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France's 2020 finance bill contains measures on corporate tax rate reduction

Continuing the corporate income tax rate reduction trajectory, the bill would reduce the standard rate to 25% by 2022; other tax measures include the transposition of ATAD 2 into domestic law and adjustments to withholding taxes for nonresident companies.



Belgium

New deadline for requesting rulings impacting 2020 corporate tax returns

Requests for certain rulings affecting corporate tax returns for calendar year 2019 must be submitted by 31



Denmark

Court rules certain previously rejected VAT refund applications may be reopened

Taxable persons resident in other EU member states who were denied VAT

January 2020, to enable the rulings to be issued before the return filing deadline.

refunds because they failed to provide additional information within the required one-month period now may request the reopening of VAT refund applications dating from 2014.



France

Tax authorities rule on VAT treatment of public offerings of tokens

In addition to confirming the VAT treatment of transactions such as initial coin offerings and initial token sales, the authorities have published VAT guidelines regarding vouchers.



Germany

Government publishes first draft of DAC 6 implementation law

Contrary to an earlier unofficial draft, the official draft law includes no reporting obligations for purely domestic tax planning arrangements; only cross-border arrangements would be covered, in line with DAC 6.



Guatemala

Tax authorities requesting 2018 transfer pricing studies

Many taxpayers are being asked to provide a copy of their transfer pricing study so that the authorities can verify that it supports the transactions reported with nonresident related parties.



Indonesia

Plans for tax reform announced

The government intends to introduce legislation aimed at boosting the economy, including a gradual reduction of the corporate tax rate and the introduction of VAT liability for foreign digital suppliers.



United Kingdom

Advance UK VAT registrations for some non-UK EU businesses



Uruguay

Decree implements 2015 MERCOSUR decision on FTZs into law

New guidance has been provided on temporary rules to allow some businesses to apply for a UK VAT registration that will go live only if the UK leaves the EU without a deal.

Goods entering a free trade zone from one MERCOSUR country to another (including storage in warehouses) will not be subject to the External Common Duty applicable to other imports.

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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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