



World Tax Advisor

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New Zealand outlines its proposal for a digital services tax

A consultation document proposes the introduction of a 3% DST for certain digital platforms if insufficient progress is made by the OECD in 2019 on a global solution to taxing the digital economy.



Argentina

Legislation implementing measures to promote knowledge economy enacted

Tax incentives will apply for a 10-year period for qualifying entities that perform knowledge-based activities, including a 15% tax rate for entities

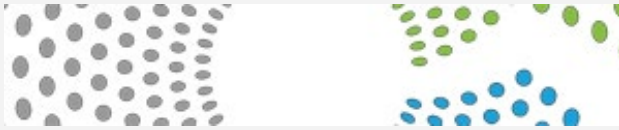
Denmark

Tax authorities to obtain distance selling information from payment service providers

The tax authorities can request individuals' credit card statements and other information to determine whether a foreign online retailer has

that maintain the size of their workforce.

exceeded the VAT annual distance selling threshold.



European Union

Dominica removed from EU list of noncooperative jurisdictions

Dominica has addressed the EU's concerns on the automatic exchange of financial information; 11 jurisdictions remain on the noncooperative jurisdiction list.



Israel

First court decision issued on taxation of Bitcoin transactions by individuals

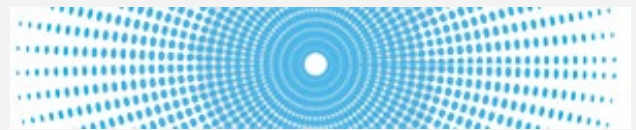
The District Court has concluded that Bitcoin cannot be considered a currency for tax purposes and profits on the sale of Bitcoin by individuals are subject to capital gains tax.



Malta

Consolidated group rules introduced

A parent company may elect to have itself and certain of its subsidiaries file a consolidated income tax return for fiscal years beginning on or after 1 January 2019.



Poland

New withholding tax provisions apply to certain cross-border payments

Beginning in July 2019, domestic entities that make cross-border payments of dividends, interest or royalties, or that pay for certain intangible services, may be required to withhold tax at the standard rate on the amount of the payment exceeding PLN 2 million.



United States

Who is an applicable taxpayer for BEAT purposes?

The article examines the definition of an applicable taxpayer for purposes



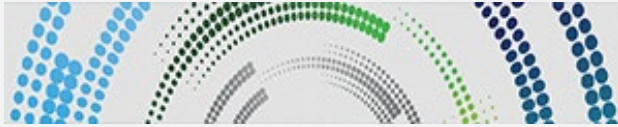
United States

Final GILTI regulations issued

The regulations contain guidance relating to inclusions of global intangible low-taxed income and

of the base erosion and anti-abuse tax that was enacted as part of the 2017 tax reform.

subpart F income in the gross income of US shareholders, as well as certain reporting requirements and foreign tax credit rules.



United States

Regulations proposed on treatment of domestic partnerships, GILTI high-tax exception

Proposed regulations address the treatment of domestic partnerships for purposes of determining gross income inclusions of their partners with respect to foreign corporations and the GILTI treatment of gross income that is subject to a high rate of foreign tax.



United States

Final temporary regulations address dividends received deductions

The regulations limit the DRD available for certain dividends received from CFCs and the foreign personal holding company income "look-through" exception for certain dividends received by upper-tier CFCs from lower-tier CFCs.

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