



ADDRESSING TAX EVASION AND AVOIDANCE

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Two responses to tax avoidance & evasion

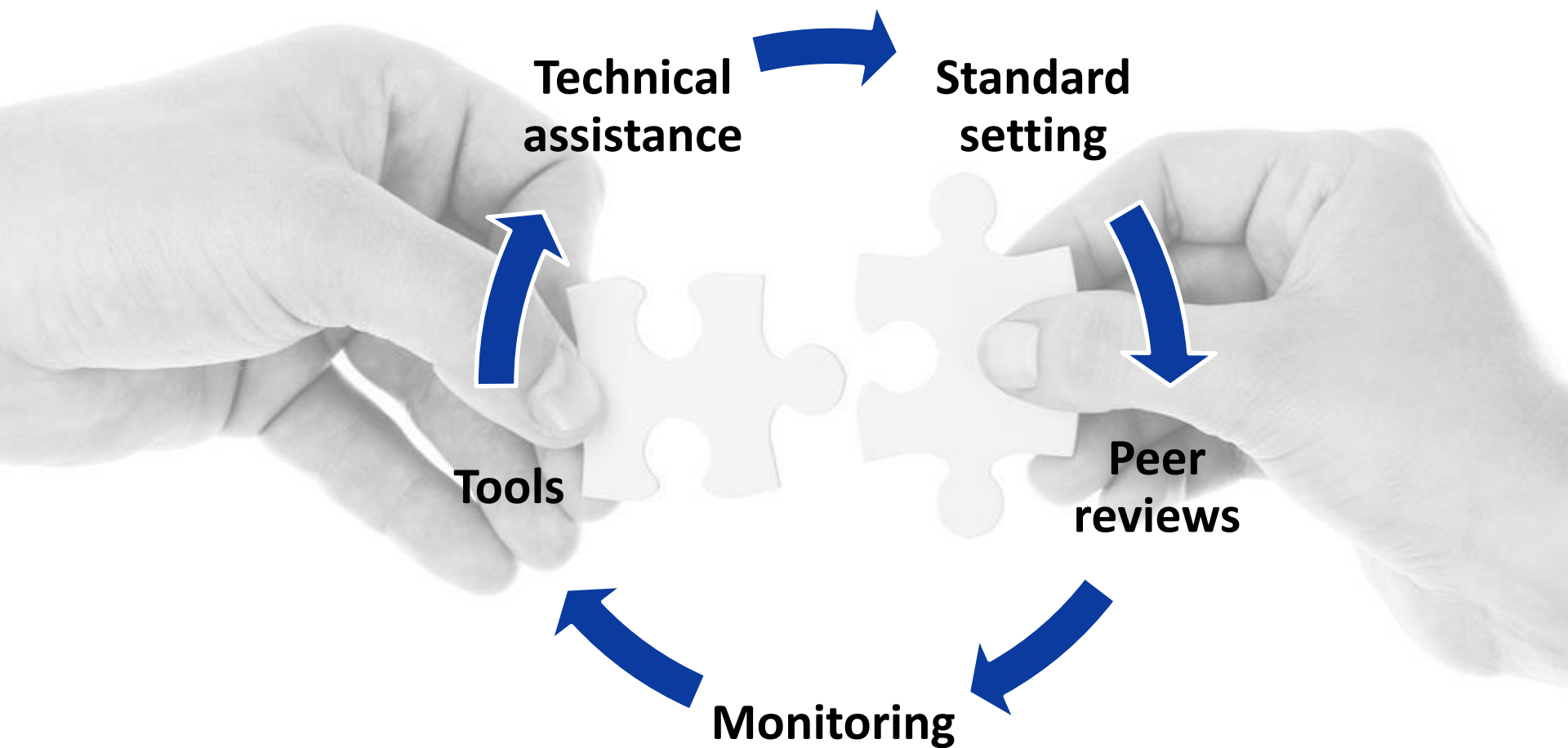


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Membership keeps increasing

Same Principles: Universal Cooperation – Shared Benefits





The Global Forum

To facilitate the effective global implementation of the two internationally agreed standards of tax transparency and EOI

Exchange of information on request
(154)

Automatic exchange of
Information (101 plus 5)

Monitoring and peer reviews to secure a level playing field
Technical assistance and assessment of impact





What is changing?

- Over 120 jurisdictions reviewed in the 1st round
- Nearly 40 jurisdictions reviewed in the 2nd round
- Many recommendations have been implemented, including bank secrecy provisions, access powers of tax authorities, bearer shares, etc.
- In the ongoing round – focus on beneficial ownership
- Over 80 countries are exchanging information automatically since September 2018
- With further 20 more to come shortly, including some developing countries



The Inclusive Framework on BEPS

Minimum standards	Reinforced international standards	Common approaches & best practices	Analytical reports & measuring BEPS
<p>Action 5 Counter harmful tax practices</p>	<p>Action 7 Prevent the artificial avoidance of PE status</p>	<p>Action 2 Neutralise the effects of hybrid mismatch arrangements</p>	<p>Action 1 Digital economy</p>
<p>Action 6 Prevent treaty abuse</p>	<p>Actions 8 - 10 Aligning transfer pricing outcomes with value creation: Intangibles; Risk and capital; and Other high-risk transactions</p>	<p>Action 3 Strengthen CFC rules</p>	<p>Action 11 Data analysis</p>
<p>Action 13 Re-examine transfer pricing documentation (CbCR)</p>		<p>Action 4 Limit interest deductibility</p>	<p>Action 15 Develop a multilateral instrument</p>
<p>Action 14 Dispute resolution</p>		<p>Action 12 Mandatory disclosure rules</p>	

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“The most significant re-write of the international tax rules in a century”



What is changing?

- Multilateral Convention to Implement Tax Treaty related Measures to Prevent BEPS (MLI): 84 jurisdictions
- Over 17,000 rulings exchanged
- Modification/abolishment of 112 preferential tax regimes
- Over 1400 active relationship to exchange country-by-country reports
- Nearly 30 peer reviews on dispute resolution