



**International Tax Bytes**  
*by Steve Towers*

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Recent Topics from ITB by Steve Towers  
(Last 4 videos: 29 Sep, 6, 20, 27 Oct)

## Global topics

- **Pillar One**
  - Amount A MLC: **20 Oct**
  - OECD defends complexity of Amount A MLC: **27 Oct**
  - Netherlands suggests that its plan B is an EU DST: **27 Oct**
  - OECD webinar on Amount A MLC: **27 Oct**
- **GloBE rules**
  - **GloBE model rules (detailed review):**
    - July 2023 Administrative Guidance on GloBE rules
      - QDMTTs (part 3): (1) Eligible Distribution Tax System, (2) ETR Computation for Investment Entities, (3) Investment Entity Tax Transparency Election, (4) Taxable Distribution Method Election, (5) Taxes allocable to Hybrid Entities or Distributing Constituent Entities: **29 Sep**
      - QDMTTs (part 4): (1) Transition Years (introduction), (2) Transition Years (Arts. 9.1.1 & 9.1.2), (3) Transition Years (Art. 9.1.3), (4) Exclusion from UTPR of MNE Groups in the initial phase of their international activity: **6 Oct**
      - QDMTTs (part 5): (1) Currency for QDMTT computations, (2) Multi-Parented MNE Groups, (3) Filing Obligations, (4) Definitions: **27 Oct**
  - Bulgaria: Draft law to implement GloBE rules: **29 Sep**
  - Hungary: Government's consultation with large companies on implementation of GloBE rules: **29 Sep**
  - France: Finance Bill 2024 (includes GloBE rules): **29 Sep**
  - UK: Proposed amendments and explanatory notes to existing GloBE legislation: **29 Sep**
  - Taiwan: Government's statement on GloBE rules: **29 Sep**
  - Austria: Draft bill to implement GloBE rules and QDMTT: **6 Oct**
  - Cyprus: Draft bill to implement GloBE rules and QDMTT: **6 Oct**
  - Romania: Draft bill to implement GloBE rules: **6 Oct**
  - ATAF: Guidance and explanatory notes on 3 approaches to draft QDMTT legislation: **6 Oct**
  - Hungary: Draft law to implement GloBE rules, including QDMTT: **20 Oct**
  - Denmark: Bill to implement GloBE rules: **20 Oct**
  - Netherlands: Amendments to draft bill to implement GloBE rules: **20 Oct**
  - Malaysia: Implementation of GloBE rules in 2025 instead of 2024: **20 Oct**
  - Bermuda: Proposal for 15% corporate income tax released for public comments: **20 Oct**
  - IF: Minimum Tax Implementation Handbook: **20 Oct**
  - Finland: Bill to implement GloBE rules: **27 Oct**
  - Ireland: GloBE rules included in Finance (No. 2) Bill 2023: **27 Oct**
  - EU: 5 Member States (so far) elect to delay implementation of GloBE rules: **27 Oct**
  - Japan: Technical explanation of GloBE rules: **27 Oct**
  - Marshall Islands: calls on US for assistance with "shipping income exclusion" in Art. 3.3: **27 Oct**
- **Subject to Tax Rule (STTR)**
  - STTR MLI: **6 Oct**
  - STTR MLI (part 2): Definition of "preferential adjustment" in Art. 1(6)(a): **20 Oct**
- **Other global developments**
  - OECD: Compilation report of all 2023 peer review reports on BEPS Action 13 on CbC reporting: **29 Sep**
  - OECD Tax Talks webcast and slides: **20 Oct**
  - UN: draft resolution on international tax cooperation convention and committee: **20 Oct**
  - EU Tax Observatory: Global Tax Evasion Report 2024: **27 Oct**

## International tax cases

- **Spain EU State aid case** (European Commission not permitted to change decision) (EGC): **29 Sep**
- **DST case** (Constitutional validity of penalty provision which blocks internet) (Turkey): **29 Sep**
- **Nestlé case** (MFN clause in India's double tax treaties) (India): **20 & 27 Oct**
- **Excise duty case** (Constitutional validity of State tax on use of electric vehicles) (Australia): **27 Oct**
- **Portugal interest case** (EU free movement of capital) (ECJ): **27 Oct**
- **Danone case** (Constitutional validity of dividend withholding tax imposed on "third country" shareholder with "direct investment") (France): **27 Oct**

