



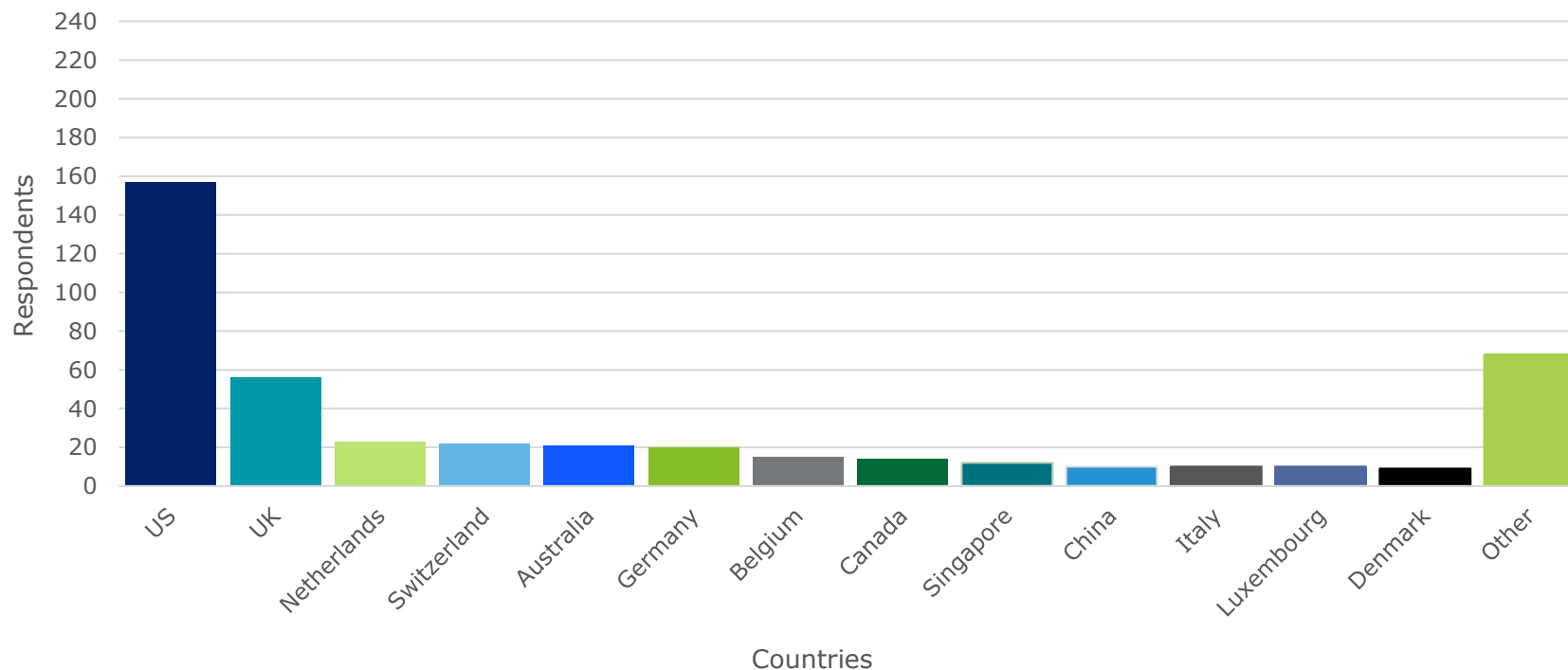
**OECD's Base Erosion and  
Profit Shifting (BEPS) initiative  
and the "Global Tax Reset"**  
2018 Survey summary results

# OECD's BEPS initiative—fifth annual survey

## Overview of the 2018 survey

The purpose of Deloitte's 2018 survey was to gauge multinationals' views on the progress of the implementation of the BEPS project recommendations and their views on consequential developments within their organizations given the changing tax landscape. The survey was conducted in January 2018 and shows evolution of the views since the start of the BEPS debate.

447 people from 39 countries responded to the 2018 survey, including 157 respondents from the United States, 56 from the United Kingdom, and 23 from the Netherlands.



# OECD's BEPS initiative—fifth annual survey

## Key findings

### Substantial change is expected

**68%** anticipate significant legislative and treaty changes in their country.

**76%** of Boards became more actively engaged in tax governance.

But only **31%** secured (plan to) additional resource.

