

World Tax Advisor

A world of news with tax@hand.



Greek PEs of EU/EEA companies eligible for capital gains participation exemption

A circular issued by the Independent Authority for Public Revenue clarifies that the corporate income tax exemption for capital gains from the sale of shares applies when the beneficial owner of the income is a Greek permanent establishment of a foreign entity based in the EU or European Economic Area.



Belgium

Deadline to apply for new tax regime for inbound taxpayers and inbound researchers likely will be extended

The parliamentary Finance Committee has adopted an amendment to extend the deadline to submit applications to participate in the new expatriate tax regime for inbound taxpayers and inbound researchers from 31 July 2022 to 30 September 2022.



European Union

Cross-border workers COVID-19 “no-impact” position extended through 31 December 2022

Representatives of the European Economic Area countries and Switzerland have decided to extend the no-impact position for social security purposes through 31 December 2022, so that changes in work patterns resulting from COVID-19 do not affect the applicable social security legislation.



France

FTA repeals several provisions of DST guidelines

The tax authorities have repealed certain provisions of the administrative guidelines regulating the 3% digital services tax; the provisions narrowed the exclusion of intragroup services and the definition of excluded online games and had been ruled illegal by the Administrative Supreme Court.



Germany

Tax authorities issue guidance on amended RETT rules

Two decrees issued by the tax authorities provide guidance on the application of the amended real estate transfer tax rules in cases involving corporations and partnerships owning real estate, including the extension to corporations of certain rules previously applicable only to partnerships.



India

Updated guidance on mutual agreement procedure issued

Guidance issued by the Central Board of Direct Taxes addresses areas not covered in previous guidance and includes new sections dealing with matters resolved under the direct tax resolution scheme and an applicant's responsibilities.



OECD

Tax highlights of statement from OECD 2022 Ministerial Council Meeting

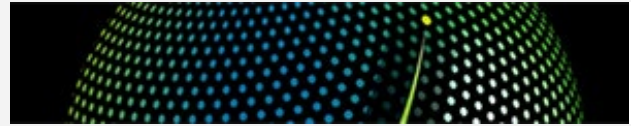
In a statement issued at the conclusion of the annual ministerial council meeting, ministers welcomed OECD initiatives on carbon mitigation and the role of tax policy in gender equality, adopted a new recommendation on fighting tax crime, and reaffirmed their commitment to implement the OECD/G20 inclusive framework's two-pillar solution to address the tax challenges arising from digitalization.



Taiwan

Revised template for transfer pricing report available for public consultation

The Ministry of Finance continues to seek comments on a new draft transfer pricing report template that would require taxpayers to provide additional analysis and explanation of their transfer pricing policies and adjustments.



United Kingdom

Domestic start date for Pillar Two global minimum tax rules deferred

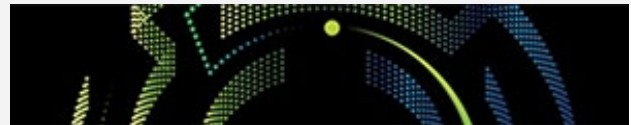
Her Majesty's Treasury has announced the deferral through 31 December 2023 of the proposed implementation date in the UK of the global minimum tax rules under Pillar Two; the rules will apply to accounting periods beginning on or after 31 December 2023.



United States

Hungary's opposition to global minimum tax has implications for Biden administration

The decision by Hungary to veto proposals at a meeting of EU finance ministers for an EU directive to implement the global minimum tax rules under Pillar Two also may have implications in the US, as President Biden's administration seeks to have the US conform to Pillar Two in 2022.



United States

FTC regulations: Ways and Means Republicans renew push to delay implementation

Republicans on the House Ways and Means Committee have renewed their call to delay through 1 January 2023 the implementation of final foreign tax credit regulations that were issued in late December 2021 and took effect on 7 March 2022.

Tax treaty round up

Recent developments with respect to the following tax treaties: Czech Republic-Qatar, Luxembourg-United Kingdom, and Russia-Ukraine.

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](#)
[COVID-19 response hub for tax and legal leaders](#)
[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.

[Deloitte.com](#) | [Legal](#) | [Privacy](#)

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

© 2022. For information, contact Deloitte Touche Tohmatsu Limited.



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 related services, 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 more than 345,000 people worldwide make an impact that matters at www.deloitte.com.

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.