International Tax Review

Latest information on international tax developments provided by EY Austria

International Tax Developments

Content

- 01 Austria EY Tax Short Cuts - English No. 16/2024 and 17/2024
- 02 OECD Developments
- 02 EU Developments
- 02 Country Updates

Austria: EY Tax Short Cuts - English No. 16/2024 of 9 August 2024

- Organizational Decree on the COFAG Reorganization and Resolution Act published
- Tax Reporting Regulation published in the Federal Law Gazette
- Austrian Supreme Administrative Court: No additional double acquisition for an IC supply subject to VAT within a chain transaction
- Federal Fiscal Court: 5% VAT rate to be interpreted narrowly due to conflict with EU law and not applicable to activities falling under Sec 111/2 Trade Law
- ► FAQ on the Digital Platforms Reporting Obligations Act
 ► Read more

Austria: EY Tax Short Cuts - English No. 17/2024 of 22 August 2024

- Austrian Supreme Administrative Court on change in the organizational structure of a corporate shell
- MoF: Interest on refunds under the COFAG Reorganization and Resolution Act
 - ► Read more



OECD Developments

OECD Developments

 OECD releases selection documentation package for MNEs participating in ICAP risk assessments ▶ Read more

EU Developments

EU Developments

► EU seeks input on the ATAD and public CbCR reporting formats ▶ Read more

Argentina

Country Updates

Argentine Budget and Finance Committee approves Multilateral Instrument Read more

Australia

Australian public country-by-country reporting Bill progress update Read more

Bermuda

Bermuda releases public consultation for CIT administrative provisions Read more

Brazil

Brazil moves major VAT reform bill to Senate for consideration ▶ Read more

Canada

- Canada Department of Finance releases draft legislation for 2024 budget and other measures ▶ Read more
- Canada imposes provisional duties on imports of high-protein content pea protein from China ▶ Read more

China

China makes significant progress on tax certainty, launching pilot program for Advance Tax Rulings ▶ Read more

EY International Tax Review, 09/2024 | 2

China | Reform decisions from Third Plenary Session seek to modernize China's tax system ▶ Read more

Denmark

- ▶ Danish Government plans to introduce a new agriculture CO2 tax
 ▶ Read more
- ▶ Danish Parliament introduces CO2 tax on fuels and CO2-emission tax on industry from 2025 ▶ Read more

Ethiopia

► Ethiopia makes major changes to foreign exchange regime ► Read more

Germany

► German Ministry of Finance regulations comment on Advance Mutual Agreements, including Advance Pricing Agreements ► Read more

Gibraltar

Gibraltar proposes to tax gains on sales of certain residential real estate
 ▶ Read more

Israel

► Israel to adopt local minimum tax regime (QDMTT) from 2026 ► Read more

Italy

► Italy introduces new provisions to Cooperative Compliance regime
▶ Read more

Kenya

- Kenya High Court rules technical fees are not taxable in source country unless recipient has PE in source country under Kenya-France DTA
 Read more
- Kenya Court of Appeal declares the Finance Act, 2023 unconstitutional one year later ▶ Read more
- Kenya publishes Climate Change (Carbon Markets) Regulations, 2024
 Read more

Republic of Korea

► Korea announces 2024 tax reform proposals, including clarifications of global minimum tax rules ▶ Read more

Luxembourg

- ► Luxembourg proposes reduction in corporate income tax rates and other changes ► Read more

Oman

Oman unveils Capital Market Incentives Program to boost economic growth
 Read more

Peru

Peru enacts rules for levying 18% VAT on use of digital services by individuals ► Read more

Poland

Polish Constitutional Court rules certain MDR provisions unconstitutional as violating tax advisors' legal professional privilege ▶ Read more

Saudi Arabia

Saudi Arabia announces 14th wave of Phase 2 e-invoicing integration
 Read more

South Africa

South Africa publishes amendments to customs duties on lead-acid batteries ► Read more

