OECD inclusive framework publishes consultation document on Pillar One, Amount B

The OECD/G20 Inclusive Framework on BEPS has published a public consultation document containing updated design elements of “Amount B” of the Pillar One approach to profit allocation, including a new process for pricing baseline marketing and distribution activities in accordance with the arm’s length principle. Comments on the pricing framework are invited by 1 September 2023.

OECD inclusive framework publishes documents on implementation of Pillar Two

The OECD/G20 Inclusive Framework on BEPS has published a package of documents on the implementation of the Pillar Two global minimum tax rules, which includes two new safe harbors, additional administrative guidance, a finalized information return, and model treaty articles to implement a subject to tax rule.
Cambodia

Sub-decree implements Law on Investment

A sub-decree implementing provisions of the Law on Investment has been promulgated, which affects various qualified investment projects. The sub-decree includes details on the registration process, incentives, and filing obligations.

Cayman Islands

CRS and FATCA updates and reminders issued (July 2023)

The Department for International Tax Cooperation has issued an updates bulletin regarding reporting obligations under the Common Reporting Standard and the US Foreign Account Tax Compliance Act. The bulletin includes information on reporting deadlines, reportable jurisdictions, reportable information, filing declarations, and portal updates.

Colombia

Deadline to register in beneficial owner registry is 31 July 2023

The deadline for commercial and not-for-profit organizations, permanent establishments, and certain foreign legal entities to register in the single registry of beneficial owners and report their beneficial ownership information is 31 July 2023. The same deadline applies for unincorporated or similar structures established prior to 15 January 2022 to register with the unincorporated structures identification system.

Egypt

Tax reform package includes changes affecting multinational groups

The president has approved a tax reform package that introduces a new set of tax reforms, which include changes to the rules regarding permanent establishments, the taxation of interest on cross-border loans, and thin capitalization.
European Union

**European Commission publishes Annual Report on Taxation 2023**

The European Commission has published its Annual Report on Taxation 2023, which provides an analysis of tax policies in the EU by evaluating recent developments in tax systems and identifying how tax policy, implementation, or compliance could be improved across the EU.

Germany

**First draft of business tax reform bill of the Ministry of Finance released**

A first draft of a business tax reform bill of the Ministry of Finance has been released. The proposed measures include changes to the research and development tax incentive, loss carryback periods, net operating loss carryforwards, and interest deduction limitation rules, as well as the introduction of a “maximum interest barrier rule” and a mandatory disclosure rule for certain domestic tax planning arrangements.

Germany

**Ministry of Finance issues draft decree on interpretation of anti-hybrid rules**

The Ministry of Finance has published a first draft of a decree on the interpretation of the German anti-hybrid rules, which are based on the EU anti-tax avoidance directive. The draft decree provides the tax authorities’ view on the interpretation and application of the rules. Interested parties may provide comments on the draft decree until 10 August 2023.

Luxembourg

**Draft legislation to modernize current investment tax credit published**

The government has presented to parliament a draft law that proposes an in-depth modernization of the current investment tax credit. The reform is part of a package of measures previously agreed upon between the government and social partners to support the competitiveness of Luxembourg companies.
United States

Finance Committee seeks public comments on digital asset taxation

The Senate Finance Committee has released an open letter to members of the digital asset community and other interested parties, soliciting comments on how Congress can address current uncertainties around the tax treatment of digital assets. Comments will be accepted through 8 September 2023.

United States

Taxwriting leaders unveil US-Taiwan (China) double-tax relief proposal

The congressional taxwriting committees have announced a bipartisan discussion draft of a proposal to provide relief from double taxation for workers and businesses engaged in cross-border investment between the US and Taiwan (China). A new tax code section would provide benefits to “qualified residents of Taiwan,” similar to those that are available under the 2016 United States Model Income Tax Convention.

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