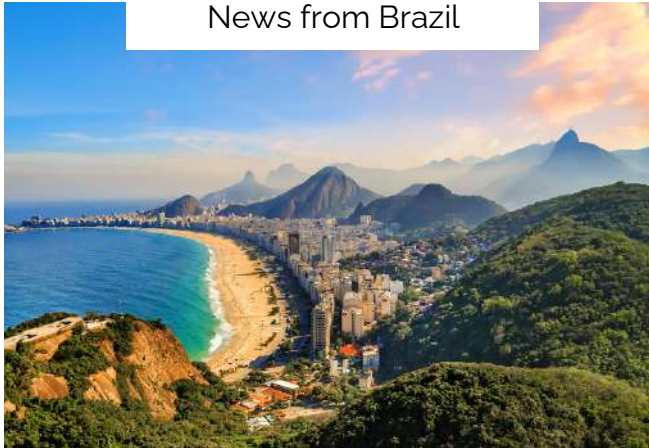


NEWSLETTER

JANUARY 2025

News from Brazil



BRAZIL: PUBLIC CONSULTATION ON COMMODITY TRANSFER PRICING CHANGES

The Federal Revenue of Brazil has opened a public consultation to modify RFB Normative Instruction No. 2.161/2023, which regulates controlled commodity transactions. This initiative seeks to align Brazilian regulations with international standards, promoting greater transparency and fairness in international operations. Contributions can be submitted until December 11, 2024, and the new rules are expected to come into force in January 2025.

News from Chile



ACCORDING TO THE NEW SII REGULATIONS IN CHILE, TRANSFER PRICING AND ASSET APPRAISAL ARE UNDER EXAMINATION

Chile's SII issued Exempt Resolution N°120 on December 18, 2024, focusing on auditing business groups and large taxpayers. Priority areas include transfer pricing, asset valuation, justification of intercompany operations and corporate reorganizations. This measure strengthens the SII's capabilities to supervise strategic operations and ensure tax compliance.

International News



ASTRAZENECA GETS TAX BENEFIT AFTER TRANSFER PRICING REVIEW

India's Income Tax Appellate Tribunal (ITAT) has ordered a reassessment of AstraZeneca's transfer pricing, which could give the drugmaker a tax benefit of Rs. 35 crore. This case highlights the importance of multinationals maintaining robust documentation and complying with local and international regulations to avoid tax adjustments and penalties.

International News



FIVE REASONS FOR INSUFFICIENT TAX REVENUES IN LATIN AMERICA

Latin America faces insufficient tax revenues due to several factors: high labor informality reduces the tax base; tax evasion and avoidance, especially by large companies, reduce tax collection; a low tax burden reflects dependence on indirect taxes; inequitable tax systems do not mitigate economic inequality; and the lack of regional coordination makes it difficult to deal with unfair tax competition and cross-border problems.

News from Canada



TAX REFORMS IN CANADA: GLOBAL MINIMUM TAX AND DIGITAL SERVICES LEVY

Canada is moving forward with its tax reforms to adopt the global minimum tax and digital services levy, aligning with OECD initiatives. These measures seek to ensure that large companies are taxed at a minimum in all countries where they operate and to regulate income generated from digital services. These reforms mark a key step towards greater tax fairness.

India News



TRANSFER PRICING CHALLENGES FOR STARTUPS IN INDIA

Startups in India face transfer pricing challenges, especially in the valuation of intangible assets, financing structures and lack of comparables. To mitigate tax risks, it is essential that they implement policies aligned with OECD guidelines and properly document their intercompany transactions.

Do you need Transfer Pricing support?

At TPC Group, we have a highly trained staff qualified to advise and support you.

For support, please contact me through my corporate email.



Carlos Vargas
CEO



Abigail Alayo
Director of Transfer Pricing



Luis Castillo
Manager of Transfer Pricing



Luis Tuesta
Manager of Transfer Pricing