

# Americas Tax Roundup

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## Latest news – Americas

### [Brazil allows taxpayers to settle certain debts from the tax regime preceding Law No. 12,973/2014](#)

The Brazilian Office of the General Counsel for the National Treasury published, on 3 May 2022, [Public Notice 9/2022](#), which allows taxpayers to settle debts arising from the amortization of goodwill under the tax regime preceding Law No. 12,973/2014. Before entering into a settlement agreement, taxpayers should consider the tax and financial implications.

### [Brazil increases social contribution on net profits rate for financial institutions and insurance companies](#)

Brazil published Provisional Measure No. 1,115, which increases the social contribution on net profits rate from 20% to 21% for banks, and from 15% to 16% for insurance companies and other financial institutions. The increased rate applies until 31 December 2022.

### [Canada | Highlights from the CRA's 2020 Mutual Agreement Procedure Report](#)

The Canada Revenue Agency released its Mutual Agreement Procedure (MAP) Program Report for calendar year ended 31 December 2020. The report provides an overview of the operations of the Canadian MAP program, including statistical analyses of cases completed and in progress.

### [Cayman Islands' new enforcement guidelines detail circumstances under which financial institutions could face penalties for failing to comply with Common Reporting Standard](#)

In [Enforcement Guidelines](#), the Cayman Islands' Department for International Tax Cooperation (DITC) outlined the circumstances under which financial institutions could face penalties for failing to comply with the Common Reporting Standard. The DITC also discussed the process by which financial institutions would be notified of penalties, and the notice and appeals process by which they may contest penalty imposition.

### [US Department of Homeland Security issues rule to increase Automatic Extension of Work Authorization for certain applicants with pending renewals](#)

Effective 4 May 2022, certain applicants with requests to renew their Employment Authorization Documents (EAD) currently pending with US Citizenship and Immigration Services (USCIS) will receive an increased extension of work authorization from 180 days to 540 days beyond the expiration of their EAD. This temporary measure is intended to address current USCIS processing backlogs and delays of EAD applications.

### [ITTS Washington Dispatch \(April 2022\) available](#)

The monthly ITTS Washington Dispatch (April) has been released. Highlights include recent legislative developments and IRS and OECD/BEPS news.

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## This week's tax treaty news in the Americas

- ▶ United States and Kenya: negotiations for a free trade agreement held



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## Upcoming webcasts

### [International tax talk \(10 May\)](#)

This webcast will address how the recent US foreign tax credit (FTC) regulations are expected to impact the ability of US MNEs to claim credits in the United States. At a high level, the webcast will also consider the interplay between the US FTC regulations, US policy perspectives and implementation of the OECD's BEPS 2.0 initiative.

### [How MNEs can adapt to TP developments in financial transactions and related controversy \(11 May\)](#)

This webcast will address the ongoing developments in the Americas and Europe in financial transaction transfer pricing, the associated controversy environment and how multinational enterprises can practically respond.

### [BEPS webcast: What companies should know about the latest BEPS 2.0 dynamics \(12 May\)](#)

In this webcast, panelists will provide an update on the latest OECD/G20 project developments and address key practical questions related to BEPS 2.0 Pillar One and Pillar Two that are important in preparing for the "new normal" in this evolving global legislative landscape.

### [BorderCrossings . . . US state and local tax transfer pricing update \(25 May\)](#)

This month's BorderCrossings webcast examines transfer pricing (TP) topics in US state and local tax. The panel will discuss issues arising from transactions and global economic developments impacting domestic TP. Panelists will also review the latest state tax administrative approaches to resolving TP disputes, such as state advanced pricing agreement initiatives, as well as recent case law and legislative proposals – highlighting controversy considerations for multicorporate businesses.

For a full list of upcoming webcasts, please access EY's webcast page on ey.com [here](#).

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## Recently archived webcasts

### [Leverage data and AI to enable Finance and Tax to pioneer transformation throughout the organization](#)

In this webcast, EY and Microsoft reported on how data and AI enable the transformation of the Finance and Tax functions to accelerate meaningful change and improve business outcomes.

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## Recently issued EY podcasts

### [US Cross-Border Taxation weekly podcast, 6 May 2022](#)

EY's weekly US Cross-border Taxation podcast reviews the week's US international tax-related developments. Highlights this week include:

- ▶ US Treasury Secretary calls on Congress to pass BEPS-like minimum corporate tax
- ▶ Treasury officials comment on BEPS 2.0 – IRS publishes changes to QI withholding agreement rules
- ▶ IRS unclear on scope of financial transaction transfer pricing regulation project
- ▶ US House Ways and Means Committee members request delay to implementation of final FTC regulations
- ▶ First-ever US-Croatia income tax treaty under US State Department review

You can register for this weekly podcast on iTunes [here](#).



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## This week's EY Global Tax Alerts

### Americas Global Tax Alerts

- ▶ [Report on recent US international tax developments – 6 May 2022](#)
- ▶ [Canada | Highlights from the CRA's 2020 Mutual Agreement Procedure Report](#)
- ▶ [Brazil allows taxpayers to settle certain debts from the tax regime preceding Law No. 12,973/2014](#)
- ▶ [Cayman Islands' new enforcement guidelines detail circumstances under which financial institutions could face penalties for failing to comply with Common Reporting Standard](#)
- ▶ [Brazil increases social contribution on net profits rate for financial institutions and insurance companies](#)
- ▶ [Canada | Ontario issues budget 2022/23](#)

### Other Global Tax Alerts

- ▶ [South Africa's Minister of Finance proposes further disclosure of wealth](#)

### Transfer Pricing Alerts

- ▶ [Denmark introduces new filing requirements for transfer pricing documentation](#)

### Human Capital Alerts

- ▶ [US Department of Homeland Security issues rule to increase Automatic Extension of Work Authorization for certain applicants with pending renewals](#)

### Indirect Tax Alerts

- ▶ [EU imposes sanctions in response to war in Ukraine](#)
- ▶ [UK Tax Authority updates Plastic Packaging Tax Guidance](#)

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## EY Industry and Tax Services publications

### Industries

#### Financial Services

- ▶ [Upcoming webcast: Let's talk strategy: How digital disruption is redefining an industry](#)

### Services

#### People and workforce

- ▶ [Updated: How COVID-19 is disrupting immigration policies and worker mobility: a tracker](#)

### Comments

If you have any questions or suggestions about this newsletter, please email Global Tax News Update Help at: [globaltaxnewsupdatehelp@ey.com](mailto:globaltaxnewsupdatehelp@ey.com).



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