

## World Tax Advisor

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### Canada's 2021-2022 federal budget includes tax measures relevant for multinationals

The government has presented tax proposals that introduce anti-hybrid rules, limitations on interest deductibility, and an interim digital services tax and significantly expand the scope of mandatory disclosure requirements; in addition, a public consultation on transfer pricing legislation has been announced.

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



#### Canada

### CRA provides further guidance on international income tax issues

The Canada Revenue Agency has issued further guidance for individuals and companies on measures to address some of the potential income tax issues arising from the COVID-19 pandemic, in particular the implications for



#### Costa Rica

### Guidelines issued on process for advance pricing agreements

The tax authorities have published the first official guidelines addressing the advance pricing agreement process, including application requirements, deadlines, and annual reports.

individual tax residency, permanent establishments, and cross-border employment.



#### France

### **Main corporate tax aspects of FTA guidelines regarding Brexit**

The tax authorities have released guidance on the tax consequences of Brexit focused primarily on the post-transition period, including confirmation of the position in respect of tax consolidated groups involving a UK company, dividends received from or paid to a UK company, transfers of headquarters or permanent establishments into the UK, and certain UK collective investment undertakings.



#### Guatemala

### **SAT has been requesting certain taxpayers to resubmit transfer pricing annex**

The Superintendency of Tax Administration has requested that taxpayers resubmit the transfer pricing annex to their annual corporate income tax return where the return has been amended, even if the amendments have no effect on the information reported in the annex.



#### India

### **CBDT eases CbC and master file reporting requirements**

The Central Board of Direct Taxes has announced an increase in the turnover threshold for country-by-country reporting and that one constituent entity of an international group may be designated to file a master file in India on behalf of all such group entities otherwise also required to do so.



#### India

### **Changes to rules disallowing payments to nonresident without TDS apply retroactively**

The Mumbai Bench of the Income-tax Appellate Tribunal has ruled that provisions relaxing the conditions under which a payment to a nonresident may be disallowed for failure to deduct tax at source from the payment apply retroactively.



#### Mexico

### Labor outsourcing reform bill approved by Chamber of Deputies

The Chamber of Deputies has approved a bill that would significantly alter the regime for labor outsourcing arrangements and disallow certain tax deductions and VAT credits for payments related to such arrangements.



#### Netherlands

### Supreme Court releases decisions on nonresident funds' entitlement to WHT relief

The Supreme Court has released two decisions denying dividend withholding tax relief to nonresident investment funds, referencing its decision in an earlier recent case where the court had to determine whether a nonresident investment fund was comparable to a Dutch resident investment fund and, thus, entitled to a refund of dividend withholding tax.



#### OECD

### No or only nominal tax jurisdictions carry out first annual information exchanges

The OECD has announced that 12 “no or only nominal tax” jurisdictions have begun exchanging information with the aim of facilitating risk assessments and the application of controlled foreign company, transfer pricing, and other BEPS-related provisions by the tax authorities.



#### Singapore

### IRAS publishes summary of advance ruling on source of franchise income

The Inland Revenue Authority of Singapore has published a summary of an advance ruling in which it determined that franchise income derived by a newly incorporated Singapore company under a franchise agreement with a non-Singapore resident affiliated company was sourced in Singapore and taxable on an accrual basis.



Taiwan

## Amendments to integrated house and transaction income tax rules approved

The Legislative Yuan has approved amendments to income tax provisions on house and land transactions. The reforms include an extension to the application of the provisions and changes to the tax rate structure intended to curb short-term speculation on real estate and prevent tax avoidance.



Venezuela

## Value of tax unit significantly increased for 2021

The national tax and customs authorities have published an administrative ruling that significantly increases the value of the tax unit (used as a unit of measurement for purposes of determining national taxes and relevant penalties) from VES 1,500 to VES 20,000.

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