

## Questionnaire

Countries' experiences regarding base erosion and profit shifting issues

Developing countries are invited to provide feedback by answering the following questions.

Feedback (and any questions about the feedback requested) should be sent to [taxfdoffice@un.org](mailto:taxfdoffice@un.org). The deadline for responses is 8 August 2014.

1. How does base erosion and profit shifting affect your country?

The current legal framework of Chile to counteract BEPS situations is still narrow compared to other countries' legislation. The lack of a General Anti-avoidance Rule and CFC rules together with only limited specific anti-avoidance measures and a formalistic legal culture imply that Chilean tax administration faces more difficulties to address the complexity of

Action 6 – Prevent Treaty Abuse

Action 8 – Assure that transfer pricing outcomes are in line with value creation: intangibles

Action 9 – Assure that transfer pricing outcomes are in line with value creation: risks and capital

Action 10 – Assure that transfer pricing outcomes are in line with value creation with reference to other high risk transactions (in particular management fees)

Action 11 – Establish methodologies to collect and analyse data on BEPS and the actions to address it

Action 12 – Require taxpayers to disclose their aggressive tax planning arrangements

Action 13 – Re-examine transfer pricing documentation

5. Do you agree that these are particularly important priorities for developing countries?

Yes