

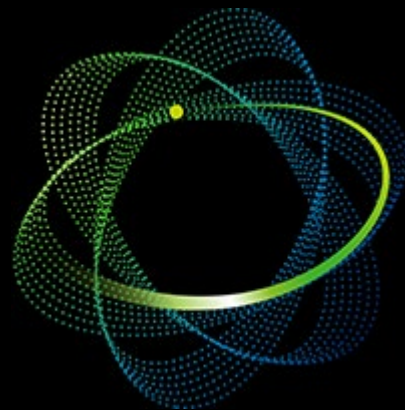
World Tax Advisor

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Customs and tax authorities in China Mainland city of Shenzhen announce transfer pricing collaboration

The collaboration program on transfer pricing administration announced by the city's customs and tax authorities allows qualifying businesses in Shenzhen to have their transfer pricing arrangements for the importation of goods from related parties accepted by both authorities and should increase certainty for taxpayers. It essentially consolidates two existing procedures—advance rulings on customs pricing and advance pricing arrangements.



Germany

Upper house of parliament approves fourth COVID-19 tax relief bill

The upper house of parliament has approved a bill that contains various measures to continue to support taxpayers affected by the ongoing consequences of the pandemic, including extensions of certain loss carryback provisions. The final bill enhances several of the Ministry



India

Supreme Court rules service tax applied on reimbursed costs of seconded employees

The Supreme Court has ruled that the reimbursement by an Indian company of the salary and other costs of seconded employees gave rise to a supply of "manpower services" on which service tax was payable under the reverse charge mechanism. The ruling nullifies

of Finance's initial proposals and provides for a further extension of the tax return filing deadlines.



Malaysia

High Court holds that gains from intellectual property transfer were revenue in nature

The High Court has ruled that because the taxpayer failed to provide evidence that a transfer of technical know-how was an outright sale and the consideration received was based on projected future income, the proceeds were revenue in nature. The court also concluded that in view of the circumstances, the tax authorities were not time-barred from issuing an assessment and imposing penalties. The ruling has been appealed.



Saudi Arabia

Tax authorities announce tax amnesty program

The Zakat, Tax and Customs Authority has announced a tax amnesty program for the relief of certain penalties, which is available to taxpayers as from 1 June through 30 November 2022. The taxes covered include VAT, withholding tax, excise tax, income tax,

the view adopted by various benches of the Customs Excise and Service Tax Appellate Tribunal. The principles established in the case potentially also may be relevant under the goods and services tax regime.



New Zealand

Consultation on the disputes resolution process launched

Inland Revenue has released for public consultation a draft standard practice statement (SPS) on the disputes resolution process. The draft SPS combines two existing SPSs and sets out each phase of the disputes process, detailing the rights and requirements of both the taxpayer and the Commissioner of Inland Revenue. The deadline for comments on the draft SPS is 24 June 2022.



United Kingdom

EU General Court rules in favor of European Commission in UK CFC state aid case

The General Court has handed down its judgment in favor of the European Commission in the lead cases in the UK controlled foreign company state aid litigation. The court upheld the European Commission's 2019 decision that between 1 January 2013 and 31 December

and real estate transaction tax; customs duties are not within the scope of the program.

2018, the group financing exemption within the UK's controlled foreign company rules was incompatible with EU state aid rules.

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