

# Americas Tax Roundup

# Latest news - Americas

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# Argentine Congress approves Budget bill for 2023

The Argentine Chamber of Senators gave final approval to the Budget bill for 2023 on 17 November 2022. The bill includes a new disclosure program for unreported foreign currency and the expansion of the normalization program of local and foreign currency for construction investments.

# Brazil and United Kingdom sign comprehensive double tax treaty

On 29 November 2022, Brazil and the UK signed a first-ever double tax treaty

(DTT). The DTT incorporates post-BEPS minimum standards and key items from the existing OECD and UN model tax treaties.

#### Peru enacts rules for the online payment of taxes by nonresidents

On 27 November 2022, Peru enacted rules allowing nonresident taxpayers to pay their income tax online. Nonresident taxpayers must make their payments through the Peruvian tax authority's online platform and must pay by credit card or debit card.

#### Colombia's Tax Reform includes key provisions on individual taxation

Colombia's Congress approved the tax reform bill on 17 November 2022. The reform bill contains several provisions with respect to individual taxation, as wells equity tax and capital gains.

## Uruguay updates conditions for employees to work remotely under Free Trade Zone regime

Uruguay's National Directorate of Free Trade Zones has clarified the requirements with which employers must comply under the remote work regime and postponed Decree the 319/022 effective date.

## OECD releases corporate tax statistics and the 2022 revenue statistics and consumption tax trends

On 17 November 2022, the OECD released the fourth edition of its annual Corporate Tax Statistics publication (the <u>Corporate Tax Report</u>) together with an updated <u>database</u>. The OECD describes the database as intended to assist in the study of corporate tax policy and expand the quality and range of data available for the analysis of base erosion and profit shifting activity.

#### OECD's 2021 mutual agreement procedure statistics show US continues to decrease case inventory

Newly-released <u>statistics</u> from the OECD on the Mutual Agreement Procedure (MAP) show that the US MAP program's inventory decreased in 2021. In addition, the US MAP program closed more cases (that were started on or after 1 January 2016) than it opened in 2021.



# This week's tax treaty news in the Americas

- Argentina and United States: 2022 FATCA agreement signed
- Brazil and Poland: social security agreement initialed
- Chile and Romania: social security agreement approved by Chilean Senate
- Colombia and Uruguay: income and capital tax treaty approved by Uruguayan Senate
- Costa Rica and Ecuador: fourth round of negotiations for free trade agreement held

# Upcoming webcasts

#### Omnishoring: Recent trends in supply chain, tax and global trade (13 Dec)

A global EY panel will discuss the current factors that affect supply chain. This session will cover the macroeconomic, geopolitical and operational trends driving multinationals to reconsider the resilience of their supply chain across the manufacturing, logistics, distribution and sales functions.

#### Tax in the time of COVID-19: update on US legislative, economic, regulatory and IRS developments (16 Dec)

COVID-19 and the resulting economic crisis have made reacting to tax developments more complicated than ever. Join us for the next webcast in our series as we discuss how businesses can navigate the tax policy environment and continue to effectively operate their tax function in this time of crisis and change. Panelists will provide updates on: (i) the US economy and tax policy; (ii) breaking developments; and (iii) what's happening at the IRS.

For a full list of upcoming webcasts, please access EY's webcast page on ey.com <a href="here">here</a>.

# Recently archived webcasts

## How to navigate information requests in transfer pricing audits

This webcast addressed various cross-border controversy topics and featured insights from EY professionals around the globe.

#### Global treasury: Key tax trends and topics to consider for 2023

A global EY panel discussed key tax trends and topics that will affect global treasury activity in 2023. This session covered multinationals' cash management and risk management activities, as well as the potential effect of OECD BEPS 2.0 Pillar Two and the trends in financial transaction transfer pricing controversy.

# Recently issued EY podcasts

# US Cross-Border Taxation weekly podcast, 9 December 2022

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

- ▶ US Congress grapples with government funding in lame duck, will impact tax package options
- US, Croatia sign tax treaty
- OECD releases consultation document on design elements of BEPS Pillar One Amount B re: simplification of transfer pricing rules

You can register for this weekly podcast on Apple Podcasts here.



# This week's EY Global Tax Alerts

## Americas Global Tax Alerts

- Report on recent US international tax developments 9 December 2022
- OECD releases corporate tax statistics and the 2022 revenue statistics and consumption tax trends
- OECD's 2021 mutual agreement procedure statistics show US continues to decrease case inventory
- PE Watch: Latest developments and trends, December 2022
- Argentine Congress approves Budget bill for 2023
- Brazil and United Kingdom sign comprehensive double tax treaty
- Colombia's Tax Reform includes key provisions on individual taxation
- Peruvian Tax Authority introduces rules for online payment of taxes by nonresidents
- Uruguay updates conditions for employees to work remotely under Free Trade Zone regime

# **Human Capital Alerts**

- Malaysia announces Long-Term Pass holders now eligible to use Autogate facility at two Malaysian airports
- Netherlands publishes new salary requirements for 2023
- Global Portuguese consular workers' strike cancelled
- Switzerland extends Service Mobility Agreement with the UK until 31 December 2025
- United Kingdom updates list of Immigration Skills Charge exemptions effective 1 January 2023
- UK Border Force to strike from 23 to 31 December 2022

#### **Indirect Tax Alerts**

- European Commission publishes proposals for VAT in the Digital Age
- Poland issues draft regulations on mandatory electronic invoicing
- Singapore passes Goods and Services Tax (Amendment) Bill 2022

#### Other Global Tax Alerts

- ► EU Member States give final approval to Foreign Subsidies Regulation
- **EU** publishes Directive proposal on tax transparency rules for crypto-assets
- ▶ Italy releases initial draft of 2023 Budget Law
- Kenya Court of Appeal upholds decision of the High Court of Kenya and declares minimum tax unconstitutional
- Kenya signs MCAA for Exchange of Country-by-Country reports | Implications for MNEs operating in Kenya
- Netherlands issues favorable withholding tax Decree dealing with disregarded entities
- Saudi Arabia extends tax amnesty initiative
- ▶ UAE Ministry of Finance releases Corporate Tax Law



# EY Industry and Tax Services publications

# Industry Technology

Top 10 opportunities for technology companies in 2023

#### Oil & Gas

Five ways oil and gas can lead the race to decarbonization

#### Consumer Products & Retail

How consumer-facing companies can speed up, as economies slow down

#### Services

#### People and workforce

Updated: How COVID-19 is disrupting immigration policies and worker mobility: a tracker

#### Comments

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