



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 21, 28 Mar, 4, 11 Apr)

Recent topics (Last 4 videos)

Global topics

- **GloBE rules**
 - **GloBE model rules (detailed review):**
 - June 2024 Administrative Guidance on GloBE rules:
 - Allocation of profits and taxes in structures including Flow-through Entities (part 1): **28 Mar**
 - Allocation of profits and taxes in structures including Flow-through Entities (part 2): **4 Apr**
 - Allocation of profits and taxes in structures including Flow-through Entities (part 3): **11 Apr**
 - Bahrain: updated version of domestic minimum top-up tax registration manual: **21 Mar**
 - Switzerland: Lucerne launches consultation on proposal to introduce qualified refundable R&D tax credit: **21 Mar**
 - Switzerland: guidance on tax treatment of business units which qualify as PEs: **21 Mar**
 - Liechtenstein: draft legislation which would allow for automatic exchange of GloBE Information Returns between tax administrations: **21 Mar**
 - Finland: 2 items of guidance on GloBE rules: **21 Mar**
 - Germany: Federation of German Industries (BDI, its German acronym) issues position paper: **21 Mar**
 - EU: no amendments or suspension of GloBE Directive: **21 Mar**
 - OECD: how GloBE rules can accommodate US's GILTI regime on permanent basis: **21 Mar**
 - EU: DAC9: **21 Mar**
 - Qatar: Income tax law amended to introduce both domestic minimum top-up tax and IIR: **28 Mar**
 - Inclusive Framework: updated central record of legislation with transitional qualified status: **4 Apr**
 - Japan: UTPR enacted: **4 Apr**
 - UK: UTPR enacted: **4 Apr**
 - UK: Regulations: **4 Apr**
 - Bulgaria: Parliament enacts legislation which amends country's GloBE rules: **4 Apr**
 - Spain: Regulations to implement country's GloBE rules: **4 Apr**
 - Luxembourg: Luxembourg Accounting Board releases accounting guidance: **4 Apr**
 - Germany: Transitional CbCR Safe Harbour: **11 Apr**
 - EU: Letter from BusinessEurope: **11 Apr**
- **Other global developments**
 - OECD: peer review reports on tax transparency and EOIR: **21 Mar**
 - OECD: Investment Tax Incentives Database 2024 Update: **21 Mar**
 - OECD: working paper: **21 Mar**
- **Tariff wars**
 - US: 25% tariffs on imports of steel, aluminum, and derivative products from all countries: **21 Mar**
 - Canada: 25% tariffs on US-origin steel and aluminum products: **21 Mar**
 - EU: 2-phase response: **21 Mar**
 - US: 25% tariffs on imports of automobiles and certain automobile parts: **28 Mar**
 - EU: countermeasures: **28 Mar, 11 Apr**
 - US: 10% & higher reciprocal tariffs: **4 Apr**
 - US: duty-free de minimis treatment of imports from China: **4 Apr**
 - Countermeasures: **4 Apr**
 - Canada: 25% tariffs on US automobiles and automobile parts: **11 Apr**
 - China: escalation of tariffs on imports from US: **11 Apr**
 - US: 90 days pause on reciprocal tariffs on imports from all countries, except China: **11 Apr**

International tax cases

- **John Cockerill SA (ECJ)** (does Belgium's dividend received deduction comply with EU Parent-Subsidiary Directive?): **21 Mar**
- **Rubis Energie (France)** (interaction between France's CFC rules and France / Mauritius treaty): **21 Mar**
- **Solidarity surcharge case (Germany)** (levying of solidarity surcharge was not unconstitutional in 2020 and 2021): **28 Mar**
- **Arcomet Towercranes (ECJ)** (Advocate General issues opinion on VAT treatment of transfer pricing adjustments): **11 Apr**
- **Nordcurrent (ECJ)** (application of anti-abuse provision in EU's Parent-Subsidiary Directive): **11 Apr**

Asia Pacific

- **Australia**
 - Managed investment trust (MIT) withholding: **21 Mar**
 - 2025 Budget: **28 Mar**
 - Debt deduction creation rules: **4 Apr**
- **India**
 - PPT provisions in treaties: **21 Mar**
 - Finance Bill 2025 & 6% equalisation levy: **28 Mar**
 - Transfer pricing safe harbour: **28 Mar**
 - APAs report: **4 Apr**
- **Japan**
 - Innovation box guidance: **4 Apr**
 - See "GloBE rules" (above)
- **Malaysia**
 - e-invoicing: **28 Mar**
- **New Zealand**
 - FBT consultation: **4 Apr**
 - Tax governance: **11 Apr**
 - GST treatment of fund manager fees: **11 Apr**
 - GST and incorporated joint ventures: **11 Apr**
- **Singapore**
 - Guidance on restructuring of company: **28 Mar**
- **Taiwan**
 - Investment losses: **4 Apr**
- **Vietnam**
 - Transfer pricing: **28 Mar**

