

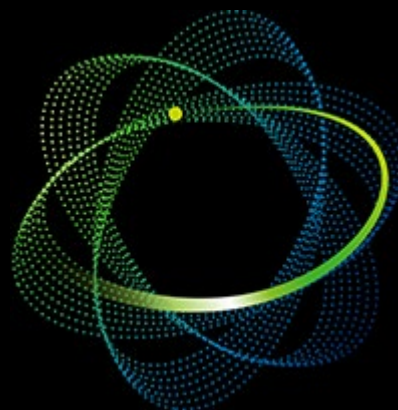
## World Tax Advisor

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### Hong Kong SAR defers Pillar Two implementation

The Secretary for Financial Services and the Treasury has announced that the government is deferring the implementation of a global minimum tax regime in Hong Kong SAR and that a consultation on the implementation is planned to be launched toward the end of 2022. The decision to adjust the timeline was based on views collected from various stakeholders and the latest progress of other jurisdictions.



#### Czech Republic

### Considerations for MNEs in light of SAC ruling on contract manufacturers with losses

This article discusses the Supreme Administrative Court's decision in a transfer pricing case, in which the court agreed with the tax authorities' position that subsidiaries of multinational enterprise groups operating in the Czech Republic as contract manufacturers generally should not incur any losses from their routine activities.

#### Czech Republic

### DAC 7: New rules for digital platforms expected to apply as from 1 January 2023

A bill that has passed its first reading in the Chamber of Deputies would impose new reporting obligations that would require digital platforms to collect and report certain information regarding the sellers that use the platform and the transactions carried out through the platform. The new rules are expected to apply as from 1 January 2023.



Germany

### **BFH rules on conditions for a German PE due to servicer provider activities**

The federal tax court has ruled that the activities of a German third party property management company engaged by a foreign investor to manage its German real estate investments generally should not create a German permanent establishment for the foreign real estate investor.



Mexico

### **Court rules on whether offsetting debt obligations results in VAT being creditable**

The Plenary Session of the Sixteenth Administrative Circuit Court in Guanajuato has ruled that the offsetting of debts under civil law does not constitute a means of payment allowing VAT to be considered creditable under VAT law.



Thailand

### **Criteria set forth for determining eligibility for tax incentives provided in SEZs**

The Director-General of the Revenue Department has issued a notification that sets forth the criteria for determining eligibility for certain personal and corporate income tax incentives provided in relation to special economic zones.



Thailand

### **Tax exemptions provided for sales of assets to REITs under buy-back arrangements**

The government has issued a royal decree that provides exemptions from corporate income tax, VAT, specific business tax, and stamp duty for a company or juristic partnership with respect to certain sales of assets to the trustee of a real estate investment trust under “buy-back” arrangements, under which the company or juristic partnership agrees to subsequently repurchase the assets.

## **Tax treaty round up**

Recent developments with respect to the following tax treaties: Brazil-Colombia, Colombia-Japan, and Korea (ROK)-Türkiye.

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