

International Tax Review

Current information on
international tax
developments provided by EY
Austria

International Tax Developments

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OECD Developments

- ▶ OECD documents on BEPS 2.0 include new details and identify issues under consideration on Pillar One and Pillar Two [▶Read more](#)
- ▶ OECD announces renewed commitment of participating countries to reach consensus on new international tax rules under BEPS 2.0 project in 2020 [▶Read more](#)
- ▶ The Latest on BEPS and Beyond - January 2020 [▶Read more](#)
- ▶ OECD releases additional guidance on Country-by-Country Reporting and a summary of related notification requirements [▶Read more](#)
- ▶ Alert: OECD releases third peer review report on Action 5 on the exchange of tax rulings [▶Read more](#)

EU Developments

- ▶ European Court of Justice rules on Dutch withholding tax reclaim by German investment fund [▶Read more](#)
- ▶ European Commission publishes 2020 Work Programme, including two tax initiatives [▶Read more](#)
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Algeria

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Argentina

- ▶ Argentina allows payments of dividends and profits to nonresidents without prior authorization if certain conditions are met [▶Read more](#)
- ▶ Argentina suspends promotional regime for knowledge-based economy [▶Read more](#)
- ▶ Argentina implements new tax on purchase of foreign currency [▶Read more](#)

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- ▶ Australian Taxation Office issues Taxpayer Alert on non-arm's length arrangements and schemes connected with the DEMPE of intangible assets [▶Read more](#)

Bahrain

- ▶ Deadline for Bahrain VAT refund for nonresident businesses approaching [▶Read more](#)
- ▶ Central Bank of Bahrain publishes reporting template for economic substance requirements [▶Read more](#)
- ▶ Bahrain publishes economic substance guidance for non-regulated commercial activities [▶Read more](#)

Canada

- ▶ Canada again begins Canada-US-Mexico Agreement (CUSMA) ratification [▶Read more](#)
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Chile

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China

- ▶ China adjusts certain 2020 commodity import tariff rates [▶Read more](#)
- ▶ US and China sign Phase One Economic and Trade Agreement though tariffs remain [▶Read more](#)

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- ▶ Costa Rica's tax authorities publish updated list of non-cooperative jurisdictions [▶Read more](#)
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- ▶ Costa Rica-Mexico Double Tax Treaty now applies [▶Read more](#)
- ▶ Costa Rica's General Directorate of Customs publishes resolution on the Customs Declaration Message Format [▶Read more](#)

Cyprus

- ▶ Cyprus deposits MLI instrument of ratification [▶Read more](#)
- ▶ Cyprus-Kazakhstan double tax treaty enters into force [▶Read more](#)

Denmark

- ▶ Danish Parliament enacts final MDR legislation [▶Read more](#)

Dominican Republic

- ▶ Dominican Republic's National Council of Free Trade Zones of Exportation modifies VAT exemption card validity period [▶Read more](#)

Ecuador

- ▶ Ecuador-Japan double tax treaty is now in force [▶Read more](#)

El Salvador

- ▶ El Salvador approves tax amnesty program [▶Read more](#)

Finland

- ▶ Finland passes Act to implement Mandatory Disclosure Rules [▶Read more](#)

France

- ▶ France's 2020 Social Security Finance and Income Tax Bills to introduce significant changes [▶Read more](#)

Germany

- ▶ European Court of Justice rules on Dutch withholding tax reclaim by German investment fund [▶Read more](#)

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- ▶ Germany's Ministry of Finance revises standards for proper management and storage of books, records and documents in electronic form [▶Read more](#)

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- ▶ Ghana's High Court decision allows monthly upfront mortgage concession for employees [▶Read more](#)

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- ▶ Hungarian Minister of Finance proposes local business tax cut for manufacturers, principals and R&D activities [▶Read more](#)

India

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Indonesia

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Ireland

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- ▶ Italy: Review of public consultation on Italian insurance distribution [▶Read more](#)
- ▶ Italy's Digital Services Tax enters into force as of 1 January 2020 [▶Read more](#)
- ▶ Italy introduces proportional tax on plastic items [▶Read more](#)

Japan

- ▶ Ecuador-Japan double tax treaty is now in force [▶Read more](#)

