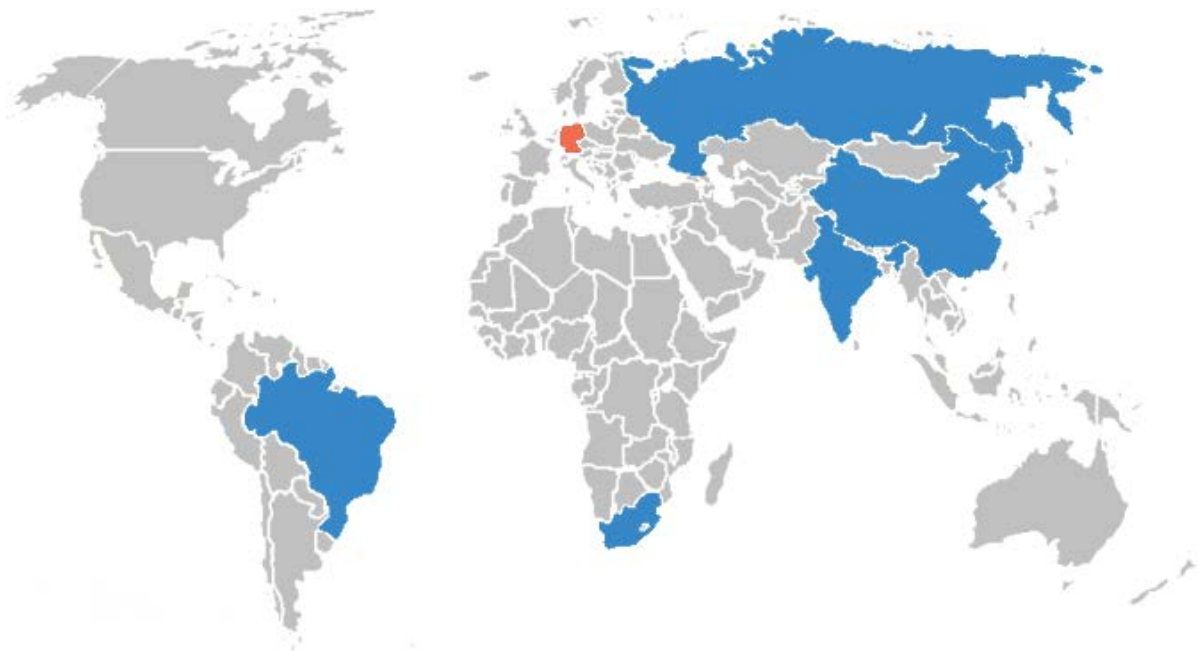


TPA German BRICS+ Desk



What the **BRICS countries** do for German Multinationals has a significant economic relevance – at least 1,800 German corporates already have a presence in India, and in Russia one may find 6,000 active corporates with a German origin. Next to these countries, some important markets for the German business community exist, such as **Mexico, Turkey, Singapore or Indonesia**.

BRICS+ countries show, next to their attractive markets, challenging legal frameworks and location factors. The legal and tax framework is generally not an easy one to work with, and local Transfer Pricing, VAT and customs regimes significantly differ from the ones of developed countries, representing a challenge for the German multinationals more familiar with OECD and WCO conditions. Actual economic downturn situations in these emerging countries (e.g. a monetary decay) provide new and significant challenges for corporations.

Critical for a consistent and defensible Tax, Transfer Pricing and Customs policy is that all group transactions follow the local requirements in both the jurisdiction of the entity providing compensation for the transaction and in the jurisdiction of the entity receiving this compensation.

Characteristic features of **BRICS+ countries** are e.g.:

- **Brazil:** Missing DTT with Germany, numerous specific taxes and a separate route in Transfer Pricing since decades
- **Russia:** First-time implementation of local Transfer Pricing regime in 2013 with some specific characteristics and deviations from the well-known OECD world
- **India:** Non acceptance of the OECD Guidelines, local characteristics and Permanent Establishment (PE) risks
- **China:** Non acceptance of the OECD Guidelines, local characteristics and a greed for a “Super Profit“
- **South Africa:** Strong Focus on tax audits and interesting holding regime for the African continent

TPA Global has been setting up the **TPA German BRICS+ Desk** for those requirements of multinationals being active in these regions.

The **TPA German BRICS+ Desk** coordinates centrally all questions in these countries, while also wielding a unique expertise in German territory. The **TPA German BRICS+ Desk** coordinates the local know-how of the TPA Global experts around the globe and brings the TPA service portfolio together at a central point – a unique one stop shop for multinationals with global activities.

	Brazil	Russia	India	China	South Africa	Germany
Transfer Pricing	•	•	•	•	•	•
Tax	•	•	•	•	•	•
Customs	•	•	•	•	•	•
VAT	•	•	•	•	•	•
Valuation	•	•	•	•	•	•

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