



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 7, 14, 28 Nov & 5 Dec)

Recent topics (Last 4 videos)

Global topics

- **GloBE rules**

- Side-by-side: UK think tank (TaxWatch) issues report: **7 Nov**
- Mauritius: New deadline to provide notification of entity responsible for filing country's QDMTT return: **7 Nov**
- South Africa: Extension of deadlines for notification of filing entity and GloBE Information Return: **7 Nov**
- Italy: Guidance on how to complete GloBE Information Return: **7 Nov**
- Kenya: Draft regulations on GloBE rules: **7 Nov**
- GloBE compliance costs: **14 Nov**
- Japan: FAQs on GloBE rules updated: **14 Nov**
- ECJ: UTPR case: **28 Nov**
- "Side-by-side" agreement – US loses patience: **5 Dec**
- EU & Estonia: Proposed "side-by-side" exemption: **5 Dec**
- Australia: Practical compliance guideline: **5 Dec**
- France: Second set of guidance on GloBE rules: **5 Dec**

- **Tariff wars**

- China / US: US government releases several documents in response to last week's trade deal with China: **7 Nov**
- US Supreme Court: Appeal in V.O.S. Selections case – oral arguments: **7 Nov**
- US: trade agreements with Central and South American countries: **28 Nov**
- US: trade agreement with Switzerland and Liechtenstein: **28 Nov**
- UK / US: pharmaceuticals: **5 Dec**

- **Other global developments**

- OECD: 2024 MAP and APA statistics: **7 Nov**
- GIR MCAA: Hungary is latest signatory: **7 Nov**
- OECD: new peer review reports: **14 Nov**
- ATAF: Significant Economic Presence: **14 Nov**
- OECD: Effective Carbon Rates 2025 report: **14 Nov**
- OECD: Corporate Tax Statistics: **28 Nov**
- OECD: report on ways to simplify taxation of cross-border business activities: **28 Nov**
- OECD: global mobility of individuals: **28 Nov**
- OECD's Global Forum: 2 reports: **5 Dec**

- **2025 update to OECD model treaty**

- Impact of home office on Art. 5 definition of PE: **28 Nov**
- Other topics in update: **5 Dec**

International tax cases

- **G Global (Australia) (Constitutional validity of legislation which retroactively overrides double tax treaties): 7 Nov**
- **Pride Foramer (India) (Whether non-resident company can be considered to be carrying on business in India, if it ceases to have PE in India): 7 Nov**
- **eBay (India) (Interaction between India's domestic law indirect share transfer provision and the India / Singapore double tax treaty): 14 Nov**
- **Grupo Massimo Dutti (ECJ) (Determining the customs value for goods which are sold in successive transactions): 14 Nov**
- **UTPR case (ECJ) (Group of law professors file an amicus curiae brief): 28 Nov**
- **Netflix (India) (Transfer pricing – limited risk distributor or entrepreneur?): 5 Dec**

Asia Pacific

- **Australia**
 - Public country-by-country report – draft instructions: **7 Nov**
 - Voluntary Tax Transparency Code – updated version: **7 Nov**
 - Hybrid mismatch rules: **14 Nov**
 - News Bargaining incentive: **28 Nov**
 - Reportable tax position schedule: **28 Nov**
 - See "GloBE rules" (above)
 - See "International tax cases" (above)
- **Cambodia**
 - Capital gains tax: **28 Nov**
- **Hong Kong**
 - Digital Certificate of Resident Status: **14 Nov**
- **India**
 - Transfer pricing tolerance range: **28 Nov**
 - See "International tax cases" (above)
- **Japan**
 - Satellite launch transportation services – consumption tax treatment: **28 Nov**
 - See "GloBE rules" (above)
- **Macau**
 - Administrative regulation on transfer pricing: **7 Nov**
- **Malaysia**
 - Asset-Backed Securitisation: **14 Nov**
 - "Fit and proper" employees of Labuan entity: **14 Nov**
- **New Zealand**
 - Film industry cash rebate regime: **14 Nov**
 - Uber drivers are employees: **28 Nov**
 - Software development expenditure: **28 Nov**
- **Philippines**
 - Temporary suspension of tax audits and field operations: **5 Dec**
- **Singapore**
 - Subordinated perpetual securities: **7 Nov**
 - 2 advance ruling summaries: **14 Nov**
 - Characterisation of foreign entities for purposes of Singapore income tax: **14 Nov**
 - Transfer pricing guidelines: **28 Nov**
- **Vietnam**
 - New enterprise accounting regime: **14 Nov**

