

World Tax Advisor

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Netherlands publishes consultation on changes to tax classification rules for certain entities

The government has published a consultation on proposals aimed at reducing hybrid mismatches by amending the tax classification rules for Dutch and foreign limited partnerships, Dutch open-ended mutual funds, and certain foreign incorporated entities; comments may be submitted until 26 April 2021, with amendments expected to be effective as from 1 January 2022.



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



Australia

Federal government considers introduction of electronic invoicing

This article discusses electronic invoicing, which can provide business and economic efficiencies and facilitate accuracy in tax compliance matters for both taxpayers and tax authorities; the government currently is



China

Preferential tax policies extended

The Ministry of Finance and the State Taxation Administration have issued bulletins extending certain preferential tax policies relating to COVID-19, investments in fixed assets, the “super deduction” for research and development expenditure, and financial transactions.

considering mandating such invoicing for all businesses and government agencies.



Germany

Governing grand coalition reaches agreement on draft law to amend RETT rules

The governing grand coalition reportedly has reached an agreement on amendments to the real estate transfer tax rules, including some updates to the original proposal published in 2019 by the Ministry of Finance; the legislative process is expected to be finalized no later than June 2021, with the amended rules entering into force as from 1 July 2021.



Germany

MOF publishes final decree on application of DAC 6 rules

The Ministry of Finance has published the final decree on the mandatory disclosure rules relating to certain cross-border tax arrangements, which includes extensive guidance on the application of the rules, the interpretation of the hallmarks of a reportable arrangement, and the reporting process, among other things.



India

AAR rules on taxability of capital gains on shares under India-Singapore tax treaty

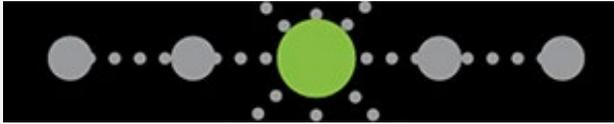
The Delhi Bench of the Authority for Advance Rulings has confirmed that investment holding is a bona fide business activity and has ruled that capital gains on an Indian company's shares prior to 1 April 2017 were not taxable in India since conditions for a tax exemption under the India-Singapore tax treaty had been satisfied; the analysis in the decision could have persuasive value in similar cases.



India

Finance Bill, 2021, with amendments, becomes law

The newly enacted Finance Bill, 2021 amends various corporate tax provisions, as well as provisions related to mergers and acquisitions and the International Financial Services Centre regime, among other things.



Indonesia

Implementing regulations issued for Omnibus Law on Job Creation

The government has issued regulations implementing the Omnibus Law on Job Creation, affecting a wide variety of corporate and individual income tax, withholding tax, VAT, and tax administrative provisions; the changes aim to improve the ease of doing business and the business climate.



Italy

Guidance issued on digital services tax, payment and filing obligations deferred

The tax authorities have issued extensive guidance on the digital service tax, which clarifies the definitions of taxable persons and services, exemptions, territorial nexus requirements, reporting and accounting obligations, refunds, and double taxation relief; the payment and reporting deadlines also have been further postponed.



Luxembourg

Tax assessments: Pre-litigation and litigation procedures for corporate taxpayers

This article discusses the procedural framework for contesting decisions issued by the tax authorities in regard to corporate income tax, municipal business tax, and net wealth tax, from the receipt of a notification of the tax authorities' intent to disagree with a filed tax return through the litigation phase.



Netherlands

Proposed withholding tax on dividends paid to related low taxed entities

The Ministry of Finance has published a legislative proposal that would impose a 25% withholding tax on dividends paid to related entities located in specified low tax jurisdictions, applicable as from 1 January 2024.



United States

Treasury report drills down further on White House tax priorities

The Treasury Department has released a report detailing the tax code changes proposed by the



United States

White House proposal re-energizes global talks on corporate tax reallocation

The Biden administration reportedly has delivered a fresh negotiating position with

Biden administration as part of the Made in America Tax Plan, primarily focusing on international tax matters.

regard to the reallocation of corporate tax among countries, which would use quantitative criteria to include no more than 100 of the largest and most profitable multinational groups within the scope of the rules, regardless of business sector.

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