

International Tax Review

Latest information on
international tax
developments provided by EY
Austria

International Tax Developments

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Cuts - English No.
18/2024 and 19/2024

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Austria: EY Tax Short Cuts - English No. 18/2024 of 5 September 2024

- ▶ FAQs on the Upper Limits Directive published
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Austria: EY Tax Short Cuts - English No. 19/2024 of 19 September 2024

- ▶ Tax measures regarding the current flood disasters, information from the Austrian Health Insurance Fund
- ▶ Supplementary prepayments of income tax and corporate income tax 2023
- ▶ Applications for reduction of income tax and corporate income tax prepayments 2024 until 30 September 2024
- ▶ Valorisation of tax brackets as of and tax deductions from 2025 published
- ▶ Interest rate adjustments
- ▶ Reorganisation Reporting Regulation published in the Federal Law Gazette
- ▶ Input tax refund in the EU until 30 September 2024
- ▶ Disclosure of financial statements - deadline and penalties
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OECD Developments

OECD Developments

- ▶ PE Watch | Latest developments and trends, September 2024 [▶ Read more](#)
- ▶ EY Global Tax Controversy Flash Newsletter (Issue 73) | Recent developments reinforce importance of reviewing transfer pricing approach [▶ Read more](#)

Argentina

Country Updates

- ▶ Argentina reduces Impuesto PAIS tax rate [▶ Read more](#)
- ▶ Argentina implements withholding-tax exemption for electronic payments [▶ Read more](#)

Bahrain

- ▶ Bahrain issues domestic minimum top-up-tax legislation [▶ Read more](#)

Brazil

- ▶ Brazilian Federal Revenue Service publishes public consultation regarding proposed transfer pricing regulations applicable to intragroup services and advance pricing arrangements [▶ Read more](#)
- ▶ Brazilian Government proposes to increase combined CIT rate, and withholding tax on INE payments [▶ Read more](#)

Canada

- ▶ Canada proposes UTPR and further amendments to Global Minimum Tax Act [▶ Read more](#)
- ▶ Canada Department of Finance releases revised legislative details to implement changes to increase capital gains inclusion rate [▶ Read more](#)

Colombia

- ▶ Colombian 2024 Tax reform bill submitted to Congress, would affect corporate and capital gains rates, among others [▶ Read more](#)

Curaçao

- ▶ Curacao and Republic of Suriname enter treaty for elimination of double taxation on income and capital [▶ Read more](#)

Country Updates

El Salvador

- ▶ Salvadoran Congress approves tax amnesty program [▶Read more](#)

Germany

- ▶ German Federal Tax Court rules that German dividend withholding tax must be refunded to nonresident funds [▶Read more](#)

Ireland

- ▶ Irish Government publishes second Feedback Statement on introduction of participation exemption for foreign dividends [▶Read more](#)

Kenya

- ▶ Kenya High Court rules club entrance and subscription fees are exempt from VAT [▶Read more](#)
- ▶ Kenya Supreme Court stays Court of Appeal's decision declaring the Finance Act, 2023 unconstitutional [▶Read more](#)

New Zealand

- ▶ New Zealand proposes generic emergency response tax relief measures and other changes [▶Read more](#)

Peru

- ▶ Peru enacts regulations for 18% VAT on use of digital services by individuals [▶Read more](#)

Saudi Arabia

- ▶ Saudi Arabia announces 15th wave of Phase 2 e-invoicing integration [▶Read more](#)

Sweden

- ▶ Sweden | CJEU rules Swedish withholding tax on dividends to foreign public pension funds is contrary to free movement of capital [▶Read more](#)

Switzerland

- ▶ Swiss BEPS 2.0 Pillar Two implementation - applying IIR as per 1 January 2025, delaying UTPR indefinitely [▶Read more](#)

Country Updates

Taiwan

- ▶ Taiwan announces foreign institutional investors may appoint more than one custodian [▶ Read more](#)
- ▶ Taiwan announces proposal increasing AMT rate for certain MNEs from 12% to 15% [▶ Read more](#)

United States

- ▶ Report on recent US international tax developments - 13 September 2024 [▶ Read more](#)
- ▶ Report on recent US international tax developments – 6 September 2024 [▶ Read more](#)
- ▶ US IRS issues penalty relief for failure to pay remaining estimated CAMT installments for 2024 [▶ Read more](#)
- ▶ US Tax Court allows a domestic corporation to claim IRC Section 245A DRD for IRC Section 78 dividend on IRC Section 965 inclusion from fiscal-year CFCs but reduces FTC claim [▶ Read more](#)

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