

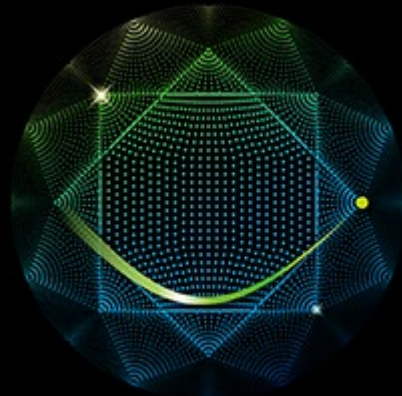
## World Tax Advisor

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### Overview of committee's interim report on Sweden's implementation of EU Pillar Two directive

This article discusses an interim report and a draft bill for a proposed "top-up" tax released by the government committee responsible for analyzing the implementation in Sweden of the EU directive on the global minimum tax rules under Pillar Two. Consultation on the proposed legislation and other matters raised in the report ends on 15 May 2023.



#### Australia

### New tax transparency proposals would require public tax-related disclosures

Draft legislation has been introduced that would require large multinational groups that operate in Australia to make public tax-related disclosures for every jurisdiction in which the group operates. The legislation would be effective as from the 2023-24 income year and would require in-scope companies to publish

#### Australia

### Transfer pricing implications of proposed new debt deduction rules

This article discusses the proposed earnings-based interest deduction limitation rules and proposed amendments to the transfer pricing rules relating to the debt levels of certain taxpayers, as well as how these proposals may affect multinational groups operating in Australia.

the relevant information within 12 months of the year end.



#### Belgium

### Tax reform proposals for carried interest will increase taxes for managers

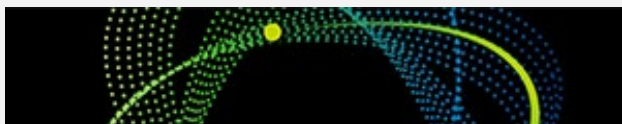
This article discusses a tax reform proposal for the tax treatment of carried interest and management incentive plans that provides for a 35% tax for excess returns on shares, which would be treated as taxable professional income in the hands of a person who is directly or indirectly professionally active in an entity subject to the rules.



#### China

### Overview of updates to forms for 2022 enterprise income tax annual filings

This article discusses the State Taxation Administration's updates to the forms for enterprise income tax annual filing, which reflect changes based on policies newly implemented in 2022. The deadline for the 2022 enterprise income tax annual filing is 31 May 2023.



#### China

### R&D super deduction rate increased to 100% for all eligible sectors

The State Council has increased the super deduction rate for research and development expenditure from 75% to 100% for all eligible sectors, and the Ministry of Finance and State Taxation Administration have confirmed that the 100% rate applies retroactively as from 1 January 2023. In addition, updated policy guidance has been published regarding the super deduction.



#### Germany

### Lower tax court rules on applicable dividend WHT rate during liquidation process

The lower tax court of Cologne has ruled that a 0% dividend withholding tax rate under the EU parent-subsidiary directive applied to a German company's distribution of operating profits that were generated prior to a liquidation period, even though the dividend was resolved and paid during the liquidation period.



#### Greece

### No WHT due on service fees paid to certain domestic branches of foreign entities

The Independent Authority of Public Revenue has clarified that certain service fees paid to Greek permanent establishments of legal entities resident in a jurisdiction whose tax treaty with Greece includes a nondiscrimination clause are exempt from withholding tax in the same way as service fees paid to domestic legal entities.



#### Kuwait

### Random sampling method available for tax inspection determinations

The Ministry of Finance has published a ministerial order in the official gazette that allows the tax authorities to conduct tax inspections based on a random sampling of annual tax returns, rather than following the standard tax inspection process that involves mandatory inspection of each annual tax return filed.

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