## Asia Pacific

- **Australia**
  - Independent review of PwC Australia: **29 Sep**
  - Thin cap changes: **20 Oct**
  - See "International tax cases" (above)
- **China**
  - Increased R&D incentives for certain companies: **29 Sep**
- **Hong Kong**
  - Amendment of FSIE regime for foreign-sourced disposal gains: **20 Oct**
  - Patent box: **27 Oct**
- **India**
  - Valuation methods for "Angel tax": **29 Sep**
  - See "International tax cases" (above)
- **Japan**
  - Proposed tax incentives: **29 Sep**
  - See "GloBE rules" (above)
- **Malaysia**
  - 2024 Budget: **20 Oct**
  - See "GloBE rules" (above)
- **Marshall Islands**
  - See "GloBE rules" (above)
- **Singapore**
  - Foreign exchange gains or losses: **29 Sep**
- **Taiwan**
  - See "GloBE rules" (above)

- **Austria**
  - See "GloBE rules" (above)
- **Bulgaria**
  - See "GloBE rules" (above)
- **Cyprus**
  - See "GloBE rules" (above)
- **Denmark**
  - See "GloBE rules" (above)
- **EU**
  - 2 lists of non-cooperative tax jurisdictions: **20 Oct**
  - DAC8 adopted: **20 Oct**
  - See "International tax cases" (above)
  - See "GloBE rules" (above)
  - See "Other global developments" (above)
- **Finland**
  - See "GloBE rules" (above)
- **France**
  - Finance Bill 2023: **27 Oct**
  - See "International tax cases" (above)
  - See "GloBE rules" (above)
- **Hungary**
  - See "GloBE rules" (above)
- **Ireland**
  - Finance (No. 2) Bill 2023: **27 Oct**
  - See "GloBE rules" (above)
- **Italy**
  - Windfall tax on banks: **29 Sep**
  - Investment management PE exemption: **27 Oct**
- **Netherlands**
  - See "Pillar One" (above)
  - See "GloBE rules" (above)
- **Norway**
  - Resource rent tax on onshore wind power: **20 Oct**
- **Poland**
  - Withholding tax: **6 Oct**
  - Cost-plus method: **6 Oct**
- **Portugal**
  - See "International tax cases" (above)
- **Romania**
  - 2 new taxes: **29 Sep**
  - See "GloBE rules" (above)
- **Russia**
  - Exit tax rate increased: **27 Oct**
- **Spain**
  - See "International tax cases" (above)
- **Sweden**
  - Disagreement with proposed EU TP Directive: **27 Oct**
- **Turkey**
  - See "International tax cases" (above)
- **UK**
  - See "GloBE rules" (above)
- **Ukraine**
  - Tax rate doubled for banks: **27 Oct**



## Middle East & Central Asia

- **UAE**

- Corporate tax guidance on (1) non-resident persons and (2) exempt income: **20 Oct**
- Guidance on transfer pricing: **27 Oct**

## Americas

- **Argentina**

- New "income tax prepayment" for certain companies: **6 Oct**

- **Bermuda**

- See "GloBE rules" (above)

- **Brazil**

- Final TP regulations: **6 Oct**

- **US**

- Canada's DST: **29 Sep**
- Proposed regulations under section 367(b): **6 Oct**
- Taiwan bipartisan treaty-like bill: **20 Oct**

## Treaty news

- **Treaties signed**

- Croatia / Egypt
- New Zealand / Slovak Republic
- Andorra / Netherlands
- Cameroon / China
- China / Senegal
- Croatia / Cyprus

- **Treaties terminated**

- Syria / Ukraine
- Iran / Ukraine

- **MFN clause triggered**

- France / Lithuania

- **Treaty provisions suspended**

- Czech Republic / Russia

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