

## World Tax Advisor

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### OECD amends model digital platform reporting rules to offer option for extended scope

The OECD has published a document that permits an extended application of the model digital platform reporting rules to cover income realized by sellers from the sale of goods and rental of vehicles, and introduces a new multilateral agreement to support the annual automatic exchange between tax authorities of information collected under the rules.

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



#### Germany

### MOF publishes draft decree on tax treatment of virtual currencies and tokens

The Ministry of Finance has published a draft decree that explains certain key elements of the virtual currency environment, including tokens, blockchains, wallets, initial coin



#### India

### Doctrine of impossibility applies to tax deduction obligations imposed retroactively

The Mumbai Bench of the Income-tax Appellate Tribunal has issued a decision reaffirming the application of the “doctrine of impossibility” with respect to withholding tax

offerings, staking, forks, lending, and airdrops, and provides guidance on the income tax treatment of transactions using virtual currencies and tokens.

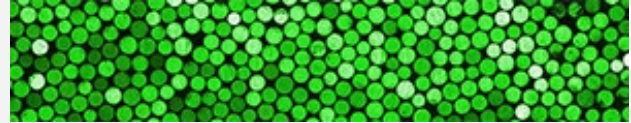


#### Qatar

### **Deadline for submitting transfer pricing master and local files extended**

The General Tax Authority has extended the deadline for master file and local file submissions to 30 September 2021 by companies whose financial year began on or after 1 January 2020.

obligations arising due to retroactive tax law amendments.



#### United Arab Emirates

### **Potential effects of a global minimum tax on low or no tax jurisdictions**

Following the high-level agreement reached by G7 finance ministers on global tax reform, including a global minimum effective tax rate of at least 15%, this article discusses the potential implications of implementation of a global minimum tax for countries with low or no corporate income tax and possible strategies such countries may adopt in response.



#### United States

### **House approves corporate governance package with country-by-country reporting mandate**

The House of Representatives has narrowly approved a corporate governance package that includes an amendment to the Securities Exchange Act of 1934 requiring publicly traded corporations to report certain tax and nontax information to shareholders on a country-by-country basis.



#### Venezuela

### **New procedures in effect for science and technology contribution and certification**

The National Fund for Science, Technology and Innovation has issued a ruling amending the procedures for self-assessment, filing, and payment of the annual contribution for science, technology, and innovation, including the procedure to obtain the electronic “solvency certificate,” which confirms that an

enterprise has complied with its contribution obligations.

## Tax treaty round up

Recent developments with respect to the following tax treaties: Austria-Ukraine, Brazil-United Arab Emirates, Cyprus-Netherlands, Georgia-Hong Kong, Georgia-Japan, Indonesia-United Arab Emirates, Israel-United Arab Emirates, Kuwait-South Africa, Netherlands-Russia, and Ukraine-United Arab Emirates.

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