



Communique of BRICS Heads of Revenue Meeting

Issued in Moscow on November 19, 2015

We, the Heads and Representatives of Revenue Administrations of the Federal Republic of Brazil, the Russian Federation, the Republic of India, the People's Republic of China and the Republic of South Africa held a meeting on November 19, 2015 in Moscow to discuss the potential areas of cooperation and to exchange opinions and views based on our Leaders' commitment to openness, solidarity, equality, mutual understanding, inclusiveness and mutually beneficial cooperation, as stated in the Ufa Declaration issued on July 9, 2015.

We are committed to reaching a globally fair and modern tax system. In this regard we reiterate our commitment to the actions taken by the G20 to reach a globally fair and modern international tax system as stipulated in the G20 Leaders' Communique issued in Antalya, Turkey on November 16, 2015.

In accordance with the above, we conducted the meeting with the primary objective of promoting cooperation and exchanging relevant knowledge and experience in the area of international taxation.

Combating Base Erosion and Profit Shifting

We remain deeply concerned by the challenge of erosion of the tax base and reaffirm our resolve to work together to address its causes.

We acknowledge our common understanding that profits should be taxed in those jurisdictions where the activities deriving those profits are performed and where value is created.

In this regard, we welcome the final package of Base Erosion and Profit Shifting (BEPS) Action Plan measures which was endorsed by the G20 Finance Ministers in Lima, Peru, on October 8, 2015. We look forward to the finalization of the design of an inclusive framework for supporting and monitoring the implementation of the minimum standards agreed on the BEPS Action Plan measures and we call on all countries and jurisdictions to participate in the implementation process.

We commit to continue exchanging experiences and to cooperate in combating base erosion and profit shifting and improving compliance.

We acknowledge that challenges presented by the digital economy; cross-border e-trade and transfer pricing constitute areas of priority if we are to increase tax

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bases. In this regard we commit to exchanging best practices and to continue working towards common approaches to these issues.

Implementing the Automatic Exchange of Information

We recognize the importance of the exchange of tax information in accordance with relevant treaty provisions between competent authorities in preventing cross-border tax evasion.

In this regard we reiterate our endorsement for the global Common Reporting Standard for the automatic exchange of information on a reciprocal basis and reconfirm our commitment to begin exchanging information automatically with each other and with other jurisdictions by 2017 or 2018 subject to fulfilling the necessary legal requirements. We recognize the importance of the *Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information* (MCAA) in accelerating the implementation of the Common Reporting Standard (CRS), and call on more jurisdictions to sign the MCAA.

We reaffirm our resolve to cooperate closely to tackle any potential challenges, both domestically and internationally, that may delay the implementation of the CRS.

Extending the reach of tax cooperation and building capacity

We are convinced that the perusal of a globally fair and modern tax system requires the involvement of as many countries and jurisdictions as possible. In this regard we welcome deeper engagement of developing countries in the international tax cooperation.

We commit to work closely with each other and with developing countries to facilitate and deepen our collective involvement in the implementation of the BEPS measures as well as to share best practices in international taxation. In this regard we agree to rotate the hosting of technical assistance events aimed at developing countries.

International Tax Cooperation

We affirm our commitment to promoting closer cooperation on issues of common interest.

We recognize the importance of the economic and commercial links between Brazil, Russia, India, China and South Africa and the need for us to contribute to the strengthening of these links. We will work towards developing a framework of cooperation between our Administrations to contribute to the economic growth of the BRICS countries.

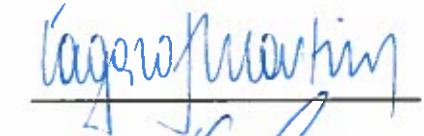


We also agree:


- (i) to inform the BRICS Summit of the outcomes of our deliberations; and
- (ii) to decide the date and place of next meeting BRICS Heads of Revenue after mutual consultation

Signed in Moscow on November 19, 2015.

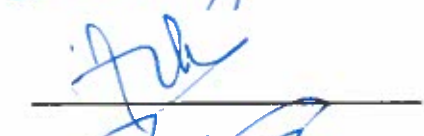
On behalf of the Secretariat of the Federal Revenue of the Federative Republic of Brazil



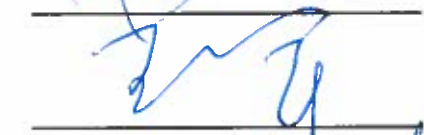
On behalf of the Federal Tax Service of the Russian Federation



On behalf of the Department of Revenue, Ministry of Finance of the Republic of India



On behalf of the State Administration of Taxation of the People's Republic of China



On behalf of the Revenue Service of the Republic of South Africa

