

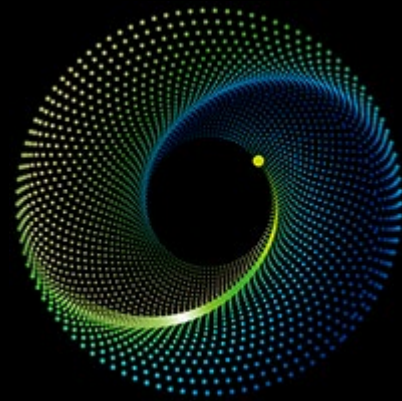
World Tax Advisor

A world of news with tax@hand.



Dutch Ministry of Finance publishes tax plan for 2024

The Dutch Ministry of Finance has published the government's tax plan for 2024, which includes several proposals that are relevant for international companies, such as amendments related to the tax classification of certain entities and the rules against dividend stripping. The legislative proposals will be discussed by parliament and are expected to be adopted by the end of 2023.



Brazil

Draft bill would eliminate corporate income tax deduction for interest on net equity

The government has published a draft bill that would eliminate the corporate income tax deduction for interest on net equity distributions as from 1 January 2024. The draft bill would maintain the deduction for distributions for calendar year 2023, even if paid or credited during calendar year 2024.



China

Circulars issued extending preferential individual income tax policies

The Ministry of Finance and State Taxation Administration have published a series of circulars to extend multiple preferential individual income tax policies through 31 December 2027. The State Council also has announced a retroactive increase of certain itemized deductions for resident individuals. The measures aim to reduce the tax burden for

individuals and to retain foreign talent to work in China.



European Union

European Commission publishes proposed directive on head office tax system for SMEs

The European Commission has published a proposal for a directive to establish a head office tax system for micro, small, and medium-sized enterprises (SMEs). The proposed directive would allow SMEs to opt to apply the tax rules of the EU member state of the head office to calculate the taxable result of their permanent establishments in other member states.



Germany

Federal tax court broadens concept of permanent establishment

A decision has been published in which the federal tax court ruled that a UK resident's use of a designated locker for personal items in connection with the provision of aircraft maintenance services at a German airport was a sufficient nexus to create a permanent establishment under domestic legislation and the Germany-UK tax treaty, even if the locker was not used to store business equipment.



Luxembourg

Pillar Two draft law—Phase two: Demystification of the top-up tax

This article discusses certain determinations that would be required to be made by groups within the scope of application of the draft law to implement the EU Pillar Two directive on ensuring a global minimum level of taxation for certain groups. The article focuses on the determination of whether an amount of top-up tax would be required to be paid and how any such tax should be allocated.



OECD

2023 report on tax policy reforms released

The OECD has announced the publication of *Tax Policy Reforms 2023: OECD and Selected Partner Economies*, the latest edition in a series of annual reports that provide comparative information on tax reforms across jurisdictions, track tax policy developments over time, and provide an overview of the latest tax reform trends.



United States

IRS issues notice on amortization of specified research or experimental expenditures

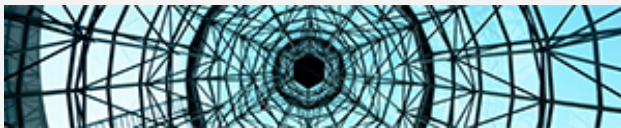
The Department of the Treasury and the Internal Revenue Service have released a notice to provide interim guidance to clarify the application of section 174 of the Internal Revenue Code for specified research or experimental expenditures paid or incurred for tax years beginning on or after 1 January 2022, as well as to announce their intent to issue proposed regulations consistent with the interim guidance.



United States

Notice 2023-64 provides additional corporate AMT guidance

The Department of the Treasury and the Internal Revenue Service have released a notice to provide additional interim guidance to further clarify the application of the corporate alternative minimum tax that is effective for tax years beginning after 31 December 2022, as well as to announce their intent to issue proposed regulations that would include proposed rules consistent with the interim guidance.



Vietnam

Overview of draft resolution issued to adopt global minimum tax rules

This article discusses a draft resolution issued by the government to adopt a 15% global minimum tax on multinational enterprises having consolidated revenue of at least EUR 750 million, which aims to implement the OECD "Pillar Two" rules. The draft resolution includes a qualified domestic minimum top-up tax and an income inclusion rule, and proposes an effective date of 1 January 2024.



Vietnam

Resolution provides tax incentives for innovative startup enterprises in HCMC

A resolution has entered into effect that contains a number of tax incentives aimed at supporting organizations involved in priority sectors within Ho Chi Minh City, including innovative startup enterprises, scientific and technological organizations, innovation centers, and intermediary organizations supporting innovative startup activities.

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 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 peopleworldwide 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

© 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.