

International Tax Review

Latest information on
international tax
developments provided by EY
Austria

International Tax Developments

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Austria: EY Tax Short Cuts - English No. 02/2024 of 25 January 2024

- ▶ Reporting obligation for certain payments
 - ▶ Wage tax guidelines - Maintenance Decree 2023
 - ▶ DTC Austria-Germany: Amendments in force
 - ▶ VAT guidelines - Maintenance Decree 2023
 - ▶ Austrian Supreme Administrative Court on the term "renting" of land by a municipality
 - ▶ Regulations on energy cost subsidies for non-profit organizations published
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Austria: EY Tax Short Cuts - English No. 03/2024 of 8 February 2024

- ▶ MoF query response to the Remuneration in Kind Ordinance
 - ▶ Energy Cost Subsidy II: Reminder for settlement of subsidy period 2
 - ▶ DTC Austria-South Korea: Amendments applicable
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OECD Developments

OECD Developments

- ▶ OECD releases 2024 update on peer reviews under BEPS Action 5 on harmful tax practices [▶Read more](#)
- ▶ PE Watch | 2023 in review [▶Read more](#)
- ▶ EY Global Tax Controversy Flash Newsletter (Issue 66) | Results of 2024 EY International Tax and Transfer Pricing Survey reveal businesses require a comprehensive transfer pricing policy to manage emerging risks [▶Read more](#)
- ▶ PE Watch | Latest developments and trends, February 2024 [▶Read more](#)
- ▶ OECD publishes ICAP statistics [▶Read more](#)
- ▶ OECD releases updated estimates of the economic impact of Pillar Two [▶Read more](#)
- ▶ Global Tax Policy and Controversy Watch | January 2024 edition [▶Read more](#)

Argentina

Country Updates

- ▶ Argentina eliminates the Economic Financial Capacity analysis for imports [▶Read more](#)

Australia

- ▶ Australia revises draft legislation for public country-by-country reporting [▶Read more](#)
- ▶ Australian Tax Office issues updated draft taxation ruling TR 2024/D1 on software royalties [▶Read more](#)
- ▶ Australian Taxation Office finalizes compliance guidelines on intangibles arrangements [▶Read more](#)

Belgium

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- ▶ Belgium adopts entity-approach CFC rules [▶Read more](#)

Brazil

- ▶ Brazil's new tax law affects individuals residing in Brazil [▶Read more](#)

Canada

- ▶ Canada Revenue Agency provides additional guidance on home office expenses for 2023 [▶Read more](#)
- ▶ Canada's new trust reporting requirements discussed; rules are broader than anticipated [▶Read more](#)

Country Updates

- ▶ Canada's new trust reporting requirements to impact many foreign trusts [▶Read more](#)
- ▶ Canada trade compliance verification list update – January 2024 [▶Read more](#)

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- ▶ Cyprus tax authorities issue revised thresholds for transfer pricing documentation [▶Read more](#)

France

- ▶ French Finance Bill for 2024 reinforces tax authorities' power to audit and reassess transfer pricing deficiencies [▶Read more](#)
- ▶ France revises schedule for adopting e-invoicing reform [▶Read more](#)

Germany

- ▶ Germany and Luxembourg announce transitional rules for digital platform reporting obligations under DAC7; other countries retain 31 January 2024 reporting deadline [▶Read more](#)

Ghana

- ▶ Ghana's 2024 Budget Statement tax proposals passed into law [▶Read more](#)

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- ▶ Gibraltar announces interest income of insurers and Distributed Ledger Technology firms must be treated as taxable income [▶Read more](#)

Italy

- ▶ Italy issues 2024 Budget Law and tax reform decrees [▶Read more](#)

Japan

- ▶ Japan | Impact of 2024 tax reforms for inbound businesses [▶Read more](#)

Kenya

- ▶ Kenyan High Court again holds interchange fees are exempt from VAT [▶Read more](#)

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Luxembourg

- ▶ Luxembourg enacts law on modernization and expansion of investment tax credit [▶Read more](#)
- ▶ Germany and Luxembourg announce transitional rules for digital platform reporting obligations under DAC7; other countries retain 31 January 2024 reporting deadline [▶Read more](#)

Malta

- ▶ Malta announces accelerated tax deductions for intellectual property [▶Read more](#)

Netherlands

- ▶ Netherlands revises Decree on VAT treatment of immovable property [▶Read more](#)

North Macedonia

- ▶ North Macedonia adopts new VAT rules [▶Read more](#)

Pakistan

- ▶ Pakistan taxpayers required to issue electronic invoices for fast-moving consumer goods must request extensions until government approves software providers [▶Read more](#)

Philippines

- ▶ Philippines clarifies tax treatment of cross-border services [▶Read more](#)

Poland

- ▶ Poland postpones implementation of mandatory National e-Invoicing System [▶Read more](#)

South Africa

- ▶ South Africa Revenue introduces estimated assessment for VAT - implications for taxpayers [▶Read more](#)

South Sudan

- ▶ South Sudan enacts Financial Act 2023/2024 [▶Read more](#)

Country Updates

Spain

- ▶ Spain publishes draft legislation on implementation of EU Minimum Tax Directive [▶Read more](#)

United Kingdom

- ▶ UK releases new operational guidance on transfer pricing and role of risk in the accurate delineation of actual transactions [▶Read more](#)

United States

- ▶ United States | IRS sending out more letters regarding transfer pricing compliance [▶Read more](#)
- ▶ Report on recent US international tax developments – 9 February 2024 [▶Read more](#)
- ▶ Report on recent US international tax developments - 2 February 2024 [▶Read more](#)
- ▶ Report on recent US international tax developments – 26 January 2024 [▶Read more](#)

Uruguay

- ▶ Uruguay introduces a modification to the Corporate Income Tax regulations for 'Small Companies' [▶Read more](#)
- ▶ Uruguay's Executive Branch raises income limit to apply for simplified regime for Personal Income Tax [▶Read more](#)
- ▶ Uruguayan Government extends period to invest in large economic projects [▶Read more](#)
- ▶ Uruguayan Government establishes prioritized withholding order on yields of capital [▶Read more](#)
- ▶ Uruguay introduces zero VAT rate on hotel-related services to resident tourists for the summer season [▶Read more](#)

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