

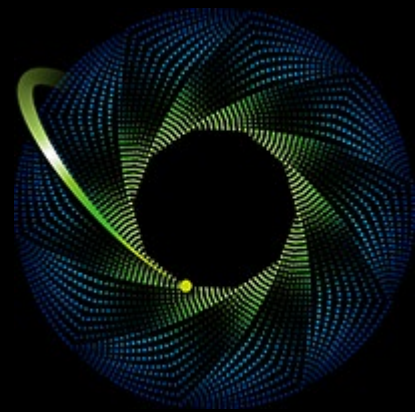
World Tax Advisor

A world of news with tax@hand.



US notice addresses treatment of section 961(c) basis adjustments

This article discusses a notice released by the Department of the Treasury and the Internal Revenue Service announcing their intention to issue proposed regulations that address the treatment of basis adjustments made in certain transactions in which a domestic corporation acquires the stock of a controlled foreign corporation from another controlled foreign corporation. A taxpayer may rely on the notice for transactions completed on or before the date the proposed regulations are published.



Greece

Rates for capital duty and listed stock sales tax reduced

Reduced rates of capital duty and listed stock sales tax are now applicable. Capital duty applies at a rate of 0.2% to transactions where the corresponding tax obligation arises on or after 11 December 2023, while listed stock sales tax applies at a rate of 0.1% for sales of listed shares settled on or after 2 January 2024.

Guatemala

Expectations regarding SAT's investigation and audit approach for 2024

The Superintendency of Tax Administration's investigation and audit approach for 2024 is expected to maintain the trend of risk-based inspections. This article describes some of the factors analyzed to identify potential risks,

which may be considered in the selection of companies for tax investigations and audits.



Luxembourg

Tax credits will benefit companies investing in digital and green transformation

A law to modernize the investment tax credit is effective as from 1 January 2024. The changes include an increase in the tax credit rates for overall investments and the replacement of the tax credit for additional investments with a tax credit for investments and operational expenses incurred during an eligible taxpayer's digital transformation or ecological and energy transition.



Malaysia

Finance (No. 2) Act 2023 enacted, introduction of CGT on unlisted shares clarified

The enacted Finance (No. 2) Act 2023 adopts all provisions proposed in the finance bill, including provisions introducing capital gains tax on the disposal of certain assets by certain legal entities. An order has been gazetted to provide that gains from disposals of unlisted shares of Malaysian-incorporated companies occurring prior to 1 March 2024 generally will be exempt from capital gains tax.



Portugal

DAC 7: Guidance published in relation to obligations of digital platform operators

Two government ordinances have been published relating to registration and reporting obligations that may apply to digital platform operators following the transposition of Council Directive (EU) 2021/514 (commonly referred to as "DAC 7") into Portuguese domestic law. The first annual reporting obligations for digital platform operators must be fulfilled by 31 January 2024.



Sweden

Definition of a "permanent stay" for purposes of individual tax residence proposed

The Swedish Tax Agency has submitted a proposal to the government for a definition of a "permanent stay" to be introduced within Swedish tax legislation, with the intention of clarifying the circumstances in which the physical presence in Sweden of non-Swedish domiciled individuals can trigger Swedish tax residency. The suggestion is for the new definition to enter into force as from 1 January 2025.



United States

IRS considers effects of group membership on financial transactions

A memorandum has been released that addresses the Internal Revenue Service's consideration of group membership in determining the arm's length rate of interest chargeable for intragroup loans, as well as transfer pricing adjustments in accordance with guidance articulated in regulations issued under section 482 of the Internal Revenue Code.



United States

Tax package includes business tax relief, child tax credit enhancements, and more

A bipartisan tax relief package includes temporary provisions that would reverse several "taxpayer-unfriendly" business provisions enacted in the Tax Cuts and Jobs Act of 2017 and enhance the child tax credit. Other provisions relate to the reduction of double taxation on Taiwanese companies operating in the US, the employee retention tax credit, and the filing requirements for certain information returns.

Have you visited Deloitte tax@hand?

Tax reform. Unprecedented change. Unique challenges. This is the future of tax. How can you stay ahead? Understand what changes are unfolding in the global tax landscape. Be informed so that you can turn change into opportunity. For the latest tax news and information from over 80 countries, [visit tax@hand](#) or [download](#) the tax@hand mobile app today.

Helpful Resources

[Subscribe to World Tax Advisor](#)
[World Tax Advisor archives](#)
[Business Tax](#)
[Deloitte International Tax Source](#)
[Join Dbriefs](#)
[Follow us on Twitter](#)

Have a question?

If you have any questions about the content in *World Tax Advisor*, please email [Karen Ebert](#) or [Alison Brock](#).

Did someone forward you this message? Skip the grapevine. Receive this newsletter email by clicking on the [subscribe](#) link above to hear it first.

30 Rockefeller Plaza
New York, NY 10112-0015
United States

© 2024. For information, contact Deloitte Touche Tohmatsu Limited.



This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms or their related entities (collectively, the “Deloitte organization”) is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see [www.deloitte.com/about](#) to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte’s approximately 415,000 people worldwide make an impact that matters at [www.deloitte.com](#).