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Brazil takes steps toward OECD transfer pricing guidelines

Representatives of the government of Brazil (including the Minister of the Economy) and the OECD's Centre for Tax Policy and Administration met yesterday, 12 April 2022, in Brasilia to consider revisions to Brazil's transfer pricing rules. Information learned about the meeting suggests that Brazil is now inclined to fully adopt international standards on transfer pricing—that is, the OECD Transfer Pricing Guidelines. Read an [April 2022 report](#) prepared by the KPMG member firm in Brazil

These changes would move Brazil from its unique system of transfer pricing rules to one more aligned with a global transfer pricing framework, and could have significant effects on the current interaction of Brazil's tax system with the U.S. income tax system, including on issues relating to the creditability for U.S. federal income tax purposes of various Brazilian taxes.

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