

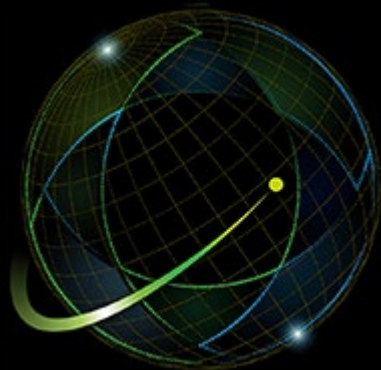
## World Tax Advisor

A world of news with tax@hand.



### Draft bill to implement EU Pillar Two directive submitted to Belgian parliament

A draft bill has been submitted to parliament to introduce the Pillar Two minimum effective tax rate of 15% into Belgian law for certain multinational enterprise groups or large domestic groups. The draft bill also would introduce some adjustments to align the existing tax rules with the proposed Pillar Two rules, most notably an update to the research and development tax credit regime.



#### Australia

### ATO's latest income tax findings for Top 100 and Top 1,000 taxpayers

The Australian Taxation Office has published its latest findings on the outcomes of the income tax justified trust assurance reviews undertaken with "Top 100" and "Top 1,000" taxpayers. This article provides an overview of the findings and the income tax risk areas attracting the tax authorities' attention, along with some additional observations.

#### Australia

### Simplified transfer pricing record keeping options: Interest rate thresholds update

The Australian Taxation Office has released an updated version of a practical compliance guideline containing changes related to the eligibility criteria for applying simplified transfer pricing record keeping options for low-level related party inbound and outbound loans. The changes involve updates to the

interest rates for the 2023-24 income year in respect of inbound and outbound loan options.



#### Brazil

### Requirements eased for 0% WHT rate on certain private equity investments

The government has published a law that eases certain requirements for a 0% withholding tax rate on income distributions and capital gains arising from foreign investments in Brazilian private equity funds that qualify as investment entities.



#### Czech Republic

### Proposal would change tax treatment of stock acquired by employees through ESOP

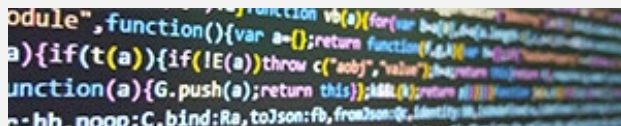
A proposal to amend a bill that is undergoing the legislative process would provide for new rules that would allow the deferral of payment of income tax and social security contributions for “non-cash” income related to the acquisition of stock (or certain other securities) in a corporation through an employee stock ownership plan.



#### Germany

### Lower tax court clarifies application of double deduction rule for partnerships

In a recently published decision, the lower tax court of Muenster considered the double deduction rule for partnerships and ruled that there was no double deduction where interest expense incurred by a Dutch resident BV partner was deductible at the level of the German partnership but no deduction was available for Dutch tax purposes at the level of the BV due to the Dutch tax consolidation regime.



#### New Zealand

### Finalized Inland Revenue guidance on deductibility of costs related to SaaS

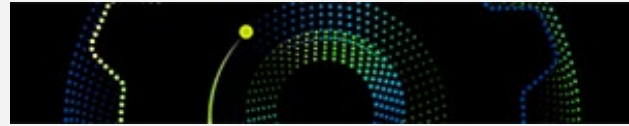
Inland Revenue has published finalized guidance on the deductibility of software-as-a-service configuration and customization costs. The final version is largely in line with the draft proposals, with only minor changes and some helpful clarifications.



OECD

### **New MAP statistics and consolidated information released on “Tax Certainty Day” 2023**

On its fifth “Tax Certainty Day,” the OECD released the 2022 mutual agreement procedure statistics, covering 133 members of the OECD/G20 Inclusive Framework on BEPS. The OECD also released the first edition of a new publication that summarizes and consolidates published mutual agreement procedure information for inclusive framework members.



OECD

### **New toolkits published for developing countries regarding pricing of minerals**

The OECD has published new resources to support developing countries, including a toolkit that sets forth a transfer pricing framework for determining the price of minerals and another toolkit that applies the transfer pricing framework to bauxite. The OECD also has requested comments by 2 February 2024 on a draft toolkit that applies the transfer pricing framework to lithium.



Singapore

### **Commitment given to implementation of Crypto-Asset Reporting Framework**

Singapore and 47 other jurisdictions have endorsed a joint statement expressing the intent to work toward a goal of implementing the Crypto-Asset Reporting Framework (CARF) developed by the OECD, as well as recent amendments to the Common Reporting Standard, by 2027. The Inland Revenue Authority of Singapore also published a media release confirming Singapore’s commitment to the CARF.



United States

### **Essential tax and wealth planning guide: 2024 edition**

Deloitte’s 2024 *Essential tax and wealth planning guide* explores various aspects of family wealth and taxation, including tax policy, setting up the family office, furthering the family’s philanthropic goals, and considerations relating to state passthrough entity taxes.

## Tax treaty round up

Recent developments with respect to the following tax treaties: Andorra-Czech Republic, Andorra-Netherlands, Australia-Iceland, Burkina Faso-France, Croatia-Cyprus, Greece-Japan, Malaysia-Maldives, and Ukraine-United Arab Emirates.



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