



## World Tax Advisor

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### **Australian Federal Court agrees with taxpayer in transfer pricing case**

The court found that the terms of price sharing agreements entered into by the taxpayer should be respected by the tax authorities and that no reconstruction was warranted.



### **Czech Republic**

#### **Eligibility for investment incentives limited**

Among other changes, certain tax and investment incentives for the manufacturing industry are limited and the grant of incentives is subject to government approval.



### **European Union**

#### **CJEU AG opines on refund of dividend WHT to nonresident FIIs**

The CJEU Advocate General has opined that the Dutch distribution requirements for refunds of dividend withholding taxes by nonresident

fiscal investment institutions may violate EU law.



## Ireland

### Department of Finance issues draft transfer pricing legislation

The transfer pricing rules would be extended to non-trading income, capital transactions and SMEs, and the recharacterization of transactions for transfer pricing purposes would be allowed.



## Japan

### Transfer pricing law amended and interpretative material issued

The amendments clarify the definition of intangible assets, introduce the OECD's "hard to value intangibles" approach into domestic law and extend the statute of limitations relating to transfer pricing.



## New Zealand

### What's in the Tax Policy Work Programme?

Among the corporate tax rules that are considered for review are those for loss carryforwards, research and development costs, purchase price allocation and cross border employment.



## OECD

### Tax policy reforms 2019 report released

The report identifies major tax policy trends for the 36 OECD countries, plus Argentina, Indonesia and South Africa.



## Sweden

### Economic employer concept proposed to apply as from 1 January 2021

The "economic employer" rather than the "formal employer" would be considered the employer for purposes



## United States

### IRS issues proposed regulations regarding income recognition and advance payments

The proposed regulations address changes made by the 2017 tax

of interpreting tax treaties and domestic legislation.

reform law to the rules on when businesses recognize income and the treatment of advance payments.

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### Have a question?

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

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