



Corporate tax alert International tax

BEPS Action 15: 68 jurisdictions sign the multilateral instrument to modify bilateral tax treaties

On 7 June 2017, representatives covering 68 jurisdictions gathered at the OECD's headquarters in Paris for the signing of the Multilateral Convention to Implement Tax Treaty-Related Measures to Prevent Base Erosion and Profit Shifting ('the Convention' or 'MLI').

The Convention is designed to implement swiftly the tax treaty-related measures arising from the G20/OECD Base Erosion and Profit Shifting ('BEPS') Project. 'Minimum standard' changes to the functioning of existing double tax conventions in the areas of treaty abuse, mutual agreement procedures and treaty preambles will be implemented through the Convention and, depending on the reservations and notifications made by each party, optional changes to modify tax treaties in respect of permanent establishments (taxable presence), transparent entities, residency tie-breakers, double tax relief, minimum shareholding periods, capital gains derived from immovable property and a jurisdiction's right to tax its own residents will also be facilitated.

A subgroup of 26 jurisdictions, including 16 EU member states, have opted in to the mandatory binding arbitration provisions, based on the principles set out in the 2015 BEPS Action 14 Final Report on Making Dispute Resolution Mechanisms More Effective.

Contacts

If you have any questions concerning the items in this alert, please contact your usual tax consultant at our Deloitte office in Belgium, or:

- Pascal van Hove, pvanhove@deloitte.com, +32 2 600 67 70

For general inquiries, please contact:
bedeloittetax@deloitte.com, + 32 2 600 60 00

Be sure to visit us at our website:
<http://www.deloitte.com/be/tax>



Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients. Please see www.deloitte.com/about for a more detailed description of DTTL and its member firms.

Deloitte provides audit, tax and legal, consulting, and financial advisory services to public and private clients spanning multiple industries. With a globally connected network of member firms in more than 150 countries, Deloitte brings world-class capabilities and high-quality service to clients, delivering the insights they need to address their most complex business challenges. Deloitte has in the region of 225,000 professionals, all committed to becoming the standard of excellence.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited, its member firms, or their related entities (collectively, the "Deloitte Network") is, by means of this communication, rendering professional advice or services. No entity in the Deloitte network shall be responsible for any loss whatsoever sustained by any person who relies on this communication.

© 2017. For information, contact Deloitte Belgium.

[Subscribe](#) | [Unsubscribe](#)