### External forces are impacting tax strategy

**76%** are concerned about the media, political and activist group interest in corporate taxation.

**76%** are more aware about reputational risk in relation to cross-border tax planning.

**66%** changed the way they conduct cross-border tax planning.

### The compliance burden is increasing

**91%** expect that BEPS-related transfer pricing reporting requirements will substantially increase corporate tax compliance burden.

**80%** expect public country-by-country reporting in the next few years.

**48%** are concerned about lack of domestic guidance on BEPS-related legislative changes.

### Scrutiny is growing

**86%** believe tax structures are under greater scrutiny.

**85%** expect that tax authorities will increase tax audit assessments as a result of the BEPS debate.

**59%** developed additional policies in response to the increased corporate tax scrutiny.

### Cross-border coordination is lacking

**59%** expect unilateral changes in their country without coordination with other countries.

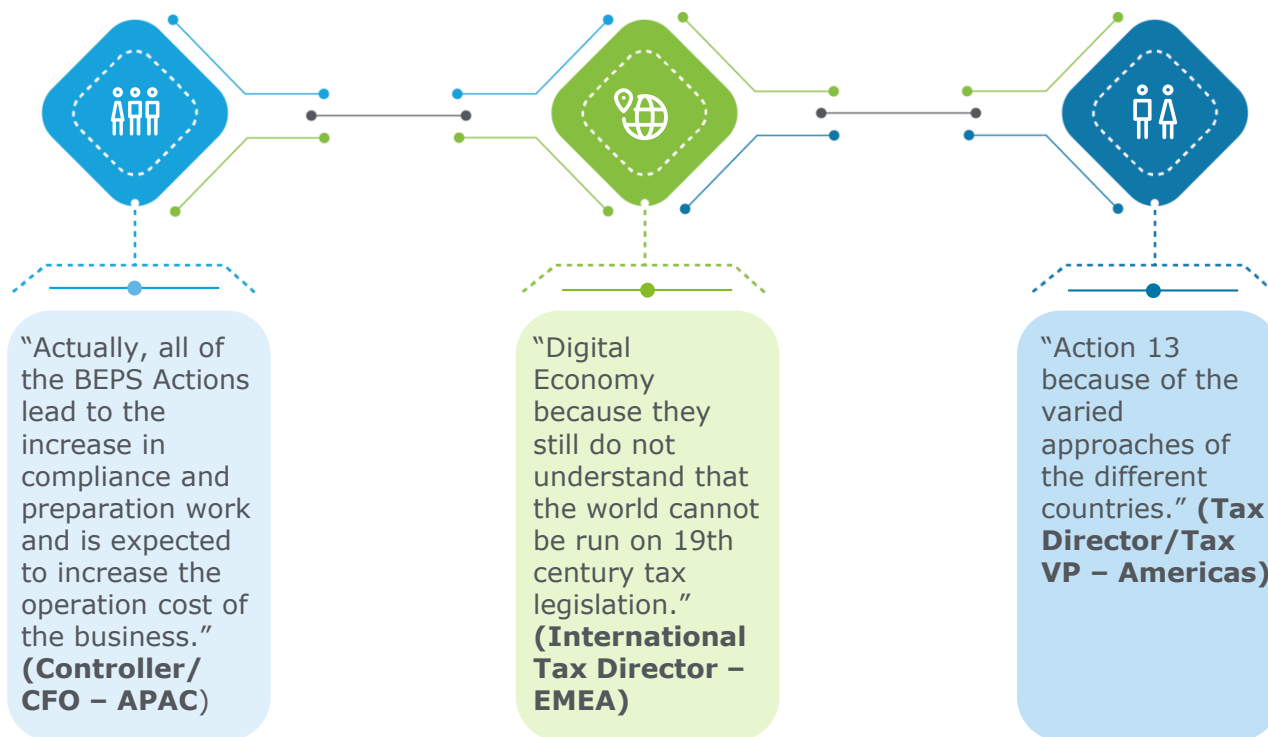
**78%** expect double taxation from the unilateral changes.

Only **21%** expect consistent interpretation of the proposed changes to the transfer pricing guidelines.

