



World Tax Advisor

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India's High Court clarifies that APAs, MAP agreements may have persuasive value

The High Court ruled that the profit mark-up from a MAP agreement could be applied in determining the arm's length price for transactions of a similar nature that were not covered by the MAP.



Canada

Federal budget proposes change to treatment of employee stock options

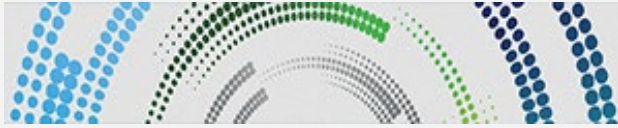
A budget proposal would introduce an annual cap on the beneficial treatment of employee stock options for large companies.



China

New requirements relating to declaration of dutiable royalties

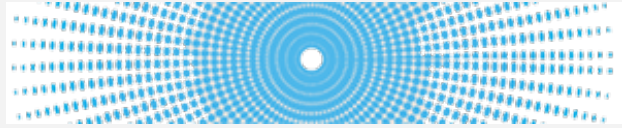
The customs authorities have issued guidance on how to complete the self-declaration of dutiable royalties, which also may help to standardize the authorities' practices.



Cyprus

EU ATAD 1 transposed into domestic law

The ATAD interest limitation rules, general anti-avoidance rule and controlled foreign company rules have been voted into law and apply as from 1 January 2019.



Greece

New incentives introduced for Greek branches of foreign and Greek entities

The new law expands the list of allowed business activities and provides for state aid support in the form of cash grants for specific expenses incurred by qualifying entities.



India

ITAT rules on taxability of commission earned by nonresident agents outside India

A commission earned by a nonresident agent for services performed outside of India is taxable in India only if it has a territorial nexus in India.



Ireland

VAT and RCT considerations for commercial lessees

The VAT and relevant contracts tax treatment of rent and other charges should be considered when taking out a new lease.



New Zealand

What is next for the tax system?

The government has announced its decisions on the recommendations of the Tax Working Group, including its rejection of the introduction of a capital gains tax.



Taiwan

Measures to reduce surtax on undistributed earnings passed by Executive Yuan

A draft amendment would allow amounts reinvested in certain types of assets to be deducted from the tax base when calculating the 5% surtax on undistributed earnings.

Tax treaty round up

Tax treaty developments in Australia, China, Czech Republic, Finland, Hong Kong, India, Israel, Italy, Luxembourg, Malta, New Zealand, Saudi Arabia, Singapore and Turkey.

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