Kazakhstan

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Kenya

- ▶ Kenya Revenue Authority issues guidelines on implementation of recent legislative changes to Import Declaration Fee and Railway Development Levy [▶Read more](#)

Luxembourg

- ▶ Luxembourg State Council issues opinion on draft MDR legislation - Application of legal professional privilege to be revised [▶Read more](#)
- ▶ Luxembourg transposes EU Tax Dispute Resolution Directive into domestic law [▶Read more](#)
- ▶ Luxembourg implements EU ATAD 2 - A detailed review [▶Read more](#)

Mexico

- ▶ Costa Rica-Mexico Double Tax Treaty now applies [▶Read more](#)

Netherlands

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- ▶ Panama's tax authority issues resolution regulating the country-by-country notification obligation [▶Read more](#)

Poland

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- ▶ Qatar deposits MLI ratification instrument [▶Read more](#)
- ▶ Qatar introduces transfer pricing documentation requirements [▶Read more](#)

Romania

- ▶ Romania issues draft mandatory disclosure regime legislation [▶Read more](#)

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- ▶ South Africa enacts Tax Amendment Acts for 2020 [▶Read more](#)

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- ▶ South Sudan enacts Finance Act 2019/20 [▶Read more](#)

Taiwan

- ▶ Taiwan amends filing thresholds for master file and Country-by-Country report [▶Read more](#)
- ▶ Taiwan releases final regulations on undistributed earnings tax exemption for substantive investments [▶Read more](#)

Thailand

- ▶ Thailand issues revised draft of VAT bill on foreign e-business for public consultation [▶Read more](#)

Country Updates

Turkey

- ▶ Turkey publishes Draft General Communiqué on Digital Services Tax [▶ Read more](#)
- ▶ Turkey imposes recycling contribution fee [▶ Read more](#)
- ▶ Turkey's 7.5% Digital Services Tax to be effective 1 March 2020 [▶ Read more](#)

United Kingdom

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- ▶ UK: Brexit Withdrawal Agreement, future trading relationship, immigration and VAT implications [▶ Read more](#)
- ▶ Brexit: UK HMRC provides guidance to EU businesses and removes opportunity for advance VAT registrations [▶ Read more](#)

United States

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- ▶ Report on recent US international tax developments - 31 January 2020 [▶ Read more](#)
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- ▶ US IRS rules target's capitalized transaction costs do not create a separate and distinct intangible asset [▶ Read more](#)
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- ▶ Updated US list of foreign currency futures contracts - starting point for Section 1256 [▶ Read more](#)
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- ▶ US states Maryland and Nebraska propose taxing revenues from digital advertising [▶ Read more](#)
- ▶ US Treasury and IRS issue final FATCA and chapter 3 regulations [▶ Read more](#)
- ▶ US and China sign Phase One Economic and Trade Agreement though tariffs remain [▶ Read more](#)
- ▶ US and Japan formalize initial Trade Agreements, effective 1 January 2020 [▶ Read more](#)

Country Updates

Uruguay

- ▶ Uruguay's tax authorities update list of low- or no-taxation countries and jurisdictions and aligns it with the transfer pricing list [▶Read more](#)
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Zambia

- ▶ Zambian Government issues 2020 Tax Amendment Acts [▶Read more](#)
- ▶ Zambia amends VAT legislation [▶Read more](#)

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Business Tax

Dr. Markus Schragl
Phone +43 1 211 70 1268
markus.schragl@at.ey.com

International Tax

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

Transfer Pricing

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

Indirect Tax

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

People Advisory Services

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

Global Compliance & Reporting

Maria Linzner-Strasser
Phone +43 1 211 70 1247
Maria.Linzner-Strasser@at.ey.com

Transaction Tax

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

Editor and owner of the medium:

Ernst & Young
Steuerberatungs-
gesellschaft m.b.H. ("EY")
Wagramer Straße 19
1220 Vienna

Responsible Partner

Klaus Pflieger
Phone +43 1 211 70 1179
klaus.pflieger@at.ey.com

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**Ernst & Young
Steuerberatungsgesellschaft m.b.H.**
1220 Wien, Wagramer Straße 19
4020 Linz, Blumauerstraße 46
5020 Salzburg, Sterneckstraße 33
9020 Klagenfurt, Eiskellerstraße 5

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