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TP Documentation and BEPS - a LATAM Perspective

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TP Documentation and BEPS - a LATAM Perspective Mr. Steef Huibregtse, Mr. Heberth Guevara, Ms. Daniela Ionescu, Ms. Trang Huynh
In the last decade, the number of multinationals doing business in Latin America (LATAM) has increased significantly, impacting the complexity of the taxation system. Both the economy of the region and the corporations operating within it have become globally integrated, so the system needs to keep up with global standards. One of the most recent programs launched by the Organisation for Economic Co-operation and Development (OECD) targets the problem of base erosion and profit shifting (BEPS). These new proposals aim to ensure coherence of corporate income tax (CIT) at an international level, reinforce substance and improve transparency and certainty. The way in which LATAM countries' tax developments interact with the OECD/G20 BEPS Action Plan is dealt with in this booklet. Additionally, based on a survey conducted in 18 countries, an analysis has been made of the most important points arising from the BEPS project. Lastly, a detailed analysis of Action Point 13 is presented, focusing on the four layers of transfer pricing documentation.

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