



International Tax Bytes
by Steve Towers

Recent Topics from ITB by Steve Towers
(Last 4 videos: 12, 19 Dec 25, 9 & 16 Jan 26)

Recent topics (Last 4 videos)

Global topics

- **GloBE rules**

- Inclusive Framework negotiations: **12 Dec, 19 Dec**
- Bermuda: QRTCs: **12 Dec**
- Bahrain: updated guidance: **12 Dec**
- France: GIR and user guide: **12 Dec**
- Australia: several items of guidance updated: **19 Dec**
- Netherlands: guidance on calculation of IIR top-up tax: **19 Dec**
- Ireland: GloBE registration deadline extended to 28 February 2026: **19 Dec**
- OECD: new guidance on GloBE rules: **9 Jan**
- Side-by-Side Package: **9 Jan**
- Side-by-Side Safe Harbour: detailed review: **16 Jan**
- OECD webinar: **16 Jan**
- EU: Side-by-Side Package: **16 Jan**
- Israel: Domestic minimum top-up tax enacted: **16 Jan**
- Uruguay: Domestic minimum top-up tax enacted: **16 Jan**

- **Tariff wars**

- US: 25% tariff on imports of certain advanced computing chips: **16 Jan**
- US: 25% tariff on imports from countries doing business with Iran: **16 Jan**

- **Other global developments**

- Inclusive Framework: exchange of information on tax rulings: **19 Dec**
- Inclusive Forum on Carbon Mitigation Approaches: climate policy database: **19 Dec**
- OECD: global mobility of individuals: **9 Jan, 16 Jan**
- US to withdraw from international organisations: **9 Jan**
- OECD: digital continuous transactional reporting for VAT: **16 Jan**

International tax cases

- **Clifford Chance (India) (Is there a "service PE" under the India / Singapore treaty?): **12 Dec****
- **Colorcon case (India) (interaction between India's dividend distribution tax (DDT) and India / UK double tax treaty): **19 Dec****
- **Tiger Global (India) (Indian taxation of indirect share transfer – claim of exemption under India / Mauritius treaty – treaty abuse, residence status): **16 Jan****

Asia Pacific

- **Australia**
 - Public CbC reporting exemptions: **12 Dec**
 - Top 500 privately owned groups: **12 Dec**
 - Transfer pricing issues related to inbound distribution: **12 Dec**
 - Draft guidance on tax treatment of mining and petroleum exploration and farm-out arrangements: **19 Dec**
 - See "GloBE rules" (above)
- **Cambodia**
 - Capital gains tax: **16 Jan**
- **China**
 - APA report: **9 Jan**
 - VAT implementation regulations: **9 Jan**
 - VAT refunds for certain exports: **16 Jan**
- **Hong Kong**
 - Consultation on implementation of CARF and amended CRS: **9 Jan**
- **India**
 - See "International tax cases" (above)
- **Indonesia**
 - Regulation on tax treaty implementation: **9 Jan**
- **Japan**
 - 2026 tax reform proposals: **9 Jan**
- **Korea**
 - Outbound equity investments: **9 Jan**
 - 2026 tax reform enacted: **9 Jan**
- **Malaysia**
 - E-invoicing: **12 Dec**
 - Income tax treatment of construction contracts: **19 Dec**
 - Special and double deductions for testing-related expenditure: **9 Jan**
- **Singapore**
 - Income tax treatment of hybrid instruments: **9 Jan**
- **Taiwan**
 - CFC's losses: **12 Dec**
 - Foreign e-commerce operators: **12 Dec**
- **Thailand**
 - End of de minimis exemption from customs duty: **19 Dec**
- **Vietnam**
 - Online platforms required to remit taxes on behalf of vendors: **12 Dec**
 - Sale of shares in Vietnamese companies: **9 Jan**

