

ACTION

1

Addressing the tax challenges of the digital economy

ACTION

2

Neutralising the effects of hybrid mismatch arrangements

ACTION

3

Designing Effective Controlled Foreign Company Rules

ACTION

4

Limiting Base Erosion Involving Interest Deductions and Other Financial Payments

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

Preventing the artificial avoidance of permanent establishment status

ACTION

8-10

Aligning transfer pricing outcomes with value creation

ACTION

11

Measuring and monitoring BEPS

ACTION

12

Mandatory disclosure rules

ACTION

13

Guidance on transfer pricing documentation and country-by-country reporting

ACTION

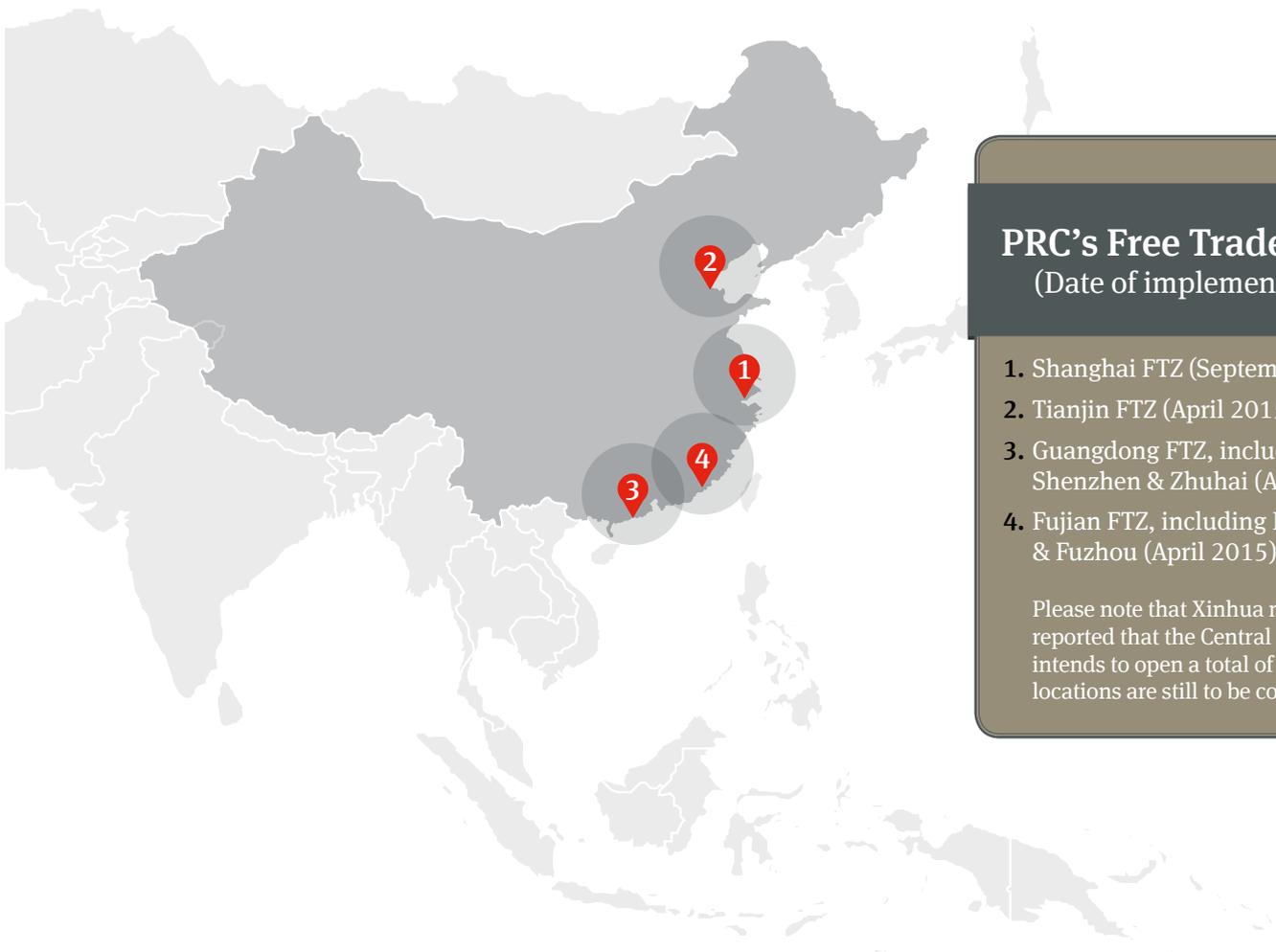
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Developing a multilateral instrument to modify bilateral tax treaties

ACTION

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Making dispute resolution mechanisms more effective



PRC's Free Trade Zones (Date of implementation)

1. Shanghai FTZ (September 2013)
2. Tianjin FTZ (April 2015)
3. Guangdong FTZ, including Guangzhou, Shenzhen & Zhuhai (April 2015)
4. Fujian FTZ, including Pingtan, Xiamen & Fuzhou (April 2015)

Please note that Xinhua news agency has reported that the Central Government intends to open a total of 12 FTZs, their locations are still to be confirmed.