

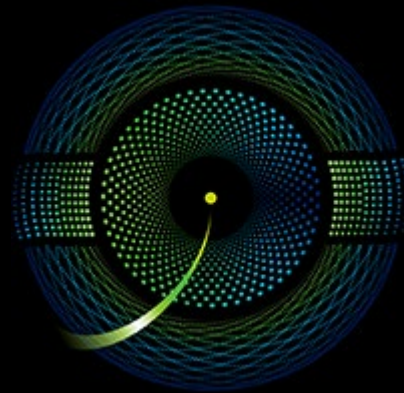
World Tax Advisor

A world of news with tax@hand.



Canada issues consultation paper on reforming and modernizing domestic transfer pricing rules

The Department of Finance has issued a consultation paper to gather stakeholder input on a range of questions and proposals related to domestic transfer pricing legislation, with the main proposal focusing on the general guidance on the application of the arm's length principle outlined in the OECD transfer pricing guidelines. The deadline for stakeholders to provide their submissions is 28 July 2023.



Australia

Tax legislation containing measures relating to multinationals introduced

The government has introduced a bill including new interest limitation rules and certain tax transparency measures, and also has issued revised exposure draft legislation that would deny deductions for certain payments to low corporate tax jurisdictions attributable to

Brazil

Private letter ruling published on cross-border taxation of software licensing

The federal tax authorities have published a private letter ruling that clarifies the application of certain taxes to outbound payments made by Brazilian end users to foreign licensors of software and for related services. The ruling includes a new position

intangible assets. The measures are proposed to be effective as from 1 July 2023.

that outbound payments for software licenses should be treated as an import of services for purposes of the PIS/COFINS social contribution taxes.



Denmark

Corporate income tax return filing deadline extended for 31 December 2022 year end

The tax authorities have announced an eight-week extension to the deadline for the submission of 2022 corporate income tax returns for companies with a fiscal year ending on 31 December 2022, for whom the reporting deadline would otherwise be 30 June 2023. The relevant deadlines relating to transfer pricing documentation are also extended.



European Union

CJEU finds Polish rules restricting interest paid on tax overpayments violate EU law

The Court of Justice of the European Union (CJEU) has rendered a decision regarding the reimbursement of overpaid Polish corporation tax and the calculation of interest. The court ruled that EU principles prohibit national legislation that restricts the payment of interest on a tax overpayment when a refund request is submitted more than 30 days after a CJEU judgment stating that the tax at issue is contrary to EU law.



European Union

European Commission proposes new FASTER directive to simplify WHT procedures

The European Commission has proposed new rules for a common EU-wide system for withholding tax on cross-border dividends or interest payments, referred to as FASTER. The proposal aims to foster cross-border investment, tackle tax fraud, and simplify



Germany

Legislation to implement EU public CbC reporting directive enacted

Domestic legislation implementing the provisions of the EU public country-by-country reporting directive has been published in the federal gazette. The new rules are in line with the EU directive and require certain multinational enterprises to disclose to the general public certain income tax information

taxation. A public consultation runs through 15 August 2023.



Germany

MOF issues updated transfer pricing principles, replacing previous guidance

The Ministry of Finance has published an updated decree containing administrative principles regarding transfer pricing, which replaces guidance provided in a 2021 decree and incorporates new jurisprudence and guidance regarding the “price-adjustment” mechanism and transfers of a function.

on a country-by-country basis for fiscal years beginning on or after 22 June 2024.



India

High courts may consider appeals against ITAT’s determination of arm’s length price

The Supreme Court has ruled that the high courts may consider appeals against the determination of the arm’s length price by an Income-tax Appellate Tribunal if the courts consider the determination of the price to be a substantial question of law after examining the provisions of the Income-tax Act, 1961 and associated rules.



Malaysia

Special voluntary disclosure program 2.0 available from 6 June 2023 to 31 May 2024

The Inland Revenue Board has announced the commencement of the special voluntary disclosure program “2.0,” which effectively offers a full penalty and surcharge waiver for qualifying taxpayers that make certain voluntary disclosures and pay any tax due within the specified period. The board also has issued guidelines and frequently asked questions in relation to the program.



United States

US-Chile tax treaty clears US Senate

The Senate has approved the US-Chile tax treaty, whose ratification has become a priority in light of the growing importance to US industries of Chile’s lithium and copper mines. The US will exchange articles of ratification with the Chilean government, and Chile also will have to vote on the treaty again before it will enter into effect.

Tax treaty round up

Recent developments with respect to the following tax treaties: Armenia-Switzerland, Belgium-Netherlands, China-Norway, Hong Kong SAR-Mauritius, and United Arab Emirates-Zambia.



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

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

© 2023. For information, contact Deloitte Touche Tohmatsu Limited.



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.

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 provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte’s approximately 415,000 people worldwide make an impact that matters at www.deloitte.com.