United Arab Emirates Ministry of Finance announces corporate tax on business profits

The Ministry of Finance has announced that a federal corporate tax on business profits will be introduced for financial years starting on or after 1 June 2023. The corporate tax will be payable on the profits of most UAE businesses as reported in their financial statements prepared in accordance with international accounting standards, with minimal exceptions and adjustments.

Australia

ATO announces review of advance pricing arrangement (APA) program

The Australian Taxation Office is conducting a review of its APA program, focusing on the efficiency of the program, as well as evaluating how to modify the APA process to better align with risk and taxpayer behavioral indicators.

Australia

Federal Court rules in favor of the ATO in related party interest dispute

The Federal Court of Australia has ruled that interest deductions on loans made under a related party financial arrangement should be disallowed because the arrangement allowed the taxpayer to obtain a “transfer pricing benefit” and such an arrangement would not have been agreed to between independent parties.
Botswana

**Overview of SEZ tax incentives**
This article provides an overview of income tax incentives available to licensed investors and developers undertaking certain business operations in special economic zones.

Canada

**Release of draft Digital Services Tax Act signals new era in Canadian tax**
This article provides an overview of a draft of the Digital Services Tax Act, which would introduce a new type of tax on resident and nonresident businesses that incorporate digital technology to engage with online users in Canada.

China

**Updated versions of environmental projects catalogues published**
The authorities have published updated versions of environmental project catalogues; enterprises engaged in projects listed in these catalogues may benefit from certain tax incentives.

Colombia

**Tax authorities issue regulations governing newly created beneficial owner registry**
The National Tax Administration has issued an administrative order addressing various issues in regard to beneficial ownership, which includes clarification on the definition of “beneficial owner” and a description of who is required to submit information to the newly created registry of beneficial owners.

France

**Certain trust tax provisions amended by 2022 finance law**

Germany

**MOF does not apply 2016 federal tax court decision regarding DCL rules**
The 2022 finance law includes a tax law amendment providing that a 10% holding requirement under an income inclusion provision is presumed to be satisfied in the case of a tax resident settlor of a trust organized in a foreign jurisdiction, although the presumption is rebuttable.

The Ministry of Finance has published a decree stating that the existence of a loss for purposes of the dual consolidated loss rules must be determined at the level of the controlling parent/controlled subsidiary on a stand-alone basis rather than on a consolidated group basis, indicating that it will not apply a differing approach taken in a 2016 federal tax court decision to other cases.

Germany

**MOF publishes decrees detailing the application of the royalty barrier rule**

The Ministry of Finance has published two decrees providing guidance on aspects of the “royalty barrier rule” limiting the deductibility of certain related party royalty payments that result in low taxation as a result of certain preferential tax regimes, as well as an updated non-exclusive list of such regimes.

Guatemala

**SAT has been issuing notifications regarding issues with audited financial statements**

The Superintendency of Tax Administration has issued a substantial number of notifications via email to taxpayers required to submit audited financial statements along with their annual corporate income tax return, regarding items considered to be “inconsistencies” that it has identified in audited financial statements submitted for fiscal year 2020.

India

**Highlights of Union Budget 2022**

The finance minister has presented the Union Budget 2022, which contains several key tax proposals including a new tax on virtual digital assets, extended incentives for units in the International Financial Services Centre, an extended qualifying period for eligible start-
ups or new manufacturing companies, and a cap on the surcharge applicable to long-term capital gains.

several types of tokens and common transactions involving various tokens.

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