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## Representative responses on main hurdles

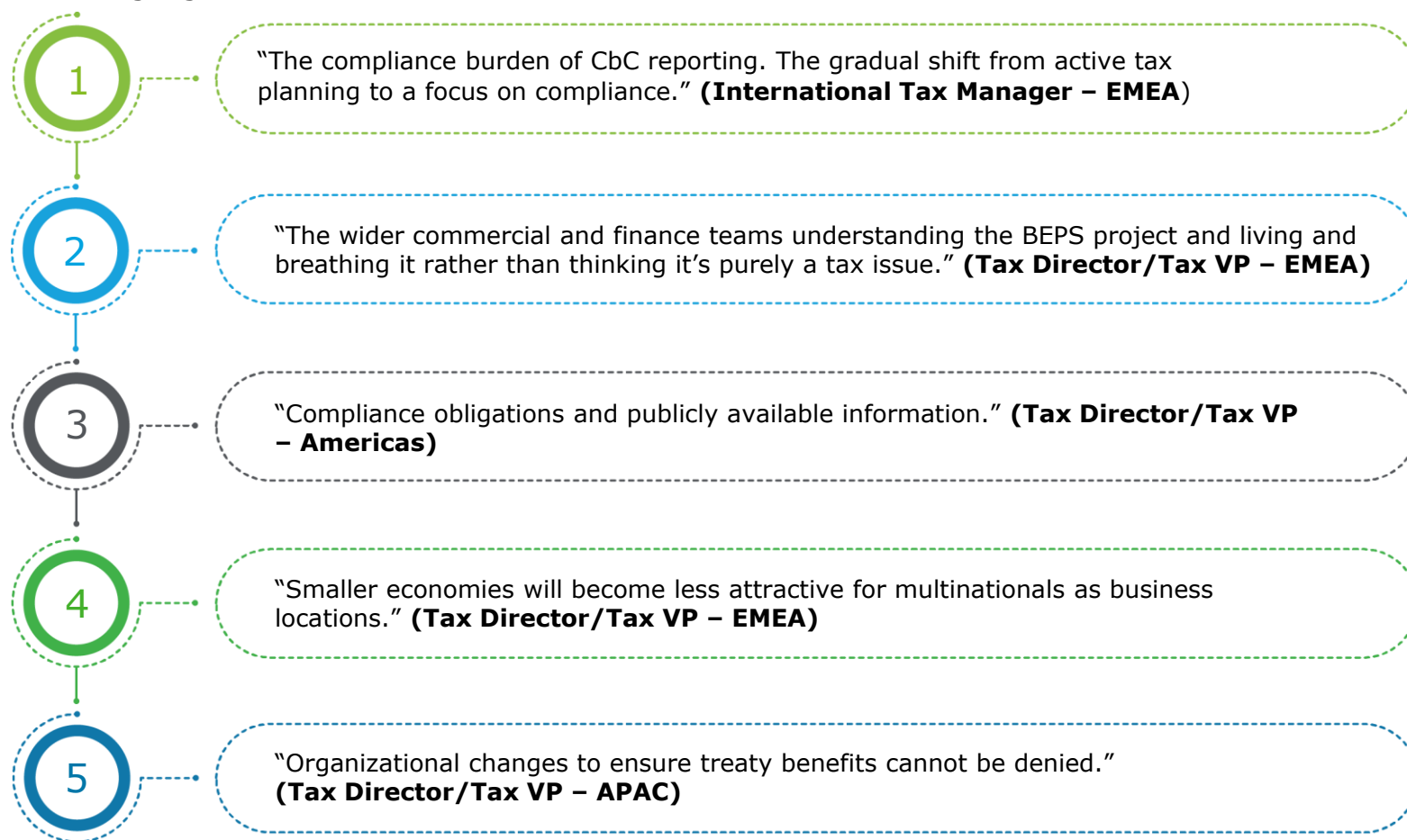
Organizations have varying views on which of the BEPS Actions present the biggest challenge for their business.



# OECD's BEPS initiative—fifth annual survey

## Representative responses on significant areas of change for businesses





Respondents had varying answers as to what the most significant areas of change would be for their business. Highlights of the feedback included:



# OECD's BEPS initiative—fifth annual survey

## Representative responses on main hurdles to the final BEPS reports

When asked what surprised them the most, organizations had different reactions to the final BEPS reports:

-  "I would not say surprised but I am disappointed that nothing has really been done to address double taxation in a practical way to ensure tax authorities don't abuse the rules." (**International Tax Manager - EMEA**)
-  "Different perspectives by accountants and tax lawyers." (**Tax Director/Tax VP – Americas**)
-  "No collective action and no international consensus between countries. Some countries are even implementing new measures that seem contradictory to BEPS (i.e., US tax reform). Every country believes BEPS will increase its tax base, none view that it could decrease its tax base to be benefit of another State." (**Tax Director/Tax VP – EMEA**)
-  "The speed of the way countries are adopting the changes through their own legislation." (**International Tax Director – AP**)



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