Europe

- **Belgium**
 - 3 months tolerance period for e-invoicing: **12 Dec**
- **Estonia**
 - Tax rates: **12 Dec**
- **EU**
 - Fixed customs duty on small consignments: **19 Dec**
 - Tax gaps: **19 Dec**
 - Consolidation of DACs into single instrument: **19 Dec**
 - CBAM: **19 Dec, 9 Jan, 16 Jan**
 - Foreign Subsidies Regulation: **16 Jan**
 - See "Other GloBE news" (above)
 - See US (below)
- **France**
 - Transfer pricing: **19 Dec**
 - 2026 Finance Bill: **9 Jan**
 - See "GloBE rules" (above)
- **Germany**
 - Withholding tax on dividends paid by German hybrid entity to US parent: **19 Dec**
 - Updated guidance on application of Commentary to OECD model treaty: **16 Jan**
- **Hungary**
 - Amendments to transfer pricing documentation requirements: **9 Jan**
- **Ireland**
 - eWHT public consultation: **12 Dec**
- **Italy**
 - 1% withholding tax on B2B payments: **19 Dec**
 - 2026 Budget Law: **9 Jan**
- **Netherlands**
 - Sint Maarten BVs: **12 Dec**
 - Proposed amendments to FGR regime: **19 Dec**
 - See "GloBE rules" (above)
- **Slovak Republic**
 - Outbound software payments: **9 Jan**
- **Switzerland**
 - Proposed VAT amendments: **19 Dec**
- **Turkey**
 - Reduction in DST rates: **9 Jan**
- **UK**
 - Finance (No. 2) Bill 2024-2026 published: **12 Dec**
 - Implementation timetable for Amount A of Pillar One and repeal of DST: **12 Dec**
 - Advance tax certainty for major projects: **19 Dec**
 - Updates to Capital Gains Manual: **19 Dec**
 - Imported hybrid mismatch rules: **16 Jan**
 - Transfer pricing, PEs, and DPT reforms: **16 Jan**

Africa

- **Cameroon**
 - SEP tax introduced: **12 Dec**
- **Sierra Leone**
 - 2026 Budget: **12 Dec**

Middle East & Central Asia

- **Bahrain**
 - General corporate income tax: **9 Jan**
 - See "GloBE rules" (above)
- **Israel**
 - See "Other GloBE news" (above)
- **Oman**
 - E-invoicing FAQs: **12 Dec**
- **UAE**
 - E-invoicing fines: **12 Dec**
 - VAT law amendments: **12 Dec**
 - VAT administrative exceptions: **12 Dec**
 - APAs: **9 Jan**
 - Profit Margin Scheme for VAT: **9 Jan**
- **Uzbekistan**
 - Corporate income tax rate: **12 Dec**

Americas

- **Argentina**
 - Proposed new transfer pricing rules: **12 Dec**
- **Bermuda**
 - See "GloBE rules" (above)
- **Brazil**
 - 10% dividend withholding tax: **12 Dec**
 - Reporting of crypto assets: **12 Dec**
- **Colombia**
 - Tax reform bill rejected: **12 Dec**
 - National state of economic and social emergency: **16 Jan**
- **Costa Rica**
 - List of large taxpayers reporting losses or zero profits: **19 Dec**
- **Uruguay**
 - See "Other GloBE news" (above)
- **US**
 - USTR threatens EU over digital services restrictions: **19 Dec**
 - Taxation of foreign governments and their controlled entities: **19 Dec**
 - Final regulations on BEAT: **19 Dec**
 - Section 163(j) interest expense limitation: **9 Jan**
 - 100% additional first-year depreciation deduction under section 168(k): **16 Jan**
 - See "Other global developments" (above)

Treaty news

- **Treaties signed**
 - Qatar / Uruguay
 - Belarus / Jordan
 - Hong Kong¹ / Norway
 - Cyprus / Vietnam
 - Japan / Kyrgyzstan
- **Treaties enter into force**
 - Italy / Libya
 - Jordan / Switzerland
 - Sierra Leone / UAE (on 24 January 2023 – late notice!)
 - Malaysia / Russia
 - Andorra / Romania
 - Portugal / UK
 - Romania / UK
 - Andorra / UK
 - Gabon / Italy
 - Estonia / Liechtenstein
 - Estonia / Oman
 - Peru / UK
- **Treaty terminated**
 - Mauritius / Nepal (terminated by Nepal, effective 1 July 2026)
- **Protocol signed**
 - Mozambique / Portugal
- **Protocols enter into force**
 - Germany / Netherlands
 - Norway / Qatar
- **MFN clauses triggered**
 - Belgium / Chile
 - Chile / New Zealand

¹ Due to Hong Kong's status, not strictly a treaty.

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