



International Tax

## United States Tax Alert

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### OECD Releases First Set of BEPS Deliverables

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On Tuesday, September 16, 2014 the OECD released seven deliverables in response to its Base Erosion and Profit Shifting (BEPS) Action Plan of July, 2013. The deliverables, which are [available](#) on the OECD website, address the following actions:

- Action 1: Addressing the Tax Challenges of the Digital Economy
- Action 2: Neutralising the Effects of Hybrid Mismatch Arrangements
- Action 5: Countering Harmful Tax Practices More Effectively, Taking into Account Transparency and Substance
- Action 6: Preventing the Granting of Treaty Benefits in Inappropriate Circumstances
- Action 7: Guidance on Transfer Pricing Aspects of Intangibles
- Action 13: Guidance on Transfer Pricing Documentation and Country-by-Country Reporting
- Action 15: Developing a Multilateral Instrument to Modify Bilateral Tax Treaties

Alerts on these deliverables will be forthcoming.

Additionally, Deloitte is hosting a special edition Dbrief webcast with invited speaker Robert Stack, Deputy Assistant Secretary, International Tax Affairs, U.S. Department of the Treasury on Wednesday, September 17 at 2:00 PM EST, which will cover the OECD documents in greater detail. For details about the Dbrief, and to register, click [here](#).

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