

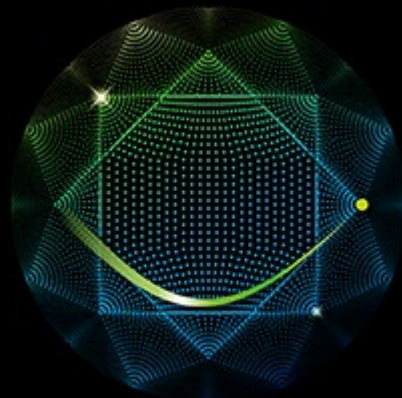
World Tax Advisor

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Letter from bipartisan group of US House taxwriters details taxpayer concerns about foreign tax credit regulations

A bipartisan group of taxwriters from the House of Representatives has written a letter asking Treasury Secretary Janet Yellen to work with companies and other stakeholders to provide further guidance and safe harbors for recently finalized regulations on foreign tax credits and to extend the deadline for implementing the new rules.



Belgium

Practical guidance on new tax regime for inbound taxpayers and researchers issued

The tax authorities have released a circular letter providing additional clarification regarding the new expatriate tax regime for inbound taxpayers and researchers, which generally is applicable as from 1 January 2022.



Bermuda

CRS deadlines for 2021 reporting year extended and reminders issued

The Ministry of Finance has published a notice extending the deadline for Bermuda reporting financial institutions to submit Common Reporting Standard filings for the period ended 31 December 2021, which also includes a number of other reminders for reporting financial institutions.



France

Tax consolidation: *Steria* does not extend to dividends paid by non-EU companies

The Versailles administrative court of appeal has ruled in two decisions that the French participation exemption applicable to dividend distributions from group companies within the EU did not extend to dividend distributions from non-EU group companies and that the denial of the exemption did not violate principles of EU law.



Germany

Lower tax court treats cryptocurrency gains as taxable income

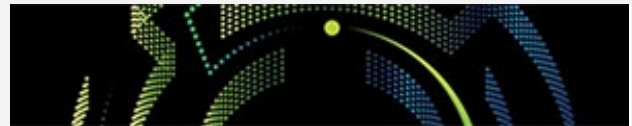
The lower tax court of Cologne has ruled that capital gains from the sale of cryptocurrencies are taxable as “other income” because cryptocurrencies qualify as assets for income tax purposes; the ruling is in line with some other lower tax court rulings and the Ministry of Finance’s position.



Indonesia

Regulations governing VAT and income tax treatment of cryptoasset trading issued

This article discusses regulations recently issued by the Minister of Finance that address the VAT and income tax treatment of cryptoasset trading in Indonesia, which include definitions of relevant terms, information on the types of cryptotransactions covered, and confirmation of the VAT and income tax treatment of cryptotransactions.



Malaysia

Tax Corporate Governance Framework introduced

The Inland Revenue Board has issued the Tax Corporate Governance Framework and Tax Corporate Governance Guidelines in response to the increasing expectation for organizations in Malaysia to implement governance practices that enhance the accountability, transparency, and integrity of the tax system.



New Zealand

The reality is here: Inland Revenue releases final details for trust disclosure rules

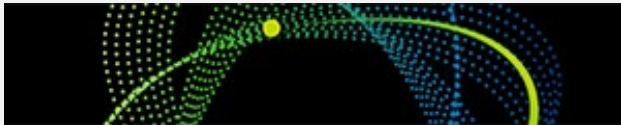
Inland Revenue has released final details on the new disclosures that trustees must make when filing trust tax returns, which include financial statement disclosures and certain disclosures of details on distributions, beneficiaries, and settlors.



OECD

OECD requests comments on regulated financial services exclusion under “Amount A”

As part of the ongoing work of the OECD/G20 Inclusive Framework on BEPS on a two-pillar solution to address the tax challenges arising from the digitalization of the economy, the OECD has invited public comments on a consultation document on the exclusion of revenues and profits from regulated financial institutions from the scope of “Amount A” under Pillar One; comments are requested by 20 May 2022.



South Africa

The evolution of value-added tax on electronic services

This article highlights some of the key considerations and current developments in respect of the VAT legislation pertaining to electronic services; the article also covers some examples and issues taxpayers have encountered, to illustrate the practical complexities.



Various jurisdictions

Global tax rates 2022 available

Deloitte’s Global tax rates 2022 is now available, providing corporate income tax, historic corporate income tax, and domestic withholding tax rates for more than 130 jurisdictions.

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