



World Tax Advisor

A world of news with tax@hand.

Japan's enhanced earnings stripping rules align with action 4 of BEPS project

New rules will reduce the interest deduction limitation, expand the scope of "harmful interest," revise the exceptions to the deduction limitation and introduce a new exception for interest paid by group companies.



Brazil

Tax treaty signed with Uruguay

The treaty includes BEPS-related measures and provides for a principal purpose test, a limitation-on-benefits clause and an article on fiscally



European Union

CJEU rules on applicable social security system for activities performed outside EU

The decision may have consequences for certain cross-border employment situations where an employee is working outside the EEA or

transparent entities, among other provisions.

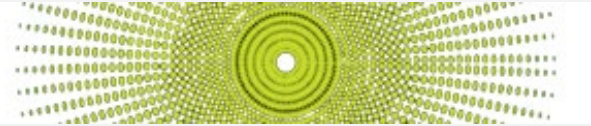
Switzerland while maintaining clear links with these territories.



Germany

BFH asks CJEU to rule on scope of VAT exemption for commercial education services

The federal tax court referred questions to the CJEU relating to whether a VAT exemption applies to services such as swimming lessons, which could have a broad impact on the commercial education sector.



India

GST Council recommends further extension of GST return filing deadline for 2017-18

The recommendations include extending the filing deadline to 31 August 2019, as well as postponing the new GST return filing system and introducing e-invoicing through a phased approach.



Italy

Supreme Court rules on tax residence of holding company

The decision addresses significant factors in determining the tax residence of a company incorporated abroad, including the location of board of director and shareholder meetings.



Malaysia

Update on implementation of service tax on imported digital services

Foreign service providers will have to register and collect service tax on digital services supplied to both businesses and consumers in the country, and implementation of the tax will not be deferred.



OECD

MLI matching database expanded, more countries sign/deposit ratification instruments



United States

Ninth Circuit Court of Appeals reverses Tax Court in Altera

The court ruled that a regulation is valid that mandates that stock-based

The functionality of the database has been expanded to include information on the entry into effect of the MLI; in addition, Morocco has signed the MLI and India and Russia have deposited their ratification instruments.

compensation costs related to the intangible development activity of a qualified cost sharing arrangement must be included in the joint cost pool of the arrangement.



United States

New regulations addressing GILTI issues, foreign tax credits, section 245A summarized

The summaries examine regulations addressing various provisions affecting multinational corporations that were enacted under the 2017 tax reform, including final regulations relating to global intangible low-taxed income.



United States

Joint Committee on Taxation releases overview of Qualified Opportunity Zones

The presentation covers rules enacted under the 2017 tax reform, including the requirements and tax benefits for investors and a comparison of the program with other available tax benefits.

Tax treaty round up

Tax treaty developments in Austria, Brazil, Greece, Hong Kong, Ireland, Netherlands, Poland, Russia, Singapore, Sweden, Switzerland, Turkey, Ukraine and Uruguay.

Have you visited Deloitte tax@hand?

Tax reform. Unprecedented change. Unique challenges. This is the future of tax. How can you stay ahead? Understand what changes are unfolding in the global tax landscape. Be informed so that you can turn change into opportunity. For the latest tax news and information from over 70 countries, **visit** [tax@hand](#) or **download** the [tax@hand](#) mobile app today.

Helpful Resources

[Subscribe to World Tax Advisor](#)
[World Tax Advisor archives](#)
[Business Tax](#)

[Deloitte International Tax Source](#)
[Join Dbriefs](#)
[Follow us on Twitter](#)

Have a question?

If you have any questions about the content in *World Tax Advisor*, please email Sally Clurman at sclurman@deloitte.com.

Did someone forward you this message? Skip the grapevine. Receive this newsletter email by clicking on the [subscribe](#) link above to hear it first.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms.

[Deloitte.com](#) | [Legal](#) | [Privacy](#)

30 Rockefeller Plaza
New York, NY 10112-0015
United States

© 2019. For information, contact Deloitte Touche Tohmatsu Limited.



About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as "Deloitte Global") does not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms. Please see www.deloitte.com/us/about for a detailed description of the legal structure of Deloitte LLP and its subsidiaries. Certain services may not be available to attest clients under the rules and regulations of public accounting.

© 2019. For information, contact Deloitte Touche Tohmatsu Limited.