

## World Tax Advisor

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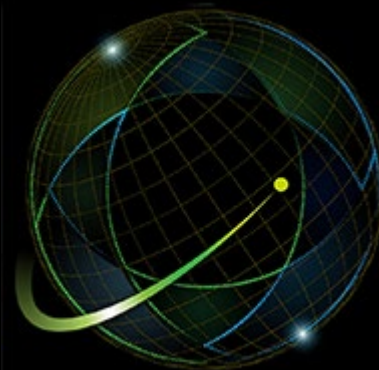


### Italy's government approves draft decree including significant international tax measures

The Council of Ministers has approved a draft legislative decree providing for the transposition into domestic law of the EU Pillar Two directive. The draft decree also includes several other significant provisions on certain international tax topics.

### Sweden's final legislative proposal to implement EU Pillar Two directive released

The government has published a bill containing the final legislative proposal for the implementation into domestic law of the EU Pillar Two directive. This article discusses some of the key aspects of the bill, including areas where the bill appears to be missing more recent rules proposed by the OECD.



#### Belgium

### First assessment notices for windfall tax on electricity generators issued

The federal public service for the economy has delivered the first assessment notices to companies that fall within the scope of the



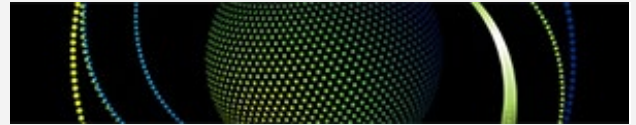
#### Belgium

### New draft tax law on restructurings may have wider tax implications

A draft law has been submitted to parliament that would realign certain tax law definitions relating to mergers and divisions with recently updated company law definitions. The

temporary windfall tax on electricity producers. The energy sector has raised questions regarding the implementation of the tax and its calculation, and this article includes a discussion of formal and informal methods that companies may use to dispute an assessment.

company law definitions were updated to reflect modifications required by the EU mobility directive, and the draft law aims to ensure that the transposition of the directive into domestic law has full effect for tax purposes.



#### Mexico

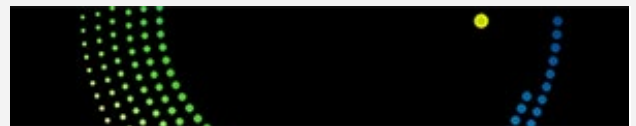
### Tax incentives for taxpayers in zones affected by Hurricane Otis

The government has issued a decree that provides tax incentives for taxpayers that have their fiscal domicile, agency, branch, or any other establishment located in a zone affected by Hurricane Otis, including an immediate 100% deduction for investments in new or used fixed assets in certain municipalities of Guerrero state.

#### New Zealand

### Restricted transfer pricing rules: Five years on

This article discusses transfer pricing rules that were introduced in 2018, which diverge from the OECD guidance on the pricing of financing transactions and require taxpayers to price certain loans as if they were five-year loans. Many of the loans are coming to the end of their first pricing period, resulting in taxpayers having to revisit their pricing analysis to ensure compliance with the rules.



#### OECD

### Pillar One: Factsheets published on Amount A multilateral convention

The OECD has published factsheets relating to a multilateral convention to implement Amount A of Pillar One, which address the process for applying the Amount A rules, the Amount A tax certainty framework, dispute resolution for issues related to Amount A, and

#### United Arab Emirates

### Qualifying income of certain free zone persons entitled to 0% corporate tax rate

This article discusses the conditions under which “free zone persons” may be entitled to a 0% corporate tax rate on qualifying income. The conditions must be met from the start of the tax period and include maintaining adequate substance in the free zone and

removal and “standstill” of digital service taxes and relevant similar measures.

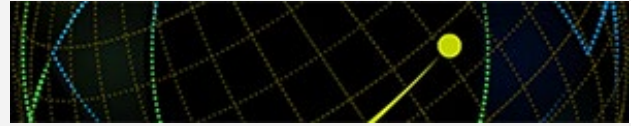
complying with the arm’s length principle and transfer pricing documentation requirements.



#### United Kingdom

### Tax authorities publish additional guidance on the meaning of R&D for tax purposes

HM Revenue & Customs has published additional guidance on the definition of “research and development” as set forth in statutory guidelines issued by the Department for Science, Innovation & Technology for purposes of claiming research and development tax relief or expenditure credits.



#### United States

### Implications of Pillar Two for global stock-based compensation, state and local taxes

Deloitte Tax LLP has published two resource guides relating to Pillar Two: one provides an overview of Pillar Two and explains some of the opportunities and challenges that the emerging rules present for in-scope companies that offer global stock-based compensation programs, while the other provides insights for taxpayers regarding how Pillar Two interacts with state and local taxes.

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