) now to secure your place.