

World Tax Advisor

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Regional Comprehensive Economic Partnership agreement signed

The Regional Comprehensive Economic Partnership is a multilateral free trade agreement that includes 15 countries in the Asia-Pacific region and, after ratification by individual countries, will result in harmonized rules and improved access to regional value chains.

For the latest developments from various countries on measures in response to COVID-19, please visit the [Deloitte tax@hand COVID-19 page](#).



Austria

SAC rules third-country insurers and pension funds entitled to dividend WHT refund

The Supreme Administrative Court has held that a Canadian pension fund organized as a corporate entity is entitled to a refund of withholding taxes based on the free movement of capital requirement under the Treaty



France

2021 draft finance bill would reverse nonresident withholding tax reform proposal

The finance bill sets forth proposals to reverse a nonresident withholding tax reform proposal, temporarily increase certain gift tax exemptions, and create an anti-abuse rule regarding the flat tax on investment income.

on the Functioning of the European Union.



France

Court broadly interprets 50% tax exemption for certain inpatriate investment income

The Supreme Court has broadened the scope of taxpayers under the inpatriate tax regime that may benefit from the 50% tax exemption on certain investment income; taxpayers may amend prior years' tax returns to claim a previously denied refund.



Germany

MOF modifies definition of "supply of goods with installation"

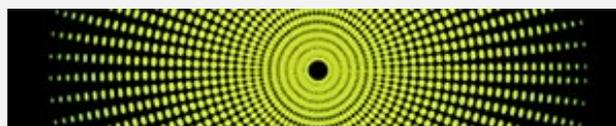
The Ministry of Finance has broadened the circumstances in which foreign suppliers are required to register for VAT in Germany and charge German VAT to their customers by amending the definition of a "supply of goods with installation."



India

CBDT amends deadlines under Direct Tax Vivad se Vishwas Act, 2020

In response to difficulties faced by taxpayers as a result of COVID-19, the filing and payment deadlines under the direct tax dispute resolution scheme introduced by the Direct Tax Vivad se Vishwas Act, 2020 have been extended, with the payment deadline for the minimum amount extended to 31 March 2021.



Malaysia

Highlights of Budget 2021 include incentive measures to attract foreign investment

The budget aims to manage the government's financial stability, ensure social well-being, and revive the economy, and includes measures to revise and expand tax incentives to encourage in-country investment.



Mexico

Legislation proposed to limit subcontracting would have tax implications

The proposed legislation would modify tax laws to treat prohibited subcontracting schemes as tax evasion or avoidance and disallow tax deductions and VAT credits relating to payments made as a result of such arrangements.



Taiwan

Eligibility for deemed profit treatment clarified

The tax authorities have issued guidance describing certain circumstances where the deemed profit method used to calculate Taiwan-source income is not applicable.



United States

IRS guidance addresses deductibility of SALT payments by passthroughs

The IRS has announced that it will issue proposed regulations clarifying rules surrounding the deductibility of certain state and local income taxes by passthroughs; the IRS also has issued guidance on the application of the final and proposed bonus depreciation regulations.



Uruguay

Government amends investment promotion regime

The government has issued regulations that modify the investment promotion regime by broadening tax incentives to promote specific activities and investment projects.

Tax treaty round up

Recent developments with respect to the following tax treaties: Azerbaijan-Spain, Hungary-Kyrgyzstan, Netherlands-Poland, Palestinian Territories-Turkey, and Turkey-Ukraine.

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30 Rockefeller Plaza
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