

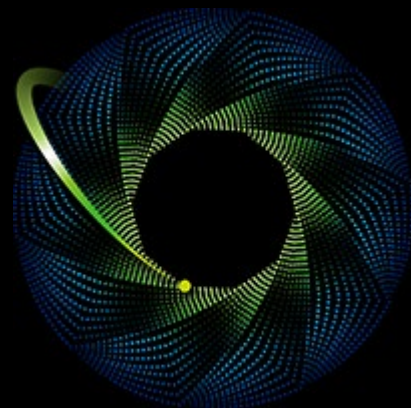
World Tax Advisor

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German Ministry of Finance confirms tax-free treatment of capital repayments from non-EU subsidiaries

The Ministry of Finance has issued a decree confirming that a non-EU subsidiary may make a tax-free repayment of capital to a German corporate shareholder and setting forth related rules and documentation requirements to prove the character of such a repayment. The decree generally aligns with principles established in several federal tax court decisions.



Belgium

Mutual agreement with Netherlands on cross-border workers to end on 30 June 2022

The governments of Belgium and the Netherlands have agreed not to extend the mutual agreement on the tax status of cross-border workers working from home during the COVID-19 pandemic beyond 30 June 2022; thereafter, the normal rules under the 2001



El Salvador

Considerations regarding cost contribution arrangements and transfer pricing analysis

This article provides an overview of some relevant considerations for taxpayers carrying out transactions with related parties that are covered by a cost contribution arrangement and aims to help taxpayers ensure that their transfer pricing analysis supports that the conditions for such transactions are in line with

Belgium-Netherlands tax treaty will apply for the sourcing of employee income.



Guatemala

Obligation to include detail on local suppliers in monthly VAT returns reinstated

A final decision of the Constitutional Court has ended the temporary suspension of the obligation for taxpayers to report certain details on their main local suppliers in an annex to electronic form SAT 2237, the monthly VAT return and payment form.



Mexico

Postponement of supplemental “carta porte” requirement could cause unexpected issues

The Service Tax Administration has postponed until 30 September 2022 the requirement to issue a supplemental bill of lading with electronic tax invoices when certain carriers transfer goods into the country by land, sea, rail, or air; this article also discusses some potential issues relating to the postponement.

the arm’s length principle and that the analysis is appropriately documented.



Israel

Supreme Court ruling addresses tax rate on distributable profits element of gain

Based on a ruling by the Supreme Court, individuals may be entitled to a reduced capital gains tax rate on the gain attributable to the distributable profits component of the gain arising on a sale of unquoted shares of a company that is an approved enterprise under the Encouragement of Capital Investments Law.



Singapore

Update on initiatives to demonstrate good tax governance and tax risk management

This article discusses the Tax Governance Framework and the Tax Risk Management Control Framework for Corporate Income Tax, which are voluntary compliance initiatives offered by the Inland Revenue Authority of Singapore to help companies demonstrate good tax governance and tax risk management.



Thailand

Rules provided for claiming tax incentive for investments in automation systems

The Director-General of the Revenue Department has issued a notification on income tax setting forth rules, criteria, and conditions for claiming the additional corporate income tax deduction for investment expenditure incurred to purchase machinery and computer software for qualifying automation investment projects.



Thailand

Rules provided for individuals to offset certain gains and losses from digital assets

A ministerial regulation and a notification on income tax from the Director-General of the Revenue Department have been issued that provide for a personal income tax exemption for certain capital gains derived from the transfer of cryptocurrency or digital tokens, in an amount equal to the capital losses incurred from the transfer of such assets during the same tax year.

Tax treaty round up

Recent developments with respect to the following tax treaties: Brazil-Chile, Georgia-Hong Kong SAR, Japan-Morocco, Monaco-United Arab Emirates, and Morocco-Serbia.

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