Europe

- **Belgium**
 - Withholding tax on outbound rent payments: **7 Nov**
- **Bulgaria**
 - Dividend withholding tax rate increase: **7 Nov**
 - 2026 Budget bill withdrawn: **5 Dec**
- **Cyprus**
 - Tax reform bills: **7 Nov**
- **Czech Republic**
 - New government coalition's draft program statement: **7 Nov**
- **Estonia**
 - See "GloBE rules" (above)
- **EU**
 - VAT treatment of free-of-charge access to platform in exchange for user data: **28 Nov**
 - Report on evaluation of DAC: **28 Nov**
 - See "GloBE rules" (above)
 - See "International tax cases" (above)
- **Finland**
 - Authorised OECD approach (AOA): **14 Nov**
- **France**
 - Draft 2026 Finance Bill: **28 Nov**
 - See "GloBE rules" (above)
- **Germany**
 - Updated FAQs on mandatory e-invoicing: **14 Nov**
- **Greece**
 - 200% deduction for investments in defence and related manufacturing units: **5 Dec**
- **Hungary**
 - Proposed increase in extra profit tax imposed on banks: **14 Nov**
 - Proposed amendments to transfer pricing documentation requirements: **5 Dec**
- **Ireland**
 - Application of VAT grouping rules: **28 Nov**
 - Reform of taxation regime for interest: **28 Nov**
 - Hybrid mismatch rules and partnerships: **5 Dec**
- **Italy**
 - See "GloBE rules" (above)
- **Lithuania**
 - Guidance on new 17% rate for dividend withholding tax: **7 Nov**
 - Draft commentary on corporate income tax exemption: **7 Nov**
 - Increased supplementary tax rate on banks and credit institutions: **14 Nov**
- **Netherlands**
 - Closure of loophole concerning lucrative interests: **14 Nov**
 - Funds for joint account (FGR) and "transparent funds": **5 Dec**
- **Portugal**
 - New VAT group regime: **28 Nov**
- **Russia**
 - Tax Code amendments: **28 Nov**
- **Slovenia**
 - E-invoicing: **7 Nov**
- **Sweden**
 - Interest deduction limitation rules: **5 Dec**
- **Switzerland**
 - Proposal for inheritance and gift tax rejected: **5 Dec**
- **UK**
 - R&D tax relief regime for SMEs: **7 Nov**
 - Updated transfer pricing guidance: **14 Nov**
 - "Nudge letters" regarding management expenses: **28 Nov**
 - Autumn 2025 Budget: **28 Nov**
 - International tax changes (transfer pricing, permanent establishment, Diverted Profits Tax): **5 Dec**

Africa

- **Cameroon**
 - Guidance on mutual agreement procedure: **7 Nov**
- **Ivory Coast**
 - Draft Finance Bill 2026: **28 Nov**
- **Kenya**
 - Draft regulations on APAs and GloBE rules: **7 Nov**
 - See "GloBE rules" (above)
- **Liberia**
 - 2026 Budget: **14 Nov**
- **Malawi**
 - 2025-26 Mid-Year Budget Review: **5 Dec**
- **Mauritius**
 - Communique on Fair Share Contribution: **7 Nov**
 - See "GloBE rules" (above)
- **Morocco**
 - Transfer pricing documentation: **28 Nov**
- **Nigeria**
 - New capital gains tax causes major stock market fall: **14 Nov**
- **South Africa**
 - VAT obligations of foreign suppliers of electronic services and foreign intermediaries: **7 Nov**
 - ZARONIA replaces JIBAR: **14 Nov**
 - See "GloBE rules" (above)

Middle East & Central Asia

- **Israel**
 - Comprehensive high-tech tax reform: **7 Nov**

Americas

- **Argentina**
 - Increase in thresholds for filing of transfer pricing documentation: **7 Nov**
- **Brazil**
 - 10% dividend withholding tax introduced: **14 Nov, 5 Dec**
- **Canada**
 - 2025 Budget: **7 Nov**
 - DST repeal: **28 Nov**
- **US**
 - Penalty relief for OBBBA's tips and overtime: **14 Nov**
 - Excise tax on stock repurchases: **28 Nov**
 - Repeal of one-month deferral election under section 898(c)(2): **28 Nov**
 - Notices 2025-75, 2025-77, and 2025-78: International tax provisions in OBBBA: **5 Dec**

Treaty news

- **Treaties signed**
 - Andorra / Korea
 - Netherlands / Thailand
 - Australia / Croatia
 - Croatia / New Zealand
 - Bahrain / Saudi Arabia
- **Treaties enter into force**
 - Luxembourg / Montenegro
 - Bahrain / Oman
 - Albania / Luxembourg (on 25 June 2025 – late notice!)
 - Benin / UAE (on 23 January 2025 – late notice!)
 - Ivory Coast / UAE (on 14 December 2023 – late notice!)
 - Armenia / Japan (on 20 December 2025)
 - Albania / Luxembourg (on 25 June 2025 – late notice!)
- **Treaty terminated**
 - Belarus / Estonia (termination effective on 1 January 2027)
- **Protocol signed**
 - Jordan / Kuwait
- **Protocols enter into force**
 - Brazil / Singapore
 - Hungary / Switzerland
 - Germany / Switzerland
- **MFN clauses triggered**
 - Belgium / Chile (interest and royalties)
 - Chile / New Zealand (interest)
 - Chile / Norway (interest and royalties)
 - Chile / Switzerland (interest and royalties)
 - Chile / Uruguay (interest)

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