



World Tax Advisor

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French parliament approves legislation creating digital services tax

The 3% DST applies to resident and nonresident companies that carry out significant digital activities and provide certain digital services in France, with a payment due in November 2019 based on the taxpayer's 2018 taxable revenue.



Finland

Consultation launched on implementation of ATAD anti-hybrid and exit tax rules

Interested parties may submit comments on the draft exit tax proposal no later than 8 August 2019



France

Legislation shifts corporate income tax rate reduction trajectory

The standard tax rate for 2019 remains at 33.33% and is reduced to 31% only for corporate taxpayers

and on the draft hybrid mismatch proposal no later than 15 August 2019.



Indonesia

CFC deemed dividend rules amended

A new regulation issued by the Ministry of Finance makes changes to the rules for controlled foreign corporations that limit deemed dividends to certain types of passive income.

with turnover of less than EUR 250 million.



Malaysia

Rules and guidelines released to implement earnings stripping rules

The rules limit deductions of certain interest expense on controlled transactions to 20% of tax EBITDA, and the tax authorities have issued guidelines that provide additional clarifications.



Portugal

New transfer pricing rules approved

The rules affect transfer pricing methodologies, reporting and advance pricing agreements, and introduce penalties for taxpayers that do not timely submit CbC notifications.



Taiwan

Bill passed on repatriation of overseas funds

Taxpayers that repatriate and invest funds according to the legislation would be able to elect to be taxed under a new proposed regime instead of the current income tax rules.



United Kingdom

Draft legislation and guidance issued on digital services tax

The tax authorities have released draft legislation and guidance and a response to the public consultation on



United States

Taxwriters back trade representative's investigation into French digital services tax

The US trade representative has opened an investigation into whether

a proposed new 2% tax on revenues of businesses that provide a social media platform, search engine or online marketplace to UK-based users.

France's new digital services tax potentially unfairly targets large US technology companies.

Tax treaty round up

Recent developments with respect to the following tax treaties: Argentina-Chile, Argentina-Japan, Armenia-Singapore, Australia-Chile, Belgium-Botswana, Belgium-Lithuania, Chad-Turkey, Colombia-United Arab Emirates, Croatia-Vietnam, Iraq-Netherlands, Israel-North Macedonia and Switzerland-Zambia.

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

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