

# OECD TRANSFER PRICING STANDARD AND BRAZILIAN APPROACH: THE WAY FORWARD

Thursday, 11 July 2019, Brasília, Brazil

## About the event

This one-day-long event will bring together senior officials from the Brazilian government, the OECD, representatives of MNEs operating in Brazil, and major trading and investment partners of Brazil.

This event has been organised to highlight an important milestone reached in the joint transfer pricing project between OECD and *Receita Federal do Brasil* (RFB), which was supported by the United Kingdom Foreign and Commonwealth Office and focussed on analysing the existing Brazilian transfer pricing rules and comparing them to the international standard represented by the OECD Transfer Pricing Guidelines.

The differences identified were then further assessed from the perspective of meeting the primary objectives of transfer pricing rules as well as from the perspective of other tax policy objectives. Based on the results of this assessment, the project also explored the possibilities for alignment to address the divergences identified.

In the relevant sessions, the results of the project between OECD and RFB will be presented and discussed. The event will also provide the opportunity to discuss the possible options for alignment and it will conclude with a roundtable, which should allow for an exchange of views among the panellists.

## REGISTRATION

We kindly invite you to send your complete contact details (name, organisation, professional title, etc.) to [TransferPricing@OECD.org](mailto:TransferPricing@OECD.org).

The event will take place at **Confederação Nacional da Indústria (CNI) - Auditório S1**, at the following address:

**Edifício Roberto Simonsen, Setor Bancário Norte, Quadra 1, Bloco C Brasília/DF.**



# AGENDA

## 9:30-10:30 HIGH-LEVEL OPENING

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Keynote speeches delivered by:

- Mr. Paulo Guedes, Minister of Economy
- Mr. Marcos Cintra, Special Secretary of the Federal Revenue of Brazil
- Ms. Grace Perez-Navarro, Deputy Director of the OECD Centre for Tax Policy and Administration
- Mr. Iain Frew, Chargé d'affaires to the United Kingdom in Brazil
- Mr. Robson Braga de Andrade, President of the Brazilian National Confederation of Industry (CNI)

*10:30-11:00 Coffee Break*

## 11:00-12:30 ASSESSMENT OF THE EXISTING TRANSFER PRICING SYSTEM

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This session will discuss the similarities and differences identified between the Brazilian transfer pricing rules and the international standard reflected in the OECD Transfer Pricing Guidelines. This will be followed by a presentation of the outcomes of the assessment of the strengths and weaknesses identified in the Brazilian transfer pricing rules and administrative practices and what their implications are on the business and investment climate from the perspective of MNEs and key trading partners.

Panellists:

- Andrea Chaves, Head of Division, Divisão de Tributação Internacional (Ditin), Coordenação-Geral de Tributação (Cosit), Federal Revenue of Brazil (FRB)
- Elizabeth Arnold, Head of International Branch, Corporate Tax, Business and International Tax Group, HM Treasury
- John Hughes, Director, APMA, Large Business & International, United States Internal Revenue Service
- Antoinette Musilek, Consejera de Finanzas de la Embajada de España en Brasil (Embassy of Spain in Brazil)
- Tomas Balco, Head of Transfer Pricing Unit, OECD Centre for Tax Policy and Administration
- Camille Tirand, Junior Transfer Pricing Adviser, Transfer Pricing Unit, OECD Centre for Tax Policy and Administration

*12:30-13:30 Lunch*

## 13:30-15:00 OPTIONS FOR ALIGNMENT WITH THE OECD STANDARD

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This session will explore possible benefits of alignment of the Brazilian transfer pricing rules with the international standard as well as risks and challenges. This session will provide the opportunity to present and discuss the possible options for alignment, taking into account the benefits and risks identified.

#### Panellists:

- Elizabeth Arnold, Head of International Branch, Corporate Tax, Business and International Tax Group, HM Treasury
- John Hughes Director, APMA, Large Business & International, United States Internal Revenue Service
- Antoinette Musilek, Consejera de Finanzas de la Embajada de España en Brasil (Embassy of Spain in Brazil)
- Tomas Balco, Head of Transfer Pricing Unit, OECD Centre for Tax Policy and Administration

*15:00-15:30 Coffee Break*

#### **15:30-17:00 ROUNDTABLE**

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This roundtable will enable the panellists to interact and exchange their views on the outcome of the project as well as the issues emerging from the previous sessions. This roundtable would allow discussion of issues such as how to retain the benefits of the existing system, while achieving alignment. In addition, the panel will explore how to ensure that both the tax administration and taxpayers are prepared and in a position to comply with a potentially new transfer pricing regime.

#### Panellists:

- Flavio Araujo, Chefe da Assessoria de Relações Internacionais, Federal Revenue of Brazil (RFB)
- Claudia Pimentel, Coordenadora da Coordenação de Tributação Internacional (Cotin), Coordenadora-Geral de Tributação (Cosit), Federal Revenue of Brazil (RFB)
- Elizabeth Arnold, Head of International Branch, Corporate Tax, Business and International Tax Group, HM Treasury
- John Hughes, Director, APMA, Large Business & International, United States Internal Revenue Service
- Antoinette Musilek, Consejera de Finanzas de la Embajada de España en Brasil (Embassy of Spain in Brazil)
- Romero Tavares, Adviser to Brazilian National Confederation of Industry (CNI/PwC)

#### Business representatives:

- Daniel Perin, Diretor de Planejamento Tributário, Novartis
- Simone Frizzo, Tax Director, Mercedes-Benz
- Vinicius Bentolila, Tax Senior Manager, Thyssenkrupp
- Gustavo Machado, Tax Manager, AztraZeneca
- Cristine Chui, Tax Manager, Abiove

#### **17:00 – 17:15 CLOSING REMARKS BY SPECIAL SECRETARY OF FEDERAL REVENUE**

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