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HAPPY FRIDAY!

Bigger than BEPS? Yes! The **IF's 4 proposals** will likely have a bigger impact on international tax than the BEPS project! And "**beyond the arm's length principle**" shows that there will be **no more fig leaves!**

We have 3 "**excessive AMP expenditure**" TP cases from India (**Sony, LG, and PepsiCo**) – when will this line of cases ever end? We have an Indian Supreme Court TP case on **corporate guarantee fees (Glenmark Pharmaceuticals)**. And we also have the **BHP Billiton** "sufficiently influenced" case from Australia: can A be "sufficiently influenced" by B, and B be "sufficiently influenced" by A, at the same time? Yes – just ask any married couple!

The **European Commission** gets tough with 3 Member States on infringements, **Kenya** perfects its VAT system, and **Gibraltar** is between a rock and a hard place.

Have a great weekend!

Gong Xi Fa Cai!

Steve

IN TODAY'S VIDEO PODCAST

(For video subscribers, please log in to access the video and documents/reports)

1. Digital taxation
2. Other global developments
3. India: transfer pricing cases
4. Asia Pacific
 - Australia, China, Singapore
5. Europe
 - Austria, EU, Poland, Russia
6. Africa
 - Kenya, Nigeria
7. Americas
 - Brazil, US
8. Treaties

WORTH READING

Carrie Brandon Elliot, "[Tax Authorities Still Bedeviled by Persistent 'Cum-Ex' and 'Cum-Cum'](#)" Tax Analysts: Worldwide Tax Daily (22 January 2019) (subscription service)