United Republic of Tanzania

► Tanzanian Finance Act, 2024 makes changes affecting businesses and individuals ► Read more

Türkiye

- Turkiye provides income tax exemption on share-based incentive plans of technology startups
 ▶ Read more
- Turkiye reduces allowed value limits on and increases duties applicable to B2C e-commerce shipments ► Read more
- ► Turkiye enacts and publishes amendments to various tax laws for corporations and individuals, including Pillar Two legislation ► Read more

Vietnam

▶ Vietnam modifies rules for indirect investment abroad ▶ Read more

Global or Other Countries

- ► Global Tax Policy and Controversy Watch | August 2024 edition ► Read more
- ► Trade Talking Points | Latest insights from EY's Trade Strategy team (August 2024) ▶ Read more
- ► EY Global Tax Controversy Flash Newsletter (Issue 72) | The OECD's International Compliance Assurance Programme: an avenue to address cross-border tax challenges? ► Read more
- ► G20 Finance Ministers affirm commitment to BEPS 2.0 and enhanced global tax cooperation ► Read more
- ► G20 Finance Ministers affirm commitment to BEPS 2.0 and enhanced global tax cooperation ► Read more

Contact

Feedback

If you have any questions or suggestions or if you would like to be contacted please send an e-mail to: Feedback

Website

Get more information about our services, activities and events on our website: ey.com/at

Archive

Find our previous issues of this newsletter on our <u>website</u> or send us an inquiry to: newsletter@at.ey.com.

Unsubscribe

If you want to unsubscribe from this newsletter please send an e-mail that contains your name and your e-mail address to ey.crm@ey.com.

Business Tax

Markus Stefaner +43 1 211 70 1283 markus.stefaner@at.ey.com

International Tax

Roland Rief +43 1 211 70 1257 roland.rief@at.ey.com

Transfer Pricing

Andreas Stefaner +43 1 211 70 1041 andreas.stefaner@at.ey.com

Indirect Tax

Ingrid Rattinger +43 1 211 70 1251 ingrid.rattinger@at.ey.com

People Advisory Services

Regina Karner +43 1 211 70 1296 regina.karner@at.ey.com

Global Compliance & Reporting

Maria Linzner-Strasser +43 1 211 70 1247 maria.linzner-strasser@at.ey.com

Transaction Tax

Andreas Sauer +43 1 211 70 1625 andreas.sauer@at.ey.com

Editor and owner of the medium:

Ernst & Young Steuerberatungsgesellschaft m.b.H. ("EY") Wagramer Straße 19, IZD-Tower 1220 Vienna

Responsible Partner

Klaus Pfleger +43 1 211 70 1179 klaus.pfleger@at.ey.com

EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

Working across assurance, consulting, strategy, tax and transactions, EY teams ask better questions to find new answers for the complex issues facing our world today.

The integrated service portfolio of EY is complemented by comprehensive legal advisory services provided by the international network of EY Law, in Austria represented by Pelzmann Gall Gröβ Rechtsanwälte GmbH.

In this publication, "EY" and "we" refer to all Austrian member firms of Ernst & Young Global Limited. Each EYG member firm is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via ey.com/privacy. For more information about our organization, please visit ey.com.

Information according to § 25 Austrian Media Act (MedG) can be accessed here.

In Austria, EY has 4 locations.

© 2024 Ernst & Young Steuerberatungsgesellschaft m.b.H. All Rights Reserved.

Ernst & Young

Steuerberatungsgesellschaft m.b.H. 1220 Vienna, Wagramer Straße 19 4020 Linz, Blumauerstraße 46 5020 Salzburg, Sterneckstraße 33 9020 Klagenfurt, Eiskellerstraße 5

This publication has been prepared for general informational purposes only and is therefore not intended to be a substitute for detailed research or professional advice. No liability for correctness, completeness and/or currentness will be assumed. Neither Ernst & Young Steuerberatungsgesellschaft m.b.H. nor any other member of the global EY organization can accept any responsibility.

ey.com/at