

World Tax Advisor A world of news with tax@hand.



Germany's upper house of parliament approves law to implement EU anti-tax avoidance directive

The upper house of parliament has approved the final version of the law to implement the EU anti-tax avoidance directive, which contains no changes from the version that was approved by the lower house; the anti-hybrid rules will be effective retroactively as from 1 January 2020.

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



Australia

R&D expenditure "at risk" rules clarified

The Australian Taxation Office has released a draft ruling clarifying the application of the tests for determining whether R&D expenditure is "at risk" and, therefore, notionally deductible; comments on the draft ruling may be submitted until 23 July 2021.



Austria

Special characteristics of DAC 6 implementation rules

This article discusses the legislation adopted by Austria to implement certain cross-border reporting obligations under the EU DAC 6 directive and the Ministry of Finance's clarifications with regard to the legislation,

including what constitutes a risk of tax avoidance.



Costa Rica

Congress approves law to attract investors, rentiers, and pensioners

Congress has approved a law providing tax incentives for individuals authorized to enter the country under certain immigration categories, including certain income tax, transfer tax, and import tax exemptions; such individuals will not be automatically treated as tax resident in Costa Rica.



France

EU/EEA unit-linked insurance companies: Withholding tax on French-sourced dividends

The Administrative Supreme Court has issued a decision finding that the difference between the tax treatment of dividends paid to a UK insurance company offering unit-linked policies and dividends paid to a domestic insurance company was not justified and has referred the case back to the Administrative Court of Appeal to determine the amount of withholding tax to be refunded.



Guatemala

Good practices when preparing a transfer pricing study: An interview with the SAT

This article discusses good practices in the preparation of transfer pricing studies from the perspective of the Superintendency of Tax Administration, which appears focused on continuing its oversight of transfer pricing practices; between 2016 and 2020, transfer pricing adjustments totaled over USD 400 million.



Guatemala

Initiative regarding VAT and digital economy launched by CIAT and Guatemala's SAT

The Inter-American Center of Tax Administrations and Guatemala's Superintendency of Tax Administration have held a joint press conference that focused on a system that Latin American countries can use to facilitate VAT registration and compliance in relation to the digital economy, including Guatemala's plans regarding the system.



Guernsey

Regulations extending economic substance rules to partnerships issued

The Guernsey Revenue Service has published regulations to include partnerships within the scope of the existing economic substance regulations; for partnerships existing as at 30 June 2021, the rules apply for accounting periods commencing on or after 1 January 2022.



Hong Kong

Payment of tax by installments without surcharge further extended

The Inland Revenue Department has extended a relief measure allowing certain taxpayers to make salaries tax, profits tax, or personal assessment payments in installments without surcharge for up to one year, for the 2020/21 year of assessment.



India

Grant from holding company to enable payment to directors is taxable income receipt

The Mumbai Bench of the Income-tax Appellate Tribunal has issued a decision finding that a grant received by a taxpayer from its holding company to pay directors' remuneration in excess of the maximum statutory limit under company law was taxable to the taxpayer in a situation where the entire remuneration paid was claimed as a deduction.



United States

Electing real property trade or business procedural guidance issued by IRS

The Internal Revenue Service has issued a revenue procedure providing guidance for an electing real property trade or business to change its method of accounting to comply with a change in the alternative depreciation system recovery period for certain residential rental property.

Have you visited Deloitte tax@hand?

Tax reform. Unprecedented change. Unique challenges. This is the future of tax. How can you stay ahead? Understand what changes are unfolding in the global tax landscape. Be informed so that you can turn change into opportunity. For the latest tax news and information from over 80 countries, visit tax@hand or download the tax@hand mobile app today.

Helpful Resources

Subscribe to [World Tax Advisor](#)

[World Tax Advisor](#) archives

COVID-19 response hub for tax and legal leaders

Business Tax

Deloitte International Tax Source

Join Dbriefs

Follow us on Twitter

Have a question?

If you have any questions about the content in *World Tax Advisor*, please email **Karen Ebert** or **Alison Brock**.

Did someone forward you this message? Skip the grapevine. Receive this newsletter email by clicking on the **subscribe** link above to hear it first.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte is a leading global provider of audit and assurance, consulting, financial advisory, risk advisory, tax and related services. Our global network of member firms and related entities in more than 150 countries and territories (collectively, the “Deloitte organization”) serves four out of five Fortune Global 500® companies. Learn how Deloitte’s approximately 312,000 people make an impact that matters at www.deloitte.com.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms or their related entities (collectively, the “Deloitte organization”) is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

[Deloitte.com](#) | [Legal](#) | [Privacy](#)

30 Rockefeller Plaza
New York, NY 10112-0015
United States

© 2021. For information, contact Deloitte Touche Tohmatsu Limited.



About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte is a leading global provider of audit and assurance, consulting, financial advisory, risk advisory, tax and related services. Our global network of member firms and related entities in more than 150 countries and territories (collectively, the “Deloitte organization”) serves four out of five Fortune Global 500® companies. Learn how Deloitte’s approximately 312,000 people make an impact that matters at www.deloitte.com.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms or their related entities (collectively, the “Deloitte organization”) is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.