



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 21 Oct; 4, 11 & 18 Nov)

Recent topics (Last 4 videos)

Global topics

- **Pillar One**
 - Public comments on October 2022 Progress Report on Amount A (administration and tax certainty): **18 Nov**
 - Further consultation documents: **18 Nov**
- **Pillar Two**
 - France & Germany: **21 Oct**
 - Netherlands: draft legislation released: **4 Nov**
 - Germany: draft legislation being prepared: **4 Nov**
 - France: draft legislation will be prepared: **11 Nov**
 - UTPR: customary international law & double tax treaties: **11 Nov**
 - UK: **18 Nov**
 - GloBE Implementation Framework: **18 Nov**
 - IASB "staff paper" on IAS 12 amendments: **18 Nov**
 - **GloBE model rules (detailed review)**
 - Arts. 6.3.1 to 6.3.3 (transfer of assets and liabilities, including "GloBE Reorganisation"): **21 Oct**
 - Art. 6.3.4 (GloBE election regarding adjustment of tax basis to fair value for local tax purposes): **11 Nov**
 - Art. 6.4 (joint ventures): **18 Nov**
- **Other global developments**
 - UN Committee of Tax Experts: **21 Oct**
 - US: renewable energy tax incentives: **11 Nov**
 - OECD: automatic exchange of financial account information: **11 Nov**
 - OECD: digital platforms and "opaque offshore structures": **11 Nov**
 - OECD: report on corporate tax statistics: **18 Nov**

International tax cases

- **Economic employer case (Netherlands):** "income from employment" article (Art. 10) in Germany / Netherlands treaty: **21 Oct**
- **Mishra (India):** jurisdictional nexus of India's equalisation levy: **21 Oct**
- **Pharol (ECJ):** free movement of capital – Portugal – denial of participation exemption: **21 Oct**
- **X Gmbh & Co (ECJ):** freedom of establishment – Germany – imposition of surcharge: **21 Oct**
- **ADM (Netherlands):** business restructuring TP case – Netherlands / Switzerland treaty: **4 Nov**
- **BAT (Netherlands):** TP treatment of guarantee transactions: **4 Nov**
- **Daikin Aircon (India):** depreciation claimed on purchase price of unregistered trademarks: **4 Nov**
- **Google (India):** "royalties" definition in India / Ireland treaty: **4 Nov**
- **Allianz Benelux (ECJ):** Parent-Subsidiary Directive – Belgium – dividends received deductions: **4 Nov**
- **Sunsmart (India):** fees for technical services – India / UAE treaty?: **11 Nov**
- **Fiat (ECJ):** State aid – Luxembourg – transfer pricing ruling – EU concept of "arm's length principle"?: **11 Nov**
- **Somfy (France):** tax sparing credit in France / Tunisia treaty: "ordinary credit" vs. "full credit": **18 Nov**
- **VP Capital (ECJ):** freedom of establishment – Belgium – transfer of country of incorporation from Luxembourg to Belgium: **18 Nov**

Asia Pacific

- **Australia**
 - Budget presented: **4 Nov**
- **Hong Kong**
 - "Specified foreign-sourced income" rules: **4 Nov, 18 Nov**
- **India**
 - See "International tax cases" (above)
- **Korea**
 - Exemption on bonds: **21 Oct**
- **Singapore**
 - M&A scheme: **11 Nov**
- **Sri Lanka**
 - Increased tax rates: **21 Oct**
- **Taiwan**
 - Tax incentives for innovation: **18 Nov**
- **Thailand**
 - New package of investment incentives: **11 Nov**

Europe

- **Austria**
 - Draft Budget Bill 2023: **21 Oct**
- **Belgium**
 - Windfall profits tax: **4 Nov**
- **Bulgaria**
 - Windfall profits tax: **11 Nov**
- **EU**
 - Revised Code of Conduct for Business Taxation: **11 Nov**
 - See "International tax cases" (above)
- **Finland**
 - 2 corporate income tax changes: **4 Nov**
- **France**
 - See "Pillar Two" (above)
 - See "International tax cases" (above)
- **Germany**
 - See "Pillar Two" (above)
- **Netherlands**
 - Windfall profits tax: **4 Nov**
 - Hybrid mismatch rules: **4 Nov**
 - See "Pillar Two" (above)
 - See "International tax cases" (above)
- **Portugal**
 - Windfall profits tax: **4 Nov**
- **Spain**
 - Windfall profits tax on banks: **18 Nov**
- **UK**
 - Scheduled corporation tax rate increase to proceed: **21 Oct**
 - Platform operators – draft regulations: **21 Oct**
 - Exemption on banks' regulatory capital instruments: **18 Nov**
 - Autumn Statement: **18 Nov**
 - See "Pillar Two" (above)

Africa

- **Morocco**
 - Draft Finance Law 2023: **4 Nov**
- **Mozambique**
 - Tax rate reductions: **18 Nov**
- **Rwanda**
 - Realised foreign exchange losses: **11 Nov**

Americas

- **Canada**
 - Share buybacks: **4 Nov**
- **Chile**
 - Copper mining: **4 Nov**
- **Peru**
 - Updated list of "high risk" tax planning schemes: **21 Oct**
- **Puerto Rico**
 - 15% rate does not replace 10.5% rate: **11 Nov**
- **US**
 - Maryland's digital advertising tax ruled invalid: **21 Oct**
 - Windfall profits tax: **4 Nov**
 - "Active trade or business" requirement under section 367 regulations: **11 Nov**
 - See "Other global developments" (above)

ITB video podcasts are available on our [website](#) or app.
For a free trial, contact us at itb@internationaltaxbytes.com.



Subscribe to our free newsletter [here!](#)