- **Austria**
 - Transfer pricing rules: **28 Mar**
- **Bulgaria**
 - SAF-T introduced: **4 Apr**
 - See "GloBE rules" (above)
- **Denmark**
 - Extension of scope of interest withholding tax: **21 Mar**
- **Estonia**
 - 2% corporate income tax to be abolished: **21 Mar**
- **EU**
 - VAT in the Digital Age (ViDA): **21 Mar**
 - Draft State Aid Framework accompanying Clean Industrial Deal (CISAF): **21 Mar**
 - OECD: EU CBAM: **21 Mar**
 - Decluttering and simplification agenda: **21 Mar**
 - See "GloBE rules" (above)
 - See "International tax cases" (above)
- **Finland**
 - 2 public consultations (forest deduction, and interest deduction limitation rules): **4 Apr**
 - See "GloBE rules" (above)
- **France**
 - See "International tax cases" (above)
- **Germany**
 - Interest deduction limitation rules: **4 Apr**
 - Anti-treaty shopping rules: **4 Apr**
 - Transfer pricing transaction matrix: **11 Apr**
 - Coalition agreement: **11 Apr**
 - See "GloBE rules" (above)
 - See "International tax cases" (above)
- **Ireland**
 - R&D tax credit **11 Apr**
- **Liechtenstein**
 - See "GloBE rules" (above)
- **Luxembourg**
 - See "GloBE rules" (above)
- **Malta**
 - MAP guidance: **21 Mar**
- **Netherlands**
 - Use of functional currencies: **11 Apr**
- **Norway**
 - Tax commission: **21 Mar**
 - Amount B: **11 Apr**
- **Poland**
 - Legal professional privilege: **21 Mar**
- **Spain**
 - See "GloBE rules" (above)
- **Switzerland**
 - See "GloBE rules" (above)
- **Turkey**
 - Amount B: **21 Mar**
- **UK**
 - Spring Statement 2025: **28 Mar**
 - Reserved Investor Fund: **28 Mar**
 - See "GloBE rules" (above)

Africa

- **Ghana**
 - 2025 Budget: **11 Apr**
- **Libya**
 - Statute of limitations repealed: **21 Mar**
- **Malawi**
 - Corporate income tax rate: **21 Mar**
- **Namibia**
 - 2025 Budget: **11 Apr**
- **Rwanda**
 - DST: **11 Apr**
- **South Africa**
 - Budget: **21 Mar**
 - VAT on inbound digital services: **21 Mar**
 - Capital gains tax for companies: **28 Mar**
 - VAT rate increase: **28 Mar**
- **Tunisia**
 - 2% temporary exceptional contribution: **21 Mar**
 - 3% withholding tax for online sellers: **28 Mar**

Middle East & Central Asia

- **Bahrain**
 - See "GloBE rules" (above)
- **Kazakhstan**
 - VAT standard rate: **21 Mar**
- **Qatar**
 - See "GloBE rules" (above)
- **Saudi Arabia**
 - e-invoicing: **28 Mar**
- **UAE**
 - Updated guidance on public and private rulings: **21 Mar**
 - VAT guidance: **21 Mar**

Americas

- **Brazil**
 - 10% dividend withholding tax: **21 Mar**
- **Canada**
 - Mineral exploration tax credit extended: **21 Mar**
 - Capital gains inclusion rate: **28 Mar**
- **Chile**
 - Advance pricing agreements (APAs): **21 Mar**
- **Jamacia**
 - Budget: **21 Mar**
- **Mexico**
 - Guidelines for "Plan Mexico" tax incentives: **4 Apr**
- **US**
 - "Foreign derived" service income for FDI purposes: **21 Mar**
 - Corporate Transparency Act (CTA): **28 Mar**
 - APAs report: **4 Apr**

Treaty news

- **Treaties signed**
 - Switzerland / Zimbabwe
 - Peru / UK
- **Treaties enter into force**
 - China / Italy
 - Andorra / Korea
- **Protocols enter into force**
 - Moldova / Slovak Republic (on 1 May 2025)
 - Hungary / Serbia (on 29 December 2024 – late notice!)
- **Clarification of MFN clause issued**
 - Sweden / South Africa (clarification statement issued by Sweden)

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!](#)